

SVM ASSET MANAGEMENT



Responsible Investing Report

DECEMBER

2021

Responsible Investing at SVM



Responsible investing is an important aspect of the service we offer our clients and a key point of differentiation with passive investment strategies and many other active managers. SVM began managing Socially Responsible Investment (SRI) products in 2006. Since then, our engagement principles have evolved to include environmental, social and corporate governance (ESG) issues across our range.

Our top priorities are to do our best for our clients, by maximising their portfolio returns and protecting their interests, and to drive benefit for society. To select investments, we employ a consistent and disciplined approach that focuses on intensive bottom up research. As part of our investment process we assess many factors including ESG considerations for their potential to materially affect a company's performance.

As a boutique investment firm we recognise that, because in most cases we will not hold significant positions in investee companies, it can be difficult to encourage changes in management attitudes and behaviour purely by exercising client voting powers alone. Instead, we have adopted a more flexible approach and we engage with company management and boards as and when we believe it will be of most benefit.



Company Engagement

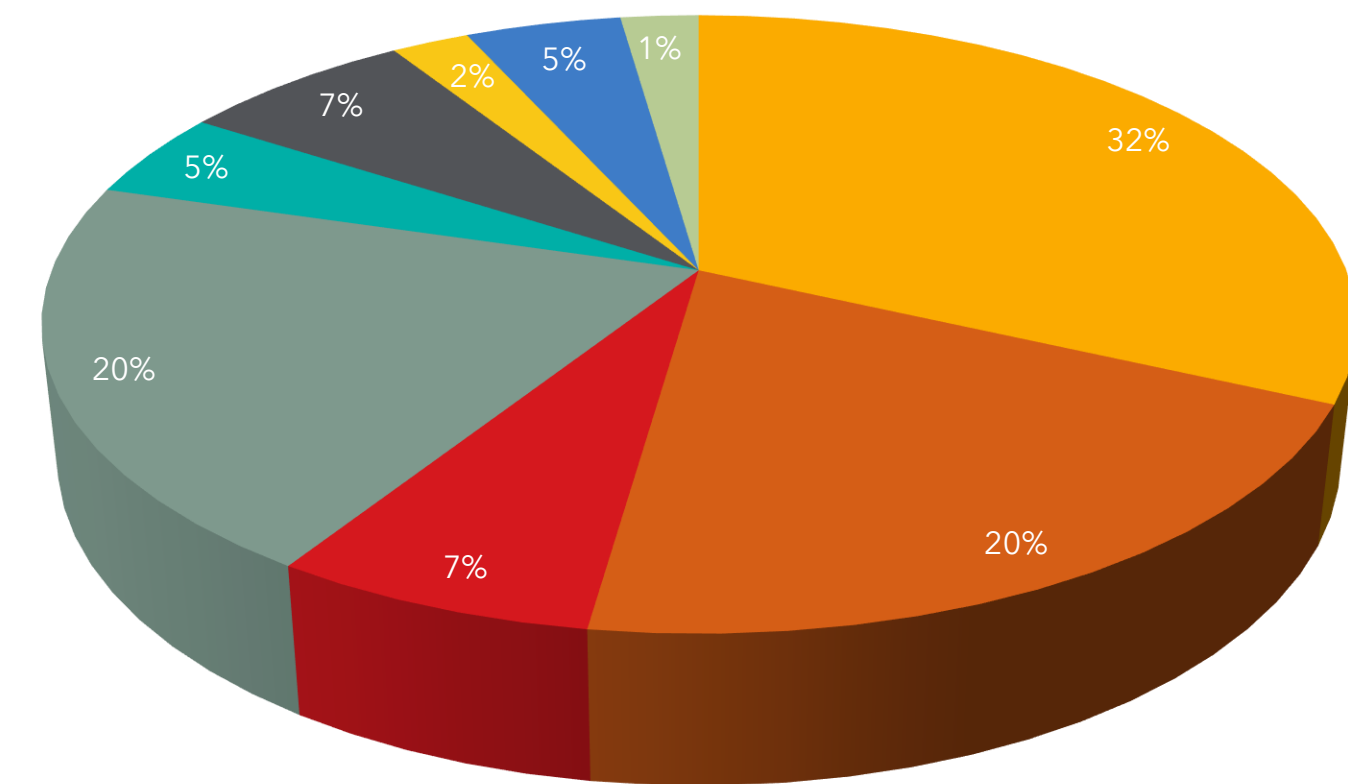


Engagement Policy

We enter into a dialogue with every potential investment with a view to having a positive influence on the company concerned. Using information derived from a combination of in-house research, dialogue with the company and external sources we identify the key issues and discuss them directly with company management, in order to affect change.

Q4 2021 Engagement Update

During the quarter we engaged with 24 companies on 44 ESG issues.



- Reporting/Disclosure
- Environment
- Remuneration
- Sustainability Strategy
- Diversity
- Governance
- Society
- Supply Chain
- Human Rights



Company Engagement - Q4 2021



Company	Engagement Topics								
	Reporting / Disclosure	Environment	Remuneration	Sustainability Strategy	Diversity	Governance	Society	Supply Chain	Human Rights
Redde Northgate Oxford Instruments			•						
Dianomi	•								
JTC PLC	•								
Delivery Hero	•			•				•	
Kooth	•				•				
Norcross	•			•					
Alpha Financial	•	•							
Synthomer		•		•					
Dustin	•	•		•					
Watkins Jones	•	•		•					
Darktrace	•	•		•					



Company Engagement - Q4 2021



Company	Engagement Topics								
	Reporting / Disclosure	Environment	Remuneration	Sustainability Strategy	Diversity	Governance	Society	Supply Chain	Human Rights
DCC	•	•		•					
Ryanair		•							
ITM Power			•						
Diurnal						•			
Essensys						•			
Allianz	•								
Ideagen			•						
Nagarro						•			
Deltic Energy	•	•		•					
Tesco							•	•	•
JDE Peets	•	•		•					



Voting



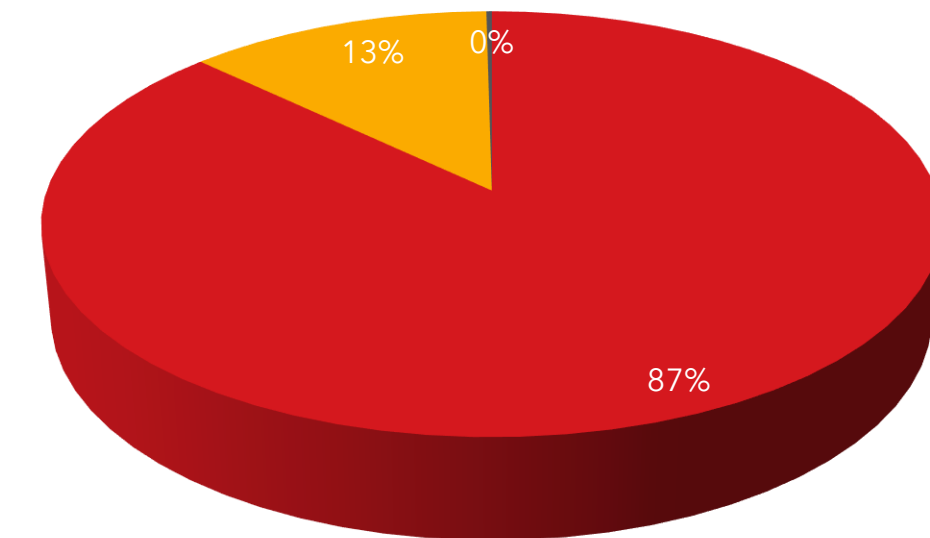
Voting Policy

We seek to promote corporate social responsibility through engagement and a negative vote will only be viewed as a final measure to be adopted when this process of engagement has not been successful. We have and will express our views in this way if necessary. Our emphasis is on engagement and resolving issues through dialogue.

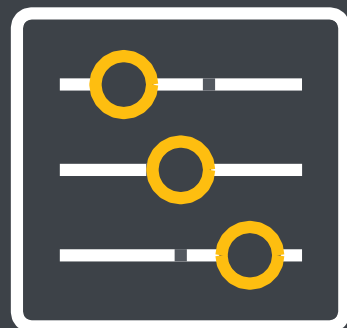
[Click here](#) for voting records for SVM Asset Management from 1 January 2019.

Q4 2021 Voting update

Across 454 unique proposals to vote, we voted 384.



■ For ■ Did Not Vote ■ Against/Withhold ■ Abstain



Voting Rationale



Date of Meeting	Security	Resolutions voted against / abstained	Reason
27/10/2021	Ideagen plc	4. Approve remuneration report	We voted against Item 4 as the CFO received options with the ability to alter targets and based only on share price performance
29/10/2021	ITM Power plc	2. Approve remuneration report	We were advised by our proxy advisers ISS to vote against resolution 2 at the AGM as a result of exceptional bonuses being paid to Executive Directors during the year which were not based on pre-set targets, which is contrary to UK best practice. In addition ITM also granted exceptional LTIP awards to Executive Directors in relation to the Fundraising.
25/11/2021	K3 Capital Group plc	3. Re-elect Stuart Lees as Director 6. Approve Remuneration Report	We voted against the re-appointment of the director in resolution 3 as he is not considered independent yet sits on the audit and remuneration committees. Also voted against resolution 6 as share price contingent awards were made as well as payments for transactions made by the company
02/12/2021	Essensys plc	4. Re-elect Jonathan Lee as Director 6. Re-elect Charles Butler as Director 7. Re-elect Alexandra Notay as Director 8. Re-elect Elizabeth Sandler as Director"	We abstained on Item 4 and voted against Items 6, 7 & 8 as the directors and chair are in receipt of outstanding options



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