

# ProxyVote **Plus**, LLC



P.O. Box 2458  
Northbrook, IL 60065-2458  
Tel. 847.525.8472  
Fax 847.513.9929  
[www.proxyvoteplus.com](http://www.proxyvoteplus.com)

This brochure was last updated on March 12, 2026

**This brochure provides information about the qualifications and business practices of ProxyVote Plus, LLC ("ProxyVote Plus"). If you have any questions about the contents of this brochure, please contact us at the phone number listed above or [gedmunds@proxyvoteplus.com](mailto:gedmunds@proxyvoteplus.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. ProxyVote Plus is registered with the SEC as an investment adviser; however, please note that such registration does not imply a certain level of skill or training.**

**Additional information about ProxyVote Plus is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## TABLE OF CONTENTS\*

A.	ADVISORY BUSINESS .....	2
B.	FEES AND COMPENSATION .....	2
C.	PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT .....	3
D.	TYPES OF CLIENTS .....	3
E.	METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS .....	3
F.	DISCIPLINARY INFORMATION .....	3
G.	OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS .....	3
H.	CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING .....	3
I.	BROKERAGE PRACTICES .....	4
J.	REVIEW OF ACCOUNTS.....	4
K.	CLIENT REFERRALS AND OTHER COMPENSATION .....	4
L.	CUSTODY .....	4
M.	INVESTMENT DISCRETION .....	4
N.	VOTING CLIENT SECURITIES .....	4
O.	FINANCIAL INFORMATION.....	6

---

\* A NOTE ABOUT THE FORMAT OF THIS BROCHURE: The SEC requires all investment advisers to organize their disclosure documents according to specific categories, some of which may not pertain to a particular adviser's business. Where a required category is not relevant to our business, we list the category and state that it does not apply.

## ***A. ADVISORY BUSINESS***

Established in 2002, ProxyVote Plus is a proxy-voting service whose key personnel have decades of experience. The company is principally owned by its founder, Craig Rosenberg.

ProxyVote Plus's primary business is providing discretionary proxy voting services to pension, health and welfare, annuity and profit-sharing plans. These services include coordinating with clients' custodial banks to receive plans' proxies, analyzing the issues included on the proxy ballot, determining the appropriate votes based on proxy voting guidelines developed to protect the interests of the plans' participants and beneficiaries, and then executing the votes. Each client is provided on an annual basis, a detailed proxy voting report that identifies all votes cast for the client and the rationale for each vote. Please refer to Section N below for more information on our primary proxy voting services.

ProxyVote Plus also offers non-discretionary vote recommendation services on a limited basis, and in the company's sole discretion. In this regard, ProxyVote Plus furnishes analysis and vote recommendations regarding a limited number of ballot issues as to which a client has an actual or perceived conflict of interest. In such cases, ProxyVote Plus's advice is based on the client's own proxy voting policies.

Also on a limited basis and in the company's sole discretion, ProxyVote sometimes assists clients and other Taft-Hartley funds in researching and sponsoring shareholder proposals.

In addition to the foregoing, ProxyVote Plus provides certain non-advisory services to clients that are not investment advisory clients of the firm.

## ***B. FEES AND COMPENSATION***

Annual fees for discretionary advisory services typically range from \$1500 to \$2000 for each equity investment portfolio. For example, if a client paying \$2000 per portfolio utilizes three investment managers to invest its funds, the comprehensive annual fee will be \$6000. However, higher fees may be charged for portfolios that involve an unusually large number of votes; the fees for such portfolios shall be subject to negotiation between ProxyVote Plus and the client. We also may charge fees lower than the standard ones where the circumstances so warrant. For example, fees for voting portfolios comprised exclusively of mutual funds generally run from \$500 to \$1500 a year.

ProxyVote Plus charges fixed fees for its non-discretionary and shareholder proposal advisory services, as negotiated between the parties.

ProxyVote Plus usually bills for services quarterly in arrears, although we may instead bill quarterly in advance if the client and we so agree. In addition, fees less than \$1200 may be billed annually in advance. Clients may cancel contracts for discretionary proxy services upon 30 days' advance written notice, and pro-rata adjustments to quarterly fees will be made for contracts terminated during a quarter.

***C. PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT***

This item does not apply to our business.

***D. TYPES OF CLIENTS***

Our discretionary services clients are pension, health and welfare, annuity and profit-sharing plans and unions. Non-discretionary advisory services are provided to asset managers.

***E. METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS***

Because ProxyVote Plus does not manage accounts or make investment recommendations, this item does not apply to our business. For information about how we determine our proxy voting advice, please refer to Section N below.

***F. DISCIPLINARY INFORMATION***

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

***G. OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS***

This item does not apply to our business.

***H. CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING***

ProxyVote Plus does not buy or sell securities for its own account. Furthermore, the company's employees who are involved in any way with the analysis, determination or processing of proxy votes are generally prohibited from buying or selling securities the issuers of which have proxies that the company is currently analyzing or otherwise acting upon, unless an employee has delegated all influence and control over his or her account to an independent discretionary money manager.

On a quarterly basis, such managers and employees must report their personal securities trades to the Chief Compliance Officer, and they must obtain the Chief Compliance Officer's approval before buying securities in an IPO, ICO, private placement or other limited offering.

As described in Section N below, ProxyVote Plus has adopted a Code of Ethics which we believe will ensure that advice to clients will be rendered independently of the securities holdings of our related persons. The Code addresses other aspects of ProxyVote Plus's relationship with our clients as well. We will make a copy of our Code of Ethics and other information about our conflict of interest controls available to interested parties upon request.

***I. BROKERAGE PRACTICES***

This item does not apply to our business.

***J. REVIEW OF ACCOUNTS***

Please refer to Section N below for information about reports regarding the proxy votes we cast for clients. Otherwise, this item does not apply to our business.

***K. CLIENT REFERRALS AND OTHER COMPENSATION***

This item does not apply to our business.

***L. CUSTODY***

This item does not apply to our business.

***M. INVESTMENT DISCRETION***

This item does not apply to our business.

***N. VOTING CLIENT SECURITIES***

Discretionary Services. In order to meet our fiduciary obligations under the Investment Advisers Act of 1940 and ERISA, ProxyVote Plus has adopted written policies and procedures reasonably designed to ensure that we vote clients' proxies in the clients' best interests. These policies and procedures also discuss how ProxyVote Plus resolves potential material conflicts of interest that may arise in the course of proxy voting. A full set of these policies and procedures is available on our website at [www.proxyvoteplus.com](http://www.proxyvoteplus.com).

We have worked closely with clients' administrators, custodial banks, and proxy infrastructure service providers Broadridge, ProxyTrust and Proxymity to establish a system in which client proxies are mailed or transmitted electronically to us. Once proxy ballots are received, the appropriate vote is determined consistent with ProxyVote Plus's proxy voting guidelines, which are part of the company's proxy voting policies and procedures. ProxyVote Plus utilizes proxy statements, independent research, and other appropriate information in determining proxy votes in our clients' best interests. Once the votes have been determined, they are

electronically transmitted back to the proxy infrastructure service provider, who handles the mechanics of the voting process. ProxyVote Plus prepares a narrative explaining the rationale for each vote cast and stores this narrative with its books and records.

ProxyVote Plus also provides clients an annual (or semi-annual if so requested) report identifying all proxy votes it has cast for those clients. These reports include the proposals presented for vote, how we voted and a written explanation for these votes. These reports are provided electronically to all clients and in hard copy, upon request. ProxyVote Plus is not required to publicly report its “say-on-pay” votes on Form N-PX because ProxyVote Plus is not a discretionary asset manager (*i.e.*, is not a 13F filer).

ProxyVote Plus endeavors to avoid all material conflicts of interest with clients. To this end, we have adopted a written Code of Ethics that is available to all clients and prospective clients upon request. Pursuant to this Code of Ethics, all of ProxyVote Plus's managers and employees involved in any way in determining proxy votes or otherwise involved in the process of voting proxies are generally forbidden to buy or sell any securities the issuers of which have proxies that we are currently analyzing or otherwise acting upon, unless all investment decision-making authority over the insider's personal account has been delegated to an independent bank or investment manager. On a quarterly basis, such managers and employees must report personal securities trades for accounts as to which they have influence or control to the Chief Compliance Officer.

Notwithstanding this Code of Ethics, a potential conflict of interest may arise in connection with the fact that ProxyVote Plus may assist clients and other Taft-Hartley funds in researching and sponsoring shareholder proposals on which ProxyVote Plus may later cast votes on behalf of clients. As indicated above, we determine all such votes consistent with our guidelines and provide clients with an explanation of each vote. Furthermore, the shareholder proposals that ProxyVote Plus helps prepare relate to fundamental corporate governance issues designed to protect the interests of shareowners. In accordance with our voting guidelines, ProxyVote Plus usually supports such shareholder proposals, whether or not the proposal is sponsored by a client, a potential client, a sponsor affiliated with a client or a potential client or a party unknown to us. Finally, we disclose in the voting reports we provide to clients all situations in which we assisted in the preparation or sponsoring of shareholder proposals. ProxyVote Plus's President, Craig Rosenberg, is responsible for overseeing client relationships and identifying any conflicts of interest that may exist between ProxyVote Plus's clients and the companies with respect to which ProxyVote Plus casts proxy votes.

ProxyVote Plus employs artificial intelligence tools (“AI”) to extract relevant information from corporate proxy statements (DEF 14A) and Form 10-K filings sourced from SEC EDGAR. PVP utilizes this information for research purposes only. AI does not determine PVP’s proxy voting decisions or generate its vote recommendations, which remain the exclusive responsibility of PVP’s analysts.

Any questions regarding our proxy voting policies and procedures should be directed to Craig Rosenberg. He can be reached at [crosenberg@proxyvoteplus.com](mailto:crosenberg@proxyvoteplus.com).

Non-discretionary services. ProxyVote Plus utilizes the same proxy statements, independent research and other sources of information to formulate non-discretionary vote recommendations that it uses in determining discretionary votes, but in the non-discretionary context, the company analyzes this information in accordance with the client’s own proxy voting guidelines, instead of ProxyVote Plus’s proprietary guidelines. ProxyVote Plus does not make recommendations on shareholder proposals that ProxyVote Plus knows have been submitted by its clients.

***O. FINANCIAL INFORMATION***

This item does not apply to our business.