Stewardship Policy

Intech® Investment Management LLC

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I. Policy

Intech views stewardship as an important component of its responsibilities as an investment adviser and as part of its broader approach to investment management. Intech's stewardship activities are intended to support the long term interests of clients and may include proxy voting and participation in collaborative engagement activities, as appropriate. Through these activities, Intech considers governance and sustainability matters that may be relevant to the companies in which it invests on behalf of clients and to the interests of those clients. Intech's approach to stewardship is informed by applicable regulatory requirements and relevant stewardship principles and initiatives.

Intech generally expects companies in which it invests on behalf of clients to maintain appropriate governance practices and to consider material environmental, social, governance, and business risks relevant to their operations. Intech recognizes that governance practices and market expectations may vary across jurisdictions and seeks to consider such practices in the context of applicable market standards, company specific circumstances, and the long term interests of shareholders.

Intech participates in collaborative engagement with other investors through Institutional Shareholder Services Inc. ("ISS") and its ESG Norm-Based Engagement solution. The program facilitates collective engagement with companies on material sustainability related themes, including environmental, social, governance, and business conduct matters. This approach allows Intech to participate in broader engagement activities in a manner consistent with the quantitative nature of its investment process. Intech's Compliance Department provides oversight of Intech's participation in the engagement program and coordinates with ISS, as appropriate, regarding engagement activities and related developments.

II. Conflicts of Interest

Intech maintains policies and procedures designed to identify and manage actual and potential conflicts of interest, including conflicts that may arise in connection with stewardship activities. Such conflicts are addressed in accordance with Intech's Conflicts of Interest Policy and, where appropriate, are documented and disclosed.

The Compliance Department is responsible for maintaining Intech's Conflicts of Interest Matrix, and the Compliance Committee reviews the Matrix at least annually as part of its oversight of Intech's conflicts framework.

Intech's Proxy and Engagement Review Group oversees the proxy voting and engagement process and is responsible for reviewing and addressing potential conflicts of interest relating to proxy voting, engagement, and other stewardship activities.

III. Escalation

Intech's participation in collaborative engagement activities through ISS may involve escalation where an engagement issue remains unresolved or additional engagement is considered appropriate. The nature and extent of any escalation will depend on the circumstances of the engagement and may occur through ISS's ESG Norm-Based Engagement solution.

Escalation may include continued dialogue with the applicable company, communication with senior management or board representatives, or other engagement actions determined appropriate in light of the circumstances. Intech may consider the nature of the issue, the company's response, and other relevant factors when evaluating whether further engagement is warranted.

IV. Collective Engagement

Intech recognizes that collaborative engagement may provide a practical means of addressing governance, environmental, social, and other sustainability related matters with companies. Intech may participate in collective engagement activities with other investors where appropriate and consistent with its investment process and fiduciary responsibilities.

Intech primarily participates in collaborative engagement through ISS and its ESG Norm-Based Engagement solution. Through this program, participating investors may engage collectively with companies on material sustainability related themes. Intech's participation in such activities reflects the quantitative nature of its investment process and its risk based approach to ESG integration.

V. Proxy Voting

Intech exercises proxy voting authority on behalf of clients that have delegated such authority to Intech, subject to applicable legal, operational, and market limitations. Clients may also retain responsibility for voting their own proxies. Where Intech has been delegated proxy voting authority, voting is conducted in accordance with Intech's Proxy Voting Policy and the proxy voting guidelines selected or accepted by the client.

Intech uses ISS to provide proxy voting services. For institutional clients that delegate proxy voting authority to Intech, Intech makes available the ISS Benchmark Proxy Voting Guidelines and the ISS Socially Responsible Investment Proxy Voting Guidelines. At the client's direction, ISS applies the selected guidelines when voting shares on behalf of the client, and clients may change their selected guidelines in accordance with Intech's Proxy Voting Policy. Unless otherwise directed by the client, the ISS Benchmark Proxy Voting Guidelines serve as the default guidelines for clients that delegate proxy voting authority to Intech.

Intech provides oversight of the proxy voting services performed by ISS, including periodic reviews of proxy voting records to confirm that votes are cast in accordance with applicable guidelines and client instructions. Intech also periodically reviews ISS and its relevant policies and procedures as part of its oversight of the proxy voting process.

Intech maintains records of proxy voting activity and provides voting information to applicable clients in accordance with its Proxy Voting Policy and applicable recordkeeping requirements.

Certain circumstances may limit or prevent the ability to vote proxies, including share blocking, securities lending, or other operational or market restrictions. Additional information regarding these circumstances is set forth in Intech's Proxy Voting Policy.

Where a client participates in securities lending through an arrangement with its custodian or another provider, securities on loan may not be available to vote, and it may be impractical or impossible to recall the securities in time to vote the applicable proxy.

VI. Governance and Sustainability Initiatives

Intech has been a signatory to the Principles for Responsible Investment ("PRI"), which is supported by the United Nations, since November 2012, and reports on its responsible investment approach through the PRI reporting framework. Intech's participation in PRI supports its ongoing engagement with evolving ESG practices and industry developments that may be relevant to its investment process and clients.

Intech also recognizes the objectives of the Paris Agreement and may manage portfolios that incorporate carbon related objectives or constraints to reflect client preferences.

Intech's Sustainability Committee serves as a forum for discussing sustainability matters, including relevant developments, initiatives, and opportunities to enhance Intech's sustainability practices. The Committee also considers the environmental impact of Intech's business operations and related sustainability programs and initiatives.

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