

# Voting Rights Policy

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In accordance with the CSSF Regulation 22-05 of 27<sup>th</sup> July 2022 amending CSSF Regulation 10-4 of 20<sup>th</sup> December 2010 and the Commission Delegated Regulation (EU) n° 231/2013 of 19<sup>th</sup> December 2013, ING Solutions Investment Management S.A. ("ISIM"), as a Management Company subject to Chapter 15 of the law of 17 December 2010 as amended by the law dated 10 May 2016 (the "UCITS Law") and Alternative

Investment Fund Manager authorized under the law of 12 July 2013 on alternative investment fund managers (the "AIFM Law"), applies voting rights on the basis of the following policy.

## **1. Scope of the voting policy**

In this document, a « Fund » means either an Undertakings for Collective Investment in Transferable Securities (hereinafter « UCITS ») or an Alternative Investment Fund (hereinafter « AIF ») for which this voting policy is applicable.

ISIM develops adequate and effective strategies for determining when and how any voting rights attached to the instruments held in the portfolios of the managed funds are to be exercised, to the exclusive benefit of the Funds concerned and their investors.

According to the Section 5.5.10. of the CSSF Circular 18/698 an investment company that has designated ISIM as its ManCo or AIFM but has not specifically mandated it to exercise the voting rights attached to the instruments held in its portfolio, must develop its own policy for the exercise of voting rights.

At the moment of its authorization, the ManCo confirms that a suitable and efficient policy has been put in place permitting the exercise of voting rights attached to the instruments held in the portfolios in the exclusive interest of the Funds concerned.

This policy is regularly updated.

## **2. Measures and procedures to exercise voting rights**

According to the Article 23 of the CSSF Regulation 22-05 (amending CSSF Regulation 10-04 and Article 37 of the Commission Delegated Regulation (EU) n° 231/2013, the above mentioned policy determines measures and procedures for:

- a) monitoring relevant corporate events / corporate actions;

Exercise of voting right rights is delegated to external Investment Managers. Custodians of ISIM's funds perform necessary duties to guarantee the good execution of the voting instruction received within the deadlines. To that extend, custodians may subscribe to external Proxy Voting services. This allows external Investment Managers to process the votes.

- b) ensuring that the exercise of voting rights is in accordance with the investment objectives and policy of the relevant fund;

Voting is a tool used to make sustainability considerations an integral part of investment decisions within ISIM's Funds. To that extent, ISIM has defined applicable additional [Voting Guidelines](#) for its funds' ranged. Note that, specifically for ISIM Funds managed by Investment Managers that are part of ING Group, ING Investment Office (ING IO)'s sustainable investment team takes the initiative for the realization of the voting guidelines.

The delegated Investment Managers are recording the ballots and how they have voted on these ballots.

Once a year, ISIM reports on the execution of votes performed by the delegated Investment Managers.

- c) preventing or managing any conflicts of interest arising from the exercise of voting rights.

In case interests of investors in the funds conflict with the interests of the delegated Investment managers, the voting is decided on a case-by-case basis.

Note that in the specific case of ISIM Funds, where Investment management role has been delegated to an entity from the ING Group, and that would hold a stake in ING Group, the delegated Investment Manager will abstain from voting at the shareholder meeting.

Whenever necessary, ISIM will liaise with its compliance department to determine how it should shape its responsibility as investor in these special cases.

### 3. Disclosure of the voting rights policy to investors

For UCITS funds:

A summary description of this policy is made available to investors by ISIM, free of charge, notably by way of its website.

Details of the actions taken on the basis of this policy are made available to investors free of charge and upon their request.

For Alternative Investment Funds:

A summary description of this policy and details of the actions taken on the basis of this policy is made available to investors on their request.

#### **4. Reporting in the management information of ISIM**

ISIM maintains, in an adequate and orderly manner, records of voting activities of the delegated Investment Managers. To this end, ISIM puts in place "management information" permitting the follow-up of the activity of its delegates.

Finally, it is ensured that this management information is available in Luxembourg and preferably kept in a central database accessible at any time in Luxembourg.

ISIM keeps the latest version of this Voting Right Policy and of its Voting Guidelines on this internet website and at the company's registered office. It can be made freely accessible to shareholders.

Requests to that effect should be sent:

**By letter to the following address:**

ISIM – 26 Place de la Gare L-1616 Luxembourg  
Grand Duchy of Luxembourg

**By email to the following Email address:**

[portfolio.isim@ing.com](mailto:portfolio.isim@ing.com)

#### **5. Annual Reporting**

In accordance with article 2 b) hereabove, ISIM published annual voting reports, which summarize voting activities and behaviors. The last available annual [Voting report](#) is made available on ISIM website.

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