

Equal Employment Opportunity

July 7, 2021

In compliance with applicable law, Intech provides equal employment opportunities for all current and prospective employees and ensures that employment, training, compensation, transfer, promotion, and other terms, conditions, and privileges of employment are provided without regard to race, color, religion, gender, national origin, age, disability, veteran status, marital status, sexual orientation, gender identity, genetic information, or any other characteristic which is protected by the jurisdiction in which the employee predominantly works (a "Protected Characteristic"). However, notwithstanding and without limiting this policy, Intech has developed and implemented an Affirmative Action Plan for (i) individuals with disabilities, and (ii) disabled veterans, recently separated veterans, active duty wartime or campaign badge veterans and Armed Forces service medal veterans (collectively referred to as "protected veterans"). This Plan is available for inspection upon request.

Equal employment opportunity means that all personnel decisions are to be made without regard to any Protected Characteristic. Intech will make reasonable accommodations for qualified individuals with disabilities, and to employees whose work requirements interfere with a religious belief unless doing so would result in an undue hardship to the company or a direct threat to other employees. Employees requiring such accommodations should direct their requests to the Human Resources department who will work with the

employee and his/her managers and supervisors to determine an appropriate course of action. Intech will also provide a private location away from an employee's regular work station for the purpose of expressing breastmilk in order to accommodate lactation.

Employees and applicants are protected from coercion, intimidation, interference, or discrimination for (1) filing a complaint; (2) assisting in an investigation, proceeding, or hearing regarding unlawful discrimination or harassment; (3) opposing any act or practice made unlawful by any applicable state or federal law requiring equal employment opportunity; or (4) exercising any right protected under any equal employment opportunity law.

Intech encourages reporting of all perceived incidents of discrimination, harassment, or retaliation, regardless of the alleged offender's identity or position. Intech encourages prompt reporting so that constructive action may be taken before relationships become unduly strained. While no fixed reporting period has been established, early reporting and intervention are the most effective means for resolving actual or perceived incidents of discrimination, harassment, or retaliation. Employees should report perceived incidents of discrimination, harassment, or retaliation to their supervisor, Human Resources or Intech's General Counsel.

Managers and supervisors are required promptly to report to the General Counsel or Human Resources Department all complaints of discrimination, harassment, or retaliation they receive (including formal and informal complaints, as well as reports made by employees other than the target of the conduct), and all perceived incidents of discrimination, harassment, or retaliation that they observe or hear about.

Besides making a report, if you believe that you or another individual is being discriminated against or harassed, we encourage you to let the offender know what behavior or action you perceive as offensive or biased and ask that it be stopped or corrected, depending on the situation. This action alone will often resolve the problem. We understand, however, that an individual may prefer to report a particular incident through the reporting procedures, and encourage you to do so.

Intech will make every reasonable effort to resolve all complaints. Intech will promptly investigate all complaints. The investigation may include individual interviews with the parties involved and, where necessary or believed appropriate, interviews with others who may have observed the alleged conduct or have relevant knowledge. Confidentiality will be maintained throughout the investigatory process to the extent possible while allowing Intech to conduct an appropriate investigation and take corrective action, as Intech determines is necessary or prudent.

Conduct found to be inconsistent with or in violation of Intech's Equal Employment Opportunity Policy will be dealt with appropriately. Responsive action may include, for example, training, referral to counseling and/or disciplinary action, such as warning, withholding pay increase(s) or promotion(s), reassignment, suspension without pay, or termination, as the Company believes appropriate under the circumstances. The Company will also take corrective action, as appropriate, to remedy the effects of any discrimination, harassment, or retaliation, and prevent its reoccurrence.

A knowingly false complaint or complaint that is both false and intentionally made for an improper reason may result in appropriate disciplinary action. This does not include complaints which, even if erroneous, are made in good faith.

Although the Company is fully committed to taking prompt, appropriate remedial action in those instances when a violation of our EEO Policy occurs, our principal goal is to create a professional workplace governed at all times by integrity, respect, and dignity, and to prevent unlawful discrimination, harassment, or retaliation in our workplace.

In addition to our commitment to equal employment opportunity, Intech strictly prohibits any retaliation (including any threats of adverse employment action) against any individual for making a good faith report of any conduct, act, or practice believed to violate this policy or any other Intech policy or standard of conduct, or for participating in good faith in an investigation of any reported violation.

Unlawful retaliation against any individual for engaging in protected activity is strictly prohibited. Employment actions or decisions adversely affecting an individual who has engaged in protected activity are, however, proper and not proscribed by this policy, if such action or decision is unrelated to the protected activity.

The implementation of this policy requires the understanding and cooperation of all employees, staff, and management. It is especially the responsibility of management to ensure non-discriminatory employment conditions for everyone.

If you have any questions or concerns regarding the EEO Policy, Intech's commitments and expectations under this policy, or your responsibilities with respect to this Policy, we encourage you to talk to your supervisor, Human Resources, or Intech's General Counsel.

Intech is a private, quantitative asset manager investing on behalf of pension funds, governments, endowments, foundations, and other institutional investors worldwide. Having pioneered the application of Stochastic Portfolio Theory in 1987, Intech continues to seek distinctive alpha sources for clients in five continents. Today, Intech provides investment solutions encompassing ESG, absolute return, defensive equity, and traditional long-only strategies.

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