

MEMORANDUM

TO: Proposed Rule: Enhanced Reporting of Proxy Votes by Registered Management Investment Companies; Reporting of Executive Compensation Votes by Institutional Investment Managers (Release No. 34-93169; IC-34389; File No. S7-11-21)

FROM: Bradley Gude, Senior Counsel, Division of Investment Management

RE: Meeting with Representatives of BNY Mellon

DATE: June 9, 2022

On June 8, 2022, staff of the SEC held a videoconference with representatives of BNY Mellon. Participants included: Sarah ten Siethoff (Deputy Director, Division of Investment Management (“IM”)), Brian McLaughlin Johnson (Assistant Director, IM), Angela Mokodean (Branch Chief, IM), David Driscoll (Senior Counsel, IM), Bradley Gude (Senior Counsel, IM), Nathan Schuur (Senior Counsel, IM), Jessica Wachter (Director and Chief Economist, Division of Economic and Risk Analysis (“DERA”)), and Hanna Lee (Financial Economist, DERA), as well as the following representatives of BNY Mellon:

- Rick Gambs;
- David DiNardo;
- Teresa Hamlin; and
- Charles Hawkins.

The participants discussed, among other things, the SEC’s proposal titled “Enhanced Reporting of Proxy Votes by Registered Management Investment Companies; Reporting of Executive Compensation Votes by Institutional Investment Managers,” set forth in Investment Company Act Release No. 34389 (Sep. 29, 2021).