



Los Angeles Capital Active Ownership Policy Statement

As a quantitative manager, data is at the heart of the Firm's investment process. As such, the Firm has adopted a multi-dimensional approach to active ownership which emphasizes the Firm's support of a consistent and transparent framework for the disclosure of material financial information. The Firm seeks to promote long-term value creation and stewardship from three primary vantage points: proxy voting, collaborative engagement, and improving disclosure of material, decision-useful financial information, through its participation in global investor initiatives.

Proxy Voting: The Firm has engaged Glass Lewis as a third-party voting administrator to assist with various proxy functions, however, the Firm retains ultimate authority and fiduciary responsibility for proxy voting. The Firm is able to implement Glass Lewis' ESG Proxy Guidelines and client's other custom proxy voting guidelines upon request. The institutional guidelines adopted by the Firm call for evaluation of shareholder initiatives regarding ESG issues with environmental and social issues considered in the context of the financial materiality to a company's operations. Members of the Firm's Proxy Committee review the Firm's proxy voting policy and assess voting decisions for top holdings.

The Los Angeles Capital's Proxy Voting Policy provides further details on the Firm's proxy voting approach

Collaborative Engagement: Los Angeles Capital believes that more uniform and transparent corporate disclosure practices are essential for investors to accurately incorporate financially material information related to climate change in investment decisions. As a result, the Firm has signed on to Climate Action 100+ to strengthen climate-related financial disclosure, improve governance and to reduce emissions. Los Angeles Capital has developed a proprietary set of investment criteria to assess potential engagement opportunities and works collaboratively with other investors committed to reducing and disclosing climate risks, while simultaneously embracing the opportunities presented by climate change.

Global Investor Initiatives: In addition to participating in Climate Action 100+, Los Angeles Capital has been a signatory of the Principles for Responsible Investment (PRI) since 2015 and publicly supported the Task Force for Climate-related Financial Disclosures (TCFD) in 2019. The Firm works with a variety of vendors and actively engages with its service providers regarding ESG data. The Firm incorporates the Sustainability Accounting Standards Board (SASB) framework in the Firm's proprietary ESG Model highlighting the Firm's support for the disclosure of relevant ESG criteria in accordance with the SASB framework. By engaging with the Firm's industry peers to advance the discussion around active ownership practices, we, as an organization, develop a more robust and holistic view of opportunities to improve corporate disclosure practices that allow us to better manage investment risks and opportunities.