



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL JUSTICE AND CONSUMERS

The Acting Director General

Brussels,  
JUST/A3/KK-H/cp

Mr Guillaume Prache  
Managing Director  
BETTER FINANCE  
and co-signatories  
Email: [prache@betterfinance.eu](mailto:prache@betterfinance.eu)

**Subject: EU Investors against any postponement of the implementation of the Shareholder Rights Directive II**

Dear Mr Prache,

Thank you for the joint letter of 29 April 2020 from you and the co-signatories in which you warn about the risks of delay in the implementation of the Shareholder Rights Directive II (SRD II). This matter falls in the competence of the Commission's Directorate-General for Justice and Consumers.

You point out that the need to improve the communication between companies and their shareholders, including by implementing straight-through-processing in the chain of the intermediaries involved, has only become more pressing with the COVID-19 crisis. According to you in the current situation, SRD II-compliant market practices are urgently needed to enable shareholders to receive information on companies' annual general meetings and to cast their votes on time. You also draw our attention to the fact that, without being able to effectively exercise their rights to vote, shareholders will not be able to push investee companies towards sustainability and thereby to contribute to reaching the EU's sustainability objectives.

The points raised in your letter reflect well the objectives of the SRD II and its Implementing Regulation. It is beyond doubt that the COVID-19 pandemic has caused disruptions to the operation of the financial sector and of companies. It has also created new needs, including for improved procedures to participate and vote in general meetings remotely for an increased number of shareholders and companies. It is also worth recalling that the new obligations were adopted 3 years ago, and the minimum requirements for the market practices have been known since the adoption of the relevant Implementing Regulation in September 2018.

We are therefore confident that financial intermediaries and issuers should be able to deploy the procedures needed to comply with the Directive and the Implementing Regulation fully as from the date of application set out therein.

Yours sincerely,

Salla SAASTAIMONEN  
(*e-signed*)

c.c.: co-signatories of the letter received:

Asociata Utilizatorilor Romani de Servicii Financiare (AURSF)  
Associacao dos Investidores e Analistas Técnicos do Expert Corporate Governance Service (ECGS)  
Mercado de Capitais (ATM)  
Association pour l'amélioration de la retraite et de l'épargne (GAIPAR)  
Dansk Aktionærforening (DAF)  
Deutsche Schutzvereinigung für Wertpapierbesitz (DSW)  
Expert Corporate Governance Service (ECGS)  
Fédération des investisseurs individuels et des clubs d'investissement (F2iC)  
Interessenverband für Anleger (IVA)  
Malta Association of Small Shareholders (MASS)  
Osakesäästäjien Keskusliitto ry  
Samtök sparifjáreigenda (ISA)  
Sdružení českých spotřebitelů (SCS)  
ShareAction  
ShareSoc  
UK Shareholders Association (UKSA)  
Vlaamse Federatie van Beleggers (VFB)  
Vseslovensko združenje malih delničarjev (VZMD)