EDGAR Form N-PX CTR XML Technical Specification

Version 2.0   **April 2023**

Table of Contents

1. INTRODUCTION
1.1 Purpose

This document details the valid structure and content of the Form N-PX CTR Electronic Data Gathering, Analysis, and Retrieval (EDGAR) Extensible Markup Language (XML) submission types. The following table lists the submission types for Form N-PX CTR.

Table 1-1: Form N-PX CTR Submission Types

Submission Type	Description
N-PX CTR	Form N-PX Confidential Treatment Request
N-PX CTR/A	Amendment to a Form N-PX Confidential Treatment Request

This specification provides the basis for creating the aforementioned submission types for Form N-PX CTR XML submissions. Filers must use this technical specification to generate a Form N-PX CTR XML submission that can be successfully parsed by the EDGAR system.

The Form N-PX CTR submission file must conform to the EDGAR Form N-PX CTR Submission Taxonomy. This taxonomy is comprised of a collection of XML Schema Definition (.xsd) files that define the structures of EDGAR Form N-PX CTR submissions.

The Form N-PX CTR XML submissions can be transmitted to the SEC via the EDGAR FilerWeb (https://www.edgarfiling.sec.gov/) or the "Transmit XML Submission" option from the EDGAR OnlineForms/XML Website (https://www.onlineforms.edgarfiling.sec.gov).

In order to use the EDGAR FilerWeb or OnlineForms/XML Website, you must have a Central Index Key (CIK) and EDGAR access codes (password, CIK confirmation code (CCC)). If you currently have a CIK and access codes, you can proceed to the EDGAR FilerWeb or OnlineForms/XML Website to submit your submission. If you do not have access codes, you will need to obtain access codes through the EDGAR Filer Management website, https://www.filermanagement.edgarfiling.sec.gov. For further information regarding how to obtain access codes, refer to the "Becoming an EDGAR Filer" section of the EDGAR Filer Manual, Volume I (General Information).

For further information regarding the EDGAR FilerWeb or OnlineForms/XML Website, specifically in regards to the transmission of filer-constructed submissions, refer to the FilerConstructed XML Submissions section of the EDGAR Filer Manual, Volume II (EDGAR Filing).

Note to filers using Online Application to file Form N-PX CTR: For guidance on how to prepare the Information table XML document, please refer to "Data Specification for Proxy Voting Record Table" in Section 3.4 of this document. The Proxy Voting Record Table must conform to "eis_NPX_PROXY_VOTING_RECORD.xsd" schema file included in this Technical Specification package. A sample Proxy Voting Record Table XML document titled "SampleProxyVotingRecordTable.xml" is also provided in this package.

1.1. Summary of Changes

On 13 April, 2023, the following updates were introduced:

- o Table 2-1 has been updated to include eis_Common_SC.xsd and eis_ISO_StateCodes.xsd schema files.

On 16 December, 2022, EDGAR Release 22.4 introduced the following changes:

- o Table 1-1 has submission Form Types N-PX CTR and N-PX CTR/A with the descriptions.
- o Table 3.4 has submission Form Types N-PX CTR and N-PX CTR/A validation of the elements.
- o The eis_Common.xsd schema file has been updated to add new Form Types N-PX CTR and N-PX CTR/A.
- o The eis_NPX_CTR_Filer.xsd schema file has been created to add new Form Types N-PX CTR and N-PX CTR/A.
- o Table 7-1 has N-PX CTR and "PROXY VOTING RECORD" document samples.

2. EDGAR SCHEMA FILES

Table 2-1: Form N-PX CTR Schema Files describes the schema files that the EDGAR system uses to validate Form N-PX CTR submissions. These schemas are considered part of this specification and are distributed with this document.

Table 2-1: Form N-PX CTR Schema Files

XML Schema File	Scope of File
eis_NPX_CTR_Filer.xsd	Defines the elements for a Form N-PX CTR submission
eis_NPX_PROXY_VOTING_RECORD.xsd	Defines the elements for the Information table document required by N-PX CTR
eis_Common.xsd	Defines the common elements for all EDGAR submissions
eis_Common_SC.xsd	Defines series and class elements for all EDGAR submissions
eis_stateCodes.xsd	Defines State Country codes referred in eis_Common.xsd.
eis_ISO_StateCodes.xsd	Defines ISO State Country codes for all N-PX CTR submissions

The schema files define the valid data elements for a Form N-PX CTR submission, the hierarchy and sequencing of these elements, data types, valid values, maximum lengths, and number of occurrences, etc.

It is recommended that you download these files and use them for your own validation prior to filing a submission. This will greatly reduce the likelihood of receiving an EDGAR Suspend error. These schema files contain several annotations that describe the nature of the content of some of the elements.

EDGAR performs several validation checks that are not related to the schema files, so it is

possible for a submission to meet all the schema constraints and still be SUSPENDED or BLOCKED. For instance, EDGAR verifies that each CIK/CCC pair is valid.

2.1. Schema Table Column Definitions

We assume the filer is familiar with the basics of the XML language, Namespaces, and the XML Schema Definition language. If not, you can find numerous references on the World Wide Web. One recommended website that provides several useful tutorials and examples is *http://www.w3schools.com/*.

The table below highlights the schema language features used most heavily in the EDGAR Form N-PX CTR submission schema files. These are:

Table 2-2: Schema Language

Indicator	Purpose
<sequence>	Specifies that child elements must appear in a specific order. This indicator is used with each element hierarchy. Elements must always appear in the order shown in Section 3.4.
<choice>	Specifies that only one of the child elements can be present within the containing element.
<minOccurs>	Specifies the minimum number of times that an element can occur.
<maxOccurs>	Specifies the maximum number of times that an element can occur.

The default value for the <minOccurs> and <maxOccurs> indicator is 1. An optional field will have a <minOccurs> value of zero.

This excerpt is from the eis_NPX_CTR_Filer.xsd schema file and includes some of these indicators:

```
<xs:complexType name="CONTACT_TYPE">
    <xs:annotation>
        <xs:documentation>These elements are part of the
CONTACT_TYPE</xs:documentation>
    </xs:annotation>
    <xs:sequence>
        <xs:element name="contactName" type="ns1:NAME_TYPE"
minOccurs="0"/>
        <xs:element name="contactPhoneNumber"
type="ns1:EDGAR_PHONE_TYPE" minOccurs="0"/>
        <xs:element name="contactEmailAddress"
type="ns1:INTERNET_ADDRESS_TYPE" minOccurs="0"/>
    </xs:sequence>
</xs:complexType>
```

This is a sample of XML that conforms to the schema definition above:

```
<edgarSubmission>
…
    <filerinfo>
```

```
          …
   <contact> <contactName>Contact Name</contactName>
          <contactPhoneNumber>000-000-0000</contactPhoneNumber>

   <contactEmailAddress>name@xyzname.com</contactEmailAddress>
   </contact>
          …
   </filerinfo>
   …
</edgarSubmission>
```

3. XML SCHEMAS

This section summarizes the restrictions and constraints imposed on the content of the two Form N-PX CTR submission types. These rules are enforced by the schema files and by EDGAR submission processing applications.

The schema files cannot enforce all the rules concerning data content, so it is possible for a submission to satisfy all the schema constraints and still be SUSPENDED or BLOCKED by EDGAR.

3.1. Schema Table Column Definitions

The following table defines the columns in the two schema summation tables provided in Sections 3.4:

Table 3-1: Column Definitions for the Tables in Section 3-4

Column Name	Description
Level	Depth of element in the XML node hierarchy.
Order	Order in which elements must appear.
Data Type	See Table in Section 3.2 for a detailed description.
Element Name	Name of the XML element. This is case-sensitive.
Max Length	Maximum length for elements. EDGAR database stores up to this number of characters. "Unlimited" means no maximum length constraint for the element value.
Data Value Constraint	The paragraph that describes the data value constraint for the element. The values specified are case sensitive.
Max Occur	Maximum times a set of elements may be repeated. The maximum occurrence is 1, if not specified.
Applicability of Element	Indicates applicability of the element. m = Mandatory o = Optional NA = Does not apply. EDGAR uses this element for server-side processing. Do not provide a value for this element.

3.2. Data Type Constraints

Each entry in the "Data Type" column of these tables will be one of these values:

Data Type	Constraints
Boolean	Indicate a "true" value with either a "1" or the word "true." Indicate a "false" value with either a "0" or the word "false." A Boolean element may not have a null or blank value. This is a schema violation and will cause a SUSPENSE error.
date	Must be of the format MM-DD-YYYY. A date element may not have a null or blank value. This is a schema violation and will cause a SUSPENSE error. Do not include a date element at all if your goal is to not provide an optional date.
integer	Only valid characters are 0-9. Cannot contain commas, a minus sign, a dollar sign, or parentheses. An integer element may not have a null or blank value. This is a schema violation and will cause a SUSPENSE error.
string	Should be no longer than the length shown in the tables in Section 3.4. EDGAR stores values in the \<signatureName>, and \<contactEmailAddress> elements exactly as provided. All other values are stored in the database as uppercase. You must use special escape sequences to represent these four characters: For the < character use the escape sequence "<" or "<". For the > character use the escape sequence ">" or ">". For the & character use the escape sequence "&" or "&". For the "character use the escape sequence """ or """.
NV	These fields cannot have a value. They are parent element nodes that contain other XML elements. These elements need to be present for proper validation.
attr	Attribute property for an XML element.

3.3. Applicability of Schema Elements

Each entry in the submission/document type column in Section 3.4 will have one of these values:

Value	Description
m	Mandatory
m#	Conditional Mandatory. The element is mandatory if its parent element is included. The element cannot be included if its parent is not included.
m#1	Conditional Mandatory. The element is mandatory if specific values are provided for other elements.
m#2	This element is required for correct processing of the submission type.
o	Optional
o#	Optional in the Schema. The value will be populated by EDGAR. Any value provided will be overwritten and a WARNING generated.
NA	Does not apply to submission type. EDGAR uses this field for server-side processing. Do not provide a value for this element.
blank	Does not apply to submission type.

3.4. Mapping of N-PX CTR Submission Schemas to Submission Types

Mapping of N-PX CTR Submission Schema to Submission Type

Level	Other	Data Type	Element/Attribute Name	Max Length	Choice List	Max Occur	N-PX CTR	N-PX CTR/A
1	1	NV	edgarSubmission			1	m	m
2	1	String	schemaVersion	5		1	o	o
2	2	NV	headerData			1	m	m
3	1	String	submissionType	10	SUBMISSION_TYPE	1	m	m
3	2	NV	filerInfo			1	m	m
4	1	NV	liveTestFlag		LIVE_TEST_TYPE	1	m	m
4	2	NV	flags			1	o	o
5	1	boolean	confirmingCopyFlag		"true" or "false"	1	o	o
5	2	boolean	overrideInternetFlag		"true" or "false"	1	o	o
4	3	NV	filer			1	m	m
5	1	NV	issuerCredentials			1	m	m
6	1	String	cik	10		1	m	m
6	2	String	ccc	8		1	m	m
5	2	String	fileNumber	17		1	m#1	m#1
4	4	NV	contact			1	m	m
5	1	String	contactName	30		1	m	m
5	2	String	contactPhoneNumber	20		1	m	m
5	3	String	contactEmailAddress	80		1	m	m
4	5	NV	notifications			1	o	o
5	1	String	notificationEmailAddress	80		3	o	o
4	6	Date	periodOfReport			1	m	m
4	7	String	deNovoRequestChoice		"Y" or "N"	1	o	o
2	3	NV	formData			1	m	m
3	1	NV	coverPage			1	m	m
4	1	NV	amendmentInfo			1	NA	m
5	1	String	isAmendment		"Y" or "N"	1	NA	m
5	2	Integer	amendmentNo	2		1	NA	m

Level	Other	Data Type	Element/Attribute Name	Max Length	Choice List	Max Occur	N-PX CTR	N-PX CTR/A
5	3	String	amendmentType		AMENDMENT_TYPE	1	NA	m
4	2	NV	reportingPerson			1	m	m
5	1	String	name	150		1	m	m
5	2	String	phoneNumber	20		1	m	m
5	3	NV	address			1	m	m
6	1	String	street1	40		1	m	m
6	2	String	street2	40		1	o	o
6	3	String	city	30		1	m	m
6	4	String	state		ISO_STATE_AND_OUTLYING_AREA_CODE_USA	1	m	m
6	5	String	country		ISO_COUNTY_CODE	1	m	m
6	6	String	zipCode	10		1	m	m
4	3	NV	agentForService			1	o	o
5	1	String	name	150		1	o	o
5	2	NV	address			1	o	o
6	1	String	street1	40		1	o	o
6	2	String	street2	40		1	o	o
6	3	String	city	30		1	o	o
6	4	String	state		ISO_STATE_AND_OUTLYING_AREA_CODE_USA	1	o	o
6	5	String	country		ISO_COUNTY_CODE	1	o	o
6	6	String	zipCode	10		1	o	o
4	4	String	yearOrQuarter		REPORT_DURATION_TYPE	1	m	m
4	5	Year	reportCalendarYear	4		1	m#1	m#1
4	6	Year	reportQuarterYear	4		1	m#1	m#1
4	7	String	fileNumber	17		1	m	m
4	8	String	reportingCrdNumber	9		1	o	o
4	9	String	reportingSecFileNumber	17		1	o	o
4	10	String	leiNumber	20		1	o	o
4	11	NV	reportInfo			1	m	m
5	1	String	reportType		REPORT_TYPE	1	m	m
4	12	NV	otherManagersInfo			1	m#1	m#1
5	1	NV	otherManager			999	m#1	m#1
6	1	String	icaOr13FFileNumber	17		1	o	o
6	2	String	crdNumber	9		1	o	o
6	3	String	otherFileNumber	17		1	o	o

Level	Other	Data Type	Element/Attribute Name	Max Length	Choice List	Max Occur	N-PX	N-PX/A
6	4	String	leiNumberOM	20		1	o	o
6	5	String	managerName	150		1	m#1	m#1
4	13	NV	explanatoryInformation			1	m	m
5	1	String	explanatoryChoice		"Y" or "N"	1	m	m
5	2	String	explanatoryNotes	4000		1	m#1	m#1
3	2	NV	summaryPage			1	m	m
4	1	Integer	otherIncludedManagersCount	3		1	m#1	m#1
4	2	NV	otherManagers2			1	m#1	m#1
5	1	NV	investmentManagers			999	m#1	m#1
6	1	Integer	serialNo	3		1	m#1	m#1
6	2	String	form13FFileNumber	17		1	o	o
6	3	String	crdNumber	9		1	o	o
6	4	String	secFileNumber	17		1	o	o
6	5	String	leiNumber	20		1	o	o
6	6	String	name	150		1	m#1	m#1
3	3	NV	signaturePage			1	m	m
4	1	String	reportingPerson	150		1	m	m
4	2	String	txSignature	150		1	m	m
4	3	String	txPrintedSignature	150		1	m	m
4	4	String	txTitle	60		1	m	m
4	5	Date	txAsOfDate			1	m	m
4	6	NV	secondaryRecords			1	o	o
5	1	NV	secondaryRecord			5	o	o
6	1	String	txSignature	150		1	m	m
6	2	String	printedSign	150		1	m	m
6	3	String	txTitle	60		1	m	m
6	4	Date	txAsOfDate			1	m	m
2	4	NV	documents			1	m	m
3	1	NV	document			Unlimited	m	m
4	1	String	conformedName	32		1	m	m
4	2	String	conformedDocumentType	32	BASE_DOCUMENT_TYPE	1	m	m
4	3	String	description	255		1	o	o
4	5	String	contents			1	m	m

Data Specification for Proxy Voting Record Table

Level	Other	Data Type	Element/Attribute Name	Max Length	Choice List	Max Occur	Proxy Voting Record
1	1	NV	proxyVoteTable			1	m
2	1	NV	proxyTable			500000	m
3	1	String	issuerName	150		1	m
3	2	String	cusip	9		1	o
3	3	String	isin	12		1	o
3	4	String	figi	12		1	o
3	5	Date	meetingDate			1	m
3	6	String	voteDescription	20K		1	m
3	7	NV	voteCategories			1	m
4	1	NV	voteCategory			14	m
4	2	String	categoryType		VOTE_CATEGORY	1	m
3	8	String	otherVoteDescription	500		1	o
3	9	String	voteSource		MATTER_DISCLOSURE_TYPE	1	o
3	10	Float	sharesVoted	24		1	m
3	11	Float	sharesOnLoan	24		1	m
3	12	NV	vote			1	o
4	1	NV	voteRecord			999	o
5	1	String	howVoted		VOTE_TYPE	1	o
5	2	Float	sharesVoted	24		1	o
5	3	String	managementRecommendation		MANAGEMENT_TYPE	1	o
3	13	NV	voteManager			1	o
4	1	NV	otherManagers			25	o
5	1	Integer	otherManager	3		1	o
3	14	String	voteSeries	10		1	o
3	15	String	voteOtherInfo	4000		1	o

4. XML SCHEMAS
4.1. LIVE_TEST_TYPE

These are the valid values for the <liveTestFlag> element in the submission file:

VALUE
LIVE
TEST

4.2. AMENDMENT_TYPE

These are the valid values for the<amendmentType>element in the submission file:

VALUE
RESTATEMENT
NEW PROXY

4.3. REPORT_DURATION_TYPE

These are the valid values for the <yearOrQuarter> element in the submission file:

VALUE
YEAR
QUARTER

4.4. REPORT_TYPE

These are the valid values for the <reportType> element in the submission file:

VALUE
INSTITUTIONAL MANAGER VOTING REPORT
INSTITUTIONAL MANAGER COMBINATION REPORT

4.5. BASE_DOCUMENT_TYPE

These are the valid values for the <conformedDocumentType> element in the submission file:

VALUE
PROXY VOTING RECORD
COVER
CORRESP
GRAPHIC
REQUEST LETTER

4.6. VOTE_CATEGORY

These are the valid values for the <categoryType> element in the submission file:

VALUE
DIRECTOR ELECTIONS
SECTION 14A SAY-ON-PAY VOTES
AUDIT-RELATED
INVESTMENT COMPANY MATTERS
SHAREHOLDER RIGHTS AND DEFENSES
EXTRAORDINARY TRANSACTIONS
CAPITAL STRUCTURE
COMPENSATION
CORPORATE GOVERNANCE
ENVIRONMENT OR CLIMATE
HUMAN RIGHTS OR HUMAN CAPITAL/WORKFORCE
DIVERSITY, EQUITY, AND INCLUSION
OTHER SOCIAL ISSUES
OTHER

4.7. MATTER_DISCLOSURE_TYPE

These are the valid values for the <voteSource> element in the submission file：

VALUE
ISSUER
SECURITY HOLDER

4.8. VOTE_TYPE

These are the valid values for the <howVoted> element in the submission file：

VALUE
FOR
AGAINST
ABSTAIN
User can enter up to 150 characters
WITHHOLD

4.9. MANAGEMENT_TYPE

These are the valid values for the <managementRecommendation> element in the submission file:

VALUE
FOR
AGAINST
NONE

5. BASIC SUBMISSION CONSTRUCTION

5.1. General Formatting of XML Files

The following rules apply to the submission file of an XML-format Form N-PX CTR submission:

1. The filename must end with an ".xml" extension.

2. The file cannot be compressed in any fashion.

3. We strongly recommend you format the submission as shown in the provided sample files. This makes the raw XML files easier to view in a text editor. The submission of ASCII XML files with no line breaks, while legal XML, is strongly discouraged. XML filings are required to be posted on public websites. While usually formatted via style sheets, the raw XML is frequently available for inspection and should be readable by a person. A single line XML file is not viewer-friendly and should be avoided.

4. The <?xml version="1.0"?> declaration line is optional; however, if it is included it must be the first line in the file. Any text entered before this line, even white space, will cause a SUSPENSE error. The version value must be "1.0." Any other value for version will cause a SUSPENSE error.

5. For an XML element with a data value, keep the begin tag, data value, and end tag on the same line of text. Otherwise, you could get a schema violation error. As an example, for a filer ID value which cannot be longer than 10 characters, this specification is correct:

<cik>1212121212</cik>

6. The specification below will result in a parsing error because the extraneous white space and line feeds will be counted as part of the length of the data value. In other words, the CIK value will be regarded as longer than 10 characters.

<cik>
1212121212
</cik>

5.2. Formatting of Supporting Document XML Files

The following rules apply to the supporting document XML-format:

1. The <?xml version="1.0"?> declaration line is optional; however, if it is included it must be the first line in the file. Any text entered before this line, even white space,

will cause an error. The version value must be "1.0." Any other value for version will cause an error.

2. The beginning tag for the << proxyVoteTable > must match the following:
   <inf:proxyVoteTable xmlns:inf="http://www.sec.gov/edgar/document/np xproxy/informationtable">

3. The XML elements cannot have any namespaces. For eg: It has to be <cusip> and not

   <ns1:cusip>

   Here is a sample of what the information table should look like:

```
<inf:proxyVoteTable
xmlns:inf="http://www.sec.gov/edgar/document/npxproxy/informationtable">
 <!--1 to 250000 repetitions:-->
 <inf:proxyTable>
  <inf:issuerName>Issuer Name</inf:issuerName>
  <!--Optional:-->
  <inf:cusip>123456789</inf:cusip>
  <!--Optional:-->
  <inf:isin>N/A</inf:isin>
  <!--Optional:-->
  <inf:figi>1</inf:figi>
  <inf:meetingDate>10/11/2022</inf:meetingDate>
  <inf:voteDescription>token</inf:voteDescription>
       <inf:voteCategories>
       <inf:voteCategory>
        <inf:categoryType>SECTION 14A SAY-ON-PAY VOTES</inf:categoryType>
       </inf:voteCategory>
       <inf:voteCategory>
        <inf:categoryType>OTHER</inf:categoryType>
       </inf:voteCategory>
     </inf:voteCategories>
  <!--Optional:-->
  <inf:otherVoteDescription>otherVoteDescription</inf:otherVoteDescription>
  <!--Optional:-->
  <inf:voteSource>ISSUER</inf:voteSource>
  <inf:sharesVoted>1</inf:sharesVoted>
  <inf:sharesOnLoan>1</inf:sharesOnLoan>
 <inf:vote>
    <!--1 to 999 repetitions:-->
    <inf:voteRecord>
     <inf:howVoted>WITHHOLD</inf:howVoted>
     <inf:sharesVoted>1</inf:sharesVoted>
     <inf:managementRecommendation>AGAINST</inf:managementRecommendation>
    </inf:voteRecord>
        <inf:voteRecord>
     <inf:howVoted>WITHHOLD</inf:howVoted>
     <inf:sharesVoted>2</inf:sharesVoted>
     <inf:managementRecommendation>FOR</inf:managementRecommendation>
    </inf:voteRecord>
        <inf:voteRecord>
```

```
                    <inf:howVoted>WITHHOLD</inf:howVoted>
                    <inf:sharesVoted>3</inf:sharesVoted>
                    <inf:managementRecommendation>FOR</inf:managementRecommendation>
                  </inf:voteRecord>

                </inf:vote>
                    <inf:voteManager>
                  <!--1 to 25 repetitions:-->
                  <inf:otherManagers>
                    <inf:otherManager>200</inf:otherManager>
                  </inf:otherManagers>
                      <inf:otherManagers>
                    <inf:otherManager>100</inf:otherManager>
                  </inf:otherManagers>
                  </inf:voteManager>
                      <inf:voteSeries>s888895895</inf:voteSeries>
                <!--Optional:-->
                <inf:voteOtherInfo>voteOtherInfo</inf:voteOtherInfo>
              </inf:proxyTable>
            </inf:proxyVoteTable>
```

5.3. XML Submission File Rules

The following rules are specific to the submission file:

1. The order of any <notificationEmailAddress> element in the <notificationAddresses> element block does not matter. EDGAR will generate a WARNING for any duplicate values in the <notificationEmailAddress> element.

2. The submission file must conform to the eis_NPX_Filer.xsd XML schema file. Any violation of this schema will result in the suspension of the submission.

5.3.1. Primary Document

EDGAR will construct the "document of record" from the XML submission that will be disseminated. The following provides information regarding the constructed primary document:

1. The <schemaVersion> element should not be included. If you do provide a value for this element, EDGAR will generate a WARNING and discard the value and replace it with the correct value.
2. The following elements will be removed if provided, due to their confidential nature:
    <contact>
    <notifications>
3. The value for the <ccc> element will be masked with XXXXXXXX

5.3.2. Supporting Documents

The <documents> element block specifies supporting documents. The following rules apply to this <documents> element block:

1. Allowable file extensions are .xml.

2. The allowable document types are shown in the Table 5-1: Supporting

Document Maximum Allowed.

3. The attached document must conform to the eis_NPX_PROXY_VOTING_RECORD.xsd XML schema file.

4. The attached documents contain requestletter.pdf file.

5. You may enclose the following documents for submission of form types N-PX CTR and N-PX CTR/A. The document count limits are provided in Table 5-1: Supporting Document Maximum Allowed.

Table 5-1: Supporting Document Maximum Allowed

Document Type	Maximum Allowed
PROXY VOTING RECORD	1
REQUEST LETTER	1

6. The names of attached document files must follow the EDGAR file naming conventions:

   - File names cannot exceed 32 characters, including the file extension.
   - Valid characters are lowercase letters, digits 0-9, up to one underscore, up to one hyphen, and up to one period.
   - First character must be a letter.
   - Spaces are not allowed.
   - File name must have a file type extension of .xml.

7. The <description> is optional, but all other elements must be present and must have a value.

8. The <contents> element must contain a MIME encoded document. You can use any standard 64-character set based MIME encoding algorithm to create a MIME document.

9. The XML for an enclosed supporting document looks like this:

```
<document>
    <conformedName>ProxyVotingTable.xml</conformedName>

    <conformedDocumentType>PROXY VOTING RECORD</conformedDocumentType>
<description>Proxy Table</description>
    <contents>
      PT09PT09PT09PT09PT09PT09PT09PT09PT09PT09PSAgIGNvdmVyIGxldHRl
ciAgID09PT09PT09PT09PT09PT09PT09PT09PT09PT0NCg0KVGhpcyBp
cyBhIHByaXZhdGUgY292ZXIgbGV0dGVyIHRoYXQgZG9lcyBub3QgY29udGFp
biBhbnkgcmVkbGluZQ0KdGFncy4gVGhpcyBpcyBzdHJpY3RseSBhIHRlc3Qu
DQoNCj09PT09PT09PT09PT09PT09PT09PT09PT09PT09PT09PT09PT09
      PT09PT09PT09PT09PT09PT09PT09PT09PT09PT09PT09PT09DQo=
    </contents> </document>
```

6. ERROR REPORTING

EDGAR will generate an error for each violation of an XML schema constraint, as well as for each violation of a Form N-PX CTR filing business rule. The schema files do not enforce all error checks, so it is possible to construct a submission that meets all the schema constraints yet is still

SUSPENDED.

This table summarizes the errors that can result from violations of schema constraints and EDGAR business rules. This is not an all-inclusive list.

Table 6-1: Submission Errors and Severity

Error Condition	Severity
Elements not in sequence prescribed in Section 3.4	SUSPENDED
Inclusion of XML-stylesheet reference or any other Processing Instruction	SUSPENDED
Inclusion of an element not prescribed in the schema	SUSPENDED
String value exceeds maximum length constraint	SUSPENDED
Element constrained by a Choice List has an invalid value	SUSPENDED
Mandatory element has no value or an invalid value	SUSPENDED
Special character (&, <, >) not provided as escape sequence	SUSPENDED
Date, Boolean, or Decimal element does not have a value	SUSPENDED
Duplicate Notification Address	WARNING
"NA" or blank field has a value	WARNING
Invalid Issuer CIK	SUSPENDED
Improperly formatted email address	SUSPENDED
Exceeding a "Max Occur" limit from Section 3.4 (e.g., more than 999Other Managers on the Cover Page)	SUSPENDED
Missing the required XML Instance document for the Proxy Voting Record Table for N-PX CTR submissions.	SUSPENDED
Invalid content in an enclosed XML Instance document for the Proxy Voting Record table.	SUSPENDED
Any XML schema violation not mentioned in previous table row	SUSPENDED

You may sometimes get multiple error messages reporting the same error. The XML parser EDGAR used to process a Form N-PX CTR submission generates messages that are rather technical in nature and require an understanding of the XML schema language. Whenever possible, EDGAR generates a more "friendly" error message to give a precise description of the error.

7 .EXAMPLE FORM N-PX CTR SUBMISSION FILES

Table 7-1: Sample Submission/Document Files provides a list of sample submission files as well as a sample Information Table document.

Table 7-1: Sample Submission/Document Files

Submission/Document Type	Sample File
N-PX CTR	SampleN-PXCTR.xml
N-PX CTR/A	SampleN-PXCTRA.xml
PROXY VOTING RECORD	SampleProxyVotingRecordTable.xml
REQUEST LETTER	N-PXCTR.PDF

8 .ISO STATE CODES SCHEMA DATA VALUE CONSTRAINTS
8.1. ISO_COUNTY_CODE

These are the valid values for elements with type <country> element in the submission file:

VALUE	CODE DESCRIPTION
AF	AFGHANISTAN
AX	ALAND ISLANDS
AL	ALBANIA
DZ	ALGERIA
AS	AMERICAN SAMOA
AD	ANDORRA
AO	ANGOLA
AI	ANGUILLA
AQ	ANTARCTICA
AG	ANTIGUA AND BARBUDA
AR	ARGENTINA
AM	ARMENIA
AW	ARUBA
AU	AUSTRALIA
AT	AUSTRIA
AZ	AZERBAIJAN
BS	BAHAMAS
BH	BAHRAIN
BD	BANGLADESH
BB	BARBADOS
BY	BELARUS
BE	BELGIUM
BZ	BELIZE
BJ	BENIN
BM	BERMUDA
BT	BHUTAN
BO	BOLIVIA (PLURINATIONAL STATE OF)
BQ	BONAIRE, SINT EUSTATIUS AND SABA
BA	BOSNIA AND HERZEGOVINA
BW	BOTSWANA
BV	BOUVET ISLAND
BR	BRAZIL
IO	BRITISH INDIAN OCEAN TERRITORY

VALUE	CODE DESCRIPTION
BN	BRUNEI DARUSSALAM
BG	BULGARIA
BF	BURKINA FASO
BI	BURUNDI
CV	CABO VERDE
KH	CAMBODIA
CM	CAMEROON
CA	CANADA
KY	CAYMAN ISLANDS
CF	CENTRAL AFRICAN REPUBLIC
TD	CHAD
CL	CHILE
CN	CHINA
CX	CHRISTMAS ISLAND
CC	COCOS (KEELING) ISLANDS
CO	COLOMBIA
KM	COMOROS
CG	CONGO
CD	CONGO, THE DEMOCRATIC REPUBLIC OF THE
CK	COOK ISLANDS
CR	COSTA RICA
CI	COTE D'IVOIRE
HR	CROATIA
CU	CUBA
CW	CURACAO
CY	CYPRUS
CZ	CZECHIA
DK	DENMARK
DJ	DJIBOUTI
DM	DOMINICA
DO	DOMINICAN REPUBLIC
EC	ECUADOR
EG	EGYPT
SV	EL SALVADOR
GQ	EQUATORIAL GUINEA
ER	ERITREA
EE	ESTONIA
ET	ETHIOPIA

VALUE	CODE DESCRIPTION
FK	FALKLAND ISLANDS (MALVINAS)
FO	FAROE ISLANDS
FJ	FIJI
FI	FINLAND
FR	FRANCE
GF	FRENCH GUIANA
PF	FRENCH POLYNESIA
TF	FRENCH SOUTHERN TERRITORIES
GA	GABON
GM	GAMBIA
GE	GEORGIA
DE	GERMANY
GH	GHANA
GI	GIBRALTAR
GR	GREECE
GL	GREENLAND
GD	GRENADA
GP	GUADELOUPE
GU	GUAM
GT	GUATEMALA
GG	GUERNSEY
GN	GUINEA
GW	GUINEA-BISSAU
GY	GUYANA
HT	HAITI
HM	HEARD ISLAND AND MCDONALD ISLANDS
VA	HOLY SEE (VATICAN CITY STATE)
HN	HONDURAS
HK	HONG KONG
HU	HUNGARY
IS	ICELAND
IN	INDIA
ID	INDONESIA
IR	IRAN, ISLAMIC REPUBLIC OF
IQ	IRAQ
IE	IRELAND
IM	ISLE OF MAN
IL	ISRAEL

VALUE	CODE DESCRIPTION
IT	ITALY
JM	JAMAICA
JP	JAPAN
JE	JERSEY
JO	JORDAN
KZ	KAZAKSTAN
KE	KENYA
KI	KIRIBATI
KP	KOREA, DEMOCRATIC PEOPLE'S REPUBLIC OF
KR	KOREA, REPUBLIC OF
KW	KUWAIT
KG	KYRGYZSTAN
LA	LAO PEOPLE'S DEMOCRATIC REPUBLIC
LV	LATVIA
LB	LEBANON
LS	LESOTHO
LR	LIBERIA
LY	LIBYAN ARAB JAMAHIRIYA
LI	LIECHTENSTEIN
LT	LITHUANIA
LU	LUXEMBOURG
MO	MACAU
MK	MACEDONIA, THE FORMER YUGOSLAV REPUBLIC OF
MG	MADAGASCAR
MW	MALAWI
MY	MALAYSIA
MV	MALDIVES
ML	MALI
MT	MALTA
MH	MARSHALL ISLANDS
MQ	MARTINIQUE
MR	MAURITANIA
MU	MAURITIUS
YT	MAYOTTE
MX	MEXICO
FM	MICRONESIA, FEDERATED STATES OF
MD	MOLDOVA, REPUBLIC OF
MC	MONACO

VALUE	CODE DESCRIPTION
MN	MONGOLIA
ME	MONTENEGRO
MS	MONTSERRAT
MA	MOROCCO
MZ	MOZAMBIQUE
MM	MYANMAR
NA	NAMIBIA
NR	NAURU
NP	NEPAL
NL	NETHERLANDS
NC	NEW CALEDONIA
NZ	NEW ZEALAND
NI	NICARAGUA
NE	NIGER
NG	NIGERIA
NU	NIUE
NF	NORFOLK ISLAND
MP	NORTHERN MARIANA ISLANDS
NO	NORWAY
OM	OMAN
PK	PAKISTAN
PW	PALAU
PS	PALESTINIAN TERRITORY, OCCUPIED
PA	PANAMA
PG	PAPUA NEW GUINEA
PY	PARAGUAY
PE	PERU
PH	PHILIPPINES
PM	PITCAIRN
PL	POLAND
PT	PORTUGAL
PR	PUERTO RICO
QA	QATAR
RE	REUNION
RO	ROMANIA
RU	RUSSIAN FEDERATION
RW	RWANDA
BL	SAINT BARTHELEMY

VALUE	CODE DESCRIPTION
SH	SAINT HELENA
KN	SAINT KITTS AND NEVIS
LC	SAINT LUCIA
MF	SAINT MARTIN
PM	SAINT PIERRE AND MIQUELON
VC	SAINT VINCENT AND THE GRENADINES
WS	SAMOA
SM	SAN MARINO
ST	SAO TOME AND PRINCIPE
SA	SAUDI ARABIA
SN	SENEGAL
RS	SERBIA
SC	SEYCHELLES
SL	SIERRA LEONE
SG	SINGAPORE
SX	SINT MAARTEN (DUTCH PART)
SK	SLOVAKIA
SI	SLOVENIA
SB	SOLOMON ISLANDS
SO	SOMALIA
ZA	SOUTH AFRICA
GS	SOUTH GEORGIA AND THE SOUTH SANDWICH ISLANDS
SS	SOUTH SUDAN
ES	SPAIN
LK	SRI LANKA
SD	SUDAN
SR	SURINAME
SJ	SVALBARD AND JAN MAYEN
SZ	SWAZILAND
SE	SWEDEN
CH	SWITZERLAND
SY	SYRIAN ARAB REPUBLIC
TW	TAIWAN
TJ	TAJIKISTAN
TZ	TANZANIA, UNITED REPUBLIC OF
TH	THAILAND
TL	TIMOR-LESTE
TG	TOGO

VALUE	CODE DESCRIPTION
TK	TOKELAU
TO	TONGA
TT	TRINIDAD AND TOBAGO
TN	TUNISIA
TR	TURKEY
TM	TURKMENISTAN
TC	TURKS AND CAICOS ISLANDS
TV	TUVALU
UG	UGANDA
UA	UKRAINE
AE	UNITED ARAB EMIRATES
GB	UNITED KINGDOM
US	UNITES STATES OF AMERICA
UM	UNITED STATES MINOR OUTLYING ISLANDS
UY	URUGUAY
UZ	UZBEKISTAN
VU	VANUATU
VE	VENEZUELA
VN	VIET NAM
VG	VIRGIN ISLANDS, BRITISH
VI	VIRGIN ISLANDS, U.S.
WF	WALLIS AND FUTUNA
EH	WESTERN SAHARA
YE	YEMEN
ZM	ZAMBIA
ZW	ZIMBABWE
XX	UNKNOWN
C2	ASHMORE & CARTIER IS
E5	CANAL ZONE
E6	MONTREAL, CANADA
E7	CANTON/ENDERBURY IS
2N	CZECH REPUBLIC
G5	CZECHOSLOVAKIA
I7	GAZA STRIP
X9	GERMANY (BERLIN)
I8	GERMANY (WEST)
I9	GERMANY, FED. REP.
L1	IRAQ-SAUDI

VALUE	CODE DESCRIPTION
L4	ISRAEL-JORDAN
L5	ISRAEL-SYRIA
M1	JOHNSTON ATOLL
O6	MIDWAY ISLAND
P8	NETHERLANDS ANTILLES
Q9	PACIFIC ISLANDS TRU
R3	PARACEL ISLANDS
T4	SOUTHERN RHODESIA
U2	SOVIET UNION
U4	SPANISH NORTH AFRICA
U6	SPRATLY ISLAND
X7	WAKE ISLAND
2F	EAST TIMOR
Y2	YUGOSLAVIA

8.2. ISO_STATE_AND_OUTLYING_AREA_CODE_USA

These are the valid values for the <state> element in the submission file:

VALUE	CODE DESCRIPTION
US-AL	ALABAMA
US-AK	ALASKA
US-AZ	ARIZONA
US-AR	ARKANSAS
US-CA	CALIFORNIA
US-CO	COLORADO
US-CT	CONNECTICUT
US-DE	DELAWARE
US-DC	DISTRICT OF COLUMBIA
US-FL	FLORIDA
US-GA	GEORGIA
US-HI	HAWAII
US-ID	IDAHO
US-IL	ILLINOIS

VALUE	CODE DESCRIPTION
US-IN	INDIANA
US-IA	IOWA
US-KS	KANSAS
US-KY	KENTUCKY
US-LA	LOUISIANA
US-ME	MAINE
US-MD	MARYLAND
US-MA	MASSACHUSETTS
US-MI	MICHIGAN
US-MN	MINNESOTA
US-MS	MISSISSIPPI
US-MO	MISSOURI
US-MT	MONTANA
US-NE	NEBRASKA
US-NV	NEVADA
US-NH	NEW HAMPSHIRE
US-NJ	NEW JERSEY
US-NM	NEW MEXICO
US-NY	NEW YORK
US-NC	NORTH CAROLINA
US-ND	NORTH DAKOTA
US-OH	OHIO
US-OK	OKLAHOMA
US-OR	OREGON
US-PA	PENNSYLVANIA
US-RI	RHODE ISLAND
US-SC	SOUTH CAROLINA
US-SD	SOUTH DAKOTA
US-TN	TENNESSEE
US-TX	TEXAS
US-UT	UTAH
US-VT	VERMONT
US-VA	VIRGINIA
US-WA	WASHINGTON
US-WV	WEST VIRGINIA
US-WI	WISCONSIN
US-WY	WYOMING
US-AS	AMERICAN SAMOA

VALUE	CODE DESCRIPTION
US-GU	GUAM
US-MP	NORTHERN MARIANA ISLANDS
US-PR	PUERTO RICO
US-UM	UNITED STATES MINOR OUTLYING ISLANDS
US-VI	VIRGIN ISLANDS, U.S.

8.3. ACRONYMS

Acronym	Description
ASCII	American Standard Code for Information Interchange
CCC	CIK Confirmation Code
CIK	Central Index Key
EDGAR	Electronic Data Gathering, Analysis, and Retrieval
ICT	Investment Company Type
PDF	Portable Document Format
SEC	Securities and Exchange Commission
XML	Extensible Markup Language