

LSV Asset Management Statement regarding Shareholder Rights Directive II

LSV Asset Management (“LSV”) is subject to the Shareholder Rights Directive (EU) 2017/828 (“SRD II”). Where applicable, SRD II intends to enhance the shareholder position of investors by increasing transparency and encouraging engagement. LSV has adopted an Engagement Policy (available [here](#)) in accordance with the requirements of SRD II. As referenced therein, additional information concerning the exercise of voting and other rights also is available in LSV’s Proxy Voting Policy (available [here](#)).

SRD II further requires LSV to annually disclose the following:

Engagement Policy Implementation: LSV’s voting behavior and use of proxy service advisors has been consistent with LSV’s Proxy Voting Policy. During the twelve months ending September 30, 2022, LSV voted proxies in a manner consistent with the applicable recommendations of its proxy service advisor. No material deviations from those recommendations occurred, and no voting matter was deemed significant enough to require additional explanation to relevant clients.

Investment Strategy Implementation: Consistent with our policies and procedures, LSV has monitored its accounts to ensure its investment strategies and their implementation comply with clients’ arrangements. Details of the extent to which LSV has contributed to the medium- to long- term performance of its clients’ assets have been communicated in relevant performance reporting. UCITS and strategy-level composite performance information also is publicly available (please see the menus of sub-funds and strategies [here](#) and [here](#)). Where applicable, Institutional Investors and other interested clients are advised to also consider:

*Key Material Medium- to Long- Term Risks:* Risks associated with LSV’s investing strategies are described within its Form ADV Part 2A (available [here](#)). Additional information, if applicable, may be found in relevant fund prospectuses available on our website.

*Portfolio Composition, Turnover, and Turnover Costs:* Details of portfolio composition together with a summary of material portfolio changes and associated costs are included in periodic reports provided to clients and fund investors.

*Use of Proxy Advisors:* Use of proxy service advisors for engagement activity has been consistent with LSV’s Engagement Policy.

*Securities Lending Practices:* LSV does not have a securities lending program.

*Consideration of Medium- to Long- Term Performance in Investing Decisions:* LSV considers the performance of companies when making investment decisions, including as further described in our Form ADV Part 2A, Statement of Responsible Investment Initiatives (available [here](#)), and Engagement Policy.

*Conflicts of Interest in Engagement:* LSV manages conflicts of interest in relation to its engagement activities as described in our Engagement Policy. In the twelve months ending September 30, 2022, there were no instances in which a material conflict arose in connection with engagement activities.

This statement is subject to at least annual review.