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The Shareholder Rights Directive (SRD II) was implemented into UK law on 10 June 2019

David Booler and Co is categorised as a MiFID investment firm and therefore has an obligation to either produce an engagement policy or explain why it does not comply with the disclosure requirements.

We have not published a policy as we do not currently invest on behalf of clients in shares on a regulated market.

We will continue to assess the application of SRD II and whether to develop and publicly disclose an engagement policy.