

Stewardship Disclosure Framework for Asset Managers

“Asset managers, with day-to-day responsibility for managing investments, are well positioned to influence a company’s long-term performance through stewardship.”

Asset managers are asked to self-certify against the below stewardship categories by highlighting the appropriate boxes and where relevant providing a link to further relevant disclosures or information in the box below. Completed frameworks should be returned to the NAPF where they will then be made publicly available for pension funds and other potential clients and stakeholders to view at a glance the stewardship policies and activities of the responding asset manager.

Category		A	B	C	D	Explanation for exemption
In one sentence, how do you aim to enhance and protect value for clients?		<p>Liontrust is committed to the principle of Corporate Social Responsibility or similar Environmental, Social and Governance standards and intends that they should become embedded into its policies and practices where it does not conflict with our proprietary investment processes and is in the client's best interests.</p>				
Public transparency <i>SC Principle (1&7)</i>	Stewardship policy disclosure	Stewardship policy reviewed and updated in the last 12 months; available on the firm’s website and covers all asset classes and geographies where the firm is present.	Stewardship policy reviewed and updated in the last 12 months and available on the firm’s website.	Stewardship policy reviewed and updated in the last 2 years and available on the firm’s website.	Stewardship policy is not publicly disclosed.	Liontrust currently provide an AAF01/06 assurance report on internal controls to clients on request, we are reviewing the additional reporting and control requirements to extend the reporting to provide an independent opinion on our engagement and voting processes.
	Level of stewardship disclosure	Disclosure is sufficient to enable 1) investee companies to understand (ex-ante) when, on which topics, and with whom they can engage; and, 2) clients to distinguish the stewardship approaches of different products.	Disclosure is sufficient to enable investee companies to understand with whom they can engage and clients can grasp the stewardship approach of the firm.	Brief summary of stewardship policy and approach available on the firm’s website. Basic contact details for engagement enquiries.	Stewardship policy is not publicly disclosed.	
	Voting disclosure	Comprehensive public disclosure of full voting record with explanations given for key votes.	Public disclosure of summary voting record or no explanations given.	Voting record available to clients only.	No disclosure on voting activity.	
	Voting disclosure timing	At least quarterly vote reporting.	At least annual vote reporting.	Ad hoc vote reporting.	No disclosure on voting activity.	
	Engagement Reporting	Public disclosure of key engagement activities on a quarterly basis.	Public disclosure of key engagement activities on an annual basis.	Engagement record available to clients only.	No disclosure on engagement activity.	
	Independent assurance	Independent assurance obtained on both voting and engagement processes – for example AAF 01/06 - and publicly available.	Independent assurance obtained on voting or engagement processes – for example AAF 01/06.	Third party assurance systems independently verified.	No assurance reports on any voting or engagement processes.	
Integrating ESG <i>SC Principle 1</i>		Demonstrable systematic integration of ESG factors within company analysis and investment decision process and company engagement activities.	Demonstrable regular consideration of ESG factors within company analysis and investment decision process and engagement activities.	Minor consideration - i.e. as adjunct or final check – of ESG factors within company analysis and investment decision process.	No active consideration of ESG factors as part of the investment process.	The level of direct engagement each team has with companies differs. For some teams engagement will be integral to the investment process, whereas others actively avoid regular engagement with management because of potential behavioural biases, or because of the quantitative basis of the process (although this may change when specific management actions occur, i.e. inappropriate remuneration etc).
Managing	Policy	A specific stewardship conflicts of interest	A specific stewardship conflicts of interest	Summary of specific stewardship	There is no separate	

conflicts <i>SC Principle 2</i>		policy is in place. All material conflicts are documented - including engagement and proxy voting - and are mitigated.	policy is in place. All material conflicts are mitigated.	conflicts of interest policy is documented.	stewardship conflicts of interest policy.	
	Disclosure	Is disclosed publicly e.g. on the firm's website and a description provided as to how conflicts are mitigated.	Is disclosed publicly e.g. on the firms' website.	Is available on request to the client.	There is no separate conflict of interest policy.	
Monitoring, engagement and escalation <i>SC Principle 3&4</i>	Engagement approach	Fund manager (together with CG-ESG teams if separate) engages in an integrated manner proactively on a full-spectrum of factors - including strategy, risk, capital structure, M&A activity and material ESG issues.	Firm - not always in an integrated manner - engages proactively on a wide-spectrum of factors, for example including strategy, risk, capital structure, M&A activity and material ESG issues.	Firm engages reactively on material issues of strategy, risk, capital structure and ESG issues.	Very little engagement with investee companies.	The level of direct engagement each team has with companies differs. For some teams engagement will be integral to the investment process, whereas others actively avoid regular engagement with management because of potential behavioural biases, or because of the quantitative basis of the process (although this may change when specific management actions occur, i.e. inappropriate remuneration etc).
	Escalation	Systematically utilises all powers at disposal when engagement fails, including shareholder resolutions, attending AGMs, escalating votes and public statements.	Regularly utilises powers at disposal when engagement fails, including shareholder resolutions, attending AGMs, escalating votes and public statements.	Occasionally escalates engagement activities by utilising powers such as escalating voting and attendance at AGMs.	Rarely, if ever, escalates engagement activities.	
Collaboration <i>SC Principle 5</i>	Disclosure	Has a disclosed approach collective engagement and is a member of a range of collaborative engagement and policy initiatives.	Has a disclosed approach to collective engagement and is a member of collaborative engagement fora.	Has a disclosed approach to collective engagement.	No disclosure on collaborative activities.	
	Activity	Demonstrably proactively leads collaborative company engagements in past 12 months.	Been an active member of collaborative company engagements in past 12 months.	Is willing to participate in collaborative engagements.	Does not act with other investment institutions.	
Voting <i>SC Principle 6</i>	Portfolio Holdings	Votes 90%+ of global portfolio holdings.	Votes 80%+ of all portfolio holdings.	Votes 50%+ of all portfolio holdings.	Votes less than 50% of global portfolio holdings.	For some companies, typically smaller companies where we control a larger proportion of a company's shares, or for certain types of votes at all companies, we will take a more active role in the voting process but otherwise we will typically follow a standard voting policy. It is important to note that the standard voting policy has been agreed by the fund managers (and is largely based upon industry recommendations) and this is then implemented by a third party.
	Proxy input	Demonstrably vote all shares on a considered basis with fund manager involvement.		Votes cast always follow recommendations of external voting advisory service.		
	Client Input	There is scope for client input over vote decision whether in segregated or pooled accounts.	Client may direct voting in segregated account or elect for external party to advise and implement voting policy.	There is scope for client (or ext. party) to input into voting policy but not vote decision.	There is no scope for client input over vote decision or policy.	
	Stock Lending	There is a policy on stock lending and stock is recalled for all votes (or not lent).	There is a policy on stock lending and stock is recalled for all key votes.	There is a policy on stock lending and stock is able to be recalled.	Stock lending policies are not disclosed.	
Reporting to clients	Timing	There is client specific reporting of stewardship activities on at least a quarterly basis.	There is client specific reporting of stewardship activities on at least an annual basis.	There is reporting of stewardship activities to clients on an ad hoc basis or only on request.	There is no client specific reporting of stewardship activities.	

<i>SC Principle 7</i>	Content	Reporting includes: evidence of activities undertaken – with identified case studies - an illustration of progress against objectives; disclosure of holding periods and an analysis of ESG risks within the portfolio. Stewardship is integrated into broader reporting process and how activities have enhanced and protected value is explained.	Reporting includes evidence of activities undertaken – with case studies - and an outline of on-going activity.	Reporting includes a summary of activity undertaken and successes achieved.	There is no reporting to clients on stewardship activities	
Compensation / incentives for investment staff		Significant proportion of compensation for investment staff based on at least 5 year portfolio performance with a policy on co-investment.	Significant proportion of compensation for investment staff based on at least 3 year portfolio performance.	Significant proportion of compensation for investment staff based on at least 2 year portfolio performance.	Compensation for investment staff has no portfolio performance link.	Although Liontrust does not explicitly link remuneration of investment staff with portfolio performance, it is indirectly linked to compensation through our remuneration policy which is in line with the various regulatory requirements.
Policy activities		Demonstrably actively contributes and leads key policy debates on stewardship in all relevant geographies.	Demonstrably contributes to key policy debates on stewardship in main geographic regions.	Rarely contributes to policy debates on stewardship.	Does not contribute to policy debates on stewardship.	Liontrust works closely with industry bodies such as the IMA to contribute to key policy debates on stewardship matters.
Stewardship rating		This Framework does not seek to pass judgement on the particular stewardship policies and activities of the responding asset manager. It is envisaged that the completed Framework will better equip asset owners, specifically pension funds to have a more constructive dialogue with investment managers, selecting those which most appropriately meet their own expectations and policies and act in the best interests of their end beneficiaries.				