

Harbor Capital

Proxy Voting Policy Evolution: 2021-2026

Analysis of 3 policy versions across 1 revision cycles

Based on archived versions from the Wayback Machine
and Harbor Capital's public website

Prepared March 2026

Executive Summary

This report analyzes 3 versions of Harbor Capital's proxy voting guidelines spanning 2021-2026. Over this period, the guidelines remained at 2 pages and the number of identifiable policy statements changed from 1 to 1. Policy revisions were detected in 1 of the 2 year-over-year transitions examined.

Over the 2021-2026 period, Harbor Capital's proxy voting guidelines have maintained a relatively consistent scope while undergoing targeted revisions in specific governance areas.

The most significant revision occurred in 2024 (compared to 2021), with 12% textual similarity, 0 new statements added, and 0 removed. These inflection points mark the key moments when Harbor Capital substantively rethought its governance approach.

Key Observations

- Voting Approach & Engagement: Relatively stable (2 -> 2 references), suggesting consistent governance priorities in this area

Year-by-Year Policy Changes

2021

Document: 2 pages, 187 KB, approximately 1,215 words, 1 policy statements identified.

2024

Document: 2 pages, 128 KB, approximately 1,156 words, 1 policy statements identified.

A major restructuring or rewrite occurred compared to the 2021 edition (12% textual similarity). 0 policy statements were modified, 0 added, and 0 removed.

2026

Document: 2 pages, 128 KB, approximately 1,156 words, 1 policy statements identified.

This version is identical to the 2024 edition. No changes were detected.

Overall Assessment

Across 3 versions spanning 2021-2026, Harbor Capital's proxy voting guidelines show 1 revision cycle(s). The guidelines have evolved meaningfully over this period.

1. Current Governance Priorities

As of the 2026 edition, Harbor Capital's governance priorities ranked by emphasis are: Voting Approach & Engagement (2 refs). Companies engaging with Harbor Capital should prioritize these areas when preparing for proxy season and governance discussions.

The evolution of Harbor Capital's proxy voting guidelines over 2021-2026 reflects the broader transformation of institutional stewardship from a compliance exercise into a strategic governance function. As the regulatory and political landscape continues to shift, these guidelines will likely continue to evolve. Governance professionals, corporate secretaries, and investor relations teams should monitor these changes to anticipate Harbor Capital's governance expectations and voting behavior.

Source Documents

All documents were retrieved from the Wayback Machine (web.archive.org) and the manager's public website:

Year	Pages	Size	Words	Statements	Source
2021	2	187 KB	1,215	1	Wayback Machine
2024	2	128 KB	1,156	1	Wayback Machine
2026	2	128 KB	1,156	1	Live URL