

UK Stewardship Code

PATRIZIA Property Investment Managers LLP

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UK Stewardship Code Disclosure Statement

PATRIZIA Property Investment Managers LLP (“PPIM”/the “Firm”)

The Financial Reporting Council’s (“FRC”) UK Stewardship Code (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.

PPIM recognises the importance of the principles set out in the Code. PPIM supports the objectives that underlie the Code; however, PPIM does not currently advise or manage any portfolios which invest in UK listed companies. As a result, the provisions of the Code are not relevant to its investment strategy. PPIM currently only advises or manages collective investment schemes or segregated mandates which invest in real estate.

The Firm has chosen an alternative approach to stewardship consistent with its overall approach to Environmental, Social and Governance issues (“ESG”), sustainable finance and responsible investment. Further detail can be found in PATRIZIA’s Responsible Investment Policy.

PPIM is authorised and regulated by the FCA and is subject to FCA rules which include but are not limited to having appropriate governance arrangements in place, having appropriate controls in place to avoid/manage conflicts of interests and promoting the well-functioning of markets in which PPIM operate within. Client and investor needs are central to the way PPIM operate. PPIM is a subsidiary of a listed entity, PATRIZIA SE which has its own requirements to demonstrate appropriate governance and oversight.

Should PPIM’s activities change in such a manner that the provisions of the Code become relevant, this disclosure will be amended accordingly.