



Geode Environmental, Social & Governance (“ESG”) Mission Statement

Geode Capital Holdings LLC’s (with its subsidiaries “Geode’s”) primary mission is to manufacture precision building blocks to help our clients efficiently achieve their investment objectives. In fulfilling this mission, Geode is also attentive to our responsibilities to our clients, investors, employees, business partners and the broader public to be 1) a good corporate citizen, 2) practice good governance and 3) promote social and environmental welfare - all while never losing sight of our fiduciary duty to our clients to meet their investment goals. This philosophy is embodied in our business, operational framework and culture. As a signatory to the Principles for Responsible Investment (PRI), Geode promotes ESG principles in our stewardship of investments in the funds and accounts we manage, as well as in our own corporate activities. Geode seeks to employ our ESG philosophy in the following manner:

Investment Solutions: The vast majority of Geode’s investment mandates are passive. Geode does not exercise discretion to choose or avoid securities in these portfolios on the basis of ESG considerations and instead endeavors to track the index with constituents selected by an index provider, whether through replication or optimization. Geode does, however, offer ESG-themed products for interested investors based on ESG factors applied by an index provider in constructing the index and Geode can manage accounts with client-defined ESG criteria as requested by clients.

Stewardship: Because the nature of Geode’s business is primarily index-based investment management, Geode believes we can most effectively influence the companies we invest in through our proxy voting and issuer engagement activities carried out by our dedicated stewardship team. In all cases, Geode seeks to maximize client value through its stewardship activities, while also promoting ESG objectives in accordance with our voting guidelines. We believe that stewardship is consistent with the goal of maximizing client value.

Corporate Governance and Culture: Geode seeks to integrate ESG principles in the management of our business. We believe good governance starts from the top and our corporate identity reflects ESG principles in a multitude of ways. This includes, among other things: a large and diverse board of directors, a majority of which are independent; an active Audit Committee, fully comprised of independent directors; fostering a culture of transparency and openness; a diverse workforce that urges inclusion of all people, both within our firm and with our external partners; an ESG Committee and employee resources groups focused on engagement, health and wellness, diversity, inclusion and community service; and minimizing our carbon footprint by maintaining a remote and hybrid workforce in a single corporate office in a building that promotes sustainable use of resources.

Participation and Promotion: Geode participates in ESG-focused organizations, such as PRI, and partners with community and charitable organizations that advance diversity, inclusion and social responsibility. Geode transparently reports information on its ESG activities, available to clients upon request to the extent determined to be appropriate by Geode. Geode also promotes ESG principles in its engagement with the companies it invests in and the assessment of the partners it works with.