

## **NEWTEK BUSINESS SERVICES CORP.**

### **PROXY VOTING POLICIES AND PROCEDURES**

We vote proxies relating to our portfolio securities in the best interest of our shareholders. We carefully review on a case-by-case basis each proposal submitted to a shareholder vote to determine its impact on the portfolio securities held by us. Although we generally vote against proposals that may have a negative impact on our portfolio securities, we may vote for such a proposal if there exist compelling long-term reasons to do so.

Our proxy voting decisions are made by the senior officers who are responsible for monitoring each of our investments. To ensure that our vote is not the product of a conflict of interest, we require that: (i) anyone involved in the decision-making process disclose to our Chief Compliance Officer any potential conflict of which he or she is aware and any contact that he or she has had with any interested party regarding a proxy vote; and (ii) employees involved in the decision-making process or vote administration are prohibited from revealing how we intend to vote on a proposal in order to reduce any attempted influence from interested parties.

#### **Proxy Voting Records**

You may obtain information, without charge, regarding how we voted proxies with respect to our portfolio securities by making a written request for proxy voting information to: Matthew G. Ash, Chief Compliance Officer, Newtek Business Services Corp., 212 West 35<sup>th</sup> Street, 2<sup>nd</sup> Floor, New York, NY 10001.