
UK Stewardship Code Disclaimer

Scope

GAM Systematic LLP

Under Rule 2.2.3R of the FCA's Conduct of Business Sourcebook, GAM Systematic LLP (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 investors with UK equity issuers, as follows:

The seven principles of the Code are that institutional investors should:

- Publicly disclose their policy on how they will discharge their stewardship responsibilities;
- Have and publicly disclose a robust policy on managing conflicts of interest in relation to stewardship;
- Monitor their investee companies;
- Establish clear guidelines on when and how they will escalate their activities;
- Be willing to act collectively with other investors where appropriate;
- Have a clear policy on voting and disclosure of voting activity; and
- Report periodically on their stewardship and voting activities.

The Firm pursues a technical trading strategy and has developed in-house trading programmes that make all our investment trading decisions. Investment holding periods are determined solely by the proprietary models, which do not consider corporate governance issues.

Therefore, the Firm pursues an investment strategy to which the aims of the Code are not relevant.

Consequently, while the Firm supports the general objectives that underlie the Code, the provisions of the Code are not relevant to the type of trading 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:

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