



Voya Investment Management **Responsible Investment Policy**

At Voya Investment Management (Voya IM), we strive to exceed our clients' expectations for service and investment results. To meet our clients' objectives, we undertake rigorous and holistic investment analysis across a range of asset classes and offer a breadth of solutions and capabilities that allow clients to customize their investments according to their preferences.

As fiduciaries, we have a duty to act in the best long-term interests of our clients. As one means to meeting that commitment, we became a signatory to the United Nations Principles for Responsible Investment (UN PRI) in 2017. In accordance with UN PRI principles, we incorporate financially material environmental, social, and governance (ESG) issues into our investment analysis and stewardship practices, with the intention of improving our long-term investment decision-making. We believe that ESG issues can affect the performance of investments over time, although the relevance to specific companies, sectors, asset classes, and regions may vary. In the "Data and Themes" section of this policy, we define some of the most material topics we consider under the umbrella of ESG.

This policy describes our governance structure and approach to responsible investing, including our solutions, investment capabilities, and stewardship practices.



Governance

Voya IM's Responsible Investment Committee acts as a governing body, providing oversight of our responsible investment strategy, and fostering continuous improvement of our research, solutions, and capabilities. The committee is chaired by our Head of Responsible Investment and Thematic Research, who reports to our Chief Investment Officer, and its membership spans our active ownership, legal, compliance, and risk teams, among others. The Voya IM Responsible Investment Committee is tasked with managing our Voya IM Responsible Investment Policy, including our related memberships and affiliations, overseeing certain disclosures about our responsible investment program, raising awareness of evolving risks and changing regulations, and fostering a unified response to such developments across our platform. Our proxy voting activities are overseen by our Voya IM Proxy Committee that meets quarterly and is chaired by our Head of Active Ownership.

The Responsible Investment and Thematic Research team acts as a center of expertise to help guide investment teams in their incorporation of responsible investment principles. The team's scope of responsibility spans three major areas: ESG Research, Active Ownership, and Thematic Research. ESG Research is focused on curating data and developing insights, both from a top-down and bottom-up perspective, to support the investment teams' ESG integration and responsible investment approaches. Our ESG Research capabilities include ESG scoring techniques, as well as both quantitative and qualitative assessments of material ESG topics. Meanwhile, the Active Ownership ("AO") team leads Voya IM's proxy voting and corporate engagement processes. Finally,

our Thematic Research capabilities are focused on providing insights about long-term trends and themes impacting our investments across asset classes. Thematic Research encompasses a broad range of themes including sustainability, emerging technologies, demographic shifts, and macro and geopolitical developments shaping our societies.

Supported by our committee governance and the Responsible Investment and Thematic Research team, Voya IM's investment teams are responsible for integrating responsible investment practices into their investment approach in accordance with client mandates. Through this collaborative structure, we aim to ensure that responsible investment practices are thoughtfully embedded across our investment process.



Our approach to responsible investing

Our approach to responsible investing is grounded in financial materiality and stewardship and is centered on our clients' preferences. To reduce risks and help generate stable long-term returns, we use information and data points related to an investment's governance, as well as its environmental and social risks and opportunities. This approach aims to assess financially material risks and opportunities over a long-term horizon.

Voya IM aims to be flexible on the path ahead as the regulatory environment and client demand evolves and will continually seek to enhance our product offerings to meet these needs. We recognize that responsible investing often requires customization, and we will continue to work closely with clients and partners to tailor our products to meet their requirements.

Our portfolio of investment solutions is comprised of three main areas: integration of material environmental, social, and governance information ("ESG integration"), client directed exclusions, and sustainability solutions. These categories are not mutually exclusive.

	 ESG Integration	 Client Directed Exclusions	 Sustainability Solutions		
			Inclusion and Improvement	Thematic	Impact
Definition and characteristics	Consideration of relevant and financially material ESG risks and opportunities.	Exclusions of certain sectors or companies based on clients' preferences.	Promoting one or more sustainability goals, tilting the portfolio, using positive screens or targets.	Targeting specific themes or sectors in portfolio management.	Investing to achieve specific sustainability objectives, in addition to financial returns.
Examples of factors, sectors, themes or objectives	GHG emissions, labor management, board composition, litigation risk.	Tobacco, controversial weapons or fossil fuels.	Carbon reduction targets, positive screening based on ESG scores.	Decarbonization or cybersecurity.	Clean energy project financing.

Integration of Environmental, Social, and Governance data and information

As fiduciaries, when selecting securities, we incorporate relevant financial and non-financial factors into our analysis of the long-term performance outlook of a company and the value of its securities. The incorporation of ESG factors into the investment process is underpinned by the belief that it will improve the resilience of the portfolio by reducing risk and generating more stable returns. We define ESG integration as the consideration of relevant and financially material ESG factors, alongside traditional factors, in our investment decision-making process.

As part of our assessment of a company's value, prospects, and financial condition, the ESG integrated portfolios consider information about many factors, including those that fit under the ESG umbrella. This may include exposure to regulation or litigation, labor relations, human rights, product quality and safety, reputation, governance practices, executive compensation, board oversight, reporting and disclosure, community relations, energy costs and climate impact.

Our investment teams have a deep understanding of the nuances of their

asset classes and specific portfolio considerations. They make informed investment decisions by focusing on those factors that are likely to have a material effect on the value and performance of an issuer and its securities over time. As an example, the mismanagement of governance issues, employee relations or toxic waste could result in increased expenses or reputational damage that may impact the valuation of a company's securities. The purpose of our ESG integration is to reduce such risks.

Portfolio managers at Voya IM have access to multiple tools and data sources to support ESG integration, including third-party data, Voya IM's ESG materiality assessment and scorecard, and quantitative research signals. Note that relevance and availability vary by asset class. The Responsible Investment and Thematic Research team, as well as other fundamental and quantitative research teams are also supporting the portfolio managers with information and research on themes, sectors and specific investments. This could also include information gathered in dialogues with investee companies performed by the AO team.



Client directed exclusions

Voya IM does not exclude companies from portfolios on a firm-wide basis. However, when a client elects to exclude certain issuers or sectors from their portfolios or when a fund is designed to meet certain regulatory requirements in specific markets, we have the capabilities to implement such client/fund-directed exclusion lists to ensure portfolios reflect the investment objectives of our clients.

Sustainability solutions

Voya IM's broad platform of investment strategies has afforded our firm the opportunity to bring those strengths into the development of sustainability solutions. Our investment capabilities have enabled us to deliver products and solutions with client-directed objectives related to sustainable development and other trends and themes. We categorize sustainability solutions as Inclusion and Improvement, Thematic or Impact.



Solutions in Foreign Markets

As ESG-related regulations evolve around the globe, we are committed to providing solutions to our clients that address demand specific to certain markets or are tailored to the regulatory requirements in their respective regions.

With respect to Voya IM managed funds distributed in Europe, these funds must meet the requirements set forth in the EU's Sustainable Finance Disclosure Regulation (SFDR), among other applicable regulatory regimes. In the management of these portfolios, our investment teams engage in specific undertakings, as described in this policy, to identify and take account of "Sustainability Risks" as defined by SFDR. A Sustainability Risk is defined under SFDR as an environmental, social, and governance event or condition which, if it occurs, could cause an actual or potential material negative impact on the value of an investment. As part of our Sustainability Risk assessment, we consider both the potentially negative impact that an investment may have on environmental and social objectives and the risk posed to the value of the investment itself. Over the long-term, the impact that a company has on its stakeholders and the environment could lead to business model changes with the potential to erode enterprise value, thus it is an important lens to consider in a holistic review of Sustainability Risks. For the applicable portfolios, these risks are mainly managed by using the capabilities and solutions described above, including integration, active ownership and exclusionary screens. More specifically, Voya IM identifies and monitors Sustainability Risks in the following ways:

1 As part of the decision to make an investment, our investment teams are provided with pre-trade alerts for severe ESG risks for publicly listed companies, based on third party ESG data and scores. Portfolio managers may consult with our Responsible Investment and Thematic Research team and/or fundamental and quantitative research teams, as well as utilize internal ESG tools, including our proprietary ESG scorecard, in assessing these risks and making a portfolio decision.

2 Our portfolio managers are provided with various tools and analytics to assess portfolio-level ESG data or characteristics to assess Sustainability Risks on an ongoing basis.

3 Prior to implementing an investment decision, portfolio managers are made aware of the Principal Adverse Impacts (PAI) – the most significant negative impacts of investments on the environment and people.¹ Alerts are triggered based on predefined severity thresholds for each mandatory PAI, with some thresholds tailored to reflect sector-specific materiality. Investments that exceed a given threshold are deemed to be doing significant harm to an environmental or social objective.

Investment teams across our platforms will consider Sustainability Risks in somewhat different manners given the differences in asset classes, geographies, data availability, and investment processes. Investments in companies that may present Sustainability Risks are not prohibited. Rather, consideration of Sustainability Risks, taken together with other factors, allows the investment team to make an informed decision on risk inclusive of all information, as applicable to the asset class.

¹ "ESAs analyse the extent of voluntary disclosure of principal adverse impacts under the SFDR," ESMA News, European Securities and Markets Authority, 28/09/2023

Stewardship – Active Ownership & Engagement

Voya IM's long-term perspective favors sound investment principles aligned with the priorities of our clients. Accordingly, our active ownership activities are designed to protect and enhance the economic value of the companies in which we invest on behalf of our clients. We do this through engaging with issuers of securities in which we have invested and exercising our voting rights at shareholder meetings.

Engagements

Ongoing discussions with senior management and board members of companies are essential to understanding the company in which we are invested and to promote best practices and long-term success. We believe that engagements should be highly relevant to our investment process and provide valuable insights to the issuers with whom we engage.

Through our discussions, we may make issuers aware of how our concerns factor into our investment decisions, understand their efforts to address these concerns, and discuss industry best practices. Engagements focused on ESG matters are led by the AO team and may also include members of our investment teams. Such dialogues are likely to enrich our investment analysis while at the same time provide useful insights to issuers into how they compare generally to industry peers and how markets perceive their ESG initiatives.

Voya IM has developed engagement guidelines to outline the AO team's engagement objectives, prioritization, methodology, tracking, and escalation processes. They are designed to help companies understand our engagement

goals and expectations, fostering mutually productive dialogue.

Additionally, Voya IM investment teams may engage directly with the companies in which they invest. The investment teams can escalate any concerns they may have with a company to the Responsible Investment and Thematic Research team for further investigation or dialogue.

Proxy Voting

Voya IM views proxy voting as an important component of fulfilling our fiduciary responsibilities to clients. When delegated authority to vote proxies on behalf of client portfolios, we exercise that responsibility with the objective of acting in our clients' best interests. We consider proxy voting a key tool for advancing long-term shareholder value and managing investment-related risks.

Our Proxy Policy outlines Voya IM's approach to voting proxies in a manner that supports the long-term economic value of the underlying securities. To this end, Voya IM considers many factors, including ESG factors, which may impact the investment risk and return profiles of our clients' investments. As such, the Voya IM Proxy Policy was developed to summarize Voya IM's view on issues of concern to shareholders and provide a general indication of how Voya IM may vote its clients' portfolio securities regarding these issues in order to maximize shareholder value and mitigate risks.

In addition, Voya IM offers proxy voting alignment to clients' ESG values by using a client's custom voting policy or using a proxy advisory firm's voting policies.



Data and themes

This section defines some of the data that is being used in the processes and workflows discussed in the policy, centered around financially material topics for responsible investments.

Governance

Governance is the system of rules, structures and processes, related to how an investment is set up and overseen. Which dimensions of governance are most important varies dependent on the asset class. As investors, our understanding of an investment's governance practices is based on a combination of data points and sources, including information from dialogues and engagements with companies, conducted either by the investment teams or the AO team. Some examples of governance information include following the rule of law, effectiveness of a company's board, accounting practices, and disclosure and transparency.

Environmental resilience

The average global temperature has risen about 2.3 degrees Fahrenheit (1.3 degrees Celsius) since global record began in 1850.² The rise in temperature in combination with an expanding global population, industrial transitions and increased consumption puts a strain on land and natural resources. For investors, this development creates risks and opportunities, which could be related to the scarcity or loss of resources, using new input factors or the transitioning to new business models. Risks can also be related to increased understanding of, for example, how toxins or waste affect human health or the environment, followed by increased scrutiny and litigation.

Voya IM recognizes that climate-related risks and opportunities can be financially material across sectors and asset classes. Data points associated with transition risks and opportunities are available to analysts and portfolio managers, where possible. Similarly, investments might be affected by physical risks, related to more volatile weather patterns, including storms, floods, droughts and wildfires, and could potentially be important to understand and consider. Additionally, financially material risks and associated data points related to water scarcity and water usage, deforestation and waste management are also accessible to the teams through the tools, research, and data sources mentioned in this policy, subject to availability.

Human rights and labor rights

Effective investment analysis includes consideration of potential risks related to human rights and labor practices. Risks can be associated with a product, business, production line, or value chain with potential negative consequences for stakeholders, the associated workforce, or customers. In large global companies with complex supply chains this can be especially tricky, requiring strong governance practices and monitoring of processes and outcomes, to avoid negative human and societal consequences. To reduce risks related to human rights and labor rights, Voya IM sources data, where possible, for the analysts and portfolio managers related to the investment's relevant policies and processes and information about potential negative outcomes.



²Climate change: global temperature | NOAA Climate.gov

All investing involves risks of fluctuating prices and the uncertainties of rates of return and yield inherent in investing. All security transactions involve substantial risk of loss.

Environmental, social and governance (“ESG”) factors may impact the investment risk and return profiles of our investments. Integration of ESG factors into an investment process may cause a strategy to take risks or forego exposures available to strategies or products that do not consider ESG factors, which could negatively impact performance. There is no assurance that integrating ESG factors will be successful for an investment strategy.

Past performance does not guarantee future results. This policy has been prepared by Voya Investment Management and provided for informational purposes. Nothing contained herein should be construed as (i) an offer to sell or solicitation of an offer to buy any security or (ii) a recommendation as to the advisability of investing in, purchasing or selling any security. Any opinions expressed herein reflect our judgment and are subject to change. Certain of the statements contained herein are statements of future expectations and other forward-looking statements that are based on management’s current views and assumptions and involve known and unknown risks and uncertainties that could cause actual results, performance or events to differ materially from those expressed or implied in such statements. Actual results, performance, or events may differ materially from those in such statements due to, without limitation, (1) general economic conditions, (2) performance of financial markets, (3) interest rate levels, (4) increasing levels of loan defaults, (5) changes in laws and regulations and (6) changes in the policies of governments and/or regulatory authorities.

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