

NOTICE

Pursuant to Art. 75a, para. 5 of the Markets in Financial Instruments Act

Pursuant to Art. 75a, para. 5, in connection with para. 1 of the Markets in Financial Instruments Act (MFIA), the Board of Directors of investment intermediary BenchMark Finance AD decided not to adopt an engagement policy due to the following detailed reasons:

1. BenchMark Finance AD does not provide the portfolio management service to its clients, which is a mandatory condition for the adoption of such a policy.

According to Art. 75as, para. 1 an investment intermediary, which provides the portfolio management service, including shares of companies domiciled in a Member State, admitted to trading on a regulated market in a Member State, shall adopt and publish an engagement policy, as well as information on its implementation.

Given the text of the MFIA, the actual and actual portfolio management is a necessary condition for the adoption of an engagement policy, ie. it is not only the possibility under the license issued by the Financial Supervision Commission to provide investment portfolio management services, but their actual provision.

2. As can be seen from Art. 75a MFIA policy is a detailed document and its preparation and adoption requires compliance with the actual provision of the portfolio management service to clients. From 2011 until the date of this decision, with reasons on the Board of Directors, the portfolio management service shall not be provided by the investment firm.

3. The client structure of the company and the focus of the requested and provided services is not on portfolio management, due to the expressed will of the clients.

4. The company has not provided a client portfolio management service since 2011. At the time of preparation of this decision and the reasons of the Board of Directors, the investment intermediary does not plan to provide client portfolio management services as a leading service for the next three years.

5. Upon change of the direction of the activity of the investment intermediary and upon commencement of the provision of a portfolio management service, an engagement policy shall be immediately discussed, adopted and announced, meeting the conditions under Art. 75a, para. 2 of the MFIA.

The decision was taken by the Board of Directors on 21.09.2020 and the reasons for it should be publicly announced on the website of the investment intermediary, given the requirement of Art. 75a, para. 5 of the MFIA, within 7 days of their adoption.