

# Service Engagement Policy

## Octopus Multi Manager

This statement provides Octopus's approach with regards to each requirement as set out under Article 3g of the European Shareholder Rights Directive II (SRD II). The Shareholders Rights Directive II (SRD II) aims to promote effective stewardship and long-term investment decision-making by enhancing the transparency of asset managers' investment strategies.

## Integration of shareholder engagement

Third party managers may engage on matters relating to environmental, social and corporate governance (ESG) developments; enhancements or clarifications to company analysis or process improvements. This is not a key consideration of our investment process but it is something we seek to understand as part of our due diligence.

Where listed funds are selected, Octopus may engage with management or investor relations of investee companies, but not other stakeholders, as we do not hold significant positions. Where any material issues occur with both the fund or the underlying company, either financial or non-financial, we would review the investment thesis to see if this has affected our investment rationale.

## Monitoring and engaging with investee companies and issuers

We select third party managers that monitor investee companies on their strategy, capital structure, financial and non-financial performance and risk. We prefer investment processes that are structured and comprehensive, generally where the key investment professionals decide on the main risk exposures. To that end, we review the third-party managers' research process, portfolio construction, sell discipline and risk management process to ensure that these processes incorporate monitoring of investee companies' strategy, capital structure, financial and non-financial performance and risk. Fundamentally, the degree of engagement with investee companies and the policy on voting will be a function of the type of fund, the fund manager and their engagement policy.

Where we do have direct voting rights in funds we hold such as investment trust or exchange traded funds, Octopus multi manager does not generally exercise voting rights unless it is on an area of interest that we have raised in our research/engagement with management. We do not currently collaborate with other stakeholders on engagement.

## Managing conflicts of interest

Octopus has a company policy on Conflicts of Interest. All employees are required to declare any conflicts of interest, including those which may arise as a result of engagement, and we have in place arrangements to prevent or manage any conflicts identified. A summary of our conflicts policy is available to all our clients on our website.

## Annual disclosure

This document was last updated on 20 August 2021 and will be reviewed and updated on at least annual basis.