

## Shareholder Rights Directive – engagement policy and voting

Aviva Investors<sup>1</sup> approach to stewardship, including engagement with the companies in whom we invest our clients' money and how we use the voting rights that attach to investments, is set out in our **Responsible Investment annual reviews**, which are available here: [Policies and documents - Aviva Investors](#)

As required by the provisions of Directive 2017/828 (EU), amending Directive 2007/36/EC, known as the Shareholder Rights Directive and as transposed by local legislation or regulation, the Responsible Investment annual reviews describe how we:

- integrate shareholder engagement in our investment strategy;
- monitor investee companies on relevant matters, including: (a) strategy; (b) financial and non-financial performance and risk; (c) capital structure; and (d) social and environmental impact and corporate governance;
- conduct dialogue with investee companies;
- exercise voting rights and other rights attached to shares;
- cooperate with other shareholders;
- communicate with relevant stakeholders of the investee companies; and
- manage actual and potential conflicts of interests in relation to our engagement.

Both our voting policy and our voting records are available online. [Policies and documents - Aviva Investors](#)

<sup>1</sup> Aviva Investors Holdings Limited and its subsidiaries, including Aviva Investors Global Services Limited, Aviva Investors UK Fund Services Limited, and Aviva Investors Luxembourg S.A.

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Aviva Investors: **Public**