

Modern Slavery and Human Trafficking Policy

April 1, 2022

I. Policy Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Intech has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labor, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

We consider the risk of slavery or human trafficking within our supply chain to be low. In general, our supply chain involves:

- Regulated professionals (attorneys, accountants, etc.)
- Financial services firms (brokers, banks, etc.)
- Information Technology (technology firms who focus on servicing asset managers typically based in North America)

We have several policies and procedures in place to prevent financial crimes including:

- Anti-Money Laundering/Terrorist Financing/Sanctions Compliance
- Fraud
- Anti-Bribery and Corruption

This Policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

II. Labor and Human Rights

Responsible Treatment of Workers

Intech's employees and suppliers are expected to treat their workers with the utmost dignity and respect, and uphold the highest standards of human rights (including the right to freedom of association). Suppliers must comply with all applicable laws and regulations relating to work and the workplace (including those relating to the payment of wages and compensation and working time).

Anti-discrimination and Diversity

Intech is committed to providing equal opportunities and seek to ensure that its workforce reflects, as far as is practicable, the diversity of the many communities in which it operates.

Employees and suppliers must not discriminate against any worker on the basis of any legally protected characteristic under applicable laws (such as age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation), in hiring and other employment practices.

Anti-harassment and Abuse

Intech operate a zero tolerance policy towards harassment and bullying.

Group entities, employees, and suppliers are expected to maintain a workplace free of harassment and abuse. They must not threaten workers with, or subject them to, harsh or inhumane treatment (including verbal abuse and harassment, psychological harassment, mental and physical coercion and sexual harassment).

Prohibition of Forced Labor and Human Trafficking

Employees and suppliers must comply with all applicable laws relating to slavery, servitude, forced or compulsory labor and human trafficking. Neither may engage in any such practices, and Intech expects its suppliers to have taken appropriate steps to ensure that the same are not taking place in their own businesses or supply chains.

Neither employees nor suppliers may withhold workers' original government-issued identification and travel document nor may they impose unreasonable restrictions on movement within or upon entering or exiting the workplace or other work-related facilities. Suppliers must ensure that workers' contracts clearly convey the conditions of employment in a language understood by the workers.

Suppliers are expected to ensure that any third-party recruitment agencies they use are compliant with the provisions of this Policy and applicable local law.

Child Labor

Employees and suppliers must not use child labor. They must not engage any workers who are younger than the legal minimum age for employment in the relevant jurisdiction.

Supplier Responsibilities

We expect our suppliers, and their subsidiaries, affiliates, employees, agents and subcontractors, (collectively, "Suppliers") to operate in accordance with this Policy, and establish and implement appropriate policies and procedures to ensure they do so. We also expect our Suppliers to encourage their own Suppliers to do the same.

To monitor compliance with this Policy, Intech may request its Suppliers to provide documentation; ask them to conduct onsite audits and report on their findings; recommend and/or review corrective action plans; and request evidence of the efficacy of any corrective action that is implemented. We expect our Suppliers to contact us if they become aware that they are not in compliance with this Policy.

III. Breaches of this Policy

Intech takes violations of this Policy seriously and Suppliers must act quickly to implement appropriate corrective actions. In some cases, Intech may choose to discontinue its relationship with them.

Any employee who breaches this Policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.