



responsible
investing

Momentum Global Investment Management Proxy Voting Approach

At Momentum Global Investment Management (MGIM) proxy voting forms part of our stewardship duty to our clients. Due to the nature of our business, we take a practical approach to ensure alignment and actively participate in the market by using shareholder legal rights to vote on behalf of our clients. At MGIM, we invest in listed equities via three different channels, listed below.

i. The Russell EPI (Enhanced Portfolio Implementation) platform

Russell Investments take responsibility for the implementation and rebalancing of all or a portion of some of our funds, in line with model portfolios provided by third party managers that have been selected by and contracted with MGIM. Proxy voting on those respective holdings follows the [Russell Proxy Voting policy](#) which is well aligned with the principles stated in our own [Momentum Investments Proxy Voting policy](#).

ii. Direct investments in listed investment trusts

Where we invest directly in listed equity investment trusts and have discretion to cast proxy votes, we will vote in line with our [Momentum Investments Proxy Voting policy](#).

We aim to vote on the majority of resolutions, in particular when:

- » MGIM is a material shareholder across all portfolios (excluding UK Institutional); or
- » The investment team deem the subject matter to be material¹; or
- » There is a special resolution².

iii. Third party funds

For our appointed third party funds, these external fund managers will cast votes on behalf of our company in line with their own proxy voting policy. Our research team analyses the voting process employed by each fund manager during the initial due diligence process and then on an ongoing basis as part of the regular monitoring process.

We report our proxy voting results

Transparency enables higher quality conversations between engaging parties, allows for management accountability, and ensures well-informed proxy voting decisions. We believe investors have an obligation to be transparent with their clients and therefore, we ensure that actions are evidenced in our Stewardship Report and voting records. MGIM's proxy voting records can be found on our website.

¹Materiality of the subject matter is decided by the lead and secondary analysts who monitor the holding, as they will have extensive knowledge of the company. ²A special resolution is a company resolution that requires a 75% majority in a vote held with shareholders (whereas an ordinary resolution requires a simple majority of over 50%). Certain important decisions require a company to make a special resolution as outlined in The Companies Act 2006.

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