



Council of the
European Union

Brussels, 15 March 2022
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COVER NOTE

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| From: | Secretary-General of the European Commission, signed by Ms Martine DEPREZ, Director |
| date of receipt: | 11 March 2022 |
| To: | Mr Jeppe TRANHOLM-MIKKELSEN, Secretary-General of the Council of the European Union |

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|----------------|--|
| No. Cion doc.: | C(2022) 1413 final |
| Subject: | ANNEX 1 to the COMMISSION DELEGATED REGULATION (EU) .../... supplementing Regulation (EU) 2019/2033 of the European Parliament and of the Council with regard to regulatory technical standards for public disclosure of investment policy by investment firms |

Delegations will find attached document C(2022) 1413 final.

Encl.: C(2022) 1413 final



Brussels, 11.3.2022
C(2022) 1413 final

ANNEX 1

ANNEX

to the

COMMISSION DELEGATED REGULATION (EU) .../...

**supplementing Regulation (EU) 2019/2033 of the European Parliament and of the
Council with regard to regulatory technical standards for public disclosure of
investment policy by investment firms**

ANNEX I

DISCLOSURE OF INVESTMENT POLICY BY INVESTMENT FIRMS

| INVESTMENT FIRMS DISCLOSURE | | | |
|------------------------------------|----------------------|-----------------------------|--|
| Template number | Template code | Name of the template | Legislative reference |
| | | INVESTMENT POLICY | |
| 1 | IF IP1 | PROPORTION OF VOTING RIGHTS | Regulation (EU) 2019/2033 Art 52(1), point (a) |
| 2 | IF IP2 | VOTING BEHAVIOUR | Regulation (EU) 2019/2033 Art 52(1), point (b) |
| 3 | IF IP3 | PROXY ADVISOR FIRMS | Regulation (EU) 2019/2033 Art 52(1), point (c) |
| 4 | IF IP4 | VOTING GUIDELINES | Regulation (EU) 2019/2033 Art 52(1), point (d) |

IF IP1 - TEMPLATE ON PROPORTION OF VOTING RIGHTS

| Country | Economic sector | Company name | Company identifier | Proportion of voting rights attached to shares held directly or indirectly as set out in Article 52(2) |
|----------------|------------------------|---------------------|---------------------------|---|
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Please insert additional rows as needed.

IF IP2.03 - TABLE ON EXPLANATION OF THE VOTES

| Row | Item | Value |
|-----|--|-------|
| 1 | Departments or roles in the investment firm that take part in deciding a voting position | |
| 2 | Description of the validation process for negative votes | |
| 3 | Number of full time equivalents used to analyse resolutions and examine voting records, excluding external resources such as proxy advisor firms | |
| 4 | Explanation of any material change in the rate of approval | |
| 5 | List of publicly available investment policy documents describing the investment firm's objectives | |
| 6 | If relevant, certification of the firm's investment policy | |

IF IP2.04 - TEMPLATE ON VOTING BEHAVIOUR IN RESOLUTIONS BY THEME

| Row | Item | Voted for | Voted against | Abstained | Total |
|-----|--|-----------|---------------|-----------|-------|
| 1 | Voted resolutions by theme during the past year: | | | | |
| 2 | Board structure | | | | |
| 3 | Executive remuneration | | | | |
| 4 | Auditors | | | | |
| 5 | Environment, social, ethics | | | | |
| 6 | Capital transactions | | | | |
| 7 | External resolutions | | | | |
| 8 | Other | | | | |

IF IP2.05 - TEMPLATE ON THE RATIO OF APPROVED PROPOSALS

| Row | Item | Value |
|-----|--|-------|
| 1 | Percentage of resolutions put forward by the administrative or management body that are approved by the firm | |
| 2 | Percentage of resolutions put forward by shareholders that are approved by the firm | |

IF IP3 - PROXY ADVISOR FIRMS

IF IP3.01 - TABLE ON THE LIST OF PROXY ADVISOR FIRMS

| Name of proxy advisor firm | Identifier of proxy advisor firm | Contract type | Investments associated with the proxy advisor firm | Themes of resolutions in which the proxy firm gave voting recommendations in the past year |
|----------------------------|----------------------------------|---------------|--|--|
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Please insert additional rows as needed.

IF IP3.02 - TABLE ON THE LINKS WITH PROXY ADVISOR FIRMS

| Name of proxy advisor firm | Identifier of proxy advisor firm | Relevant undertakings with which the proxy advisor firm has links | Type of link | If relevant, policy regarding conflicts of interests with the proxy advisor firm |
|----------------------------|----------------------------------|---|--------------|--|
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IF IP4 - TABLE ON VOTING GUIDELINES

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| <p>Voting guidelines regarding the companies the shares of which are held in accordance with Art. 52(2): short general summary and, if needed, links to non-confidential documents</p> |
| <p>a</p> |

