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Investor Access 2.0: The Post-MiFID II Playbook

How IR Teams Can Adapt, Compete, and Win in a Data-Driven Era

October 2025

Executive Summary

This white paper outlines the challenges IR professionals face in this new paradigm, particularly those working with small and mid-cap issuers, and presents actionable recommendations derived from data-driven insights to overcome these challenges and create value-enhancing investor access and engagement in the post-MiFID II environment.

The implementation of the Markets in Financial Instruments Directive II (MiFID II) in January 2018 fundamentally transformed the European investment landscape, creating significant challenges and opportunities for investor relations (IR) teams.

Since its implementation, IR professionals have seen a significant redefinition of corporate access, investor targeting, and investor engagement strategies.

Historically dominated by broker-led coordination, the landscape has evolved into a more complex and data-driven environment where issuers must take more proactive control of their investor outreach.

The combined effects of regulatory reform, the COVID-19 pandemic, and broader macro trends such as the rise of passive investing and more focus on investor stewardship and ESG-focused capital allocation have intensified these dynamics.

A Post-MiFID II World

Structural Shifts in Corporate Access Post-MiFID II

MiFID II's introduction in 2018 brought a decisive end to the long-standing practice of bundling corporate access and research costs into trading commissions.

As a result, sell-side firms adjusted their support for investor meetings, particularly those involving small and mid-cap companies, and redeployed corporate access resourcing to select institutional investor clients to commercialize their offering and avoid regulatory sanctions.

The regulatory change, while increasing transparency, significantly impaired traditional investor access mechanisms, forcing IR professionals to adapt their strategies, moving from a predominantly broker-facilitated approach to more direct engagement models.

Changes to Sell-Side Research Coverage Models

334

European companies lost all sell-side research coverage following MiFID II*

10-15%

reduction in analyst coverage for European firms relative to US counterparts

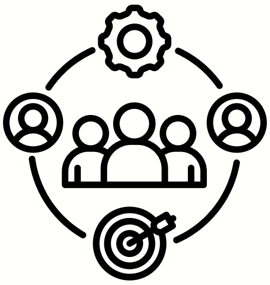
The impact, however, has not been uniform across market capitalizations, with large-cap firms experiencing the greatest reduction in overall coverage.

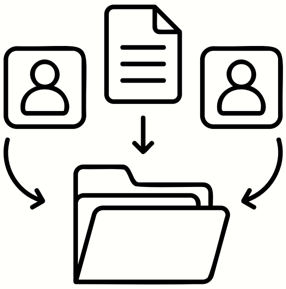
Small-caps have paradoxically benefited from select small-cap focused brokers trying to tap into the opportunity and the void created by large-cap brokers leaving the space, as well as an overall increase in coverage of small caps by company-sponsored research providers.

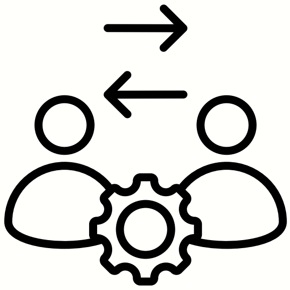
*CASS Business School: "*The Effects of MiFID II on Sell-Side Analysts, Buy-Side Analysts, and Firms*"

A Post-MiFID II World

Shifting Trends in Investor-Corporate Engagement Post-MiFID II*







Stakeholder	Pre-MiFID II (2018 Survey)	Post-MiFID II Shift
Corporates	59% expected direct meetings	**85%** now expect more direct institutional outreach
Investors	38% relied on company outreach	**54%** more reliant on companies contacting them
Investor Preference	50% favor broker-arranged meetings	**50%** now prefer issuer-IR direct meetings
Buy-Side Sell-Side Reliance	90% used sell-side corporate access	**52%** reducing sell-side reliance

*IR Society: "Buy-side expectations for corporate access under MiFID II"

The Buy-Side Research Squeeze

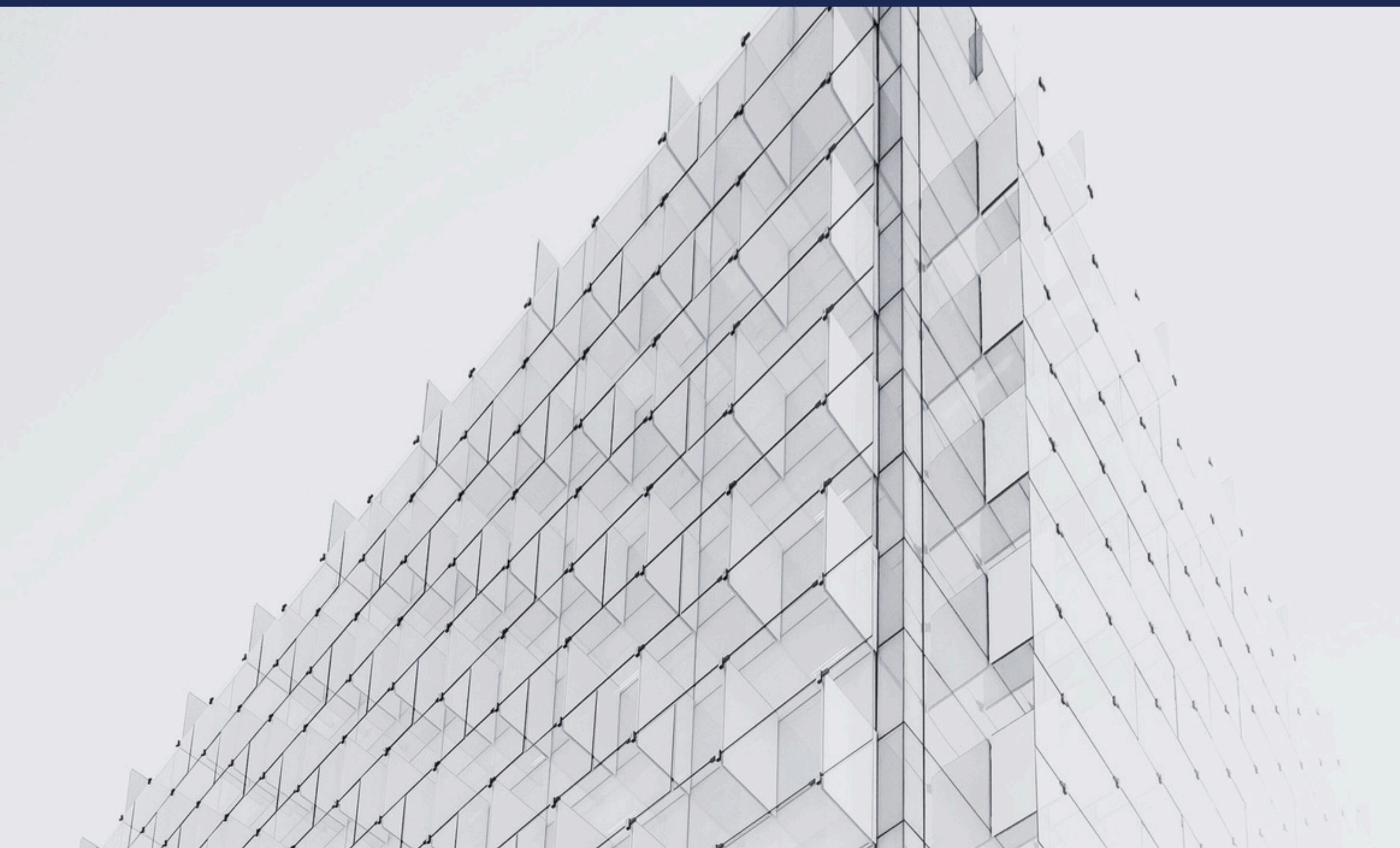
Greenwich Associates found* the European research market lost $300M in the first two weeks post-MiFID II, with average budget cuts of 6.3%—largest at big asset managers.

*Coalition Greenwich: “MiFID II has Shrunk European Equity Research Business By 20%”

11% Budget reduction for firms managing over €250 billion

8% Cuts by frms managing €20-250 billion

3% Budget cuts for firms managing €1-20 billion



Impact on Small & Mid-Cap Companies

Research consistently demonstrates that smaller companies face significantly greater challenges in the post-MiFID II environment. These challenges are multifaceted.

Research Coverage Decline

While overall European research coverage has decreased, the impact varies by company size. SME-focused research providers have been particularly affected, with many local brokerage houses - traditionally the main equity research providers for smaller companies - facing significant pressure.

Access to Investors

A recent survey of the Corporate Access landscape in Germany and Austria shows that small and mid-cap companies report increased difficulty in accessing investors. 56% of Small-, Mid- and Micro-cap companies* noting that investor access became more challenging. This is particularly problematic for companies seeking to broaden their investor base or maintain visibility in international markets.

Cost Implications

The explicit pricing of corporate access services has disproportionately affected smaller companies with more limited IR budgets. Many can no longer afford the same level of broker-supported investor engagement they previously accessed through bundled services. The greater administrative burden of managing direct engagement or outsourcing to specialist consultants is also marked.

Technology Constraints and Costs

The shift toward direct investor engagement has also created new technology and resource requirements for IR teams. Companies must now invest in:

- Customer Relationship Management (CRM) systems for investor targeting and tracking of meeting notes and details
- Digital communication platforms for virtual meetings and presentations
- Data analytics tools for investor behavior analysis
- Corporate access technology platforms for meeting coordination

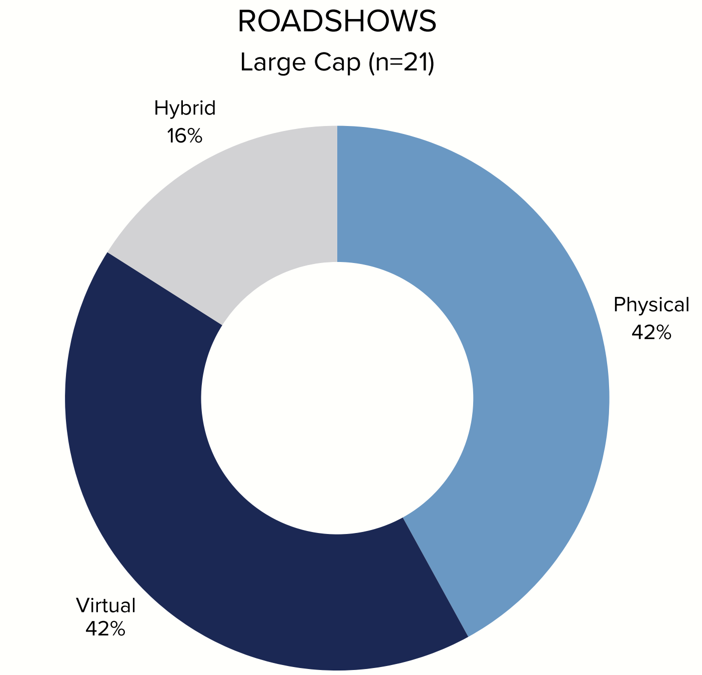
While large-cap issuers, with robust IR resources and sell-side support, remain largely unaffected post-MiFID II, small/mid-caps struggle for visibility. Their IR teams must now work more independently to sustain investor engagement.

*FH St. Pölten University of Applied Sciences and Embera Partners: “2024/25 Corporate Access and Investor Engagement Survey - Austria and Germany”

The Rise of Hybrid Engagement Models

The COVID- 19 pandemic catalyzed a transition from traditional, travel- intensive investor interactions to the incorporation of virtual engagement models.

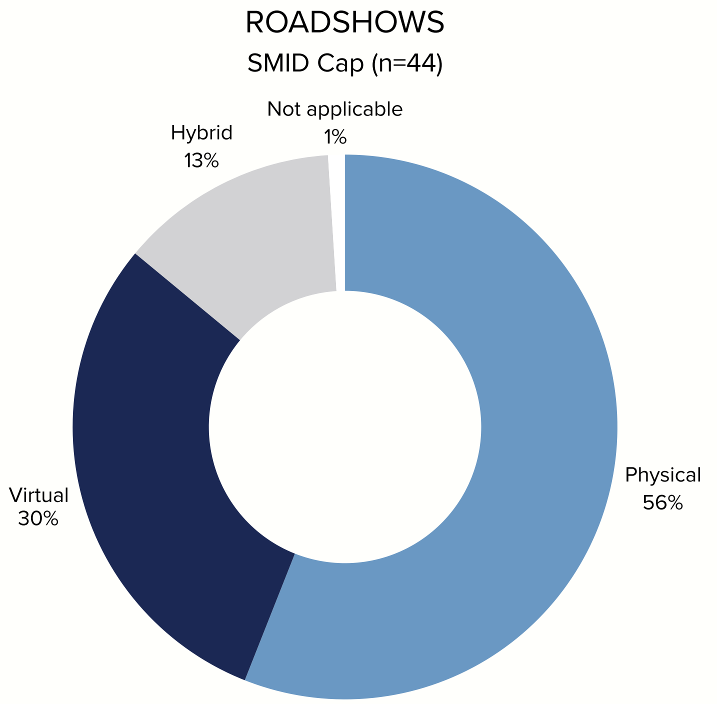
Companies swiftly adopted video conferencing for virtual roadshows and conferences, revealing new efficiencies in investor outreach.



Virtual formats enable broader reach, particularly for small- cap companies that might lack the resources for extended travel.

However, face- to- face meetings remain vital for critical engagements and deepening investor relationships, building trust and facilitating high- conviction investment decisions.

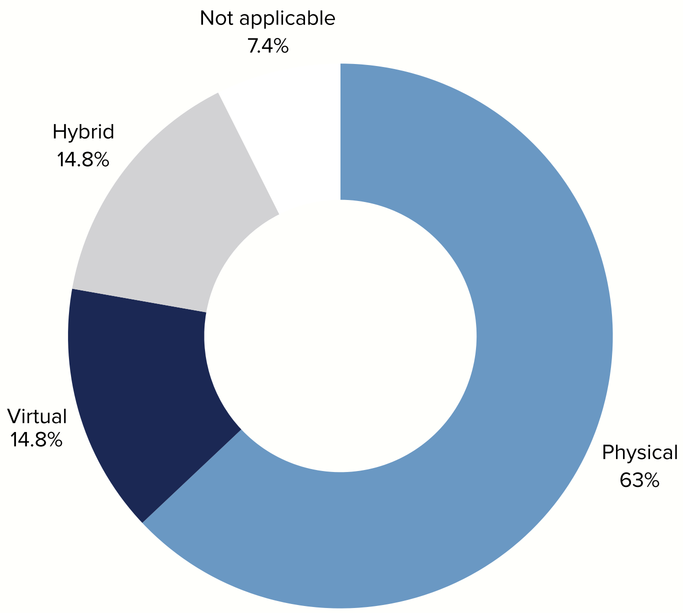
A hybrid approach has therefore emerged as the new standard.



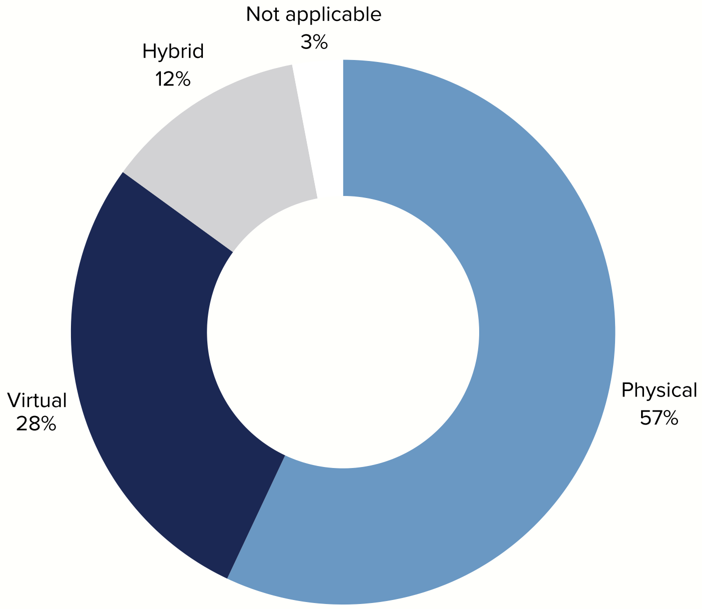
*FH St. Pölten University of Applied Sciences and Embera Partners: "2024/25 Corporate Access and Investor Engagement Survey - Austria and Germany"

The Rise of Hybrid Engagement Models

SELL-SIDE CONFERENCES
Large Cap (n=21)



SELL-SIDE CONFERENCES
SMID Cap (n=44)



The overall decrease in broker-supplied corporate access has driven company IR teams to more carefully curate their schedules.

With competition for capital amongst small and mid caps at an all time high, it has consequently become even more important for IR professionals to utilize data driven AI models to forensically evaluate investor targets and opportunities in order to prioritise and segment outreach.

The future of corporate access lies in balancing the efficiency of digital tools with the relational depth of physical meetings.

Investor Targeting

Fundamental Alignment is Key

In the evolving landscape of capital markets, small and mid-cap companies can no longer rely solely on traditional sell-side coverage to drive investor engagement. In this context, **effective investor targeting has become a strategic priority** - one increasingly powered by data analytics rather than intuition or surface-level peer comparisons.

Yet, conventional targeting approaches—such as focusing on funds with large existing holdings in a given sector or industry—often fail to identify the investors most likely to initiate new positions. Recent academic research challenges these long-standing assumptions. A notable study in IR Update Magazine* found that funds with low but non-zero exposure to an industry are significantly more likely to initiate new positions in that space than those already heavily invested.

Industry Exposure and Subsequent Initiation

Industry Exposure	None	Minimal 1st Quartile	Low 2nd Quartile	Moderate 3rd Quartile	High 4th Quartile
Rate of Initiation	0,5x	2.8x	2.2x	1.5x	1.0x

Funds with no exposure initiate at half the rate of random

Minimal exposure initiates at 2.8x High Exposure

Funds with High exposure initiate at the same rate as random

*Fitzpatrick, Brendan (May 2025). Corporate Access, Investor Targeting and Stock Selection, IR Update Magazine, Spring 2025 Edition, 38-43.

The Case for Fundamental Targeting

Investor Relations teams need a more forensic, data- driven approach- one rooted in the alignment between a company's key performance indicators (KPIs) and the investment behavior of potential shareholders, in order to either prioritize meeting demand (usually large caps) to ensure efficient use of management time, or to ensure that meetings with investors can be independently identified which actually create impact and lead to initiation of positions.

This method, known as fundamental targeting, focuses on identifying funds whose current portfolios closely match the fundamental characteristics of the issuer.

Instead of classifying funds by style labels (e.g., value or growth), we measure the statistical alignment- or Fitzcore- between a company's fundamentals and the fundamentals of the securities a fund already owns. Attributes considered include growth rates, valuation multiples, profitability metrics, risk profiles, and return trends.

The graphic above illustrates the alignment between a single fund and a single security. The closer the blue shading extends to the outer circumference, the stronger the alignment across each KPI.

"Fitzcore" defined as a percentile ranking, relative to all portfolios, of the alignment between the attributes of the portfolio's current holdings and the attributes of a specific company or ticker symbol.

The Case for Fundamental Targeting

Fitzcores applies this methodology at scale, analyzing the alignment between all funds and all securities- approximately 95 million fund- security combinations. Testing shows a strong correlation between overall KPI alignment and the subsequent initiation of positions.

The data reveals a compelling pattern: **fund- security pairs with the highest fundamental alignment are nearly nine times more likely to result in a new position** than the average pair. In other words, targeting investors based on strong fundamental fit significantly outperforms traditional methods that rely primarily on sector or industry exposure.

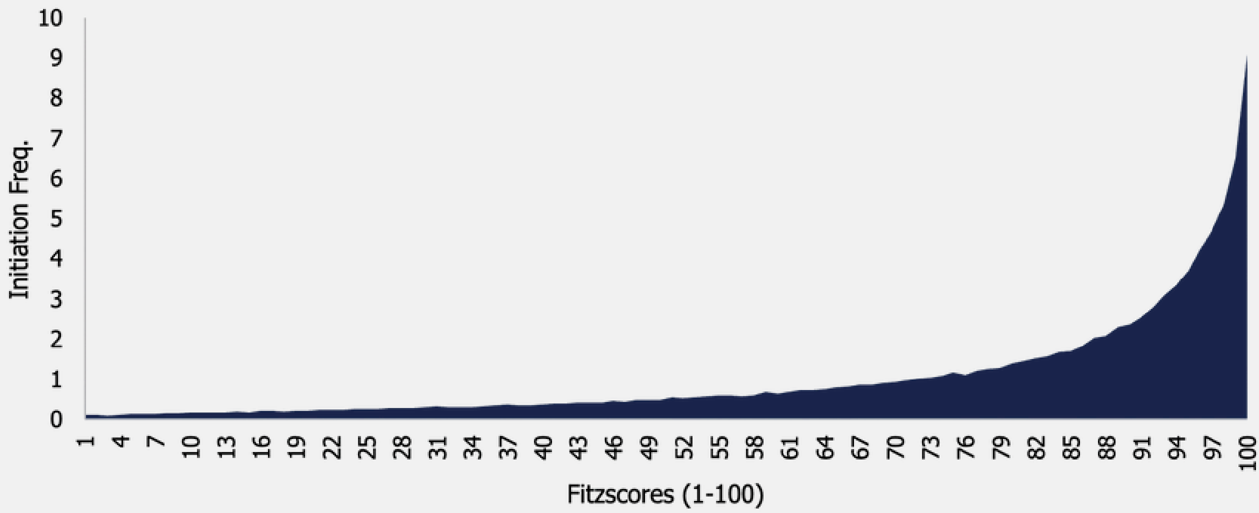
This relationship holds consistently across the full range of alignment scores. At the top end of the scale, the initiation rate peaks at more than 9× the average rate of initiation.

We also observe a clear break- even threshold at a Fitzcore of approximately 71. Above this level, funds are statistically more likely than average to initiate a position; below it, the odds decline.

Since a large portion of the fund universe scores below this line, focusing efforts on high- scoring targets is critical for maximizing return on outreach.

The takeaway is straightforward: not all investor meetings are created equal. A targeted approach rooted in fundamental alignment enables IR teams to prioritize the investors most likely to act- and avoid spending valuable time on those who are unlikely to engage.

Fig.1: Relative Initiation Rate for Non-Owning Fund-Security Pairs

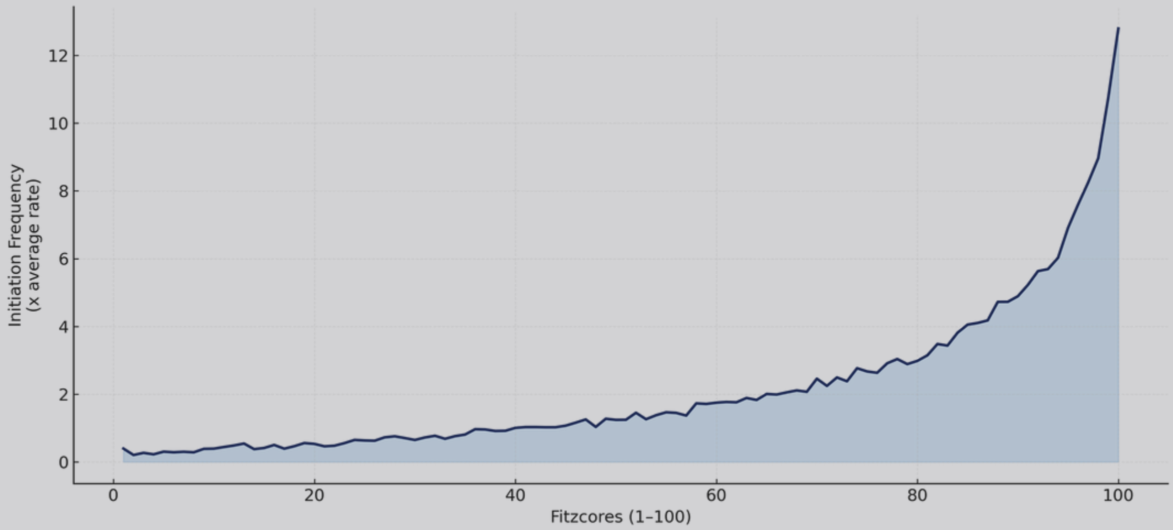


The findings showed a direct correlation: as Fitzcore increases, so does the probability of initiation.

*Fitzcores: Embera Partners' investor targeting model
"Fitzcore" defined as a percentile ranking, relative to all portfolios, of the alignment between the attributes of the portfolio's current holdings and the attributes of a specific company or ticker symbol.

Enhancing Predictive Power with Industry Exposure Filters

Fig.2: Initiation Rate for All Non-Owning Fund-Security Pairs (funds with low but some industry exposure)



While fundamental alignment is the cornerstone of effective targeting, its predictive power can be further sharpened by incorporating contextual filters- for example around existing industry exposure. As noted earlier, funds with low but non- zero exposure to a given industry are more likely to initiate new positions than those that are already heavily invested or entirely absent from the space.

When we apply this filter in tandem with the fundamental alignment, the impact is striking.

Among fund- security pairs with perfect fundamental alignment (Fitzcore = 100), those with low- but-some industry exposure initiated positions at a rate 14.6× the average- compared to 8.8× for similarly aligned pairs with no such exposure.

In other words, layering in this filter produces a 66% increase in predictive effectiveness relative to using fundamental fit alone.

This finding reinforces the value of a multi- dimensional targeting model- one that doesn’t rely solely on sector exposure or raw fundamentals in isolation, but intelligently combines both to identify high- probability opportunities for investor engagement.

"Fitzcore" defined as a percentile ranking, relative to all portfolios, of the alignment between the attributes of the portfolio’s current holdings and the attributes of a specific company or ticker symbol.

From Insight to Action: Reframing Targeting Strategy

The evidence is clear: targeting based on fundamental alignment delivers significantly higher returns than traditional methods. When enhanced with intelligent filters- such as low- but- some industry exposure- the predictive power improves even further, providing IR teams with a more accurate roadmap for investor engagement.

This approach redefines targeting from a blunt outreach exercise into a precision- guided process. Rather than casting a wide net based on assumed interest, IR professionals can now focus on a refined list of high- probability opportunities- backed by data and proven to correlate with actual investment behavior.

Practical Implications for IR Strategy

Translating these insights into day- to- day targeting decisions has measurable ROI implications.

For example:
A single meeting with a high- Fitzcore, low- industry- exposure fund has the same statistical initiation potential as 15 random meetings- or roughly three full days on the road.

By optimizing for fundamental fit, companies can:

- Prioritize their most valuable investor opportunities
- Reduce wasted outreach and travel
- Convert meetings into meaningful ownership outcomes

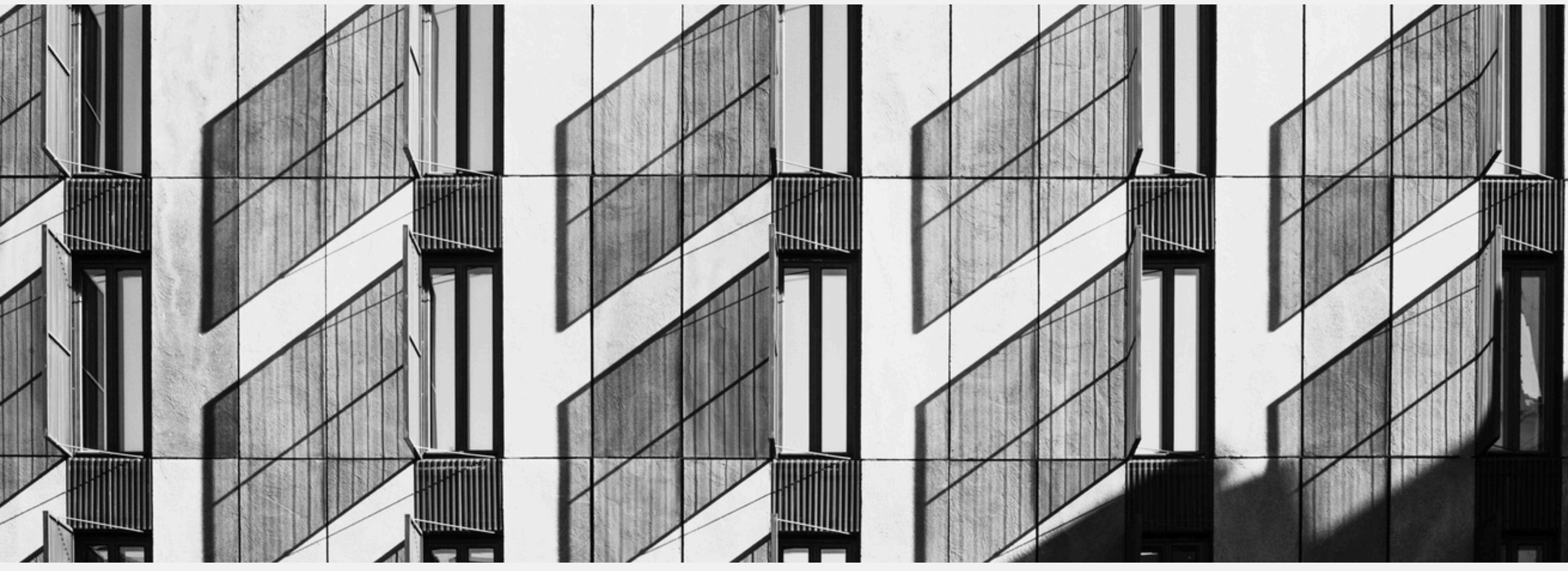
Strategic Takeaways

- Avoid outreach to funds already saturated in your sector- their likelihood of initiating a new position is statistically low.
- Focus on investors with high fundamental fit and low- but- some exposure- they offer the highest probability of engagement.
- Use data and technology to scale targeting- AI, big data platforms, and predictive analytics can transform targeting into a repeatable, measurable process.

The New Standard in Investor Targeting

In today's capital markets- defined by tighter resources, increased competition, and greater expectations for IR performance- adopting a fundamentally aligned, data- driven targeting strategy isn't just a best practice. It's a necessity.

Focusing on investors who not only match your story but are statistically primed to act is how modern IR drives results. When you align strategy with predictive insight, targeting becomes not just more efficient- but more effective.



Stakeholder Adaptation & Macro Trends

The transformation of corporate access has elicited varying responses across stakeholder groups.

Buy - side Investors

Generally receptive to direct engagement, provided that meetings are well- prepared and relevant. Time constraints have made them ever more selective, reinforcing the importance of precise targeting. Targeting specific fund managers/coverage analysts and knowing corporate access processes specific to each institution are a must. Many buy-side teams have built internal corporate access departments, often led by historic sell- side analysts and corporate access experts, in order to facilitate direct engagement between corporate issuers and the internal fund managers.

Sell - side Intermediaries

Have pivoted toward curated access for large- cap clients, and become much more selective over small and mid- caps as a result. Mid- tier brokers and boutique firms are filling gaps for smaller issuers, often through fee- based or subscription models, often also supported by stock exchanges in their respective initiatives to enable smaller- capitalized companies with research and corresponding* access.

Macro Trends

The rise of passive investing, contraction of sell- side coverage, and increasing focus on ESG have materially altered the dynamics of investor engagement. Additionally, increased scrutiny on supervisory boards, the governance profile and themes as incentive structures or remuneration systems, board independence or audit- rotation have intensified investor stewardship activities and all demand more proactive investor engagement from the corporate side, using different persona's to do so.

Engaging with passive investors

Over the past decade, capital markets have undergone a structural shift, with passive investing gaining substantial ground over active management. Today, passive vehicles such as ETFs and index funds represent more than half of equity assets under management in many developed markets. This transformation has led to a reconfiguration of how issuers approach investor engagement.

*SIX Swiss Exchange Stage Program

What’s changed?

Historically, corporate access was driven by active managers seeking bespoke insights to guide investment decisions.

However, passive investors, who we often reference as “IR- immune”, often track benchmarks rather than trying to beat them, typically don’t engage based on financial performance forecasts.

Instead, their focus lies in long- term governance, transparency, and sustainability practices with their status as universal owners trying to enhance value creation by also focusing on extra- financial factors. Furthermore, they also engage in share lending, being a key- counterparty to active owners.

Best practice

Companies are now tailoring investor relations efforts to include dedicated passive investor engagement strategies. This involves:

- ☑ Regular dialogue with stewardship teams at passive funds (e.g. BlackRock, Vanguard, State Street but also quantitative investors as Dimensional Fund Advisers, AQR or Acadian).
- ☑ Clear and proactive disclosure on governance, board structure, and long- term capital allocation as well as ESG.
- ☑ Preparing materials that align with passive investors’ proxy voting frameworks and engaging with their stewardship teams, presenting IR alongside the supervisory boards in order to reduce governance risk and position the investment story from this perspective.

Governance and ESG roadshows: from Optional to Essential

The rise in stakeholder capitalism and regulatory scrutiny has made governance and ESG- focused investor interactions a cornerstone of modern corporate access strategy. Following the implementation of MiFID II in Europe, many buy- side firms push issuers to take direct control of their investor engagement, including ESG and governance- focused meetings, which usually involve additional personnel, require different preparation and timing

What's changed?

Post- MiFID, investor access is less intermediated, meaning companies now own more of the engagement process. Governance and ESG- related roadshows continue to have limited sell- side driven support and are mostly organised by companies directly or independnet third- parties.

Concurrently, the surge in ESG- focused funds and stewardship expectations from institutional investors has created a demand for non- financial disclosures.

Best practice

Governance and ESG roadshows have emerged as a critical tool for IR teams, often co- led by the Head of IR together with members of the supervisory board, General Counsel, and Sustainability Officer.

Key elements include:

- ☑ Direct meetings with governance and stewardship teams, usually in Q4 or Q1
- ☑ Disclosures aligned with TCFD, SASB, or CSRD frameworks and the corresponding ratings and scores which are often used by the buy- side and the capital markets ecosystem
- ☑ Focused discussions on topics incl board diversity, executive compensation, and climate transition planning.

Case in point

Österreichische Post AG (Austria) — ESG Leadership as a Capital Markets Narrative.

Working closely with Embera Partners, Österreichische Post developed a structured investor communication strategy that placed ESG at the center of its corporate narrative. The teams collaborated to help shape the approach so that sustainability priorities were directly linked to operational excellence and long-term value creation.
As a result, the company launched its “ESG Leadership” presentation — a dedicated set of materials for investor dialogues and capital market events.

The presentation highlighted concrete progress on decarbonization (a 21% year-on-year reduction in logistics-related emissions in Austria), fleet electrification, and circular packaging. Importantly, ESG targets were embedded into management incentive structures and reinforced through a clear governance framework.
This structured communication — functioning much like a dedicated ESG roadshow — allowed investors to clearly see the connection between sustainability, profitability, and competitiveness in e-commerce logistics. The outcome: stronger ESG ratings, enhanced capital markets positioning, and recognition of Österreichische Post as a sector leader in sustainable transformation.

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Recommendations for IR Professionals

Immediate Actions: 0-6 months

Adopt a Direct Engagement Mindset

Develop a robust strategy for direct outreach, personalized to investor preferences and mandates, combined with traditional broker support to maximize exposure. For larger IR teams this can be done internally, but smaller teams can outsource support from specialist corporate access consultants to execute a strategic programme of cold calling, email outreach, and support of meeting preparation. This represents a significant skill shift from the traditional broker-facilitated model.

Investor Database Development

Establish a comprehensive investor database including current shareholders, potential investors, and key decision-makers. Successful companies have invested in data- driven investor targeting, using platforms that provide detailed institutional investor profiles, targeting methodologies and contact information. This approach allows for more precise targeting of relevant investors based on investment style, geographic focus, and sector preferences.

Diversify Access Channels

Leverage digital tools to optimize visibility, including enhanced corporate websites with investor-focused content, virtual investor meetings, and digital investor days. The shift toward digital engagement has accelerated post-COVID- 19, with many companies finding virtual formats more cost-effective and accessible. Meanwhile, 74% of investors now rely more heavily on corporate websites for company information.

Segment Management Involvement

Reserve executive time for high-impact meetings while empowering IR teams to lead preliminary engagements.

Recommendations for IR Professionals

Medium - term Strategies: 6 - 18 months

Utilize Data and Portfolio Analytics

- **Evaluate Every Investor:** Leverage tools that enable analysis of fund exposure, investment styles, and ESG alignment. Alternative corporate access platforms have emerged to provide direct connectivity between companies and investors without broker intermediation. One 1x in- person meeting can out- weigh an entire day's schedule of meetings, if it is with the right investor and contact. Advanced IR teams are implementing sophisticated CRM systems that integrate investor data, meeting history, and performance analytics to optimize engagement strategies.

- **Measure Outcomes:** Implement these CRM systems to track direct investor interactions and assess the ROI of access initiatives from direct, broker, and corporate access specialist strategies.

Capital Markets Day Programs

Develop regular capital markets day programs to provide in- depth company overviews for investors. These events have become increasingly important as 56% of investors view them as effective visibility tools.

Alternative Research Coverage

Explore partnerships with independent research providers or sponsored research arrangements to maintain analyst coverage, particularly important for smaller companies.

Recommendations for IR Professionals

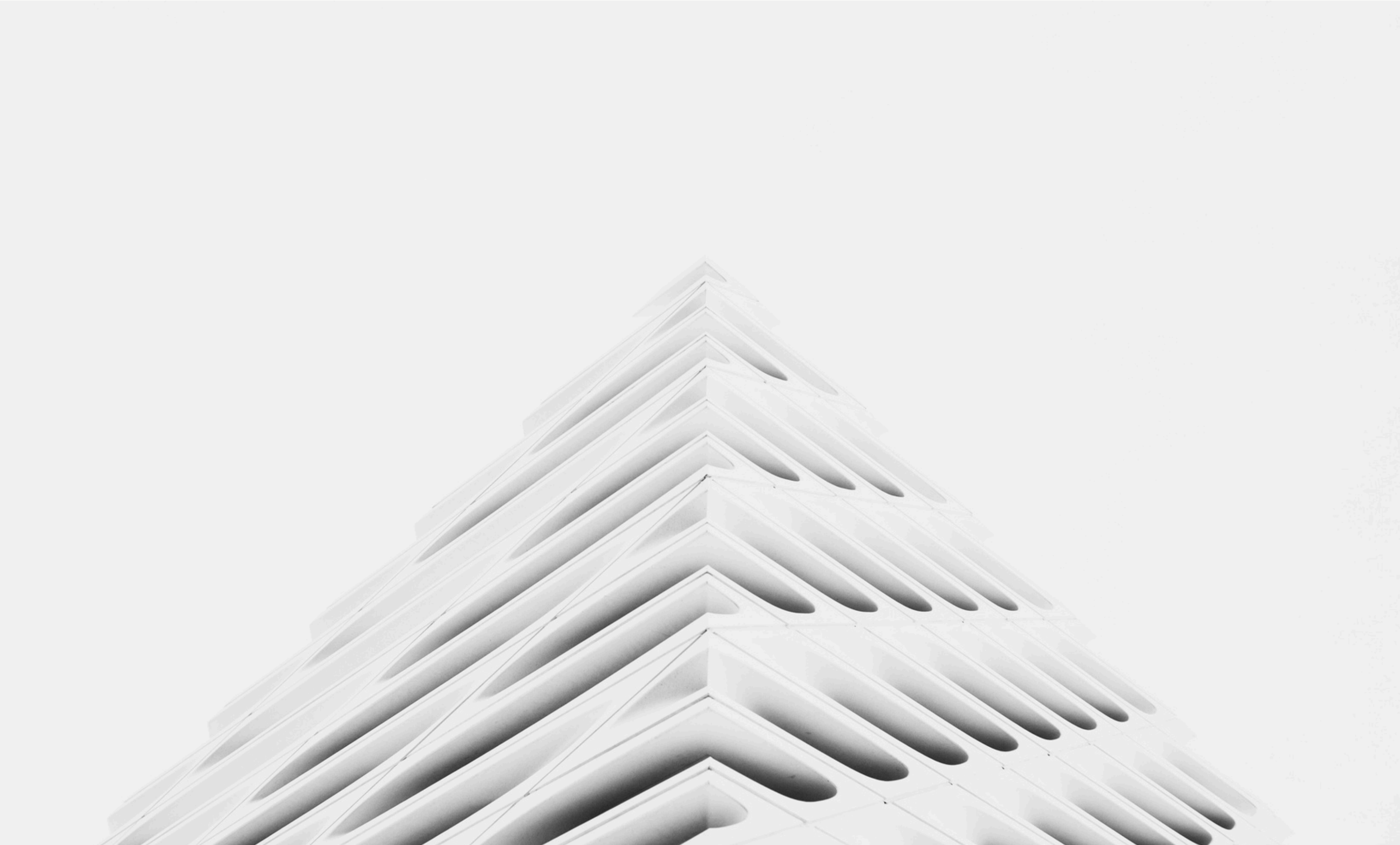
Long- term Strategic Initiatives: 18+ months

IR Team Expansion and Specialization

Consider expanding IR team with specialists in digital engagement, data analytics, and direct investor relations. Many larger market cap companies are creating dedicated investor targeting roles.

Expand ESG Integration

Integrate ESG reporting and narratives into IR strategies and communications, as this has become a key investor focus area and differentiator. Be prepared for thematic ESG discussions with investors.



Conclusion

Navigating the New Normal

MiFID II has irrevocably altered the corporate access landscape in Europe, demanding a more deliberate and data- savvy approach from IR professionals. While the challenges are significant, they are not insurmountable. The most successful IR teams will be those that proactively manage their investor relationships, embrace hybrid engagement models, and refine their targeting strategies using modern data tools.

In an increasingly competitive capital markets environment, the ability to control and optimize investor engagement has become a key differentiator. For IR professionals, mastering this new paradigm is not just a necessity- it is an opportunity to elevate their strategic value within the organization and the market.

The evidence suggests that successful adaptation requires a combination of strategic thinking, technology investment, and operational excellence.

Companies that embrace direct investor engagement, invest in appropriate technology solutions, and develop sophisticated targeting capabilities are best positioned to thrive in the post- MiFID II environment.

For small and mid- cap companies, the challenges are more pronounced, but the opportunities for differentiation and improved investor relationships are equally significant. By implementing the strategic recommendations outlined in this paper, IR professionals can not only navigate the post- MiFID II landscape successfully but also build stronger, more direct relationships with their investor base.

Bottom line: The regulatory environment will continue to evolve, but the fundamental shift toward greater transparency and pro- active direct engagement appears permanent.

About the Authors

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Managing Partner

Andreas is Embera's Managing Partner and Founding Member with a deep expertise in data-driven advisory solutions. He has +25 years of experience working with international companies, predominantly focused on strategically helping clients build their cap-tables, reducing risk and increasing opportunities to activate investors to support the clients' case.

George Carswell
Senior Adviser

George is Senior Adviser at Embera with a focus on investor access and bespoke roadshow execution for international corporates. George has +25 years of experience in corporate access and equities marketing, leading Barclays' EMEA corporate access team and developing Goldman Sachs and J.P. Morgan's businesses before that. George leads Embera's investor access solutions.

Michael Oplustil
Senior Adviser

Michael has +20 years of experience in investor relations and banking, having led Uniqa Insurance's IR program, prior to which he spent time at Erste Bank's IR team and Deutsche Bank investment banking. Michael works closely with clients on investor targeting and corporate access requirements and strategically advises IR teams on global equities marketing.

Brendan Fitzpatrick
Senior Adviser

Brendan is a leading expert in the field of investor targeting. Over his 30-year career, thousands of executives have relied upon his work to informand improve their investor engagement efforts. Brendan createdBuysideIQ, before founding Fitzcores, the most accurate, transparent andeasy to use targeting data platform of its kind. Brendan received an MBAand a Masters in Public Policy, both from the University of Michigan.

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Thank you for taking the time to read this report.
If you have any questions or would like to discuss our findings further, please don't hesitate to reach out to us.

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