

RBS Collective Investment Funds Limited

Voting Rights Policy

1 Policy Statement

This policy statement is designed to ensure that RBS Collective Investment Funds Limited (RBSCIFL) complies with all Regulatory Requirements (COLL 6.6A.6) and the environment relating to the exercise of voting rights and appropriate recording and communication where these voting rights have been exercised, and considers the best interests of customers.

This Policy will make reference to the Financial Conduct Authority's Collective Investment Schemes Sourcebook ("COLL"). You can find this Sourcebook on the Financial Conduct Authority's website.

RBSCIFL currently uses an external Investment Manager, Coutts & Company, to manage all the sub-funds provided by RBSCIFL and this Policy covers all of these.

2 Procedures

a) Strategy

RBSCIFL is required to develop adequate and effective strategies for determining when and how voting rights attached to instruments held in the sub-funds are to be exercised to the exclusive benefit of all the funds within the ICVCs.

The strategy shall be for the Investment Manager to vote in accordance with their own policy subject to that meeting with the objectives of each sub-fund within the ICVC, except where they are conflicted, such as voting on their parent company's shareholder resolutions.

In this scenario, the Investment Manager will provide RBSCIFL with the rationale and recommendations from two independent researchers. RBSCIFL will then consider these and instruct the Investment Manager on how to vote on each resolution (For, Against or Abstain).

RBSCIFL's decision will be taken after taking the views of the Head of Governance & Oversight, the Head of Governance (RBSCIFL) and a representative from the Compliance & Conduct team.

The Investment Manager Coutts defines responsible investment as the integration of environmental, social and corporate governance (ESG) factors in to their investment processes and ownership practices. Their approach to voting and engagement reflects this and more details are in the link below

<https://www.coutts.com/wealth-management/specialist-planning-services/responsible-investing.html>

The Investment Manager shall retain appropriate records to show, for each vote, the nature of the vote and how it was exercised with appropriate explanation as may be required.

b) Ownership

RBSCIFL will, through the Investment Management Committee (IMC), own the exercise of voting rights policy and any updates that are required to:

- The Prospectus or Instrument of incorporation of the ICVC
- The Investment Management Agreement
- Supplementary Information Document/Key Investor Information Document

RBSCIFL will also engage with the Investment Manager and ensure that it maintains an up to date policy.

c) Expenses/costs in providing updates

Any expenses/costs incurred in reviewing or updating these policies and in undertaking business as usual activities arising from these policies will be borne by RBSCIFL.

In the event that additional work, outwith business as usual, may be required RBSCIFL will, through IMC, consider the implications and costs of this work and approve any costs following normal formal procedures and governance.

d) Periodic Review

RBSCIFL will be responsible for ensuring that the policy and any voting instructions applied by the Investment Manager is reviewed at least annually and more frequently depending on regulatory changes or changes in business activity.

e) Management Reporting and monitoring

RBSCIFL, through IMC, is responsible for:

- Monitoring relevant corporate events
- Ensuring that the exercise of voting rights is in accordance with the investment objectives and policy of the relevant sub-fund
- Preventing and managing any conflicts of interest arising in the exercise of voting rights (see also the RBSCIFL policy on Conflicts of Interest)

Monitoring of these reports and resulting actions will be undertaken periodically during the year by Commercial and Private Banking Governance & Oversight.

Monitoring approach will be:

- Confirm that the Investment Manager does have an appropriate policy and that this is regularly reviewed and updated
- Confirm what internal governance and reviews are done to ensure that the Investment Manager follows their policy
- Investment Manager to provide retrospective records of the results of the voting policy for review by the Investment Management Committee
- Review details of any requests received from investors and the information provided to them.
-

f) Governance

Key forum to review the policy and challenge the reporting is the Investment Management Committee.

g) Escalation route

In the event of any problems arising from the implementation or practice of any of the policies escalation should follow that outlined in the most recent version of the High Level Controls Document.

h) Availability

A Summary of the strategy must be readily available to Investors. Additionally details of actions taken within this strategy shall be made available, free of charge, to any investor requesting them.

The Prospectus of the relevant ICVC will confirm that the policy is available and explain to investors how to request a copy of the strategy and results of votes exercised.

🔍 **Braille, large print or audio format?**

If you'd like this information in another format,
call us on **03457 888 444** (Minicom 0800 404 6161)