



Titan Investment Solutions Limited

Shareholder Engagement Policy

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Introduction

This policy outlines how Titan Investment Solutions Limited (the "Firm") complies with the applicable rules in the FCA's Conduct of Business Sourcebook (COBS) 2.2B, transposing the aspects of Article 3g of the European Union's Shareholders' Rights Directive II (SRD II, Directive (EU) 2017/828).

The rules require that the Firm develops and publicly discloses an engagement policy, which explains how the Firm:

- (1) integrates shareholder engagement in its investment strategy;
- (2) monitors investee companies on relevant matters, including:
 - strategy;
 - financial and non-financial performance and risk;
 - capital structure; and
 - social and environmental impact and corporate governance;
- (3) conducts dialogues with investee companies;
- (4) exercises voting rights and other rights attached to shares;
- (5) cooperates with other shareholders;
- (6) communicates with relevant stakeholders of the investee companies; and
- (7) manages actual and potential conflicts of interests in relation to its engagement.

The Firm must also publicly disclose on an annual basis how its engagement policy has been implemented and include a general description of its voting behaviour.

Approach to engagement

The Firm acts as the investment manager for funds across equity, fixed income, and multi-asset strategies. For direct equity investments, the Firm applies a disciplined, bottom-up fundamental analysis to identify high-quality businesses which it believes can sustain and compound high returns on capital.

The Firm believes in and supports the principles of effective stewardship and long-term investment decision making promoted by the regulations. The Firm seeks to act in its clients' best interests and thereby to protect and enhance the value of assets for the funds' investors through a disciplined investment management approach. In order to achieve the responsible allocation and management of capital, the Firm monitors investee companies with respect to their corporate governance, strategy, capital structure, financial and non-financial performance and risk, including sustainability-related risks, among others. Monitoring activities are undertaken primarily through the investment team's review of annual reports, financial statements, regulatory filings, company announcements, and other publicly available information. Where appropriate, the investment team also engages directly with companies' investor relations and senior management on issues material to the investment.

Proxy voting

Given that the Firm's equity holdings typically represent only a small proportion of the overall market capitalisation of investee companies, it has been determined that exercising voting rights would not currently constitute an effective or proportionate use of resources, nor is it expected to have a meaningful influence on outcomes. This position is subject to ongoing review, taking into account both the relative size of the Firm's holdings and the significance of the issues to clients' long-term interests.

Accordingly, the Firm does not use services of any proxy advisors.

Conflicts of interest

The Firm is committed to aligning its long term interests with those of its clients. As part of the wider Titan Wealth Group, it has adopted a Conflicts of Interest Policy and maintains a Conflicts of Interest Register. The Firm recognises that situations may arise which give rise to actual or potential conflicts of interest. The Firm is committed to ensuring that all clients are treated fairly and that potential conflicts, including those related to its engagement activities, are identified and managed appropriately. The Conflicts of Interest Policy is available on request.

This policy is reviewed at least annually.

The Firm did not exercise any voting rights in the year ended 31 March 2025.

Last reviewed: September 2025