

NEW YORK LIFE INVESTMENT MANAGEMENT LLC **RESPONSIBLE INVESTMENT POLICY**

I. Introduction

New York Life Investment Management LLC (“NYLIM”) provides a broad array of investment advisory services to third-party institutional clients, investment companies, other pooled investment vehicles, and wrap fee programs sponsored by unaffiliated entities, through its Multi Asset Solutions Group (“MAS”), Separately Managed Accounts Group (“SMA Group”), and mutual fund division.

As an asset manager, NYLIM has a fiduciary duty to act in the best interest of its clients. We believe we can create long-term value by considering material environmental, social, and governance (“ESG”) factors as we make investment decisions.

In conjunction with these beliefs, NYLIM is a signatory of the Principles for Responsible Investment (“PRI” or “Principles”). PRI believes that an economically efficient, sustainable global financial system is a necessity for long-term value creation. Such a system will reward long-term, responsible investment and benefit the environment and society as a whole. The PRI works to achieve this sustainable global financial system by encouraging adoption of the Principles and collaboration on their implementation; fostering good governance, integrity and accountability; and addressing obstacles to a sustainable financial system that lie within market practices, structures and regulation.

II. Scope

The policy set forth in this document applies to assets managed under the MainStay mutual fund brand, assets managed by MAS, and SMAs offered by NYLIM. Due to the multi-subadvisor structure of NYLIM and the wide range of investment strategies offered, various approaches may be used to implement the policy set forth below.

III. Policy Statement

The PRI provides a framework for incorporating ESG considerations into investment and ownership practices. In becoming a PRI signatory, NYLIM commits to the following six aspirational Principles where consistent with our fiduciary duty to clients:

- We will incorporate ESG issues into investment analysis and decision-making processes, as appropriate.
- We will be active owners and incorporate ESG issues into our ownership policies and practices.

- We will seek appropriate disclosure on ESG issues by the entities in which we invest.
- We will promote acceptance and implementation of the Principles within the investment industry.
- We will work together to enhance our effectiveness in implementing the Principles.
- We will each report on our activities and progress towards implementing the Principles.

IV. ESG Integration

NYLIM recognizes that applying the Principles may better align investors with broader objectives of society. MAS offers asset allocation and multi-asset advisory services typically through fund-of-funds, customized separate accounts, model portfolio delivery or multi-manager structures, while our SMAs and mutual funds are subadvised by affiliated and unaffiliated institutional asset managers (collectively “Subadvisers”).¹

NYLIM, through MAS and its Subadvisers, has taken several steps to incorporate ESG criteria into the investment process when conducting research and making investment decisions. Each Subadvisers’ approach may differ based on the asset class, sector, region/geography, and investment strategy being managed. NYLIM may consider certain ESG criteria when evaluating an investment opportunity. ESG criteria may include, but is not limited to, climate change, sustainability, energy resources and management, job creation/employee relations, human rights, health and safety, transparency/disclosures, Board expertise, audit practices, and transparency and accountability.

NYLIM’s Subadvisers may take their own approach to exclusions depending on client preferences, the strategy/asset class they manage, and the region they operate in consistent with their fiduciary duties.

NYLIM is committed to strengthening and refining our ESG approach through continued dialogue and education. Corporate leadership, investment professionals and key stakeholders will continue to define NYLIM’s ESG strategy and vision for the future.

V. Active Ownership, Including Engagement and Voting

As outlined in the Principles, active ownership is the use of the rights and position of ownership to influence the activities or behavior of investee companies. Active ownership can be applied differently in each asset class. For listed equities in particular, it includes engagement and voting activities.

¹ As a recent signatory to the PRI, NYLIM has started to incorporate and formalize ESG perspectives into the investment decision process. We continue to develop policies and procedures for our internal managers and our review of affiliated and unaffiliated subadvisers, with regard to ESG Investing, Active Ownership and Governance.



- Shareholder engagement captures any interactions between the investor and current or potential investee companies on ESG issues and relevant strategies, with the goal of improving (or identifying the need to influence) ESG practices and/or improving ESG disclosure. It involves a structured process that includes dialogue and continuously monitoring companies. These interactions might be conducted individually or jointly with other investors.
- Collaborative engagements include groups of investors working together, with or without the involvement of a formal investor network or other membership organization.
- Voting refers to the exercise of voting rights on management and/or shareholder resolutions to formally express approval (or disapproval) on relevant matters. In practice, this includes taking responsibility for the way votes are cast on topics raised by management, as well as submitting resolutions as a shareholder for other shareholders to vote on (in jurisdictions where this is possible). Voting can be done in person or by proxy. Ballot items are not always closely related to environmental and social issues and cover financial performance, risk management, strategy and corporate governance matters. Voting and engagement practices are interrelated and feed into each other; one can be the initiator or the complementary tool of the other.²

For more information, please see NYLIM's Engagement Policy:

<https://www.newyorklifeinvestments.com/assets/documents/lit/esg/new-york-life-investment-llc-management-engagement-policy.pdf>

NYLIM continues to develop its active ownership processes, which will address and/or outline, (i) an alignment with the Principles; (ii) asset classes covered; (iii) expectations and objectives with respect to undertaking engagement and voting activities; (iv) organizational structure and resources dedicated to ESG and active ownership; and (v) conflicts of interest when conducting active ownership activities.³

VI. Governance

NYLIM has established an ESG Governance Council (the "Council"), which has oversight and monitoring of this policy amongst other issues. The Council is responsible for overseeing the firm's commitment to the PRI and the application of ESG considerations in the investment process.

The Council's responsibilities include but aren't limited to:

- Review the firm's incorporation of ESG issues into the investment process, as appropriate.
- Promote active ownership and incorporate ESG issues into policies and practices, including voting practices, as applicable.

² UNPRI.org

³ Id.



- Give input and guidance to refine NYLIM's ESG strategy, including, but not limited to, strategic responses to ESG-related risks such as climate change and regulatory change.

VII. Reporting

As part of our commitment as a signatory, NYLIM will report on our ESG activities to the PRI on an annual basis.

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