

Allspring Global Investments Luxembourg S.A.

Best Execution Policy

Purpose / Background / Scope

Purpose

This policy sets out how, pursuant to Articles 28 and 29 of CSSF Regulation No. 10-4 Transposing Commission Directive 2010/43/EU of 1 July 2010 Implementing the UCITS Directive (“**Regulation 10-4**”), Articles 27 and 28 of Commission Delegated Regulation (EU) 231/2013 and Article 65 of Commission Delegated Regulation (EU) 2017/565 (together, the “**Rules**”) Allspring Global Investments Luxembourg S.A. is required to establish, implement and maintain an effective Best Execution Policy.

Areas primarily affected

This policy covers Allspring Global Investments Luxembourg S.A. with respect to the management of all funds (the “**Funds**”) and separately managed accounts (the “**SMA(s)**”) by Allspring Global Investments Luxembourg S.A. This Policy is applicable to all team members of Allspring Global Investments Luxembourg S.A. and to the branches of Allspring Global Investments Luxembourg S.A. to the extent applicable to their business. In the case Allspring Global Investments Luxembourg S.A. has delegated functions to a third party, the third party is expected to fulfil the requirements in relation to the activity to be carried out. It also follows that Allspring Global Investments Luxembourg S.A. verifies that the third party has taken appropriate measures in order to comply with the said requirements.

For the avoidance of doubt, this policy applies only whenever Allspring Global Investments Luxembourg S.A. buys or sells financial instruments or other assets for which best execution is relevant.

Policy Summary

Allspring Global Investments Luxembourg S.A. is required to maintain an adequate Best Execution policy and to permanently comply with such policy in order to ensure a proper performance by Allspring Global Investments Luxembourg S.A. of its activities.

Allspring Global Investments Luxembourg S.A. is authorized to:

- (i) act as a management company pursuant to chapter 15 of the Law of 17 December 2010 relating to UCITS, as may be amended from time to time (“**Law of 2010**”) transposing the Directive 2009/65/EC of the European Parliament and of the Council of 13 July 2009 on the coordination of laws, regulations and administrative provisions relating to undertakings for collective investment in transferable securities, as may be amended from time to time (“**UCITS Directive**”);
- (ii) act as an alternative investment fund manager pursuant to chapter 2 of the Law of 12 July 2013 on alternative investment fund managers (the “**Law of 2013**”);

(iii) provide discretionary portfolio management and investment advice services pursuant to Article 101(3) of the Law of 2010, and discretionary portfolio management, investment advice and reception and transmission of order services pursuant to Article 5(4) of the Law of 2013.

Policy description

Roles and Responsibilities

Allspring Global Investments Luxembourg S.A intends to delegate the portfolio management of the Funds and of the SMA. In this context, Allspring Global Investments Luxembourg S.A. does not execute orders itself, neither does it transmit orders for execution; all such activity is delegated to the appointed Investment Adviser/Managers, or any Sub-Advisers appointed to by any such Investment Advisers/Managers, who will determine how orders will be placed or executed. References in this policy to the Investment Manager shall also include reference to the Investment Adviser and/or any relevant Sub-Adviser, as applicable.

This policy outlines the duties placed on the respective appointed Investment Manager to ensure Allspring Global Investments Luxembourg S.A. 's compliance with regulatory requirements with respect to best execution/order allocation.

As part of the due diligence process, Allspring Global Investments Luxembourg S.A will ensure that the Investment Managers have best execution policies that are in line with AIFMD/MiFID best execution/order allocation requirements, as detailed in this policy and to receive regular reports that enable it to check that these procedures have adequately been followed by the relevant Investment Manager.

Standards

The best execution policy is the result of Allspring Global Investments Luxembourg S.A. general and continuous striving to act at all times in the best interest of the Funds/clients. This policy seeks to ensure that Funds'/clients' interests are paramount and that Allspring Global Investments Luxembourg S.A. satisfies its legal and regulatory obligations when trades are executed on behalf of the Funds/clients.

Management companies are required to act in the best interest of the funds they manage/ the clients when:

- a) executing decisions to deal on behalf of the funds/clients in the context of the management of their portfolios.
- b) placing orders to deal on behalf of the funds/clients with other entities for execution, in the context of the management of their portfolios.

Management companies generally must take (i) all reasonable steps to obtain the best possible result for the Funds and (ii) all sufficient steps to obtain the best possible results for the SMAs, taking into account price, cost, speed, likelihood of execution and settlement, order size and nature or any other consideration relevant to order execution. This obligation is known as the duty of "best execution". While a management company may cause the Funds/clients to pay a higher commission to obtain research, use of trading commissions to obtain research must be monitored and reported.

The purpose of this document is to detail Allspring Global Investments Luxembourg S.A. arrangements in relation to order execution, which will be applied to the Funds/SMAs. Execution of orders will exclusively be placed by the portfolio managers appointed by Allspring Global Investments Luxembourg S.A.. At this stage, Allspring Global Investments

Luxembourg S.A. will only delegate the portfolio management activities to entities belonging to Allspring Global Investments.

In this context, the portfolio manager appointed by Allspring Global Investments Luxembourg S.A. will be required to comply with best execution rules that enable Allspring Global Investments Luxembourg S.A. to comply with its obligations under the Rules. The latter will monitor that best execution is provided by its delegate portfolio manager in compliance with the Rules.

More details on the criteria for the selection of execution systems and intermediaries are provided in section "Counterparty, Broker Approval Process and Approved Lists" and in section "Execution by Asset Class" of the Allspring Order Execution Policy.

Best execution factors and best execution criteria

The best execution factors to be taken into account when executing orders for Funds/clients include:

- price,
- costs,
- speed,
- likelihood of execution and settlement,
- order size and nature,
- any other relevant consideration.

In seeking best execution, the Investment Manager must take (i) all reasonable steps to obtain the best possible results for the Funds and (ii) all sufficient steps to obtain the best possible results for the SMAs taking into account the above factors. In determining the relevant importance of each of the above factors, Allspring Global Investments Luxembourg S.A. will ensure that the Investment Manager will take into account appropriate best execution criteria including:

- the objectives, investment policy and risks specific to the Funds/SMAs, as indicated in the prospectus of the fund/documentation of the SMA or, as the case may be, the management regulations of the Funds or instruments of incorporation of the Funds/SMAs;
- the characteristics of the order;
- the characteristics of the financial instruments that are the subject of that order;
- the characteristics of the execution venues to which the order can be directed.

Allspring Global Investments Luxembourg S.A. would generally expect price to be the most important execution factor for the majority of trades that are executed, however there will be trades where price is not the most important factor when executing a trade.

For example:

1. For smaller capitalized equities and less liquid stocks, the likelihood of execution and the provision of liquidity may be more important than the price.
2. When raising cash to fund redemptions, the speed and likelihood of execution may be more important.
3. When executing a large order, the ability to transact the whole of the order at a less favorable price may be more important than only executing a part of the order at the best available price at that time.
4. In certain markets, the level of price volatility may mean that timeliness of trade execution is the priority.

5. When executing certain instruments (e.g. OTC derivatives or structured products) the choice of execution venue may be limited.

Securities Financing Transactions (“SFTs”) and efficient portfolio management techniques (“EPM”) are covered by this best execution policy. Allspring Global Investments Luxembourg S.A. has robust and comprehensive control processes in place to ensure that the Funds/SMAs obtain the best possible result as regards in particular also the securities lending revenues (lending fee) respectively the interest rates underlying repurchase agreement transactions and reverse repurchase agreement transactions, but also as regards the costs / fees charged to the Funds/SMAs when executing such transactions. Allspring Global Investments Luxembourg S.A. performs a robust initial and on-going due diligence/oversight to ensure that the best execution controls performed by the delegate are adequate. Relevant questions will be addressed as part of the due diligence/oversight process, amongst others the following:

- What are underlying operational cost drivers making up the total costs / fees paid to each entity and that are deducted from the gross revenue arising from SFTs/EPM?
- Please elaborate, by means also of quantitative information, the relevance of the underlying cost drivers, which make up the total costs / fees borne by the Funds/SMAs.
- What is the ratio of gross revenues to direct and indirect operational costs / fees arising per SFT/EPM? Please provide corresponding documentary evidence of the underlying rationale.

Allspring Global Investments Luxembourg S.A. has put in place a comprehensive documented assessment of the operational model (whether on a principal or model basis) and related processes underlying the SFTs and EPM in order to identify and record the circumstances which constitute or may give rise to a conflict of interest entailing a material risk of damage to the interests of the Funds/SMAs.

Inducements or Soft Dollars

The Investment Manager may utilize inducements (or soft dollars) to obtain research and certain execution-related services subject to restrictions that apply to the Investment Manager provided that this does not lead to the circumvention of the Rules. Inducements (or soft dollars) dollars generated through trading and their use on behalf of the Funds/SMAs must be routinely monitored and assessed by the Investment Manager. The results of such review will be reported to the Board on an annual basis.

Execution Venues

The Investment Manager will either determine the ultimate execution venue/entity for a Fund’s/client’s order on the basis of the order execution factors as described above (giving specific instructions to the broker) or the Investment Manager will satisfy itself that the broker has arrangements in place to enable the Investment Manager to comply with its obligations, including in connection with obtaining research.

The criteria for the selection of execution systems and intermediaries with which orders are placed for execution are:

- competitiveness of commission rates or spreads;
- promptness of execution;
- clearance and settlement capabilities;
- quality of service;

- willingness to commit capital;
- creditworthiness;
- reputation; and
- financial stability.

More details on the criteria for the selection of execution systems and intermediaries are provided in the Allspring Order Execution Policy.

The Investment Manager maintains policies for identifying each class of instrument, and the entities with which orders may be placed. The list of brokers, as included in Allspring Order Execution Policy is deemed to be part of this policy. Arrangements are only permissible when they are consistent with the obligations detailed in this policy.

Order Handling

Allspring Global Investments Luxembourg S.A. does not trade for its own account. The following procedures and arrangements are in place to ensure the prompt, fair and expeditious execution of orders.

The Investment Manager shall:

- ensure orders executed for a Fund/client are promptly and accurately recorded and allocated;
- ensure orders are executed sequentially unless prevailing market conditions make this impracticable or the interests of the Fund/client require otherwise;
- (where they are responsible for overseeing or arranging settlement of an executed order) ensure financial instruments/sums of money received in settlement of the executed orders shall be promptly and correctly delivered to the appropriate account;
- ensure that there will not be a misuse of information relating to pending orders, and take all reasonable steps to prevent the misuse of information.

The Investment Manager shall ensure the fair allocation of aggregated orders, including how the volume and price of orders determine allocations and the treatment of partial executions. In doing so, the Investment Manager shall consider the following factors:

- it must be unlikely that the aggregation will work to the overall disadvantage of the Fund/client;
- where orders are aggregated but are only partially executed, the related trades shall be allocated in accordance with the order allocation policy;
- where the Investment Manager aggregates an order of a Fund/SMA with a transaction for its own account or other Fund/SMA orders it must not allocate trades in a way that is detrimental to the Funds/SMA's;
- where the Investment Manager aggregates an order of a Fund/SMA with a transaction for its own account and it is partially executed, it shall allocate the related trades to the Fund/SMA in priority over those for its own account;
- proportionate allocation should not occur unless Allspring Global Investments Luxembourg S.A. has given prior approval;

- if the Investment Manager is able to demonstrate to the Fund/client on reasonable grounds that it would not have been able to carry out the order on such advantageous terms without aggregation, or at all, it may allocate the transaction for its own account proportionally, in accordance with the policy referred to above.

Monitoring and Review

Allspring Global Investments Luxembourg S.A. will monitor, on a regular basis, the effectiveness of this policy in order to identify and correct any deficiencies including allocation of trading orders and whether the quality of the execution venues/entities included in the order execution policy is consistent with the objectives described above. [Allspring Global Investments Luxembourg S.A. will also seek to monitor its delegates to ensure that delegates have best execution policies that are in line with the present best execution requirements policy. Delegates will be required to submit on a quarterly basis, specific indicators of execution oversight and performance to Allspring Global Investments Luxembourg S.A., together with exceptions based reporting on an occurrence basis. Allspring Global Investments Luxembourg S.A. will review the reports of the Investment Manager so as to enable it to demonstrate that the Investment Manager have executed orders on behalf of the Funds/clients in line with [this] best execution policy. This policy will be reviewed on an annual basis and whenever a material change occurs that affects Allspring Global Investments Luxembourg S.A.'s ability to continue to obtain the best possible result for the execution and placing of orders on a consistent basis.

Governance and reporting

Escalation and Exceptions

This policy cannot account for every possible situation. To address a situation not covered by this policy, request a change to this policy or the related standards, or recommend an alternative practice, business managers will contact the policy manager. The policy manager will work with the requesting business to address the needs and escalate the request as necessary. The discussion may result in an exception request, exemption request, change to existing policy, alternate policy for certain businesses, or directive for the business to comply with existing policy. Businesses are expected to initiate this discussion before the business is out of compliance or immediately after a policy violation has been discovered. If the decision is to pursue an exception, exemption, or alternate policy, it must be recorded in the Policy Exception Management System. If the business does not agree with the decision, or if the policy manager determines the risk warrants further escalation, matters will be escalated to the policy director as appropriate.

Violations

Failure to comply with this policy, without appropriate prior approval, is a policy violation. Policy violations may result in corrective action, including termination of employment.

Any actual or suspected violations of this Policy must be reported to the Policy owner and related remediation actions taken in a timely manner. The Policy owner is responsible for investigating any actual or suspected violation of the Policy. Unapproved exceptions may translate to a violation at the discretion of the Conduct and Ethics Team, Policy Owner, and Risk Governance.

All Policy violations must be escalated and communicated promptly to the Conduct and Ethics Team at Conduct@allspringglobal.com.

Please, refer to the Conduct and Ethics page on Springboard for “Conduct Matters Guidance.”

Escalation and Exemptions

Policy items of concern or violations require escalation to the Policy Owner. The Policy Owner will review the item of concern, exception or violation and determine if further escalation including to Conducting Officers are warranted. Conducting Officers may approve exemptions to this Policy as appropriate.

Exemption requests must be documented including appropriate rationale to justify requests. Exemption requests are logged by the Policy Owner and reviewed annually to provide assurance the exemption may still be permitted.

Reporting

The Policy is governed by Allspring Luxembourg Executive Committee. Allspring Luxembourg Executive Committee receives regular reporting includes the following components: Policy Exemptions, Escalations, etc. Items of concern identified through escalation channels are included in regular reporting or reported more frequently if warranted. The Allspring Luxembourg Executive Committee reviews the approved Policy at least annually or if material changes are necessary.

Records Retention

Physical and electronic records are retained and subject to destruction as indicated by the requirements set forth in the Allspring Records Management policy.

Related Laws, regulations and policies

CSSF Regulation N 10-4

Law of 17 December 2010 relating to undertakings for collective investment

Law of 5 April 1993 on the financial sector, as amended

Commission Delegated Regulation (EU) 231/2013

Commission Delegated Regulation (EU) 2017/565

Law of 12 July 2013 on alternative investment fund managers

Directive 2011/61/EU on alternative investment fund managers (AIFMD)

Allspring Order Execution Policy