

Egan-Jones Proxy Services

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Re: Response to Public Consultation on Best Practices Principles for Governance Research Providers

Egan-Jones Proxy is generally supportive of the Best Practice Principles for Governance Research Providers which have been developed in response to the European Securities and Markets Authority (“ESMA”) report published on February 19, 2013. Egan-Jones applauds the ESMA’s decision to seek such best practices from proxy advisory firms and has the following comments with respect to the specified Consultation Questions:

Question 16) Egan-Jones Proxy supports the principle that signatories should publicly disclose their research policies and voting guidelines.

Question 22) Egan-Jones Proxy supports the principle that signatories should publicly disclose communication policies with respect to issuers and to the media and the public.

Sincerely yours,

Kent S. Hughes
Managing Director