

**Blueglen Investment Partners Limited**  
**Stewardship Code, ESG & SRDII Disclosure**  
**16<sup>th</sup> June 2021**

## Stewardship Code 2020

Under Rule 2.2.3R of the FCA's Conduct of Business Sourcebook, Blueglen Investment Partners Limited ("Blueglen Investment Partners" or the "Firm") is required to include on this website a disclosure about the nature of its commitment to the UK Financial Reporting Council's Stewardship Code (the "Code") or, where it does not commit to the Code, its alternative investment strategy. The Code sets out a number of principles relating to engagement by asset managers or asset owners across all asset classes including, for example, listed equity, fixed income, private equity, infrastructure investment and in investments outside the UK.

The twelve principles of the Code for Asset owners and Asset Managers (in our case, Asset Managers) are as follows:

Purpose and Governance:

### **1. Purpose, strategy and culture**

Asset Managers' investment beliefs, strategy, and culture to facilitate long term value, via stewardship, for clients and beneficiaries leading to sustainable benefits for the economy, the environment and society.

### **2. Governance, resources and incentives**

Asset Managers' governance, resources and incentives support stewardship.

### **3. Conflicts of Interest**

Asset Managers should manage conflicts of interest to put the best interests of clients and beneficiaries first.

### **4. Promoting well-functioning markets**

Asset Managers should identify and respond to market-wide and systemic risks to promote a well-functioning financial system.

### **5. Review and assurance**

Asset Managers should review their policies, assure their processes and assess the effectiveness of their activities.

Investment Approach:

### **6. Client and beneficiary needs**

Asset Managers should take account of client and beneficiary needs and communicate the activities and outcomes of their stewardship and investment to them.

### **7. Stewardship, investment and ESG integration**

Asset Managers should systematically integrate stewardship and investment, including material

environmental, social and governance issues, and climate change, to fulfil their responsibilities.

#### **8. Monitoring managers and service providers**

Asset Managers should monitor and hold to account third-party managers/proxy advisors/research or other service providers.

Engagement:

#### **9. Engagement**

Asset Managers should engage with issuers to maintain or enhance the value of assets.

#### **10. Collaboration**

Asset Managers, where necessary, should participate in collaborative engagement to influence issuers.

#### **11. Escalation**

Asset Managers, where necessary, should escalate stewardship activities to influence issuers.

Exercising rights and responsibilities:

#### **12. Exercising rights and responsibilities**

Asset Managers should actively exercise their rights and responsibilities across all asset classes.

### **The Shareholder Rights Directive II (“SRDII”)**

The Directive took effect in June 2019 and requires Firms that invest in shares that trade on a UK regulated market or comparable markets outside the UK to develop and publicly disclose an engagement policy or publicly disclose a clear and reasoned explanation of why it has chosen not to comply with this requirement.

### **Blueglen Investment Partners Limited’s Approach**

The Firm pursues an investment strategy to which the aims of the Stewardship Code are not fully relevant. This is because the Firm invests in structure credit securities and typically;

- structured credit securities are backed by a large number of underlying issuers to whom the firm has no direct relationship,
- the instruments do not grant the firm voting rights in issuers therefore the firm's ability to influence senior management is limited,
- there is no definitive guidance available at this time with respect to the systems, controls and measures Blueglen would need to put in place in order to systematically integrate stewardship and investment, including material environmental, social and governance issues, and climate change into its investment strategy.

Therefore, the opportunities for stewardship engagement are limited.

The Shareholder Rights Directive does not apply to Blueglen Investment Partners Limited as it does not invest in shares traded on UK Regulated Markets or comparable markets outside the UK.

Consequently, while the Firm supports and will seek to adhere to the general objectives that underlie the Code and the Directive, the provisions of the Code are not fully relevant to the type of activity currently undertaken by the Firm. If the Firm's investment strategy changes in such a manner that the provisions of the Code become relevant, the Firm will amend this disclosure accordingly.

For further information on the Firm's approach please contact the Firm's Compliance Officer, Guglielmo Borgoricco, at: [notices@blueglen.co.uk](mailto:notices@blueglen.co.uk).