



# GLASS LEWIS

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## **Report Feedback Statement (RFS) *Etiquette Guide***

The purpose of the Report Feedback Statement (RFS) service is to allow subscribers to more fully and directly express their views on any differences of opinion they may have with Glass Lewis' research.

Because each stakeholder in the proxy voting process has put considerable thought into their work and their approach on a given vote, we expect that all subscribers respect these efforts by exercising the appropriate level of decorum and civility when putting together their Report Feedback Statement.

As a result, all subscribers must ensure the following prior to submitting their Report Feedback Statement to Glass Lewis:

- The subscriber has consulted with legal counsel to ensure the submission of its Report Feedback Statement complies with Regulation FD and any other regulatory requirements applicable to the subscriber and its disclosure of information.
- All information included in the Report Feedback Statement is "publicly available" information, meaning the information has been disseminated in a manner making it available to investors generally.
- A good faith effort has been made to ensure that all the information contained in the Report Feedback Statement is accurate.
- None of the statements included in the Report Feedback Statement defame, disparage, disrespect or offend Glass Lewis, its subsidiaries, owners, and employees, or any third party.
- The individual submitting the Report Feedback Statement is an authorized representative of the subscriber, with the authority to submit the Report Feedback Statement on behalf of the subscriber.

Glass Lewis reserves the right, in its sole discretion, to accept or reject a Report Feedback Statement for any reason. This includes, but is not limited to, any Report Feedback Statement that fails to comply with this Etiquette Guide, is inconsistent with or irrelevant to the purpose of the Report Feedback Statement service, or may cause Glass Lewis to be deemed to be engaging in a solicitation under applicable laws or regulations. In certain situations, Glass Lewis may allow a subscriber to resubmit a revised Report Feedback Statement, provided there is enough time for publication and the resubmission complies with this Etiquette Guide.