**2022 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 it’s Engagement Policy on an annual basis. The Firm’s engagement policy is set out in its Stewardship Code and can be found [here](https://www.irwinmitchell.com/terms-conditions/our-regulatory-information/asset-management-documentation).

**Shareholder engagement approach**

In the period 30th June 2021 to 1st July 2022 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.