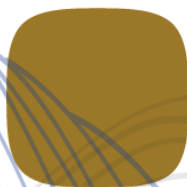


# UK Stewardship Code Disclosure

**Sumitomo Mitsui DS Asset  
Management (UK) Limited**

July 2025



# UK Stewardship Code Disclosure

Pursuant to [COBS 2.2.3R](#), a firm that manages investments for professional clients must disclose clearly on its website the nature of its commitment to the UK Financial Reporting Council's Stewardship Code (the "**Code**") or, where it does not commit to the Code, its alternative investment strategy. The Code is a voluntary code which comprises of twelve principles applicable to asset managers who are signatories and who must address these principles, including by publicly disclosing their policy on how they will discharge their stewardship responsibilities.

Sumitomo Mitsui DS Asset Management (UK) Limited (the "**Firm**") is authorised and regulated by the Financial Conduct Authority ("**FCA**") and is in scope of the aforementioned disclosure requirement. While the Firm supports the general objectives that underpin the Code, the Firm has chosen not to commit to the Code.

SMDAM UK manages segregated funds/accounts for institutional clients currently based primarily in Germany, Switzerland, and the Middle East. The Firm also manages on a delegated basis a CSSF- authorised UCITS fund (the "**Fund**"), an umbrella fund domiciled in Luxembourg consisting of various sub-funds

The Firm invests in non-UK equities, e.g., Japanese equities, equities of Chinese companies predominantly listed and traded on China Shares A Equity Markets, REITs in Asia Pacific countries including Japan. In addition, the Firm's clients are mainly in the EMEA, excluding the UK, and the Middle East.

The day-to-day portfolio management is delegated to the Firm's parent, namely Sumitomo Mitsui DS Asset Management (UK) Limited ("**SMDAM Tokyo**").

For further details on SMDAM Tokyo's engagement with the investee companies and voting, please refer to SMDAM Tokyo's "Basic Policies on Engagement" which are incorporated in the "[Engagement Activity Results](#)", and the [Basic Policy on Exercise of Voting Rights](#) and [Criteria for Determining the Exercise of Voting Rights](#).

Should you have any queries in relation to this disclosure statement, please contact our Legal & Compliance department ([ukcompliance@smd-am.co.jp](mailto:ukcompliance@smd-am.co.jp)).

This statement was last reviewed in July 2025.