



Titan Asset Management Limited

UK Stewardship Code

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Under Rule 2.2.3R of the FCA's Conduct of Business Sourcebook, Titan Asset Management Limited (the "Firm") is required to provide on its 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 is voluntary and sets out a number of principles of effective stewardship for those asset managers who manage assets on behalf of UK clients or invest in UK assets, with a focus on creating long-term sustainable value. The UK Stewardship Code 2020 has established the following principles:

PRINCIPLES FOR ASSET OWNERS AND ASSET MANAGERS

Purpose and governance

1. Purpose, strategy and culture
2. Governance, resources and incentives
3. Conflicts of interest
4. Promoting well-functioning markets
5. Review and assurance

Investment approach

6. Client and beneficiary needs
7. Stewardship, investment and ESG integration
8. Monitoring managers and service providers

Engagement

9. Engagement
10. Collaboration
11. Escalation

Exercising rights and responsibilities

12. Exercising rights and responsibilities

The Firm acts as the investment manager of a Managed Portfolio Service ('MPS'), managing the investments that constitute the model portfolios within the Firm's MPS ranges. These portfolios invest solely in collective investment schemes and do not hold direct investments. Consequently, the Firm does not engage directly with issuers and considers that stewardship responsibilities primarily rest with the fund managers of the underlying schemes.

Nonetheless, the Firm incorporates stewardship considerations indirectly by assessing the underlying fund managers in terms of governance, stewardship, and other matters, incl. sustainability, as appropriate, both during the selection process and on an ongoing basis. In doing so, the Firm seeks to act in its clients' best interests and has adopted relevant internal policies, including a Code of Conduct Policy and a Conflicts of Interest Policy.

While the Firm recognises the importance of good governance and stewardship practices, and supports the principles of the Code, given the nature of its investment activities the Firm does not commit to the Code.

The Firm notes the latest revision of the UK Stewardship Code, effective from 1 January 2026, for reference in future disclosures.

Last reviewed: September 2025.