Corporate Engagement Policy
Intech® Investment Management LLC

August 1, 2026

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Introduction

Intech views corporate engagement as a means of addressing environmental, social, and governance ("ESG") matters that may present material risks to portfolio companies and, in turn, to client portfolios. Intech's corporate engagement efforts seek to raise awareness of ESG practices and encourage portfolio companies to address material ESG risks that may affect their reputation, financial condition, or long-term sustainability.

Consistent with Intech's investment process, Intech takes a risk-based approach to ESG. Intech does not evaluate ESG characteristics on a fundamental, stock-by-stock basis, but instead considers ESG matters in the aggregate from a risk-based perspective. Given this investment approach, Intech participates in collaborative engagement with other investors to broaden the reach and potential impact of its engagement efforts.

Intech participates in collaborative engagement with other investors through Institutional Shareholder Services Inc. ("ISS") and its ESG Norm-Based Engagement solution, previously known as Pooled Engagement. The solution enables participating investors to engage collectively with companies on material sustainability-related themes.

Under the ESG Norm-Based Engagement solution, ISS identifies companies that may have failed to prevent or adequately address environmental, social, or governance controversies in accordance with established standards for responsible business conduct. Participating investors may engage with companies identified through ISS ESG's Norm-Based Research to raise concerns regarding severe adverse impacts on society or the environment and to seek greater transparency regarding risk mitigation. Engagement topics may include human rights, environmental matters, labor rights, and corruption.

Intech engages with companies solely in its capacity as an investment adviser and seeks to do so in the best interests of its clients. Intech does not, on behalf of its clients, invest in portfolio companies for the purpose or intended effect of changing or influencing control of a portfolio company.

Intech seeks to conduct its corporate engagement activities in a manner consistent with applicable fiduciary obligations and the Principles for Responsible Investment ("PRI"). Intech became a signatory to the PRI in November 2012.

Conflicts of Interest. Intech seeks to identify and appropriately manage actual or potential conflicts of interest that may arise in connection with corporate engagement activities. Any such conflicts will be addressed in a manner designed to protect clients' interests. Intech's primary objective when engaging with portfolio companies is to act in the best interests of its clients and consistent with its fiduciary obligations.

Although conflicts arising from Intech's corporate engagement activities are expected to be infrequent, any actual conflict of interest identified during or after an engagement will be referred to Intech's Proxy and Engagement Review Group ("PERG") for review. PERG is composed of Intech's Chief Executive Officer, Chief Financial and Operating Officer, and Chief Compliance Officer and is responsible for ensuring that any such conflict is appropriately addressed and documented. Compliance will include a review of any such conflicts and related documentation as part of its annual review.

Reporting and Record Retention. Intech will maintain appropriate records of its corporate engagement activities, including relevant engagement materials, communications, identified conflicts, and supporting documentation, in accordance with Intech's applicable recordkeeping requirements.

Review of Policy. Intech will periodically review this Policy and the services provided by third-party engagement providers to determine whether Intech's corporate engagement approach continues to be appropriate and in the best interests of clients.