

Preparing for EDGAR Next.

December 2024



Introduction

On September 27, 2024, the U.S. SEC announced improvements to modernize the current EDGAR system through EDGAR Next. Labrador is ready to accompany clients in this transition.

What You Need To Know

EDGAR Next upgrades the following features² that change how the EDGAR system identifies and tracks those who make submissions to the SEC:

- Stricter control of access and roles³: All new and existing filers must enroll in EDGAR Next. Once enrolled,
 roles within the account need to be delegated. The account must have a minimum of two administrators,
 who then designate employees within the company and/or third-party filers, such as Labrador, to be Users in
 the account.
- 2. Individual account credentials⁴: To operate in the EDGAR Next system, all users must first obtain individual account credentials through the U.S. government authentication service login.gov.
- 3. Multi-factor authentication and API tokens: All sign-ins will go through login.gov, where a multi-factory authentication is in place. Similarly, all entities that will connect to EDGAR will be assigned by the SEC a secure API Token for identification.
- 4. **Dashboard for improved account management**: Users will access a dashboard where all information, submissions, roles, and delegations are viewed and managed.
 - Users may access and test the EDGAR Next Adopting Beta environment here.
 - While EDGAR Next may be in beta testing right now, individual credentials created from login.gov will be carried over to the live system, so users must register with their business emails.
- 5. APIs⁶: The EDGAR Next system offers the following application programming interfaces for connection:
 - Submission allows filers to submit live and test filings to the EDGAR Next system
 - Submission Status allows filers to track the status of submissions made
 - EDGAR Operational Status allows filers to be informed of the EDGAR Next system's operational status, and/or any system issues
 - Filer management allows filers to manage users within their EDGAR accounts, as well as send delegation invites

SEC.gov | SEC Adopts EDGAR Next Improvements to Filer Access and Account Management

Final rule: EDGAR Filer Access and Account Management

³ For more information on roles, see page 27 of Final rule: EDGAR Filer Access and Account Management.

⁴ Obtaining individual account credentials (U.S. SEC Youtube channel)

For more information on the Adopting Beta, including making test submissions, see <u>SEC.gov | EDGAR Next—Improving Filer</u>
Access and Account Management

⁶ More information on APIs available here: Overview of EDGAR APIs

EDGAR Next Affects All SEC Filers, And Filing Agents

All filers, including foreign issuers and filing agents like Labrador, are required to comply within the prescribed period. Companies that use Labrador to make submissions to the SEC on their behalf must comply with the enrollment requirements, and send us a delegation invite.

Timeline

Note of three important dates:

- 1. September 30, 2024 Beta environment opens to testing.
- 2. March 24, 2025 through December 19, 2025 EDGAR Next dashboard goes live; enrollment begins.
- 3. September 15, 2025 compliance is required; legacy EDGAR filing websites and processes are deactivated.

Filers who do not enroll by December 19, 2025, will be unable to submit filings, and will need re-apply for EDGAR access via an amended Form ID. Legacy EDGAR filing websites and processes may be used only until September 12, 2025.

For more information on the necessary steps during transition, see <u>SEC.gov | EDGAR Next—Improving Filer Access and Account Management.</u>

Next Steps

Labrador recommends that clients prepare for EDGAR Next by:

- 1. Learning more about EDGAR Next and the requirements here, here, and here;
- 2. Ensuring company information is up to date⁷;
- 3. Identifying the individuals to be delegated with access and roles;
- 4. Obtaining individual credentials from login.gov;
- 5. Exploring and testing Adopting Beta, and providing feedback;
- 6. Enrolling as soon as EDGAR Next goes live and setting up accounts in the dashboard.

Once EDGAR Next is live, clients can expect their account managers and project managers to establish touchpoints at key project stages to ensure full and compliant transition to the new system starting September 15, 2025.

Labrador is prepared for EDGAR Next, and ready to accompany our clients through this transition that impacts how the system identifies and tracks those who make submissions to the SEC; there will be no changes to the EDGAR submission itself, nor enhancements regarding the EDGAR system's HTML design capabilities.

To learn more, reach out to your Lead Account Manager.

⁷ SEC.gov | Maintain and Update Company Information



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