

Responsible Investment Statement

Acadian believes that well-governed, sustainable businesses have the potential to make a positive contribution to active returns in our portfolios over time. Our investment approach is highly systematic and uses quantitative models to assess stocks. Responsible investing is integrated through factors in our core investment process and applied across all portfolios. Our goal is to continuously evaluate and incorporate additional Environmental, Social and Governance (ESG) considerations in our investment process either as return seeking or risk mitigating factors to improve our client's investment outcomes.

Acadian became the first quantitative manager to sign the United Nations Principles for Responsible Investment (UN PRI) in 2009, demonstrating our recognition of the importance of these issues. We share the philosophy that non-financial considerations may impact investment returns and risk, and we integrate an analysis of such issues in our investment process.

INTEGRATION OF ESG

We integrate ESG throughout our investment process. Acadian integrates factors into our core investment process that account for governance and management quality, carbon emissions and social issues such as sociopolitical risk and labor standards. In addition, we have an active research agenda to potentially integrate other ESG factors into our process, provided we would still be able to meet our fiduciary duty to our clients to maximize risk-adjusted returns. This includes diversity, equality, and inclusion.

Below are some details of responsible investment considerations:

- Environmental: As we acknowledge that transition risk will impact our securities, we take measures to manage as such. Acadian
 accounts for climate change and environmental considerations by integrating a carbon tax on high emitting companies with further
 options for tilts such as to environmental opportunities through customized portfolio construction.
- Social: We also believe human capital management, corporate culture and labor practices are a relevant consideration in assessing corporate asset quality.
- Governance: Acadian believes that investing in companies with strong governance profiles has the potential to enhance returns. We utilize related factors in our bottom-up framework that includes considerations of executive compensation, executive turnover, capital structure, accounting 'red flags' and a composite that assesses traditional governance practices considerations such as board independence, litigation and fraud potential.

We also offer a wide set of ESG investment options as risk controls or portfolio tilts with typically limited adverse investment impact. We can apply restriction lists of over a dozen ESG-related issues including those relating to Governance or accounting practices as well as both positive and negative screens. Furthermore, we also offer SRI proxy voting and engagement reporting.

ACTIVE OWNERSHIP

- Proxy Voting: We will vote proxies when delegated proxy voting responsibility by our clients. We have adopted the voting policy of an industry-leading proxy provider, who casts votes according to agreed-on principles relating to such issues as board structure, accounting policy, share issuance, and others. We also vote in accordance with client directed voting policies if so directed. In addition, Acadian offers ESG-based Voting Policies through our proxy voting agent, which some of our clients elect to utilize.
- Engagement: Acadian's engagement policy applies across our portfolios. We prioritize engagements that improve our competencies in portfolio management and active stewardship. Given Acadian's leadership in the incorporation of ESG issues and active stewardship, we participate in initiatives related to Energy Transition, Employee Well-being and Management Long-Termism. We engage via collaborative, Acadian-led, and third-party led dialogues. We engage where we have significant holdings and believe there is an opportunity to improve corporate behavior on environmental, social, and governance issues.

GOVERNANCE & REPORTING

- Acadian's ESG approach is regularly discussed by the firm's Responsible Investing Committee, which comprises of senior executives
 and is chaired by Andy Moniz, Senior Vice President, Director of Responsible Investing, Acadian Asset Management (UK) Limited.
- Responsible investing reporting is available to clients and includes, ESG portfolio characteristics report, proxy voting results and engagement outcomes. In addition, we offer environmental reporting such as a carbon report which shows total carbon emissions and carbon intensity details / exposures by industry and region at the portfolio level compared to the client's mandated benchmark. These metrics are built into our internal portfolio management tools allowing us to drill into the drivers of these carbon exposures.

Acadian also publicly reports on our responsible investment activities on our website. This Transparency Report is also available on the PRI's website.

Signatory of:



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Acadian's quantitative investment process is supported by extensive proprietary computer code. Acadian's researchers, software developers, and IT teams follow a structured design, development, testing, change control, and review processes during the development of its systems and the implementation within our investment process. These controls and their effectiveness are subject to regular internal reviews, at least annual independent review by our SOC1 auditor. However, despite these extensive controls it is possible that errors may occur in coding and within the investment process, as is the case with any complex software or data-driven model, and no guarantee or warranty can be provided that any quantitative investment model is completely free of errors. Any such errors could have a negative impact on investment results. We have in place control systems and processes which are intended to identify in a timely manner any such errors which would have a material impact on the investment process.

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