

RESPONSIBLE INVESTING POLICY

HISTORY AND COMMITMENTS

2024

History and Commitments

Our responsible investing journey has kept pace with our clients' evolving goals and priorities. MacKay Shields' path has advanced through becoming a signatory to the PRI, bringing in additional resources in the form of alternative data sets as well as dedicated full-time staff, contributing to industry working groups, and developing actively managed ESG-focused strategies.

2015	2016	2018	2019	2021	2022	2023	2024
Established Initial framework for proprietary ESG analysis	Became a signatory of UN PRI	Appointed ESG Director, Procured external ESG Data	Established RI Advisory Committee	Became a TCFD Supporter, Expanded ESG Team, Launched first ESG Product	Built RI Resource Center	Expanded data capabilities to include SFDR PAI Data for the management of the Article 8 portfolios	Developing Plan for Net Zero Fixed Income Portfolio Alignment

Delivering Value



We commit to delivering value. As stewards of our clients' assets, our goal is to help clients reach their objectives across risk, return, and responsibility. As an investment advisor, it is our duty to respect our clients' investment autonomy, to understand all the elements of value they aim to receive from their investment managers, and ultimately to act in a way that reflects the best interests of each of our clients. We recognize that the inclusion environmental, social, and governance considerations and/or objectives may manifest in a variety of client-determined norms-based screening criteria, exclusions on certain business practices, or the inclusion of specific regulationmandated ESG data. We believe it is our duty to identify the most appropriate tools and resources to manage these objectives, but also to ensure a mutual understanding of the potential impact of such screens and exclusions on the investible universe and therefore performance across various market cycles.

Transparency



We commit to transparency as part of our commitment to the PRI, we report on our responsible investing activities on an annual basis and make the resulting transparency report available publicly on our website. Our commitment to transparency overlaps with our commitment to delivering value through the construction of bespoke client reports. As a pillar of our teams' engagement efforts, we actively pursue disclosure and transparency on material environmental, social, and governance risks with the issuers in which we invest. We believe engagement is a sensible path to influence best practices and we therefore prioritize constructive dialogue over exclusion or divestiture to empower outcomes that align with responsible corporate citizenship. Reviews of our RI policies are conducted annually, though updates may not be necessary on such a frequent basis. All MacKay Shields' Responsible Investing policies are available on our public website.

Collaboration



We commit to collaboration. In efforts to promote Principle 5 of the PRI, which states that we will work together to enhance our effectiveness in implementing the Principles, MacKay Shields seeks to collaborate across teams internally, when appropriate, and also with external stakeholders. For example, our professionals have contributed to PRI-led white papers on ESG in specific asset classes: co-authored multiple ESG papers that are part of the CFA curriculum (Levels 1 and 2); are active members in industry working groups such as the Credit Roundtable, the CFA Institute's Standards of Practice Council and the Emerging Markets Investors Alliance (EMIA); and participate in ESG-focused investment panels and webinars. Additionally, our RI team collaborates regularly with their counterparts within the New York Life Investments family to discuss industry updates and developments within the firm.



RESPONSIBLE INVESTING POLICY

HISTORY AND COMMITMENTS

ADDITIONAL DISCLAIMER

As all asset classes are not created equal when it comes to ESG data and application, we retain discretion to apply certain a spects of this policy to a greater/lesser extent depending on data availability, investment time horizon, and client objectives. In addition, [we believe that] there is no conflict between this policy and our responsibilities as an ERISA fiduciary with respect to our ERISA clients.

IMPORTANT DISCLOSURE

Availability of this document and products and services provided by MacKay Shields LLC may be limited by applicable laws and regulations in certain jurisdictions and this document is provided only for persons to whom this document and the products and services of MacKay Shields LLC may otherwise lawfully be issued or made available. None of the products and services provided by MacKay Shields LLC are offered to any person in any jurisdiction where such offering would be contrary to local law or regulation. This document is provided for information purposes only. It does not constitute investment or tax advice and should not be construed as an offer to buy securities. The contents of this document have not been reviewed by any regulatory authority in any jurisdiction.

This material contains the opinions of certain professionals at MacKay Shields but not necessarily those of MacKay Shields LLC. The opinions expressed herein are subject to change without notice. This material is distributed for informational purposes only. Forecasts, estimates, and opinions contained herein should not be considered as investment advice or a recommendation of any particular security, strategy or investment product. Information contained herein has been obtained from sources believed to be reliable, but not guaranteed. Any forward-looking statements speak only as of the date they are made and MacKay Shields assumes no duty and does not undertake to update forward-looking statements. No part of this document may be reproduced in any form, or referred to in any other publication, without express written permission of MacKay Shields LLC. ©2024, MacKay Shields LLC. All Rights Reserved.

Information included herein should not be considered predicative of future transactions or commitments made by MacKay Shields LLC nor as an indication of current or future profitability. There is no assurance investment objectives will be met. **Past performance is not indicative of future results.**

NOTE TO UK AND EUROPEAN AUDIENCE

This document is intended only for the use of professional investors as defined in the Alternative Investment Fund Manager's Directive and/or the UK Financial Conduct Authority's Conduct of Business Sourcebook. To the extent this document has been issued in the United Kingdom, it has been issued by MacKay Shields UK LLP, 80 Coleman Street, London, UK EC2R 5BJ, which is authorised and regulated by the UK Financial Conduct Authority. To the extent this document has been issued in the EEA, it has been issued by NYL Investments Europe Limited, Hamilton House, 28 Fitzwilliam Place, Dublin 2 Ireland, which is authorised and regulated by the Central Bank of Ireland.

MacKay Shields LLC is a wholly owned subsidiary of New York Life Investment Management Holdings LLC, which is wholly owned by New York Life Insurance Company. "New York Life Investments" is both a service mark, and the common trade name of certain investment advisers affiliated with New York Life Insurance Company. Investments are not guaranteed by New York Life Insurance Company or New York Life Investments.