



Proxy Voting Policy

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1 Introduction

This Proxy Voting Policy (the "**Policy**") applies to all of the entities in the XTX group specified in the [XTX Group Entity Reference Document](#) (together "XTX" or "the Firm") whether regulated or un-regulated, and all directors, partners, officers, employees, and, where applicable, contractors of those entities (together "XTX staff").Background and Regulatory Context

In the U.S. SEC Rule 14Ad-1 was revised to require investment managers (including all 13F filers such as XTX) to report a complete proxy voting record each year by August 31 by filing a Form N-PX containing detailed voting records. If an investment manager has a disclosed policy to not vote on any proxy voting matters and has not voted on any proxy voting matters then the investment manager may file only a notice report to fulfil its filing obligation.

2 Firm Statement on Proxy Voting

XTX is an active proprietary trader of equities and through the regular course of its trading activity, may hold shares that are subject to a corporate voting matter. XTX does not seek to influence or control company operations or activities of issuers it trades. Any instances where the Firm obtained voting rights due to a position in a security are unintentional and a coincidence due to the timing of the Firm's trading activity. In many cases XTX will have exited a position by the time it receives proxy voting material. Accordingly, voting of proxies is not part of the Firm's investment decision process to purchase, hold, or sell a security. As such XTX has determined not to vote proxies.

3 Appendix – Policy History

Revision	Date	Description	Author
1	August 2024	Initial document created	Bernie Denis