

UK Stewardship Code 2026 – at a glance



Financial Reporting Council

The UK Stewardship Code 2026 (the Code) establishes the core Principles of effective stewardship and sets a high standard of transparency for asset owners and asset managers, and for the service providers that support them.

The Code is voluntary and being a signatory to the Code demonstrates commitment to stewardship and to providing transparent reporting on stewardship activities. The Code comprises a set of 'apply and explain' Principles for asset owners, asset managers and service providers. The Principles are supported by information on organisations' context and stewardship policies. The Code offers the flexibility for signatories to apply the Principles in ways that are best tailored to their approach and activities.

The Code applies from 1 January 2026 for reporting thereafter. More detail on how to apply and the application process can be found on the FRC website.

UK Stewardship Code 2026 for asset owners and asset managers

Policy and Context (P&C) Disclosure Disclosures:	Activities and Outcomes (A&O) Report Principles:
A Organisation, investment beliefs and stewardship approach	1 Integrating stewardship and investment
B Governance and resources	2 Promoting well-functioning markets
C Policies, processes and review	3 Engagement
D Conflicts of interest	4 Exercising rights and responsibilities
E Dialogue with clients and/or beneficiaries	5 Selection and oversight of managers
	6 Monitoring service providers

UK Stewardship Code 2026 for service providers

Policy and Context (P&C) Disclosure Disclosures:	Activities and Outcomes (A&O) Report Principles:
A Organisation and services	1 Communicating with clients
B Governance and resources	2 Proxy advisor services
C Policies, processes and review	3 Investment consultant services
D Conflicts of interest	4 Engagement provider services



Reporting structure and frequency.

Reporting to the UK Stewardship Code 2026 is in two parts: Policy and Context (P&C) Disclosure and Activities and Outcomes (A&O) Report.

- **Policy and Context (P&C) Disclosure.** This includes information about the organisation, its governance and resourcing, linking to relevant policies.
- **Activities and Outcomes (A&O) Report.** This is an annual update demonstrating a signatory's policies in action, showcasing what they have done the year and what they have achieved.

Applicants are required to submit an A&O Report to the FRC every year to demonstrate how they have applied the Principles in the preceding year.

Applicants are required to submit a P&C Disclosure to the FRC every 4 years and are encouraged to provide updated information if there have been changes at an organisation such that their P&C Disclosure no longer aligns with their A&O Report. Applicants may choose to submit P&C Disclosure more frequently, but it is not required.

Applicants may choose to present the P&C Disclosure and the A&O Report either as separate documents or combined in a single comprehensive submission as they prefer. They may also choose to report Principle-by-Principle or take a more narrative approach.

P&C Disclosure and A&O Reports must be reviewed and approved by the applicant's governing body, and signed by the chair, chief executive or chief investment officer.

Year 1 **Policy and Context Disclosure** + **Activities and Outcomes Report**

Applicants are required to submit a P&C Disclosure and an A&O report in their first year of reporting. Applicants may choose to present the P&C Disclosure and the A&O Report either as separate documents or combined in a single comprehensive submission, as they prefer.

Year 2 **Activities and Outcomes Report**

Year 3 **Activities and Outcomes Report**

All applicants submit an annual A&O Report to the FRC each year. Applicants that have successfully been listed as a signatory in a previous year are not required to resubmit or update P&C Disclosure annually, irrespective of whether signatories submit separate or combined P&C and A&O information. However, if there have been more substantial changes to their governance, policies or processes, such that their P&C Disclosure no longer aligns with their A&O Report, signatories are encouraged to update them.

Year 4 **Policy and Context Disclosure** + **Activities and Outcomes Report**

Applicants are required to submit P&C Disclosure every 4 years alongside their A&O report. Applicants may choose to present the P&C Disclosure and the A&O Report either as separate documents or combined in a single comprehensive submission as they prefer.



Code structure and guidance.

The UK Stewardship Code 2026 has optional guidance to support applicants' reporting against the Disclosures and the Principles.

P&C Disclosure	
Disclosures (A-E)	The Disclosures indicate areas of information that help readers to understand more about the organisation and provide context for their reporting.
"Disclosure Requirements"	Each of the Disclosures is further broken down into aspects that applicants should report against to ensure the necessary information is included.
Guidance	Using the guidance provided for P&C Disclosures is optional. Applicants can achieve good reporting without using the guidance, but it is available to support reporting where helpful. It offers hints and tips that applicants may find useful.

A&O Report	
Principles (1-6)	The Principles indicate practices that, we believe, reflect effective stewardship.
"How to report" prompts	Each Principle has concise, high-level prompts for signatories to use to explain how they have applied the Principle. These prompts indicate information that we would expect organisations to include in their annual A&O Report and forms the basis of the FRC's assessment of reporting.
Guidance	Using the guidance provided for reporting against the Principles of the Code is optional. Good reporting can be achieved without using the guidance, but it is provided to support applicants' reporting. Guidance for each Principle offers a brief commentary to explain why this is an important part of effective Stewardship. It also includes further narrative and examples for applicants to draw on to help them describe how they exercise stewardship in a way that is tailored to their organisation and approach.



Application of Principles for asset owners and asset managers.

Asset owners and asset managers have different rights, responsibilities and influence within the investment chain, and how they exercise stewardship.

Some Principles are more applicable to those who undertake stewardship directly with an issuer or asset. There is a separate Principle on the oversight role for those managing assets through an external manager.

The Principles should be applied where relevant to a signatory's stewardship activity, as follows:

Principles	Who should apply them
<ul style="list-style-type: none"> 1 Integrating stewardship and investment 2 Promoting well-functioning markets 6 Monitoring service providers 	Applied by all asset owner and asset manager signatories.
<ul style="list-style-type: none"> 3 Engagement 4 Exercising rights and responsibilities 5 Selection and oversight of external managers 	Signatories report on the Principles that are relevant to their stewardship activities. As a guideline, where a Principle refers to stewardship activity that represents 10% or less of a signatory's assets under management, then it is not an expectation that they respond to that Principle.



Application of Principles for service providers.

Proxy advisors, investment consultants and engagement service providers.

The Service Providers' Code focuses on the activities of proxy advisors, investment consultants and engagement service providers.

- **Principle 1** on communication with clients should be applied by all service provider signatories.
- **Principle 2** on quality and accuracy of recommendations applies to proxy advisors.
- **Principle 3** on market-wide and systemic risks applies to investment consultants.
- **Principle 4** on engagement applies to engagement service providers.

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