Japan's Stewardship Code

Public Acceptance and Implementation Statement

Intech® Investment Management LLC

Adopted November 23, 2026

Acceptance of the Code

Intech Investment Management LLC (“Intech”) accepts the principles of Japan’s Stewardship Code, revised June 26, 2025 (the “Code”), on a comply-or-explain basis. Intech seeks to implement the Code in a manner appropriate to its investment management strategies, client mandates and fiduciary responsibilities. The following statement describes how Intech applies the Code and explains areas where its practices differ from the Code’s guidance.

Principle 1 — Stewardship Responsibilities

Intech’s stewardship approach supports clients’ long-term investment interests through systematic quantitative equity investment management, portfolio-level risk assessment and participation in collaborative engagement through Institutional Shareholder Services Inc. (“ISS”) and its ESG Norm-Based Engagement program. Under this program, ISS independently identifies and selects companies for engagement, conducts dialogue and maintains detailed engagement records. Intech considers ESG-related risks within its broader risk framework and may implement client-specific ESG constraints. Its approach does not involve fundamental research or direct engagement with every portfolio company. Proxy voting responsibilities are determined separately under each client mandate.

Principle 2 — Conflicts of Interest

Intech maintains policies and procedures designed to identify, manage and, as appropriate, disclose conflicts relating to its advisory and stewardship activities. These include conflicts involving business relationships, client interests, proxy arrangements and engagement activities. Matters are addressed through Compliance oversight and, where appropriate, the Proxy and Engagement Review Group, which includes senior management. Intech believes this governance structure is proportionate to its activities and does not maintain a separate independent stewardship board. Intech also reviews relevant conflicts controls of external service providers.

Intech’s conflicts controls are designed to prevent business relationships or other competing interests from improperly influencing proxy voting decisions or stewardship activities, with identified conflicts subject to review and escalation under applicable firm policies.

Principle 3 — Monitoring Investee Companies

Intech evaluates investment and ESG-related risks primarily through quantitative and portfolio-level processes rather than ongoing fundamental research on each issuer. Through its Norm-Based Engagement program, ISS identifies controversies and potential engagement targets using its independent norms-based research methodology. Intech regards this as a complementary stewardship resource, not a representation that it or ISS continuously conducts full fundamental monitoring of every security held in client portfolios, including Japanese-listed securities.

Principle 4 — Constructive Engagement

Through the ISS ESG Norm-Based Engagement program described above, Intech participates in collaborative corporate engagement while ISS independently selects issuers, conducts dialogue and maintains detailed engagement records. Engagement themes may involve human rights, environmental matters, labor practices and business conduct. ISS's engagement activities span companies across multiple jurisdictions, including Japanese companies that have been selected for engagement for a particular period. Engagement of any particular Japanese issuer or client holding is not guaranteed. Intech does not direct ISS's issuer selection or carry out a general program of direct company engagement.

Shareholding inquiries: Requests from investee companies concerning the number of shares held in Intech-managed portfolios may be directed through Intech's published contact channels. Intech will assess each request, confirm the applicable account and custody arrangements, and respond or refer the inquiry to the appropriate client or custodian, as permitted by applicable law, contractual obligations and confidentiality restrictions. Intech will not disclose confidential client holding information without an appropriate basis or authorization.

Principle 5 — Proxy Voting and Disclosure

Proxy voting responsibilities are determined by each client mandate. Clients may retain voting authority or delegate it to Intech. For mandates in which voting authority is delegated to Intech, ISS facilitates proxy voting under either the ISS Benchmark Proxy Voting Guidelines or the ISS Socially Responsible Investment (SRI) Proxy Voting Guidelines, as selected or accepted by the client. The ISS Benchmark Guidelines apply by default unless otherwise directed, subject to Intech's Proxy Voting Policy, fiduciary obligations and oversight. Where clients retain voting authority, Intech does not represent votes cast by those clients or their designated providers as its own. Intech maintains oversight of ISS's proxy voting services, including monitoring adherence to applicable voting guidelines and reviewing voting exceptions or other matters requiring attention under its Proxy Voting Policy.

In connection with its acceptance of Japan's Stewardship Code, Intech will publicly disclose proxy voting activities relating to Japanese investee companies for which Intech exercises voting authority.

The disclosures will include aggregate voting results by major proposal category and individual company-level voting records on a proposal-by-proposal basis, together with explanations of significant voting decisions where appropriate.

The annual disclosure will cover the preceding calendar year ending December 31 and will be published on Intech's corporate website no later than March 31 of each year. The initial disclosure will cover the calendar year ending December 31, 2026, and will be published no later than March 31, 2027.

Intech will publish the voting disclosures in the Stewardship section of its public website, alongside its Japan's Stewardship Code acceptance and implementation statement and related stewardship reporting.

Proxy voting records relating to non-Japanese investee companies will continue to be maintained and made available to clients in accordance with Intech's established policies and procedures.

Principle 6 — Reporting on Stewardship

Intech will publish an annual summary of relevant stewardship activities, including its participation in ISS's collaborative engagement program and proxy voting activities for Japanese investee companies where Intech exercises voting authority. The summary may include relevant engagement themes and developments based on information provided by ISS, which maintains the detailed records of its engagement program. Intech does not represent voting activity conducted independently by clients or their designated providers as voting performed by Intech.

Principle 7 — Skills, Resources and Evaluation

Intech relies on internal investment, risk and governance expertise and external ISS specialist resources appropriate to its quantitative investment model. Intech periodically reviews its stewardship arrangements and oversight of external providers. Intech will periodically evaluate its implementation of the Code's relevant principles, including the appropriateness of its stewardship practices, governance arrangements, conflicts management and oversight of external service providers. A summary of the results will be made publicly available as part of Intech's stewardship reporting.

Principle 8 — Stewardship Service Providers

Principle 8 primarily addresses service providers, such as proxy advisers. Intech uses ISS for collaborative corporate engagement and, for certain mandates, proxy services. ISS independently operates its engagement program and maintains the relevant detailed records. Intech oversees its service-provider arrangements in a manner appropriate to its responsibilities, but does not assume ISS's obligations or control its engagement selections.

Ongoing Review

Intech will review this statement at least annually and update it when material changes to its practices, client arrangements or relevant Code guidance warrant. This statement reflects Intech's firm-level approach; specific proxy voting responsibilities and investment restrictions are determined under each applicable client agreement.