

Access independent research to vote client proxies in line with fiduciary obligations

EASILY ALIGN WITH SEC PROXY VOTING GUIDANCE

- Perform due diligence
- Review and validate third-party recommendations
- View historical voting trends
- Vote in client best interests
- Simplify voting from start to finish
- Maximize transparency at every step

PUTTING CLIENT BEST INTEREST FIRST

In August 2019, the SEC issued new interpretive guidance to assist investment advisors in fulfilling their proxy voting responsibilities and clarify the status of proxy advisory firms' recommendations. The new guidance aims to create more transparency around the proxy advisory recommendation process and provide best practices and regulatory obligations for advisors who exercise vote authority on behalf of clients. Here's what it means moving forward:

Investment advisors—You still have the option to vote on behalf of clients. However, the new guidance makes clear that advisors who assume vote authority must:

- Fulfill fiduciary obligations.
- Define explicit voting policies and procedures.
- Publish or make available voting policies and procedures.
- Stipulate any reliance on third-party proxy advisory firms.
- Vote in client best interest and in accordance with defined policies and procedures.

Proxy Advisory Firms—The new SEC guidance confirms that recommendations are considered “solicitations” under relevant securities law. Therefore, proxy advisors can't make materially false or misleading statements or omit material facts. To maximize transparency, SEC requires proxy advisory firms to:

- Define and describe the methodology used to formulate voting advice/recommendations.
- Identify whether the advice is based on information beyond the registrant's public disclosures (e.g., outside third-party research/provider information).
- Disclose material conflicts of interest that arise in connection with voting advisory services in enough detail so that clients can assess the relevance of those conflicts.

PERFORM INDEPENDENT RESEARCH BASED ON HISTORICAL VOTING TRENDS

Proxy Policies and Insights is a comprehensive research tool that helps you conduct oversight of third party advisory recommendations by enabling you to:

- Track historical industry voting trends.
- Conduct due diligence.
- Inform internal advisory boards.
- Review and validate third-party vote recommendations.
- Identify potential conflicts of interests.

SIMPLIFY VOTING TO MAXIMIZE CONTROL AND CONFIDENCE

The ProxyEdge voting platform puts more information at your fingertips to ensure every vote adheres to your internal policies. This solution helps to:

- Access third-party advisory vote recommendations.
- Integrate Proxy Policies and Insights to easily access historical voting trends.
- Vote client proxies in accordance with your stated policies.
- Streamline and simplify the voting process.
- Track all votes with comprehensive reporting tools.

Our reporting solutions create a full audit trail, enabling you to maximize transparency to clients and stakeholders. With ProxyEdge and Proxy Policies and Insights, you can demonstrate how every vote complies with published policies and guidelines from an industry trusted resource.

CONTACT US

For a detailed demonstration or more information, please contact us at +1 855 252 3822, or visit our website at Broadridge.com.

Broadridge provides third party research and other tools to help investment advisors fulfill their proxy voting obligations. Broadridge Proxy Policies and Insights, a complementary service to ProxyEdge, provides access to historical voting trends and the ability for firms acting on behalf of their clients to create their own data-driven rules.

Broadridge is not a proxy advisor and does not provide recommendations.

Broadridge, a global Fintech leader with over \$4 billion in revenues and part of the S&P 500® Index, provides communications, technology, data and analytics. We help drive business transformation for our clients with solutions for enriching client engagement, navigating risk, optimizing efficiency and generating revenue growth.

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Communications
Technology
Data and Analytics

