



7 Steps to prepare for Form N-PX compliance

Before the August 2025 deadline

1. APPLICABILITY

- Confirm whether your firm is required to file Form N-PX:
 - Are you a registered investment company?
 - Are you an institutional investment manager that files Form 13F?
- Identify **applicable reporting entities** within your firm structure

2. SCOPING

- Catalog all accounts where you **have voting authority**.
- Identify third-party managers or sub-advisors involved in proxy voting.
- Determine whether you **voted** (or had the ability to vote) on shareholder resolutions during the reporting period.

3. POLICIES

- Ensure your **proxy voting policies and procedures** are up to date and reflect the latest SEC rules.
- Document procedures for tracking **say-on-pay votes**, vote rationales, and abstentions.
- Align recordkeeping with **new data formatting** requirements (XML tagging, etc.).

4. VOTING DATA

- Gather relevant **vote data** from:
 - Portfolio management systems
 - Custodians/proxy voting service providers
 - Internal spreadsheets or governance teams
- Ensure **vote-level detail** includes issuer name, security, resolution, vote cast, rationale (if applicable).

5. DATA ACCURACY

- Cross-check voting records for **accuracy and completeness**.
- Standardize naming conventions and formats in line with **SEC XML schema**.
- Confirm that **no-vote positions** are captured (you may still need to file a notice).

6. TECHNOLOGY

- Assess whether your current systems support automated **XML generation** and **EDGAR filing**.
- Consider compliance or RegTech solutions to reduce manual errors and maintain audit trails.
- Test run the process **well ahead of the August 31 deadline**.

7. FILING

- Finalize and validate the XML file in line with SEC filing standards.
- Submit the Form N-PX via EDGAR.
- Keep detailed **internal documentation** for audit or investor inquiries.
- Create a **post-filing review checklist** and plan for continuous process improvement.

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