

# UK Stewardship Code 2020

**PATRIZIA Property Investment Managers LLP**

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# UK Stewardship Code (2020)

## Disclosure Statement - December 2020

### Patrizia Property Investment Managers LLP (“Patrizia” / the “Firm”)

Effective from 1 January 2020, the Financial Reporting Council’s (“FRC”) UK Stewardship Code (the “Code”) has been substantially updated to be applicable to a broader range of investment strategies, other than purely listed equity, such as fixed income bonds, real estate and infrastructure. It also reflects the growth of environmental factors, particularly climate change, as well as social and governance factors (together, “ESG”) as material issues for asset managers to consider when making investment decisions and undertaking stewardship.

In the 2020 version, the Code defines stewardship as “the responsible allocation, management and oversight of capital to create long-term value for clients and beneficiaries leading to sustainable benefits for the economy, the environment and society”.

### The Principles of the Code

There are twelve Principles of the Code that apply to asset owners and asset managers. These are grouped under four headings:

#### 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 FRC requires that firms aiming to be signatories to the Code must produce an annual Stewardship Report explaining how they have applied the Code in the previous 12 months. The FRC will evaluate Reports against an assessment framework and those meeting the reporting expectations will be listed as signatories to the Code.

### FCA Regulatory Disclosure on the Stewardship Code

Rule 2.2.3R of the Financial Conduct Authority (“FCA”) Conduct of Business Sourcebook (“COBS”) requires an FCA authorised firm to disclose the nature of its commitment to the FRC’s UK Stewardship Code or, where it does not commit to the code, its alternative investment strategy.

Adherence to the Code is voluntary.

The Firm has chosen an alternative approach to stewardship consistent with its overall approach to ESG/sustainable finance/responsible investment. The Firm believes that as an FCA authorised business (#475264) subject to notable provisions such as the Senior Managers & Certification Regime and Systems and Controls Report (SYSC) and Conflict of Interest Inventory, the Firm is already appropriately equipped to demonstrate that it is effectively managed and controlled to its stakeholders without confirming compliance with the Stewardship Code. In addition, the Firm’s control environment is independently audited under ISAE 3402 Internal Controls Report annually to assess whether that control environment is suitably designed and operating effectively for a property investment management business. Furthermore, the Firm is a subsidiary of a listed entity, PATRIZIA AG with its own requirements to demonstrate appropriate governance and oversight including but not limited to: Managing Board of Directors; Supervisory Board of Directors; Group Compliance Manual and Code of Values (supplemented by the Firm’s Compliance Manual); The Investment Committee; and the ESG Committee.

Consequently, while Patrizia supports the objectives that underlie the Code, the provisions of the Code are not considered to be additionally relevant in providing extra comfort to stakeholders that the Firm is appropriately governed and proactive in its governance and ESG considerations. If Patrizia or the Firm’s activities changes in such a manner that the provisions of the Code become relevant, the Firm will amend this disclosure accordingly.

For further details on any of the above information, please contact the Firm’s Compliance Officer.