

Shareholder Rights Directive II

Pricing Disclosure

Introduction

In line with the national transpositions of Article 3d of Shareholder Rights Directive II (SRD II or Directive) (EU 2017/828), this disclosure outlines the standard fees that are charged for services provided by The Bank of New York Mellon (BNY Mellon).

The disclosure applies to BNY Mellon when we act in the capacity of an “Intermediary” under the Directive, and relates to corporate action and proxy voting services.

Unless otherwise specified, all fees are expressed in US dollars.

BNY Mellon makes provisions for the full range of services covered by Chapter 1a of SRD II, inclusive of identification of shareholders, the transmission of information and the exercise of rights.

As standard practice, the costs for the provision of many of these services are included within our safekeeping fees, so that in many cases there is no additional fee. Existing services and client arrangements will not be affected by this disclosure.

Charges for specific services relating to SRD II are outlined below:

- a) Shareholder Identification – Requests to disclose shareholder information do not incur any additional fees
- b) Transmission of information
 - a. Corporate Events – See below notification charges
 - b. Shareholder Meetings – See below notification charges
- c) Exercise of rights
 - a. Corporate Events – Should a corporate event require a security movement, see below Corporate Action transaction fees
 - b. Shareholder Meetings – See below Shareholder Meeting charges

Standard Shareholder Meeting (Proxy Voting) Charges:

Per Notification	\$5.00
Per Vote	\$10.00
Per Manual Vote	\$75.00

Corporate Action Notification Charges¹:

Per SWIFT Message	\$1.50
Per Facsimile Message	\$2.00

Corporate Action Transaction Fees

When there is a security movement as part of a Corporate Action event, clients will be charged only once, at their agreed transaction fee, regardless of the number of security movements required as part of the event.

Market	CORPORATE ACTION TRANSACTION FEE (USD) ²	Market	CORPORATE ACTION TRANSACTION FEE (USD) ²
Austria	\$25.00	Italy	\$13.00
Belgium	\$21.00	Latvia	\$90.00
Bulgaria	\$100.00	Lithuania	\$90.00
Croatia	\$90.00	Luxembourg	\$65.00
Cyprus	\$46.00	Malta	\$100.00
Czech Republic	\$90.00	Netherlands	\$12.50
Denmark	\$23.00	Poland	\$50.00
Estonia	\$50.00	Portugal	\$33.00
Finland	\$19.00	Romania	\$100.00
France	\$16.00	Slovakia	\$90.00
Germany	\$16.00	Slovenia	\$100.00
Greece	\$26.00	Spain	\$20.00
Hungary	\$50.00	Sweden	\$20.00
Ireland	\$16.00	United Kingdom	\$10.00

Appendix – Explanatory Notes

Footnotes

¹SWIFT messages related to Corporate Actions are: MT564–Corporate Action Notification, MT566–Corporate Action Confirmation, MT568–Corporate Action Narrative.

²Unless otherwise indicated, this fee information applies to listed equities that are held with the issuer CSD. For equities held outside of their local market (i.e., with an Investor CSD), higher or additional fees will apply as they fall outside of our standard global custody service.

Additional Notes

- The fees detailed above represent current standard fees that may be applicable on top of safekeeping fees with respect to our standard global custody offering. Individual client agreements may vary.
- Different fees will apply for non-standard servicing offerings or value-added service offerings, such as but not limited to, the holding of securities in an investor CSD, corporate trust and clearing services, or the combination of custody and collateral management service offerings.
- BNY Mellon will pass through to the client any out-of-pocket expenses including (but not limited to) local market proxy voting costs, postage, courier expenses, registration fees and costs associated with physical attendance at meetings. Please refer to the Out-of-Pocket Expenses Grid attached at the end of this document for further information.
- This disclosure applies to all legal entities through which BNY Mellon custody is contracted.
- All fees disclosed in this document may be subject to change going forward.
- All fees disclosed in this document are exclusive of VAT or other relevant sales tax.

Out-of-Pocket Expenses

Market	Fee Description	Fee Detail
All Markets Outside Service: Broadridge	<i>out-of-pocket Expenses</i>	USD Direct out-of-pocket expense. Example: Meeting attendance required by Broadridge. representative or agent contracted by Broadridge.
Austria	<i>Proxy Voting</i>	EUR 12 (<i>per account represented at a meeting</i>) for Austrian companies Possible additional travel expenses, if a meeting is held at a remote location, will be charged at cost.
Bulgaria	<i>Proxy Voting</i>	Meeting Attendance Service USD 500 (per meeting participation and per securities account represented). Third-party Attendance - USD 250 (per investor/securities account intending to participate in a meeting through their own arrangements). Instruction processing only USD 20 (per securities account and per meeting). If the meeting is held outside of Sofia, additional expenses charged at cost.
Croatia	<i>Proxy Voting</i>	USD 100 per meeting. If the meeting is held outside of Zagreb, additional expenses charged at cost.
Czech Republic	<i>Proxy Voting</i>	CZK 2,000 per account (USD equivalent).
Denmark	<i>Proxy Voting Fee per beneficial owner per re-registration</i>	DKK 50 (Any out-of-pocket expenses and third party fees directly linked to the proxy service will be added (e.g. translation, notary expenses, insurance, transportation, accommodation, third party charges,etc.) Where appropriate out-of-pocket expenses will be divided by the total number of clients the subcustodian will represent at the meeting).
Estonia	<i>Proxy Voting</i>	At cost.
Finland	<i>Proxy Voting Fee per beneficial owner per re-registration</i>	EUR 35 (Any out-of-pocket expenses and third party fees directly linked to the proxy service will be added (e.g. translation, notary expenses, insurance, transportation, accommodation, third party charges,etc.) Where appropriate out-of-pocket expenses will be divided by the total number of clients the subcustodian will represent at the meeting).
	<i>Proxy Voting</i>	EUR 80 per beneficial owner per meeting, i.e., per re-registration and notification to the company about the attendance at the meeting.
Greece	<i>Proxy Voting</i>	EUR 50 per general meeting.
	<i>Physical Attendance of Subcustodian Representative at a General Meeting.</i>	EUR 150 per meeting.
Hungary	<i>Proxy Voting</i>	USD 20 per proxy event plus travel and accommodation expenses related to proxy voting for meetings outside of Budapest, insurance and third party charges.
Latvia	<i>Proxy Voting</i>	At cost.
Lithuania	<i>Proxy Voting</i>	At cost (including translation of official documents relating to proxy).
Malta	<i>Proxy Voting</i>	EUR 41 per attendance.
Poland	<i>Proxy Voting</i>	EUR 130 per voting instruction. Any out-of-pocket expenses or third party fees directly linked to the proxy service will be added (e.g., translation, notary expenses, insurance, transportation, accommodation, third party charges, etc.). Where appropriate out-of-pocket expenses will be divided by the total number of clients the subcustodian will represent at the meeting.
		EUR 100 per voting instruction. Any out-of-pocket expenses or third party fees directly linked to the proxy service will be added (e.g. translation, notary expenses, insurance, transportation, accommodation, third party charges, etc.). Where appropriate out-of-pocket expenses will be divided by the total number of clients the subcustodian will represent at the meeting.
Romania	<i>Proxy Voting</i>	USD 75 plus out-of-pocket expenses. Any out-of-pocket expenses or third party fees directly linked to the proxy service will be added (e.g. translation, notary expenses, insurance, transportation, accommodation, third party charges, etc.). Where appropriate out-of-pocket expenses will be divided by the total number of clients the subcustodian will represent at the meeting.
Slovakia	<i>Proxy Voting</i>	EUR 100 per event plus third party costs.
Slovenia	<i>Proxy Voting</i>	EUR 115 per attendance plus transportation costs if outside of Ljubljana.
Sweden	<i>Proxy voting: Fee per beneficial owner per re-registration</i>	SEK 300 (Any out-of-pocket expenses and third party fees directly linked to the proxy service will be added (e.g. translation, notary expenses, insurance, transportation, accommodation, third party charges,etc.) Where appropriate out-of-pocket expenses will be divided by the total number of clients the subcustodian will represent at the meeting).
	<i>Proxy Voting</i>	SEK 750 per beneficial owner per meeting i.e. per re-registration and notification to the company about the attendance at the meeting.
United Kingdom	<i>Proxy Voting</i>	GBP 133 for the issuance of Letter of representation.

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