

# Shareholder Rights Facilitation Policy

The EU shareholder Rights Directive II (SRD II) is a European Union Directive that establishes requirements to encourage shareholder engagement in order to promote equity investment throughout the Union and to facilitate the exercise of rights related to shares. The specific requirements apply to issuers, institutional investors and intermediaries such as Saxo Bank, in relation to:

1. Identification of shareholders
2. Transmission of information
3. Facilitation of exercise of shareholders rights.

SRD II will come into force on 3rd September 2020 and covers companies which have their registered office in a Member State and whose shares are traded on a regulated market.

In order to comply with the Directive, Saxo Bank has appointed Broadridge Financial Solutions Limited ("Broadridge") a 3rd party service provider, to manage the shareholder identification process and provide proxy voting services.

## What action is required from you

We do not require our clients to take action unless you choose to exercise your voting rights using our meeting services, in which case you should subscribe to this service offering through Saxo platforms (please see details below of how to subscribe). This will ensure that you receive information of upcoming meetings, are able to view ballots and have a mechanism to execute vote instructions.

Please note that you will be charged a fee if you choose to subscribe and use our services to exercise your voting rights.

## Fee Schedule

Description	Cost
Service subscription	EUR 30 p.a. excl. VAT
Vote/Changing a vote	EUR 5 per vote excl. VAT

The Service subscription fee will be charged on a quarterly basis at the end of the quarter and is non-refundable. Clients opting in and out within the same quarter will be charged the full amount. When relevant, the service subscription fee will be converted to the applicable local currency and subject to a currency conversion charge.

The per vote fee will be charged at the time of voting. When relevant, the per vote fee will be converted to the applicable local currency and subject to a currency conversion charge.

Saxo Bank have enhanced the corporate action e-mail notification service, so that clients can select how often and for which event types they would like to receive e-mail notifications.

Please review and select the service offerings available through Saxo platforms (please see details below of how to subscribe).

# Shareholder Rights Facilitation Policy

## 1. Scope of the Directive

The Directive covers securities with voting rights of companies which have their registered office in a Member State and the shares of which are admitted to trading on a regulated market situated or operating within a Member State.

## 2. What is an issuer

An issuer is a company which has its registered office in a Member State and the shares of which are admitted to trading on a regulated market situated or operating within a Member State.

## 3. What is an intermediary

An intermediary means a person, such as an investment firm, a credit institution and a central securities depository, which provides services of safekeeping of shares, administration of shares or maintenance of securities accounts on behalf of shareholders or other persons.

Saxo Bank serves as an intermediary.

## 4. What is Broadridge Financial Solutions

Broadridge Financial Solutions (Broadridge) is a 3rd party service provider appointed by Saxo Bank to manage the shareholder identification process and provide meeting services. Meeting services will be provided for shares of companies which have their registered office in a Member State as well as shares of companies issued in the United States, South Africa, Switzerland, Canada, Australia, Hong Kong, Singapore, Japan, China and Malaysia.

## 5. How do I connect to the Broadridge meeting services

A new event list has been introduced in the Saxo platforms that lists upcoming events relevant to your holdings. The list also contains links to further information about each event and the due date for casting votes. From here it will be possible to sign up for the voting service, and to launch the ballots to vote at the events. The module is located in the menu under "Corporate Actions -> Shareholder Voting".

## 6. What information an intermediary must transmit to an issuer or an issuer's agent

Intermediaries are required, upon request, to communicate to the company information regarding shareholder identity, including at least the following information:

- (i) name and contact details (including full address and, where available, email address) of the shareholder, and, where it is a legal person, its registration number, or, if no registration number is available, its unique identifier, such as legal entity identifier;
- (ii) the number of shares held; and
- (iii) only insofar they are requested by the company, one or more of the following details: the categories or classes of the shares held or the date from which the shares have been held.

If some of the required information is missing, Saxo Bank will request such information from the shareholder.

## 7. What does "facilitation of exercise of shareholders rights" mean

As an intermediary, Saxo Bank must facilitate the exercise of the rights by the shareholder, including the right to participate and vote in general meetings, which shall comprise at least one of the following:

# Shareholder Rights Facilitation Policy

- (i) makes the necessary arrangements for the shareholder or a third party nominated by the shareholder to be able to exercise themselves the rights;
- (ii) exercises the rights flowing from the shares upon the explicit authorisation and instruction of the shareholder and for the shareholder's benefit.

When votes are cast electronically an electronic confirmation of receipt of the votes must be sent to the person that casts the vote.

After the general meeting the shareholder or a third party nominated by the shareholder can obtain, upon request, confirmation that their votes have been validly recorded and counted by the company, unless that information is already available to them. The deadline for requesting such confirmation shall not be longer than three months from the date of the vote.

Saxo Bank will transmit confirmation of the vote without delay to the shareholder or a third party nominated by the shareholder. Where there is more than one intermediary in the chain of intermediaries the confirmation shall be transmitted between intermediaries without delay, unless the confirmation can be directly transmitted to the shareholder or a third party nominated by the shareholder..

## 8. Do I have to vote at general meetings

Shareholders have the right to vote on certain corporate matters but there is no requirement to vote. However voting can have an impact on a company's strategy and therefore its value so it is important that shareholders exercise their voting rights.

Information about general meetings will be provided to all clients including those who do not intend to vote.

## 9. Is there a cost to the client for meeting services to be provided by Saxo Bank

You will be charged a service subscription fee if you choose to subscribe and a fee per vote if you exercise your voting rights.

## 10. Why is the subscription model for corporate event e-mail notifications being introduced

From September 3rd 2020 Saxo Bank will be offering clients the opportunity to exercise their shareholder rights and make information on corporate events available on Saxo platforms without delay. In this regard, we are also offering clients the opportunity to subscribe for the relevant amount of information they receive by e-mail.

## 11. What will the frequency of corporate event email notifications be after September 3<sup>rd</sup>

The frequency of emails will depend on the subscription model, if the subscription model is not amended then the default subscription model stipulated on the platform as "default" will be applied.

## 12. What is the current frequency for e-mails being sent to clients

At present an email is sent to clients whenever there is a corporate event announcement or updates are received from our network of intermediaries and data providers.

## 13. For which corporate events are e-mails currently sent by Saxo Bank

Corporate event e-mails are currently only sent for voluntary / choice corporate events, where a decision is required by the client.

# Shareholder Rights Facilitation Policy

## 14. Will there be a cost attributed to changing the subscription model of corporate event e-mails

At present there will be no extra charge for amending the subscription model.

## 15. How do I change my subscription model

There is a new section in the platforms under the settings->notifications menu where the subscription level can be changed, and where it is also possible to subscribe or unsubscribe to income events.

## 16. What are the different subscription models available for receiving corporate event e-mails from Saxo Bank

**Level 1** - This service level will consist of following parameters:

- I. A notification when a new corporate event is announced
  - II. A notification when an update is made to a corporate event
  - III. A notification when a corporate event is cancelled
  - IV. A notification reminder when there is a deadline approaching
  - V. A notification when a corporate event payment is made
- A notification for mandatory as well as elective corporate events.  
Notification Frequency – Notifications are once at end of day.

**Level 2** - This service level will consist of following parameters:

- I. A notification when a new corporate event is announced
  - II. A notification when an update is made to a corporate event
  - III. A notification when a corporate event is cancelled
  - IV. A notification when a corporate event payment is made
- A notification for elective corporate events only.  
Notification Frequency – Notifications are sent once at end of day.

**Default Service** - This level will be available as default on day-1 for all clients. This service level will consist of following parameters:

Only following notification types:

- I. A notification when a new corporate event is announced
  - II. A notification when an update is made to a corporate event
  - III. A notification when a corporate event is cancelled
- A notification for elective corporate events only.

Notification Frequency – Notifications are sent once at end of day.

None - This service level will consist of no notifications.

In addition to the above clients can also select to receive e-mail notifications for income corporate events.

# Shareholder Rights Facilitation Policy

## 17. When in the corporate event cycle will Saxo Bank send email notifications

Saxo Bank will send the relevant e-mail notifications to clients based on the subscription level selected. When sending e-mails for updates made to a corporate event these updates will be sent at either Ex date - 1 for mandatory corporate events or ex / effective date -5 for elective events.

The ex-date is the date that determines which shareholder will be entitled to receive the relevant payment.

## 18. Why will Saxo Bank no longer send e-mail notifications when an update has been made for elective events after September 3rd 2020 under the default subscription

Clients will no longer be receiving e-mail notifications as an update has been made to an event on Saxo platforms, as corporate events will be announced without delay. Updates will be made to events on platforms constantly, to retain a good client experience Saxo Bank have taken this step to control the amount of e-mails sent to clients.

## 19. What does Saxo Bank consider as an income corporate event

Cash dividends and interest payments are classed as income corporate events.

For more information on SRD II, please read the Directive (EU) 2017/828 amending Directive 2007/36/EC as regards the encouragement of long-term shareholder engagement II – [click here](#).

Do not hesitate to [Contact us](#), if you have further questions.