

DESTRA CAPITAL ADVISORS LLC
Proxy Voting Policy and Procedures

I. INTRODUCTION

The Investment Advisers Act of 1940, Rule 206(4)-6, governs proxy voting by investment advisers. Destra Capital Advisors LLC (“Destra”), a federally registered investment adviser, accepts and exercises proxy voting authority over client securities. Exercising proxy voting authority places a fiduciary obligation on Destra to act in the best interest of its clients. For an investment adviser to exercise proxy voting authority the adviser must have adopted written policies and procedures that are reasonably designed to ensure that proxy statements are voted in the best interest of the client, the investment adviser describes its procedures to clients and provides a copy of the procedures upon request and discloses to clients how they may obtain information on how proxy statements were voted. To ensure that this obligation is met, Destra has adopted and implemented the following policies and procedures.

II. POLICY

Destra has selected an independent third party, Glass Lewis to perform proxy voting responsibilities on client securities. Client securities are voted in accordance with the independent third parties current proprietary pre-determined policy, thus ensuring that the votes are not the result of any conflict of interest between Destra and its clients.

The proprietary, pre-determined proxy voting policy of Glass Lewis is available at www.glasslewis.com. These guidelines offer information on how Glass Lewis votes a proxy ballot (in favor or against management) on various business topics in a host of situations.

Glass Lewis’ standard voting guidelines cover the following general areas:

- Operational Issues
- Board of Directors
- Proxy Contests
- Antitakeover Defenses and Voting Related Issues
- Mergers and Corporate Restructurings
- State of Incorporation
- Capital Structure
- Executive Director Compensation
- Corporate Social Responsibility Issues
- Mutual Fund Proxies

III. DECLINE OF A THIRD PARTY TO VOTE

To the extent that the independent third party service provider seeks the investment adviser’s direction on how to vote on any particular matter or type of security, the Chief Compliance Officer and Chief Investment Officer or Fund Portfolio Manager shall determine whether any potential conflict of interest is present. If a potential conflict of interest is present, the investment adviser shall seek instructions from the client on how to vote that particular item. If no conflict of interest exists, the investment adviser will instruct the third party how to vote in the matter.

IV. PROXY VOTING WITH REGARD TO SECURITIES ON LOAN

Typically a lending fund foregoes the right to vote proxies for securities out on loan however funds should vote proxies when there is a material event that will affect a security on loan. To the extent that certain Destra Funds participate in a security lending program, Destra seeks to recall shares to vote for events deemed “material” by the investment adviser. Destra may not vote proxy statements for securities on loan if the event is not “material”.

V. SHARE BLOCKING COUNTRIES

Certain countries restrict the ability of a client or fund to transact in issuer shares for which a proxy vote has been cast. Because a fund needing to sell blocked shares would incur costs and the difficulty of rescinding a vote for an issuer located in a share blocking country, Destra may not vote proxy statements received for issuers located in share blocking countries, or where the settlement location, such as Euroclear, restricts the Fund from selling shares once a proxy is voted.

VI. DESCRIPTION AND PROVISIONS OF PRXOY VOTING POLICIES AND PROCEDURES TO CLIENTS

A brief description of a Fund’s proxy voting policies and procedures is contained in each Fund’s SAI. Destra will provide contact information for shareholders seeking a written copy of our policies and procedures in addition to the independent third party proxy voting service’s voting guidelines through disclosure in the Fund’s annual and semi-annual report.

VII. DISCLOSURE OF VOTING RECORD TO CLIENTS

In accordance with SEC regulations, Destra will file, on an annual basis for each registered investment company, a Form N-PX with the SEC. Form N-PX details the proxy voting record for all securities on which Destra as adviser for Destra Funds has voted in the past calendar year. Form N-PX is available through the SEC Edgar database and is also posted on Destra’s Fund website for ease of shareholder review. Destra’s shareholder reports will disclosed were investors may access Form N-PX.

VIII. RECORDKEEPING REQUIREMENTS

Destra will maintain the following records for five years in an easily accessible place, the first two years in its office:

- Destra’s proxy voting policies and procedures as well as the voting guidelines of the independent third party service;
- Destra’s proxy service will make and retain on Destra’s behalf copies of proxy statements regarding client securities. Destra has contracted with Glass Lewis to have copies of these statements available promptly upon request;
- Destra’s proxy service will make and retain a record of votes cast on behalf of Destra’s clients. Destra has contracted with Glass Lewis to make these voting records available promptly upon request.
- Records of written client requests for voting information and all written responses to the client requests (written or verbal) from Destra.

- Any other documents created by Destra that were material to making a decision or memorializing the basis of a decision on how to vote proxies on behalf of a client.

IX. PROCEDURE

Destra will establish a feed between the Fund's custodian and the third party voting service. Fund holdings are provided to the third party for vote monitoring and vote casting. Destra will receive a quarterly record of all votes cast for each Fund. Destra will reconcile the shares voted by the third party against fund administration records to ensure that all shares were voted except for instances noted above.

This policy pertains only to Destra Funds where proxy voting is not retained by the sub-adviser.

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