

# 2020 Annual Statement of IM Asset Management Limited's Implementation of its Engagement Policy

Under the Shareholders Rights II (SRD II), IM Asset Management, also referred to as 'IMAML' or the 'Firm', is required to publicly disclose how it has implemented its Engagement Policy on an annual basis. The Firm's engagement policy is set out in its Stewardship Code and can be found here [here](#).

## Shareholder engagement approach

In the period 30<sup>th</sup> June 2019 to 1<sup>st</sup> July 2020 IMAML has invested, on behalf of retail clients, in shares of companies with a registered office of an EU member state whose shares are admitted to trading on an EEA regulated market (or on a comparable market outside of the EU).

## Voting behaviours

IMAML has not cast any votes that would be deemed as significant. All votes cast in the period were deemed insignificant in accordance with their size relative to the voting population.

## Proxy services

IMAML does not use the services of Proxy Advisors for the purpose of its engagement activities.

## Conflicts of Interest

In all engagement activities the firm has been free of any conflict of interests that would impact on its voting behaviour.