

UK Stewardship Code (2021) Disclosure Statement

American Century Investment Management (UK) Limited

September 2021

Effective from 1 January 2020, the Financial Reporting Council's ("FRC") UK Stewardship Code (the "Code") has been substantially updated to be applicable to a broader range of investment strategies, other than purely listed equity, such as fixed income bonds, real estate and infrastructure. It also reflects the growth of environmental factors, particularly climate change, as well as social and governance factors (together, "ESG") as material issues for asset managers to consider when making investment decisions and undertaking stewardship.

In the 2020 version, the Code defines stewardship as "the responsible allocation, management and oversight of capital to create long-term value for clients and beneficiaries leading to sustainable benefits for the economy, the environment and society".

The Principles of the Code

There are twelve Principles of the Code that apply to asset owners and asset managers. These are grouped under four headings:

Purpose and governance

1. Purpose, strategy and culture
2. Governance, resources and incentives
3. Conflicts of interest
4. Promoting well-functioning markets
5. Review and assurance

Investment approach

6. Client and beneficiary needs
7. Stewardship, investment and ESG integration
8. Monitoring managers and service providers

Engagement

9. Engagement
10. Collaboration
11. Escalation

Exercising rights and responsibilities

12. Exercising rights and responsibilities

The FRC requires that firms aiming to be signatories to the Code must produce an annual Stewardship Report explaining how they have applied the Code in the previous 12 months. The FRC will evaluate

Reports against an assessment framework and those meeting the reporting expectations will be listed as signatories to the Code.

FCA Regulatory Disclosure on the Stewardship Code

Rule 2.2.3R of the Financial Conduct Authority (“FCA”) Conduct of Business Sourcebook (“COBS”) requires an FCA authorised firm to disclose the nature of its commitment to the FRC’s UK Stewardship Code or, where it does not commit to the code, its alternative investment strategy. The Code is a voluntary code and sets out a number of principles relating to engagement by investors with the companies or other assets in which they are invested. Investors that commit to the Code can either comply with it in full or choose not to comply with aspects of the Code, in which case they are required to explain their non-compliance.

SHAREHOLDER RIGHTS DIRECTIVE

Under Rule 2.2B of the FCA’s Conduct of Business Sourcebook, American Century Investment Management (UK) Limited (“ACIM”) is required to (1) develop and publicly disclose on its website a copy of its engagement policy which includes the content specified in the amended EU Shareholder Rights Directive (Directive 2007/36/EC); and (2) publicly disclose on an annual basis how its engagement policy has been implemented, including a general description of its voting behaviour, an explanation of its most significant votes and details of its use of the services of proxy advisors, or, in either case, to publicly disclose a clear and reasoned explanation of why it has chosen not to comply with those requirements.

ACIM’S AND THE AMERICAN CENTURY GROUP’S INVESTMENT APPROACH

ACIM currently manages a number of Segregated Managed Accounts (SMAs). The day-to-day activities relating to such mandates are delegated to American Century Investment Management (“ACIM US”), US-based affiliate as sub-advisor, to manage their ACIM’s SMAs. ACIM does not engage in stewardship practices because ACIM US is or may be responsible for such activities. In terms of Proxy voting, neither ACIM nor ACIM US undertake proxy voting on behalf of the SMAs.

APPLICATION TO ACIM

While ACIM is generally supportive of the objectives that underlie the Code and the Shareholder Rights Directive, ACIM has chosen not to commit to the voluntary Code or adopt a shareholder engagement policy as described in the Shareholder Rights Directive. ACIM’s internal policies in relation to engagement with issuers and their management are determined globally on a group-wide basis.

Notwithstanding the above, ACIM US takes its environmental, social and governance (“ESG”) responsibilities seriously. Further information on ACIM US’s proxy voting guidelines, ESG and Investment Stewardship are available on its website:

<https://corporate.americancentury.com/en/our-firm/about-us/proxy-voting-policies.html>

<https://corporate.americancentury.com/content/corporate/en/our-firm/about-us/sustainability/esg-investment-stewardship.html>

