

# WM Capital Management Ltd

80 Coleman Street, London EC2R 5BJ

Telephone: 020 7653 8805

[www.wmcapitalmanagement.com](http://www.wmcapitalmanagement.com)

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## **Financial Reporting Council UK Stewardship Code**

### **Disclosure of our Commitment to the Code**

#### **Introduction**

Under COBS 2.2.3R of the FCA Handbook, WM Capital Management Ltd is required to make a public disclosure explaining the extent of our commitment to the UK Stewardship Code. We have recently reviewed our previous disclosure and now replace it with this disclosure to satisfy the requirement.

The Code aims to enhance the quality of engagement between asset managers and companies to help improve long-term risk-adjusted returns to shareholders and promote the efficient exercise of governance responsibilities. It also describes steps asset owners can take to protect and enhance the value that accrues to the ultimate beneficiary and sets out a number of areas of good practice on engagement with investee companies to which the Financial Reporting Council believes asset managers and asset owners should aspire. The Code is directed in the first instance to asset owners and asset managers with equity holdings in UK listed companies and service providers that support them. Adherence to the Code is voluntary.

#### **Background to the Firm's Operations**

WM Capital Management Ltd is a relatively small discretionary investment management firm, managing assets on behalf of private clients, trusts, organisations, and professional intermediaries.

The UK companies invested in are mostly very large capitalised organisations or smaller investment trusts and the exposure to any one of them would be very small in relation to their total equity capital. The degree of influence we would command would be very small indeed.

#### **Our Commitment to the Code**

Although we support the objectives that underlie the Code we are pleased to endorse the principles of the Code, in practice we are not in a position to influence the very small number of UK companies in which we might be invested.

#### **Annual review**

We acknowledge that our exposure to UK companies could change and therefore we will monitor that exposure on an annual basis and publish the outcome of the review on this website.

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**WM Capital Management Ltd**  
**80 Coleman Street, London EC2R 5BJ**  
**April 2024**

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WM Capital Management Ltd is authorised and regulated by the Financial Conduct Authority and recorded in the Register under reference no 601025. It is registered in England and Wales under company no: 07042526 and its Registered Office is 80 Coleman Street, London EC2R 5BJ.