
Investment Research Integrity Policy

Manager Research Group

Morningstar Manager Research

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Important Disclosure

The conduct of Morningstar's analysts is governed by Code of Ethics/Code of Conduct Policy, Personal Security Trading Policy (or an equivalent of), and Investment Research Policy. For information regarding conflicts of interest, please visit: <http://global.morningstar.com/equitydisclosures>

We expect the highest ethical behavior from Morningstar analysts. In addition to Morningstar's companywide Code of Ethics, we aspire for our analysts to abide by the Code of Ethics published by the CFA Institute (<https://www.cfainstitute.org/ethics-standards/ethics/code-of-ethics-standards-of-conduct-guidance>). Morningstar's Manager Research group also has established its own policy below, regarding our work and the avoidance of conflicts of interest.

Please note this Morningstar Manager Research Integrity Policy ("Policy") is in addition to all other relevant Morningstar policies, including but not limited to Morningstar's Code of Ethics, News Media Policy, Social Media Policy, Guidelines for Disclosing Information about Morningstar, and Information Security Policies & Standards.

This Policy is applicable to all Morningstar companies that produce ratings and investment research on collective investment schemes and separately managed accounts, as well as Manager Selection services. In certain jurisdictions, ratings/investment research is considered a regulated activity and must be provided through an appropriately licensed Morningstar entity. These entities are subject to certain regulatory requirements, which generally include, but are not limited to (i) to refrain from engaging in unfair, coercive, or abusive business practices, (ii) to effectively manage conflicts of interests, (iii) to have an effective program in place to identify and manage conflicts of interest, and (iv) to properly secure confidential information. Such Morningstar regulated entities have developed and implemented policies and procedures consistent with the regulatory requirements of that jurisdiction. This Policy is intended to be consistent with those policies and procedures; where discrepancies exist, the policies/procedures of the Morningstar regulated entity supersede this Policy.

Terminology

- ▶ Analyst: Person primarily responsible for or contributing in a substantial way to the Universally Distributed Research of a specific collective investment scheme or separately managed account.
- ▶ Conflict of Interest: Situations in which an analyst has a competing professional or personal interest(s) that is inconsistent with its user's interests and/or makes it difficult for an analyst to fulfill his or her duties impartially.
 - ▶ Such situations present a possible appearance of impropriety that may undermine the user's confidence in the analyst and Morningstar, even if no unethical or improper act results from the conflict.
- ▶ Universally Distributed Research: Research that is distributed through one of Morningstar's software platforms (for example, Morningstar Direct) or a Morningstar sponsored website, the content of which is

solely on the merit of the investment collective scheme or separately managed account (that is, generic/impersonal investment advice).

- ▶ **Immediate Family:** Consists of your spouse or live-in partner, each family member residing in your household, and any other person whose investment activity is influenced by you.
- ▶ **Investment Conclusions:** Ratings derived from a qualitative process and includes, but is not limited to, Morningstar Medalist Ratings, 529 Plan Ratings, and Target-Date Series Ratings, along with the component scores of those ratings, that are made available through Universally Distributed Research. Analyst determined ESG qualitative assessments are Investment Conclusions.
- ▶ **Investment Analysis:** Any data, quantitative analysis, qualitative analysis, and/or opinions an Analyst draws upon to support an Investment Conclusion, in Universally Distributed Research or in ratings notes drafted in support of such published research.
- ▶ **Manager Research:** All members of Morningstar's manager research teams who report, whether directly or indirectly, to the head of Manager Research, North America, or to the head of Manager Research, Europe and Asia Pacific.
- ▶ **Manager Research Services (Analyst Access):** A service in which Analysts respond to a specific question or questions from licensing clients via phone call or email that relates to their published research and Investment Conclusions and/or Investment Analysis.
- ▶ **Manager Selection Services:** A service where designated team members build Select Lists, Model Portfolios, and other value-added services, such as Product Shelf Evaluations, for specific clients, both internal, such as Workplace and Investment Management, as well as external licensed intermediaries and Other Institutional Clients.
- ▶ **RPS:** Morningstar's report publishing system.
- ▶ **Manager Research Clients:** Financial advisors, fund broker/dealer platforms, consultants, institutional investors, portfolio managers, and other parties subscribing to Manager Research Services.
- ▶ **Other Institutional Clients:** Customers of Morningstar's software products, data offerings, licensing services, and/or clients of the Investment Management group.
- ▶ **Issuer-Paid Research:** Research that is specifically commissioned by an asset-management group (either independent or captive subsidiary) to be conducted on its behalf by a third-party independent of itself.
- ▶ **Ratings Committee:** A committee composed of senior analysts and experts in each asset class, which reviews and vets the conclusions reached by analysts.
- ▶ **Ratings Council:** A control body to govern major methodology decisions specifically for Ratings.

Protecting the Objectivity of Morningstar Manager Research

Producing the best possible, objective, investor-focused research is the primary goal of Morningstar's research efforts. Morningstar Manager Research provides safeguards against undue influence through the use of its strict policies, ratings committees, team structure, and editing processes.

If an Analyst wishes to assign an Investment Conclusion to an investment vehicle, the Ratings Committee(s) review and vet the Conclusions. The purpose of that committee-based review process is to ensure the rigor and objectivity of the analyst's Investment Conclusion; to prevent undue influence on the analyst's Investment Conclusion by any other individual; and to ensure Manager Research is applying its ratings methodologies fairly and consistently. Those Ratings methodologies and these

Ratings Committee processes are described in corresponding methodology documents. In addition, major ratings methodology decisions are vetted through governing body Ratings Council.

All Manager Research employees are responsible for safeguarding the integrity of their work and should report any attempts to inappropriately influence research conclusions and information to their direct supervisor or the head of Manager Research, North America, or the head of Manager Research, Europe and Asia Pacific, immediately.

To ensure the objectivity of its research staff, Morningstar's Code of Ethics specifically details:

"Most importantly, there must never be any explicit or implied pressure applied by anyone outside the relevant analyst group to influence or change the opinions or conclusions reached in analyses (including editorial content) or research projects."

Members of Manager Research are also prohibited from explicitly or implicitly pressuring an Analyst to deviate from the documented investment research process or applying improper pressure on the Analyst to change his or her opinions, analysis, or qualitative ratings. Analysts are to notify their direct supervisor, the head of Manager Research, North America, or the head of Manager Research, Europe and Asia Pacific, promptly if the above occurs. Morningstar encourages and expects interaction and debate between an analyst and his or her direct supervisor as well as within Ratings Committees, which may lead to changes in an analyst's opinions, analysis, or qualitative ratings.

Morningstar Manager Research will not enter into any Issuer-Paid arrangements to provide Universally Distributed Research. Other divisions of Morningstar, such as Credit Ratings, do operate with Issuer-Paid arrangements.

Manager Research shall not create or implement any compensation, incentive, or advancement schemes that reward analysts or their supervisors for producing nonobjective research or inappropriately influencing Investment Conclusions or Investment Analysis. The reporting lines of Manager Research employees have also been structured to ensure research objectivity. Dedicated Manager Selection employees report into the CIO – Americas of Morningstar Investment Management, but with a dotted line reporting relationship to the head of manager research, North America. Manager Selection employees in Europe report to the CIO – EMEA of Morningstar Investment Management.

Analysts are strictly prohibited from plagiarizing.

Analysts may not directly or indirectly offer favorable Investment Conclusion(s) or opinions expressed in Investment Analysis or delay changing an Investment Conclusion(s) or opinion as consideration or inducement for the receipt of business of a Prospective Client or a user procuring additional products/services from Morningstar.

Analysts are to ensure that they properly distinguish facts from opinions within their Investment Analysis and that the analysis is clear and complete and in no way misleading or deceptive. Analysts' supervisors are to diligently review and, where applicable, fact-check analyses and other analyst output for accuracy and objectivity. When analysts directly cover a vehicle, they assign the three pillar ratings based on their qualitative assessment, subject to the oversight of the Analyst Rating Committee, and monitor and reevaluate them at least every 14 months.

Related-Party Products and Services

Analysts do not provide analyst-driven ratings or opinions that are derived from a qualitative process for:

- ▶ Investable collective investment schemes that track Morningstar indexes, subject to the provisions set forth in the "Morningstar Indexes" section below; or
- ▶ Investable collective investment schemes where a Morningstar investment management subsidiary performs discretionary advisory services including, but not limited to, asset allocation, portfolio construction, or security selection of the investable product; or
- ▶ Model portfolios where Morningstar's Manager Selection team or a Morningstar investment management subsidiary performs discretionary advisory services; or
- ▶ Any investable product with portfolio holdings of underlying investments that tracks a Morningstar index exceeding 10% in sum total; or
- ▶ Any investable product with portfolio holdings of underlying investments that track a Morningstar index defined as strategic beta, thematic, or sustainable exceeding 5% in sum total.

Morningstar Indexes

As stated above, certain managed investments, including exchange-traded funds, may track a Morningstar index that has been licensed from Morningstar, Inc. and its subsidiaries. We mitigate any actual or potential conflicts of interests in such instances by not assigning such managed investments to a Manager Research analyst for qualitative research coverage. We also impose informational barriers (both technology and nontechnology), having separate organizational reporting lines between Manager Research and Morningstar's index team, and monitoring by the compliance department. However, such managed investments are eligible to receive a Morningstar Medalist Rating, provided that the rating is not directly assigned by a covering analyst. In these circumstances, the Medalist Rating might be assigned quantitatively based on a machine-learning algorithm or by indirectly assigning the People, Process, and Parent Pillar ratings that analysts have assigned to other managed investments that are indirectly related to the managed investment tracking a Morningstar Index.

We define "qualitative research coverage" as anything that reflects an (1) opinion, (2) recommendation, or (3) judgment involving a Manager Research Analyst that has been directly applied to a managed investment that has been assigned to that analyst for coverage. Given this, simply including an ETF that tracks a Morningstar index in a table of all funds within a category, for instance, or making factual references would not qualify as "qualitative research coverage." Similarly, assigning a Medalist Rating quantitatively or by indirectly assigning the People, Process, and Parent Pillar ratings that analysts have

assigned to other managed investments that are indirectly related to the managed investment that licenses a Morningstar index would not constitute “qualitative research coverage.”

To illustrate an instance in which pillar ratings are indirectly assigned, consider a scenario in which a vehicle tracks a Morningstar index and that vehicle is offered by a firm that has other unrelated vehicles under direct analyst coverage. In such an instance, the analyst would have directly assigned a Parent Pillar rating to the unrelated vehicle she covers.

Since that Parent Pillar rating is just as relevant to the vehicle tracking the Morningstar index as it is to the unrelated vehicle under analyst coverage, Morningstar ports the Parent Pillar rating assigned to the unrelated vehicle to the vehicle tracking the Morningstar index. The indirect assignment of pillar ratings in this fashion is automated and not limited to instances in which a vehicle is ineligible for qualitative research coverage.

Investment Advice

Analysts are prohibited from providing investment advice (an explicit, recommended course of action about a specific investment) that is specific to a retail investor’s financial and/or personal facts and circumstances (that is, personalized investment advice). For avoidance of doubt, this prohibition does not pertain to communication an Analyst may have with a retail investor about the Analyst’s published Investment Conclusions or Investment Analysis. However, Analysts must keep such communication general and not communicate information that is or would reasonably be viewed as a recommendation or call to action based on the retail investor’s specific facts and circumstances.

From time to time and under a contractual agreement, a Morningstar entity with the proper regulatory license may be engaged by an institution to provide investment research and/or recommendations that are specific to that institution’s situation, needs, and/or goals. Analysts asked to participate in such engagement must follow the principles laid out in the Policy, Morningstar Inc.’s Code of Ethics, and any other policies Analysts in that particular jurisdiction are subject to.

When providing Manager Research Services, Morningstar analysts must deal fairly and objectively with all clients.

Specifically, Morningstar Manager Research analysts must ensure that they disseminate Investment Conclusions fairly to all audiences. Analysts must disclose and support changes to or initiations of Investment Conclusions in one or more pieces of Universally Distributed Research.

Analysts may not discuss Investment Conclusions with anyone outside of Manager Research until the Investment Conclusions are contained in published Universally Distributed Research:

- Ratings Committee participation is limited to members of the Analyst ratings team. Ratings Committee discussions, ratings in process, and any other internal discussions about pending Investment Conclusions may not be shared outside of Manager Research.

- ▶ Examples of groups that reside outside of Manager Research and therefore should not be granted access to Investment Conclusions before they are published in Universally Distributed Research include Morningstar's Investment Management group, Morningstar equity researchers, Morningstar sales teams, PitchBook employees, Sustainalytics employees, members of the media, fund companies, fund managers, Manager Research Services clients, Morningstar customers, or prospects.
- ▶ Manager Research Analysts may discuss Investment Conclusions as necessary with Morningstar employees in groups outside of Manager Research, but members of those groups are subject to these same restrictions until the analyses discussing the Investment Conclusions have been universally distributed. Communication of Investment Conclusions prior to publication of Universally Distributed Research is limited to:
 - ▶ Corporate Communications, Morningstar's legal team and the Chief Compliance Officer or relevant local compliance team in connection with a press release.
 - ▶ Copy editors and designers in connection with assigned reports and projects.
 - ▶ The engineering teams responsible for the systems used to produce and publish ratings.

Manager Research supports multiple audiences, and not all Investment Analysis will be shared with all audiences.

The level of depth and detail provided to a client depends on the service level. However, every client will receive consistent Investment Conclusions. It is acceptable to give Manager Research clients more detailed explanations that support Investment Conclusions. Analysts also may present ideas to some Manager Research clients in a format other than a published report (access to a conference call, for example) as long as these ideas support universally distributed conclusions. It is prohibited to give some Manager Research clients a new Investment Conclusion while delaying its release to other Manager Research clients. All clients paying for the same level of service should have access to the same information.

Internal/external presentations, marketing decks, and other materials used for in-person or other client-specific meetings do not need to be published through RPS but must be consistent with all published Investment Conclusions and not introduce new, material information that could affect an analyst's Investment Conclusions.

Personal Trading

The rules in this Section apply to members of Manager Research and their immediate families.

Internal Disclosure of Holdings. A new member of Manager Research must provide Morningstar's Compliance department within 10 business days of her or his date of hire a list of all of her or his and their immediate family's listed investment holdings and the brokerage firms they have accounts with. Listed investment holdings exclude open end managed funds and collective investment schemes, but they include, and are not limited to, stocks, bonds, options, ETFs, closed-end funds, and any managed or separate account programs he or she or his or her immediate family members participate in. This

information is to be submitted in such form and in such manner (which may include via a web-based system) as shall be specified by the Compliance department. Access to an individual's information is limited to that individual and the Compliance department.

Trade Information. Members of Manager Research and their immediate family members must submit brokerage account trade information in a form and in such manner (which may include, among other things, a direct electronic data feed from a brokerage firm, manual entry into a web-based system, or direct delivery of duplicate hard-copy trade confirmations) as shall be specified by the Compliance department. This applies to any accounts, including purchases made within the brokerage window of Morningstar's 401(k) plan or similar retirement plans outside of the United States, where the Manager Research member or their immediate family member have beneficial ownership in listed securities.

Manager Research Analysts Prohibited From Owning Money Management Firms. Members of Manager Research and their immediate families are prohibited from holding securities issued by publicly traded companies that derive a material portion of their revenue from managing mutual funds and which are included on a list of such companies made available via The Pond (Restricted List for Manager Research Analysts). Manager Research members who are unable to access the Restricted List for Manager Research Analysts or have technical problems are still responsible for determining whether or not a particular security is on the Restricted List prior to making any transactions.

Working With Manager Research Clients and Morningstar's Sales Team

Morningstar has earned a reputation as a source of trusted independent investment research. Investors, advisors, and fund selectors of all types value Morningstar's manager research because it is unbiased and motivated by a desire to serve investors first. Asset managers value Morningstar research partly because it is seen as credible by fund selectors. Morningstar's objectivity and willingness to criticize will inevitably cause some unhappiness, but it ultimately gives the company's praise more meaning.

To help maintain the integrity of Morningstar's investment research, there is a strict functional separation between the manager research and equity research groups (including for this purpose any employee who produces editorial content), on the one hand, and the company's sales teams, on the other. Except as described below, sales personnel are not to contact Analysts directly. Again, maintaining objectivity and editorial freedom is essential for Morningstar to keep its position of respect in the investment community.

1) Morningstar salespeople will inevitably field questions from asset managers about research matters.

Morningstar's commercial relationships with Other Institutional Clients should not be discussed with analysts below the associate director level in Manager Research. For Manager Research Services clients, analysts may know the names and research interests of clients but not the contract terms. Salespeople are prohibited from contacting analysts directly; they should direct queries to local Manager Research heads.

- ▶ If a salesperson contacts an analyst directly on behalf of another Institutional Client, the analyst should:
 - ▶ Ask the salesperson to direct the client to a Director in Manager Research.
 - ▶ Forward the salesperson's initial communication to the analyst's Director.
- ▶ Analysts should immediately alert their direct supervisor if they feel pressure to change an opinion based on a business relationship.

2) Manager Research's clients may be affiliated with or act as investment consultants for the fund companies whose products Manager Research rates.

Manager Research clients will likely include investment advisors, broker/dealer fund platforms, and investment consultants, including those within Morningstar's Investment Management group, and other Morningstar group entities. These clients may use or sell funds offered by asset managers that Manager Research rates or provide consultation, distribution, or other services to those asset managers.

Manager Research analysis must be generated independently of any business relationships Morningstar maintains. As a result, Manager Research:

- ▶ Issues ratings and grades using the same methodologies regardless of the distribution channel or the end user.
- ▶ Does not qualitatively evaluate any product in which another group within Morningstar has a management or decision-making role, including but not limited to Manager Selection Services, Morningstar Investment Management subsidiaries, or Workplace.
- ▶ Does not accept Issuer-Paid Research engagements to provide fund-, strategy-, or firm-level research.

Although Morningstar cannot police or dictate what Manager Research clients can or cannot do, Manager Research clients that in turn serve financial-services firms or asset managers that Manager Research covers should not:

- ▶ Disclose their end-client relationships with Morningstar analysts, except with directors where necessary in the normal course of business.
- ▶ Provide their end-clients with preferential or unmediated access to Manager Research analysts.

Manager Research analysts should immediately alert their manager if Manager Research clients attempt to reach out directly to them on behalf of their end-clients.

3) Manager Research has sole discretion on whether or not to cover an investment.

Manager Research's goal is to help investors make better decisions. Manager Research is constantly evaluating its coverage list to ensure sufficient and relevant breadth and depth, and it reviews queries for coverage on an ongoing basis. Morningstar's coverage is subject to change, and while the Manager Research team will review queries for coverage from users of its Universally Distributed Research, the

team reserves the right to initiate or suspend coverage on any funds or firms. Morningstar is dedicated to covering the funds/strategies most relevant to investors, including those of significant investor interest or those the Manager Research team believes have investment merit.

Analysts are free to take/listen to input from their users (including internal users such as Morningstar's Investment Management group) as to what fund(s) to add to or drop from the coverage list or a report(s) that they deemed would be useful as a supplement to the published research.

- ▶ While analysts are free to receive such input, analysts are prohibited from agreeing to the user's request or providing output in response to a user's request on their own.
- ▶ Analysts must promptly forward all requests to his or her direct supervisor.
- ▶ All decisions about whether or not to accept the user's request will be determined by the head of Manager Research, North America, or the head of Manager Research, Europe and Asia Pacific, or his or her designee, including committees that he or she has established to evaluate user requests.
- ▶ Morningstar will universally distribute any such user-requested research.

Avoiding Personal Conflicts of Interest

If for any reason Analysts think they may not be able to provide an objective opinion on a security, they should alert their supervisor and be removed from that coverage assignment, as well as any oversight to the ratings process.

Examples of conflicts of interest that could preclude an Analyst from covering a security could include the following:

- ▶ The Analyst or someone in his or her family has a personal or business relationship with someone at the company.
- ▶ The Analyst has worked for that company or interviewed for a position at that company within the past five years.
- ▶ The Analyst has received a favor or the offer of a favor from a company (for example, a corporate manager offers to write a recommendation for an MBA program or approaches the analyst about a potential job opportunity).

In addition, Analysts are prohibited from:

- ▶ Accepting gifts, including dinners, transportation, or lodging, worth more than \$100 without supervisor approval.
- ▶ Publishing Morningstar research on their own websites, blogs, and so on, without written permission.


Morningstar's Code of Ethics forbids employees from competing with Morningstar unless the employee has the necessary approval. This applies to, among other things, managing money for a fee. Manager Research analysts must disclose to their manager and to Human Resources any arrangement that involves managing money for other people outside of their immediate family, even if that arrangement does not involve a fee.

Addressing Violations of This Policy

If a violation occurs, Morningstar will immediately correct and republish any applicable Investment Conclusions in Universally Distributed Research.

If a member of the Manager Research team observes or is made aware of unethical behavior of another member of the team, including behavior contrary to this Policy, that member should immediately notify his or her direct supervisor the head of Manager Research, North America, or the head of Manager Research, Europe and Asia Pacific, if the direct supervisor is not available.

If the reporting member's direct supervisor is exhibiting such conduct, he or she must immediately notify the head of Manager Research, North America, the head of Manager Research, Europe and Asia Pacific, or the Global Chief Compliance Officer.

If the reporting member is uncomfortable speaking directly to his or her direct supervisor, the head of Manager Research, North America, the head of Manager Research, Europe and Asia Pacific, or the global Chief Compliance Officer, he or she may use the confidential Morningstar Ethics Hotline to report such behavior. The Morningstar Ethics Hotline is available 24 hours a day, seven days a week at <http://www.integrity-helpline.com/morn.jsp>. 

About Morningstar Manager Research

Morningstar Manager Research provides independent, fundamental analysis on managed investment strategies. Morningstar views are expressed in the form of Morningstar Medalist Ratings, which are derived through research of three key pillars—People, Process, and Parent. The Morningstar Medalist Rating is the summary expression of Morningstar's forward-looking analysis of investment strategies as offered via specific vehicles using a rating scale of Gold, Silver, Bronze, Neutral, and Negative. A global research team issues detailed research reports on strategies that span vehicle, asset class, and geography.

Medalist Ratings are not statements of fact, nor are they credit or risk ratings, and should not be used as the sole basis for investment decisions. A Medalist Rating is not intended to be nor is a guarantee of future performance.

About Morningstar Manager Research Services

Morningstar Manager Research Services combines the firm's fund research reports, ratings, software, tools, and proprietary data with access to Morningstar's manager research analysts. It complements internal due-diligence functions for institutions such as banks, wealth managers, insurers, sovereign wealth funds, pensions, endowments, and foundations. Morningstar's manager research analysts are employed by various wholly owned subsidiaries of Morningstar, Inc. including but not limited to Morningstar Research Services LLC (USA), Morningstar UK Ltd, and Morningstar Australasia Pty Ltd.

For More Information

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