



Corporate Engagement Policy

April 1, 2022

At Intech, we see corporate engagement as a way to improve corporate behavior on environmental, social and governance issues. Our corporate engagement efforts seek to bring awareness to companies regarding their ESG practices and to influence corporate behavior since ESG risks can create significant impacts on the reputation, financial stability, and sustainability of companies.

Consistent with Intech's investment process, we take a risk-based approach to ESG. We do not analyze ESG characteristics in a fundamental manner on a stock-by-stock basis, but in aggregate from a statistical and risk-based perspective. Given our investment approach, we participate in pooled engagement in conjunction with other investors in order to maximize the impact and the scope of our engagement efforts. We use ISS ESG's Collaborative Engagement services, which allow investors to participate in a joint outreach and dialogue with companies on material sustainability-related themes. They comprise two solutions, ISS ESG's longstanding Norm-Based Engagement solution (previously known as Pooled Engagement) and the Thematic Engagement solution. While the Norm-Based Engagement solution allows investors to react to controversies, the Thematic Engagement solution offers a more proactive solution on selected material themes.

Under the Norm-Based Engagement solution, ISS identifies approximately 100 companies per year that

fail to prevent or address social and environmental controversies in line with established standards for responsible business conduct. Investors can voice their concerns with companies identified as involved in controversies with a severe adverse impact on society or the environment by ISS ESG's Norm-Based Research, and request transparency regarding risk mitigation.

In addition, in 2022, Intech subscribed to ISS ESG's Net Zero Thematic Engagement, which is a solution that enables investors to engage with publicly listed companies on top-priority ESG themes to generate transparency and performance. For the Net Zero Thematic Engagement, ISS ESG identifies a list of target companies that show a certain underperformance, based on specific definitions for this theme.

Further, to broaden our engagement related to environmental issues, we became a signatory to Climate Action 100+. Climate Action 100+ is an investor-led climate change initiative. Members of this initiative hold constructive dialogues with the world's largest corporate greenhouse gas emitters and other companies across the global economy that have significant opportunities to drive the clean energy transition and achieve the goals of the Paris Agreement. We believe that through our partnership with ISS and Climate Action 100+, the scope and efficacy of our engagements are greater than

what we would be able to achieve on our own given the quantitative nature of our investment process.

Intech is an investment-only investor and engages with companies to represent what we believe is in our clients' best interests. We do not, on behalf of our clients, invest in companies with the purpose or intended effect of changing or influencing the control of a portfolio company.

We seek to ensure that our approach meets best practices and the standards promulgated by the United Nations Principles of Responsible Investing ("PRI"). Intech became a signatory to the PRI in November 2012.

Conflicts of Interest

Intech aims to identify potential conflicts of interest and will manage these in a manner that will not compromise clients' interests. We have a process in place for the management of conflicts of interest, which is designed to ensure that conflicts between Intech and its clients are managed appropriately. Our principal objective when engaging with companies is to ensure that we fulfill our fiduciary duty by acting in the best interests of our clients at all times.

Although conflicts in Intech's engagement process are expected to be rare, if either during or after engagement with a portfolio company an actual conflict of interest is identified, Intech's Proxy and Engagement and Review Group ("PERG"), which is composed of Intech's Chief Operating Officer & General Counsel, Chief Financial Officer and Chief Compliance Officer will be responsible for ensuring that the conflict is appropriately resolved and documented. The Compliance Department will also include review of any such conflicts and related documentation in its annual review.

Reporting and Record Retention

All corporate engagement materials and supporting documentation will be retained for a minimum of 6 years.

Review of Policy

From time to time, Intech will review this policy and the services provided by service providers to determine whether Intech's approach to corporate engagement is in the best interests of clients.