

Voting Rights Policy of SMN Investment Services GmbH

Version July 2024

This policy has been approved and is applicable as of: **July 01st, 2024**



Christian Mayer
Managing Director



Michael Neubauer
Managing Director



Joseph Waldstein
Managing Director

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Contents

A.	Preamble	4
B.	Implementation by SMN.....	4
B.1.	Inapplicability.....	4
B.2.	Exercise of voting rights.....	4
B.3.	Publication.....	4
B.3.1.	Of this policy.....	4
B.3.2.	Annual ex-post reporting.....	4
B.4.	Transparency of asset managers.....	4

A. Preamble

SMN, domiciled in Austria and duly licensed as an Alternative Investment Fund Manager (AIFM) including ancillary investment services supervised by the Financial Market Authority of Austria (FMA) has implemented the present Voting Rights Policy which has recently been amended to implement the provisions of the revised Stock Exchange Act of Austria (BoerseG 2018) implementing the Directive (EU) 2017/828 of the European Parliament and the Council of 17 May 2017 amending Directive 2007/36/EC as regards the encouragement of long-term shareholder engagement.

B. Implementation by SMN

B.1. Inapplicability

According to § 185 BoerseG 2018 asset managers (including AIFM) either have to comply with these provisions or to publish an unmistakable and reasoned declaration why they do not comply. Whenever SMN is professionally acting as AIFM or asset manager SMN does so only regarding various financial and commodity futures and other derivative instruments, so **none of these financial instruments include voting rights**. As a result, § 185 (1) lit. a) to e) are not applicable. Please refer to SMN's Conflict of Interest Policy for further details according to § 185 (1) lit. f).

As a consequence of the aforementioned, SMN will not rely on the services of proxy advisors.

B.2. Exercise of voting rights

This is not applicable as SMN doesn't invest in financial instruments with voting rights.

B.3. Publication

B.3.1. Of this policy

The present Voting Rights Policy of SMN is published on the internet on the website <http://www.smn.at> and immediately, however at least once each year, updated and adapted accordingly if necessary. This information is available free of charge.

B.3.2. Annual ex-post reporting

Asset managers must (according to § 185 (1) No. 2 BoerseG) publish via their website how they've applied their Voting Rights Policy including their voting behaviour, comments to the most important votes and any usage of proxy advisors on an annual basis. Further they must publicly disclose how they cast votes at general meetings of companies in which they hold shares.

B.4. Transparency of asset managers

In accordance with § 186 BoerseG, where applicable, SMN on an annual basis discloses to institutional investors, with which SMN holds agreements as referred to in § 186 BoerseG, how its investment strategy and its implementation complies with the agreement and how this contributes to the medium to long-term performance of the assets of the institutional investor or of the fund.