



## HUB24 Custodial Services Ltd Voting Policy

17 April 2025

# Contents

1. Overview.....	3
2. Policy Details.....	3
3. Definitions.....	5
4. Policy Governance .....	7

# 1. Overview

---

## 1.1 Background & Purpose

- 1.1.1 HUB24 Limited (ABN 87 124 891 685) (**HUB24**) is an ASX listed entity and the parent entity of the HUB24 Group of companies, which includes HUB24 Custodial Services Ltd (ABN 94 073 633 664, AFSL 239 122) (**HUB24 CS**).
- 1.1.2 HUB24 CS is the operator of the HUB24 investor directed portfolio service (**IDPS**), also known as HUB24 Invest.
- 1.1.3 HUB24 CS is the administrator of the Non-Custodial Administration and Reporting Service (HUB24 Non-Custodial Service);
- 1.1.4 HUB24 CS is the custodian and administrator of the HUB24 Private Invest Managed Investment Scheme and administrator of the Private Invest Non-Custodial Service, collectively referred to as HUB24 Private Invest.
- 1.1.5 HUB24 CS is required to comply with, among other obligations, the Corporations Act 2001 (Cth) (**Corporations Act**), the Corporations Regulations 2001 (Cth) (**Corporations Regulations**) and relevant ASIC instruments and regulatory guides.
- 1.1.6 HUB24 CS is required to operate the IDPS in accordance with the ASIC Corporations (Investor Directed Portfolio Services) Instrument 2023/669 (**ASIC Instrument**), which inserts section 912AD into the Corporations Act.
- 1.1.7 Section 912AD specifically requires that HUB24 CS, as the IDPS operator, establish and administer a voting policy.
- 1.1.8 This HUB24 CS Voting Policy (this **Policy**) has been established to comply with the ASIC Instrument and relevant Corporations Act requirements. .
- 1.1.9 This Policy outlines HUB24 CS's approach to voting in relation to listed securities and other investment products available through its services referred to in clause 2.2.1 below.
- 1.1.10 The policy is available to investors at [www.hub24.com.au/product-documents/hub24-invest-voting-policy/](http://www.hub24.com.au/product-documents/hub24-invest-voting-policy/) free of charge.

## 1.2 Scope & Application

- 1.2.1 This Policy applies to:
  - **HUB24 Invest, including the HUB24 SMSF Access offer,**
  - **HUB24 Non-Custodial Service** (HUB24 Non-Custodial Administration and Reporting Service issued by HUB24 CS), and
  - **HUB24 Private Invest** (includes the HUB24 Private Invest Managed Investment Scheme and HUB24 Private Invest Non-Custodial Service)(collectively referred to as the **Services**).
- 1.2.2 This Policy only applies to the securities and investment products accessible via the Services (referred to as **Accessible Investments**).

# 2. Policy Details

---

## 2.1 Investment Voting Rights

- 2.1.1 Investors in Accessible Investments offered under HUB24 Private Invest and HUB24 Invest, including the HUB24 SMSF Access offer, are not entitled to vote in meetings or on resolutions concerning these investments, as they are not the registered owners of these Accessible Investments. In these cases, HUB24 CS, as the legal owner, holds these voting rights.

- 2.1.2 However, for HUB24 Non-Custodial Service (includes the Non-Custodial Service available through HUB24 Private Invest), where the investments are held in the investor's name, and the investor is the registered owner, the investor retains voting rights and may vote on meetings or resolutions related to their Accessible Investments. Please refer to the relevant disclosure documentation for further information.
- 2.1.3 HUB24 CS's general approach to proxy voting in respect of Accessible Investments is that it does not vote. This is consistent with the nature of the Services, where the investor (normally under the guidance of a licensed financial adviser) has the responsibility for the selection of investments. HUB24 CS, as the provider of the Services, is not in a position to ascertain what the best voting decision would be for investors.
- 2.1.4 HUB24 CS 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 Accessible Investments available to our investors.
- 2.1.5 However, there are limited circumstances in which we may vote:
- I. **Managed portfolios:** Where voting is required in respect of an event concerning an Accessible Investment that forms part of a managed portfolio offered under the Services. In this case, and if the portfolio manager of the managed portfolio 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 five business days before the closing time to submit the votes, we will endeavour to follow those instructions.
  - II. **Other investments:** Where voting is required in respect of a contentious event concerning an Accessible Investment that does not form part of a managed portfolio, and an investor (or their adviser, as the case may be) has requested, in writing, the ability to submit their votes in respect of the event. In this case, and if the investor (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 five business days before the closing time to submit the votes, we will endeavour to follow those instructions.
  - III. **Director holdings:** Voting rights may be exercised for Accessible Investments held by investors who are directors of the company in which the vote is taking place. This applies only if the directors approach HUB24 CS with a specific request to vote on their behalf. In such cases, detailed and clear instructions on how and when to vote must be provided by the directors at least five business days before the submission deadline.
  - IV. **Significant stakeholders:** Voting rights may be exercised for investors with more than 5% ownership in any Accessible Investment. This is contingent upon these investors approaching HUB24 CS with a request to vote. HUB24 CS does not proactively seek voting instructions from these significant stakeholders. Detailed and clear instructions on how and when to vote must be provided by the investors at least five business days before the submission deadline.
  - V. **HUB24 Non-Custodial Service (including the Non-Custodial Service available through HUB24 Private Invest):** For Accessible Investments held under the HUB24 Non-Custodial Service in the investor's name, we may be able to support voting for Director holdings and Significant stakeholders in accordance with investor instructions. In these cases, investors should provide detailed and clear instructions on how and when to vote, and these instructions must be provided to us at least five business days before the submission deadline.
- 2.1.6 HUB24 does not charge any fees to investors, advisers or portfolio managers to follow and submit voting instructions on behalf of investors.
- 2.1.7 HUB24 will only vote when and as instructed by investors, or their advisers or portfolio managers.

## 2.2 Limitations of Voting Rights

2.2.1 Notwithstanding Clause 2.1.4 of this Policy, further limitations to these rights of voting apply:

- I. HUB24 CS does not permit an investor, an adviser, or a portfolio manager of a managed portfolio to act as a corporate representative for HUB24 CS in terms of voting. We only accept voting instructions from them, as described in clause 2.1.4, and we will attempt to lodge them via proxy voting if received in the manner and in the timeframes described in clause 2.1.4.
- II. HUB24 CS does not accept any liability for acting on an investor's, adviser's or portfolio manager'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 Services custodians, or application of more restrictive constraints for lodgement of instructions imposed on HUB24 CS such as a shorter time needed to lodge the instruction than that specified in this document).
- III. HUB24 CS 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.
- IV. HUB24 CS's Accessible 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 HUB24 CS cannot issue instructions regarding voting for Accessible Investments made by the pooled vehicle.
- V. HUB24 CS does not vote, nor does it permit voting, under any circumstances, in relation to holdings in HUB24 Limited.

## 3. Definitions

Term	Definition
<b>Accessible Investments</b>	Securities and investment products accessible via the Services
<b>AFSL</b>	Australian Financial Services Licence.
<b>ASIC</b>	Australian Securities and Investments Commission.
<b>ASIC Instrument</b>	ASIC Corporations (Investor Directed Portfolio Services) Instrument 2023/669.
<b>Board</b>	HUB24 CS Board.
<b>Business days</b>	A day that is not a Saturday, Sunday, bank holiday or public holiday in New South Wales, Australia.
<b>Corporations Act</b>	Corporations Act 2001 (Commonwealth).
<b>HUB24</b>	HUB24 Limited.
<b>HUB24 CS</b>	HUB24 Custodial Services Ltd (ABN 94 073 633 664).

Term	Definition
<b>HUB24 Group</b>	HUB24, the parent entity of the HUB24 Group of companies, and all of its subsidiaries.
<b>IDPS</b>	Investor Directed Portfolio Service as defined in the ASIC Instrument.
<b>Policy</b>	This policy document.

# 4. Policy Governance

---

## 4.1 Review Cycle:

- 4.1.1 This Policy is reviewed every two years, or more frequently if there is a significant change to the HUB24 strategy, operating environment or legislative updates.

## 4.2 Approval:

- 4.2.1 Amendments to the Policy are approved by the Board.