



Builders Union LLP – Shareholders Rights Directive II (‘SRD II’) Statement

Introduction

Article 3g of SRD II, which is summarised in the FCA Handbook under COBS 2.2B, requires a firm such as Builders Union LLP (‘Builders Union’ or ‘Firm’) to either:

- Develop and disclose an ‘engagement policy’ describing how the firm integrates shareholder engagement in its investment strategy; or
- Disclose why the firm has chosen not to comply with those requirements.

Such an engagement policy requires a firm to describe how it:

- Integrates shareholder engagement in its investment strategy;
- Monitors investee companies on relevant matters, including:
 - / strategy
 - / financial and non-financial performance and risk
 - / capital structure
 - / social and environmental impact and corporate governance
- Conducts dialogues with investee companies;
- Exercises voting rights and other rights attached to shares;
- Cooperates with other shareholders;
- Communicates with relevant stakeholders of the investee companies; and
- Manages actual and potential conflicts of interests in relation to the firm’s engagement.

The above engagement policy is limited to the extent that a firm invests on behalf of investors in shares traded on a regulated market (or on third country markets that meet comparable requirements and where the shares dealt in are of a quality comparable to those in a regulated market in the UK).

Builders Union’s Approach to Engagement

Builders Union’s investment strategy is such that whilst Builders Union may invest in shares traded on a regulated market (or comparable market) the resultant holdings are of an insignificant size and voting power to the extent that the Firm does not actively engage with investee companies

While Builders Union generally supports the objectives underlying the SRD II, for the above reason the Firm has chosen not to produce an engagement policy at this time. Should this change in the future, Builders Union will review its position and update this statement accordingly.

This SRD II disclosure have been last updated in February 2021 and will be reviewed annually. For any questions in respect of the disclosure email contact@buam.com.