

Voting Policy

This is the Voting Policy (Policy) of Acclaim Management Group Limited, ABN 52 091 082 058, AFSL 305 604 (“Acclaim”). In this Policy, ‘Acclaim’, ‘we’, ‘our’ and ‘us’ have the same meaning. This Voting Policy applies to the Freedom of Choice Portfolio Service.

Purpose

This Policy sets out Acclaim's approach to voting in relation to listed securities and other investment products available for investment under the Freedom of Choice Portfolio Service (“the Service”). This policy only applies to the securities and investment products accessible on the Approved Investment Menu for the Service. These are referred to as Approved Investments in this document.

Voting

Clients investing in Approved Investments offered under the Service are not in principle entitled to vote in meetings or resolutions concerning these investments given they are not the registered owners of the investments. Equity Trustees Limited, ABN 46 004 031 298, as the custodian and legal owner, holds these voting rights. Refer to the Custody Terms as set out in the Freedom of Choice Portfolio Service Guide for further information.

Acclaim's approach to proxy voting in respect of Approved Investments is that we do not vote. This is essentially consistent with the nature of the Service, where the client (normally under the guidance of a licensed financial adviser) has the responsibility for selection of investments. Acclaim, as the provider of services, is not in a position to ascertain what the best voting decision would be for individual investors. Acclaim does not offer voting rights as a matter of course, and we do not proactively make information about impending meetings or resolutions in relation to Approved Investments available to our clients. However, there are limited circumstances in which we may vote:

Where voting is required in respect of an event concerning an Approved Investment and a client (through his or her adviser, if applicable) has requested, in writing, the ability to submit his or her votes in respect of the event. In this case, and if the client (or adviser, as the case may be) provides detailed and clear written instructions as to when and how to vote, and these instructions are provided to us on or before a time not less than three Brisbane Business Days before the closing time to submit the votes, we will endeavour to follow those instructions.

Limitations

Notwithstanding the above, further limitations to these rights of voting apply.

1. Acclaim does not permit a client or a client's adviser to act as a corporate representative for Acclaim. We simply accept voting instructions from them, as described above, and we will attempt to lodge them via proxy voting if received in the manner and in the timeframes described in that clause.
2. Acclaim does not accept any liability for acting on client's or adviser's instructions in relation to this voting, including in cases when such instructions contravene the relevant law and/or regulations, or for failing to lodge proxy voting instructions due to circumstances beyond our control (for example, limitations in our own voting rights imposed by the Service's Custodian, or application of more restrictive constraints for lodgement of instructions imposed on us such as a shorter time needed to lodge the instruction than that specified in this document).
3. Acclaim does not accept standing instructions in relation to future meetings, resolutions or any other event that requires voting. Instructions, in order to be executed, will need to be supplied for each voting event as it arises.
4. Acclaim's Approved Investments include pooled vehicles with their own trustee and/or responsible entity which acts in relation to interests held by the vehicle. In this case Acclaim cannot issue instructions regarding voting for investments made by the pooled vehicle.

Further information regarding this policy is available on request. Please direct your request for information to enquiries@freedomofchoice.com.au.

Dated: 1 May 2019