Shareholder Rights Directive – engagement policy and voting

Aviva Investors’ 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 Stewardship Statement, which is available here.

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 Stewardship Statement describes 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 dialogues 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.

An annual report regarding the implementation of our Stewardship Policy will be made available on our website.

Our voting policy is available here and the record of how we have voted is available online.

1 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.