

OCTIUM

Shareholder Engagement Policy

Octium Life DAC (“Octium”) offers single premium unit linked life insurance products to High Net Worth individuals, whereby Clients have the flexibility to select from a broad range of investment options in conjunction with their chosen investment advisor or asset manager.

Octium operates cross border into EU, UK and Turkish markets. Octium policyholders, or their advisors, select the investment option linked to the policy and the investment risk is borne by the policyholder. The management of Octium’s investments is delegated to a number of experienced and reputable Asset Managers, who manage on a discretionary basis.

This document meets Octium’s requirement as an Institutional Investor under both EU regulations and Irish Company Law to disclose its Shareholder Engagement Policy.

For the purposes of compliance with the provisions of SRD II, Octium relies upon the Shareholder Engagement Policies of the Asset Managers to which it delegates investment management activities.

Octium does not:

- make investment decisions for policyholders;
- play a role in recommending or advising on investment selection;
- actively engage with investee companies;
- exercise voting rights attached to shares.

Octium has adopted a robust Conflict of Interest Policy which recognises the importance of having appropriate systems and controls in place to identify and to prevent or manage potential and actual Conflicts of Interest.

