

Supplier Code of Conduct

Loomis, Sayles & Company, L.P. (“**Loomis Sayles**”) is committed to ethical operations in all facets of its business. At Loomis Sayles, our goal is to deliver superior long-term risk-adjusted returns and effective investment solutions to meet our fiduciary duty to our clients. Sustainability considerations contribute to this goal. Loomis Sayles maintains operations in line with what it believes to be sound human rights, labor, environmental and anti-corruption tenets. The following statement provides an overview of the firm’s intentions with regard to supplier engagements.

FOUNDATION

Loomis Sayles conducts its business in accordance with its IDEALS. These ideals represent the core characteristics of who we aspire to be as employees and as an organization.¹ Amongst other things, these ideals include the core tenets of being Inclusive & Diverse, Accountable, Excellent, and Leaders. We believe that an inclusive and equitable workplace that reflects the diverse communities in which we work and live fosters innovation, creative thinking and best-of-industry solutions. These characteristics help us exceed client expectations, and our suppliers should reflect that belief. We hold ourselves to the highest standards, individually and for the sake of our clients, and we expect the same from our suppliers. We help ourselves and our colleagues by modeling behavior that inspires the people around us, including respect, humility, gratitude, empathy and encouragement, and our efforts in this regard extend to our suppliers. Loomis Sayles views the exercise of proper oversight and the highest standard of conduct to be the underpinnings of good governance.

Loomis Sayles engages with third party vendors (“Suppliers”) to meet the needs of its operations. In seeking, developing and maintaining these relationships, Loomis Sayles pays attention to a Supplier’s level of integrity and ethical actions. We set forth below Loomis Sayles’ expectations for its Suppliers.

HUMAN RIGHTS

Loomis Sayles supports internationally recognized human rights. The UN defines human rights to include: right to life, health and well-being, privacy, fair wages, decent working conditions; freedom from discrimination, slavery and torture; and freedom of association.² Loomis Sayles expects its Suppliers to support these tenets of human rights and conduct their business in accordance with these tenets.

LABOR

Equal Opportunity: Loomis Sayles expects its Suppliers to not discriminate against any employee or applicant for employment because of race, creed, color, religion, gender, sexual orientation, national origin, age, veteran status, marital status, citizenship status, disability, socioeconomic status or any other characteristic protected by federal law. In addition, Suppliers should promote a workplace free from all forms of harassment, including sexual harassment, whether verbal or physical.

The DEI principles shaping the firm’s stance when engaging applicants, employees and potential suppliers includes:

- Promoting fair and equitable access to career and procurement opportunities
- Creating a level playing field for development, key assignments, feedback, mentors, sponsors and advancement/promotion
- Leveraging DEI for greater creativity, innovation, problem solving and business opportunities

¹ Loomis Sayles IDEALS: Inclusive & Diverse, Dedicated to Teamwork, Excellent, Accountable, Leaders, Solutions-Oriented.

² <https://www.un.org/en/about-us/universal-declaration-of-human-rights>

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We expect the Suppliers we do business with to operate in alignment with and in the spirit of our DEI principles and our cultural IDEALS.

Occupational Safety: Loomis Sayles expects its Suppliers to create and maintain safe working conditions, with necessary maintenance to keep health and safety risks to a minimum in the work environment. Loomis Sayles envisions that Suppliers will adhere to applicable laws regulating occupational safety and health.

Modern Slavery: When people are deprived of their freedom and are exploited for someone's personal or business gains it is called modern slavery or human trafficking. This crime can look like involuntary servitude, slavery or practices similar to slavery, debt bondage, forced labor and child labor. Loomis Sayles expects its Suppliers to be committed to: (i) ethical business operations and relationships; (ii) complying with all anti-slavery laws; and (iii) implementing and enforcing effective systems and controls to ensure there is no modern slavery in the Supplier's business operations and supply chains.

Working Hours: Loomis Sayles expects Suppliers to follow local and national laws or regulations regarding working hours.

Wages & Benefits: Suppliers are responsible for timely compensation and payment of fair wages for their employees. All employees should be paid a fair wage aligned with prevailing industry practices and regulations.

Freedom of Association: Loomis Sayles expects Suppliers to respect the rights of workers to associate, organize and bargain collectively in a lawful and peaceful manner without interference.

ENVIRONMENT

At Loomis Sayles, we firmly believe that climate change is one of the most important global issues of our time. We are happy to see that governments, businesses and civilians around the world are mobilizing to address climate change. Loomis Sayles established its Green Council with a mission to reduce the firm's environmental footprint utilizing a systematic approach that educates our workforce, and brings about behavioral changes for a more sustainable and healthier future. Suppliers should similarly consider how they might respond to the issue of climate change.

Loomis Sayles expects its Suppliers to adhere to sound environmental industry practices and standards. Every effort should be made to remain aware of current environmental regulations and committing to meeting them. They should comply with applicable environmental reporting requirements.

ANTI-CORRUPTION

Loomis Sayles is committed to conducting business activities with the highest of ethical standards and integrity. Conduct that creates the appearance of unethical or illegal activity is strictly prohibited, and is not tolerated in any capacity. Avoiding corruption of all kinds, including commercial bribery and bribery of government officials, is of the utmost importance. Loomis Sayles expects its Suppliers to also avoid corruption of all kinds.

Data Security: Loomis Sayles expects proprietary information about Loomis Sayles and its clients to be handled in strict confidence and not to be discussed with outsiders. The operations, activities, and affairs of the firm and its

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clients, including but not limited to: (1) client lists and fees; (2) investment transactions and strategies; (3) marketing materials; and (4) finances and business plans, are the confidential and proprietary information of the firm and must be kept confidential to the greatest extent possible.

Suppliers are responsible for their internal security of such information, and are expected to utilize appropriate safeguards to protect such information. In addition, Suppliers are prohibited from engaging in securities transactions on the basis of information gleaned from their work with Loomis Sayles that is not available to the general public and which, if known to outsiders, might affect their investment decisions. The dissemination of such information to others who might make use of that knowledge to trade in securities is also prohibited.

Conflicts of Interest: Loomis Sayles expects our Suppliers to disclose any potential conflicts of interest prior to initiating their relationship with the firm, or as soon as a Supplier becomes aware of a conflict after initiating a relationship.

Anti-Bribery: As a global investment adviser, gifts and business entertainment activity represent a high level of risk to Loomis Sayles in terms of the potential to violate anti-corruption regulations. Suppliers should limit gifts and entertainment provided to Loomis Sayles to a reasonable amount. Loomis Sayles expects its Suppliers to also take every precaution to avoid violating anti-bribery regulations.

Anti-money laundering: Suppliers should comply with all applicable anti-money laundering laws and regulations.

Economic and Trade Sanctions: Applicable economic and trade sanctions should dictate the actions of Suppliers. In addition, it is Loomis Sayles' intention that its Suppliers comply with applicable global sanctions programs (e.g., U.S. Department of the Treasury's Office of Foreign Assets Control).

Antitrust and Fair Competition: Suppliers should be aware of applicable antitrust laws and abide by them.

Insider Trading: In adherence to applicable securities laws, rules, and regulations, Loomis Sayles maintains written policies and procedures designed to prevent trading on the basis of material, non-public information. Loomis Sayles' policy is to refrain from trading or recommending trading when in the possession of material, non-public information. If a Loomis Sayles Supplier obtains material, non-public information on a particular entity by way of its work with Loomis Sayles, the Supplier is prohibited from acting upon such content.

Political activity and contributions: Loomis Sayles does not support or oppose political candidates and/or political parties, and does not contribute to any candidates for office, political action committee or political parties. With regard to Suppliers, Loomis Sayles requires all engagements in political activities and contributions to be undertaken transparently and without impact to any services provided to Loomis Sayles.

MONITORING AND OVERSIGHT

Loomis Sayles expects its Suppliers to conduct their operations and provide services to Loomis Sayles in a manner consistent with the spirit of this Code. Suppliers should regularly assess their own operations and supply chain to determine whether they comply with the principles contained in this Code. Loomis Sayles will also make use of various sources, including third party vendors and internal tools and sources to monitor its Suppliers' compliance with the tenets of this Code of Conduct. If Loomis Sayles becomes aware of Suppliers, or particular practices at Suppliers, that may not be consistent with the Code; Loomis Sayles will conduct additional research on the Supplier

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or specific practices. In this regard, we have organized a Vendor Oversight Task Force consisting of membership from various departments, to assist in these efforts. Depending on the facts and circumstances, we may request more information, including any plans to respond to an identified deficiency, we may further engage with Suppliers to encourage them to improve their practices and finally, we may cease to do business with the Supplier.