Federated Hermes

Best Practice Principles for Providers of Shareholder Voting Research & Analysis

Compliance Statement

EOS at Federated Hermes Limited

June 2026

Contents

Introduction

EOS[1] at Federated Hermes Limited ("EOS") is pleased to provide its updated compliance statement in respect of the Best Practice Principles for Providers of Shareholder Voting Research & Analysis (the Principles), in support of its aims to establish standards for service providers in the industry and in line with the requirements of the amended EU Shareholder Rights Directive and equivalent UK law.

EOS helps long-term institutional investors around the world to meet their fiduciary responsibilities and become more active owners of public companies. EOS provides stewardship services for long-term global investors advising on approximately £1.8tn / $2.4tn / €2.1tn of assets (as of 31st March 2026) invested in over 18,000 companies worldwide.

EOS is a subsidiary of Federated Hermes Limited and does not itself carry out any regulated activities, manage investments or provide investment advice.

Our team of engagement and voting specialists monitor the investments of our clients with the aim of improving long-term shareholder value. Our team is comprised of experienced professionals who have the expertise, language skills and cultural knowledge to help support delivery of long-term value at the companies our clients invest in.

For many of our clients, in addition to other stewardship services, we provide voting services. EOS' voting services (together "the voting service") are provided in conjunction with Institutional Shareholder Services Inc. (ISS), itself a founding signatory of the Principles.

In this compliance statement, we explain the approach to delivering the voting service and how we comply with the Principles.

[1] EOS at Federated Hermes Limited is the brand name of the stewardship service provided by Hermes Equity Ownership Services Limited, a wholly owned subsidiary of Federated Hermes Limited, a company incorporated in England & Wales, No. 5167179, and based in London. Hermes Equity Ownership Services Limited ("EOS") does not carry out any regulated activities. This document is for information purposes only. It pays no regard to any specific investment objectives, financial situation, or particular needs of any specific recipient. EOS and Hermes Stewardship North America Inc. ("HSNA") do not provide investment advice, and no action should be taken or omitted to be taken in reliance upon information in this document. Any opinions expressed may change.

Principle One: Service Quality

Approach

During 2025, EOS provided voting services covering over 13,500 shareholder meetings, involving over 130,000 resolutions. The voting service operates as an add-on to engagement services which is our primary offering. We do not offer voting as a standalone service.

As a client of ISS, we do not seek to independently replicate the full range of research it conducts. EOS leverages and builds upon ISS research and infrastructure (including the ISS ProxyExchange platform), adding value primarily at the most important and difficult voting decisions, through engagement with companies and implementing our clients' voting policies and approaches.

The indicative vote instructions our clients receive are based on ISS' research as applied to each client's vote guidelines. We deploy engagers to add insight to a specific subset of these meetings, by considering the voting approach in the context of the engagement that has already taken place and continues to be ongoing. This is determined through the consideration of mix of holdings and the specific issues under consideration.

The EOS engagement programme consists of approximately 300 companies that have been identified for focused engagement on a range of business performance issues that could impact long-term value. The engagement programme is formulated based on factors including the aggregate size of clients' holdings and the materiality of risks and opportunities. Companies in the EOS engagement programme are assigned to a designated engagement owner, an engagement specialist with the deepest knowledge of the company, sector, or other relevant expertise. Outside of the EOS engagement programme, there may be instances of bespoke company engagement with specific client requested engagement companies. For these companies, a dedicated engagement owner is assigned in the same manner.

EOS provides voting services on the basis that clients always retain full discretion over their final voting decision.

Employee qualifications and training

EOS undertakes a skills gap analysis of the wider team with reference to the thematic and sectoral issues we cover, to ensure we have the right mix of professionals who can best represent EOS and our clients' views in our stewardship services. We have built a diverse team of experienced and international voting and engagement professionals who have the expertise, skills and cultural knowledge to deliver value through our stewardship services.

Annual client policy improvement efforts are made to reduce the number of unnecessary manual vote reviews undertaken by engagers. In cases where votes are straightforward, each client policy provides clear-cut instructions prompting an automated vote instruction, rather than ISS automatically triggering engager review. These improvements involve careful analysis to ensure impactful information, which might otherwise lead to a different vote implementation via manual review, is not overlooked.

Each EOS engager assesses each company based on ISS and other sources of research, engages with the issuer as appropriate and finalises the voting instruction for client review. The time required per vote can vary greatly depending on the issues identified. This requires a dynamic approach to workload monitoring and management oversight, rather than a set model based on average time to write research reports for each vote. Senior engagement specialists dedicate a significant portion of time to handling escalated votes and considering market developments.

Employment Structure & Resource Allocation

Our engagement team as of 31 December 2025 comprised 30 full-time employees, supported by 4 full-time employees in the EOS voting and engagement support team (VEST). EOS does not regularly employ part-time, seasonal employees (although it may occasionally do so, for example, to cover staff absences due to parental leave) as the voting service is an extension of the year-round engagement service, which is permanently resourced. In 2025 EOS did not employ any seasonal workers.

Workforce Composition

The EOS team, which as at 31 December 2025 was 53% female (2024: 57%) and 47% male (2024: 43%), draws on a number of skill sets, with our senior engagers coming from a range of backgrounds including, but not limited to, corporate law, investment management, international development banking, academia, corporate strategy, non-profit management, and management consulting (see Appendix 1).

The combination of our ability to engage in the local language and an understanding of local culture and business practice is important to the success of our engagement work. Within our team we have nationals from 20 countries and fluency in 16 languages. The team's skills, experience, languages, connections and cultural understanding equip them with the gravitas and credibility to access and maintain constructive relationships with company boards. The depth and breadth of this resource reflect our philosophy that stewardship activities require an integrated and skilled approach. Intervention at senior management and board director level should be carried out by individuals with the right skills, experience and credibility.

Our team is primarily based in the UK and the US – London-based staff generally cover engagement and voting services in Europe, Asia and emerging markets, and our Pittsburgh and New York-based staff generally cover engagement and voting services in North America. Our professionals travel to undertake engagements in person where possible at company headquarters and other facilities. We also have several senior advisers who provide us with additional resource and expertise specific to some local markets.

Our engagement professionals collaborate in teams covering themes, sectors and regions. Team members are encouraged to develop and deepen expertise on priority topics, which are identified through external client feedback and internal assessment, as well as their own prior experience and specialist areas of knowledge. In addition, team members are encouraged to build up local market expertise in the regions they cover, and to participate in relevant industry and trade associations. This ensures we have experts who can educate the wider team on developments and best practice in their respective regions, as well as enabling sufficient allocation of staff resources to relevant issues. Each engager is responsible for engagement, voting analysis, and sustainability analysis, focussing on the combination of regions, sectors and themes to which they have been appointed.

Our engagement professionals are generally on permanent contracts rather than brought in as a temporary resource for the voting season. Each engagement professional who joins the team goes through a training and onboarding process which involves formal training sessions and educational modules, as well as shadowing more experienced colleagues to ensure sufficient understanding of the client vote policies and internal guidelines in the markets involved.

Engagers retain a portion of their personal objectives dedicated to training and development throughout their time at EOS. Such training might relate to the content of a particular engagement topic, provided by internal peers or external experts; be focused on the delivery of best practice stewardship, such as training on tools and resources, or the development of key skills; or other aspects of personal and professional development.

Research methodology

EOS offers voting services for company meetings on behalf of its clients in line with agreed contracts (service agreements), detailing the client policy underpinning the vote service.

Client policies are generally structured around guidelines for each region, with further details by individual market and include the client's approach regarding relevant voting topics such as corporate governance, board composition, executive remuneration, management of overall business performance, company disclosures, corporate finance policy including dividends and investor protections.

EOS provides regular public reporting and analysis on voting topics throughout the year. Examples of this include quarterly Public Engagement Reports, which included reviews of the voting season for North America and Europe in Q2 2025[2] and Asia & Global Emerging Markets in Q3 2025[3].

Translation from client policies to final vote implementation

Our clients' relevant vote policies are translated into resolution-specific guidelines for each market which are then shared with ISS, so it can conduct its initial research in this context and apply an initial indicative vote implementation, as well as the accompanying rationales, with a focus on cases where this involves votes against management. These may also indicate under which circumstances we would expect a proposal to be brought to our attention by means of a "refer". In such cases ISS' research will not provide an initial voting instruction, and EOS engagement professionals will resolve the implementation.

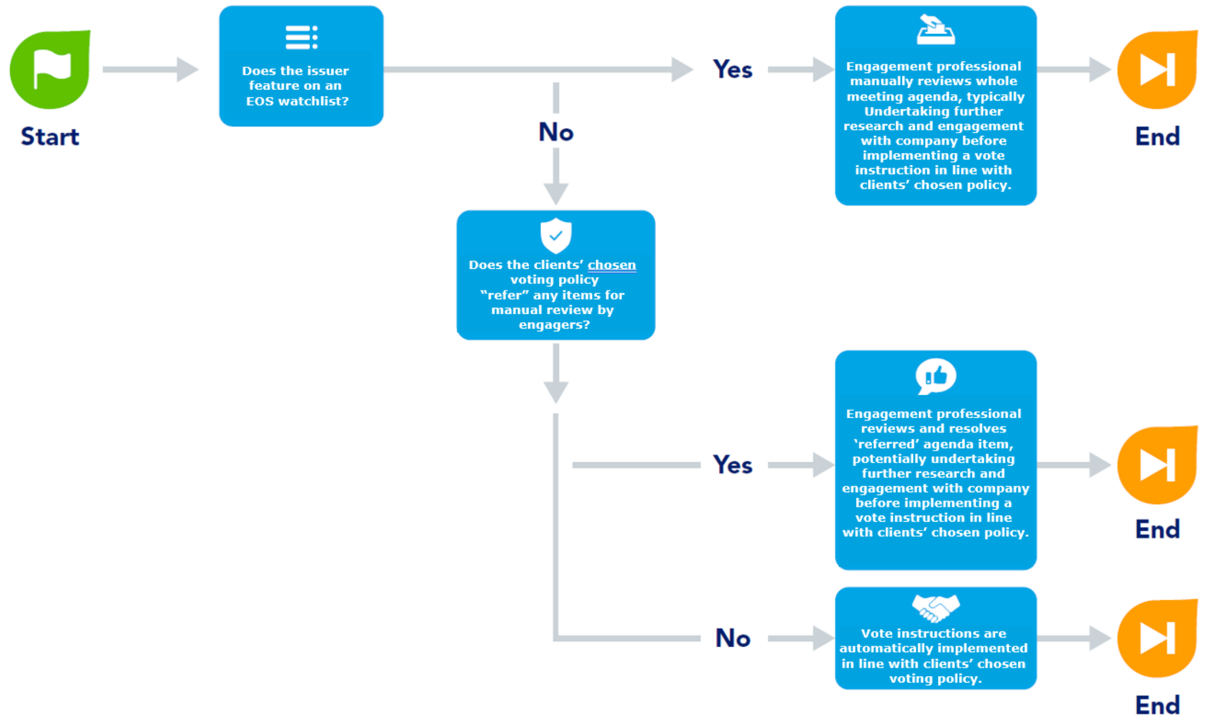
Engagement resourcing is focused on meetings of greatest interest and materiality to our clients. Each year a list is compiled of the highest priority companies for which engagers will manually review each agenda item before implementing the vote. These are known as watchlist companies. This includes our engagement programme companies plus companies of particular interest or sensitivity, or where our clients represent significant holdings (in absolute terms or as a percentage of the company's voting rights). The voting watchlist usually represents the majority of our voting service clients' assets by value.

In general, non-watchlist companies also have voting instructions issued as per ISS' research conducted in line with EOS clients' policy guidelines without further manual intervention on the part of EOS, except for meetings with a refer instruction as detailed above.

The following flow chart explains how this works in practice:

[2] EOS Public Engagement Report

[3] https://www.hermes-investment.com/uploads/2024/10/14b61bd7f701839a99efa1fef393792b/eos-public-engagement-report-q3-2024-spreads-final.pdfEOS Public Engagement Report



EOS research process

Our engagement specialists reference company materials such as annual reports, proxy statements, the ISS research, as well as EOS engagement and EOS client voting history (as recorded on our proprietary engagement management system) to aid the vote service implementation. EOS also draws on other sources such as collaborative engagement networks, national and international media, as well as a number of external research providers. This can include a range of quantitative indicators such as external benchmark scores, as well as qualitative reports relating to management quality and performance appraisals.

EOS proprietary data on the engagement management system, which is typically qualitative, may include, for example, insights gained from company engagement as to progress against various targets or planned developments which may inform EOS' view on a particular vote policy implementation. EOS also monitors the progress of its engagements with companies through a milestone system accompanied by momentum indicators.

EOS applies this range of qualitative and quantitative data when making a judgement as to how to apply each client's policy. Typically, quantitative data is used to determine whether a company's performance meets client policy guidelines, such as elements of board composition (for example the proportion of independent directors on a board, with each dimension subject to applicable local legal and regulatory requirements in the local jurisdiction). However, qualitative factors including the responsiveness and momentum of engagement and quality of management experienced in engagement can become factors which cause EOS to support a resolution 'for, by exception' to a client's usual policy. Meanwhile, a certain number of director votes are informed by reference to judgement of good governance using a range of more qualitative inputs.

An example of this would be votes for director elections related to companies with indicators of insufficient governance of certain categories of business risks. For companies where certain topics are identified as a relevant and material business opportunity and/or risk, to support board composition which, in our clients' view, improves governance and the effectiveness of management in pursuit of long-term value creation, the policy may indicate holding relevant directors accountable if there are indicators of insufficient management of these opportunities or risks. Where practicable, depending on the local legal and regulatory requirements in the relevant jurisdictions and different approaches by region, this will be appraised through consideration of a range of factors and discussed in engagement with a company. The regional vote guidelines can include indicators, as available, of the following in respect of human rights and deforestation risks:

- Concerns that the board is not appropriately managing risks in its business and wider supply chain related to the respect of human rights which are relevant and material to business opportunity and risk.
- Strategy and capital deployment: appropriate strategies and targets to manage human rights -related opportunities and risks;
- Management of deforestation-related risks in the operations and supply chains of companies.

This is initially assessed through a consideration of a range of different relevant frameworks and indicators which vary by geography and can include Influence Map, Forest IQ, MSCI, Sustainalytics, and Bloomberg reports appropriate to each company and then seek engagement with identified companies prior to implementing the vote. Companies which appear to meet one or more of these criteria of concern are flagged internally and contacted for engagement prior to final voting implementation.

Timeliness

We review ISS' timeliness, platform availability and other key indicators against our Service Level Agreement. EOS personnel liaise with their counterparts at ISS on a regular basis, informally and formally to conduct oversight, including a formal service review each year. In addition, EOS personnel can raise issues with research (e.g. factual errors, misinterpretation of voting policies) with ISS to address any problems through direct contact with nominated members of the ISS client relationship team.

Clients retain the ability to access ISS benchmark research and the EOS policy research conducted by ISS, to assess these inputs and sources. Clients are alerted via email of the vote instructions, plus further updates which may be prompted by correction of material factual errors or revisions to research, analysis or voting implementation after research publication, including where engagement has caused revision of a voting implementation.

Factual Errors and Inaccuracies

EOS generally seeks to obtain all relevant information before implementing a vote and therefore avoids changes to vote instructions. However, if new relevant information comes to light after determination of the initial vote instruction, EOS will take this into account and may amend the vote implementation, provided it continues to be before the final platform cut-off. For example, occasionally ISS updates a research note in the light of new information or corrections. In addition, occasionally through engagement or from another source, EOS identifies new information material to a voting outcome. Clients are informed of any change to a vote instruction by email.

Escalation process

EOS operates an escalation process that ensures high-impact votes receive the appropriate attention and scrutiny.

For votes which require escalation, engagement professionals will escalate to a discussion with a senior engager if they are uncertain about the client policy implementation. If unresolved, the vote is then escalated to a discussion with a Stewardship Director, especially if a vote is potentially controversial or difficult to analyse. Colleagues are encouraged to escalate any votes where they believe it would be appropriate to have additional oversight on the implementation. Escalated votes are recorded on our engagement management system, as are votes which may be considered 'significant' (for example, at a company where there is significant media coverage in the current year or a history of escalated engagement).

Input from issuers is sought as part of engagers' decision-making process regarding vote policy implementation on the EOS watchlist, and this input is therefore included for consideration in escalation discussions. Issuers can make formal complaints should they believe proper process has not been followed (see section on Feedback management and complaints).

Quality

In addition to escalation, client feedback and post-season reviews, additional measures are in place to support the quality of the voting service. A daily process prioritises meetings which are due and assigns the meeting to the most appropriate professional. The process also identifies those meetings that are approaching their deadlines to allow opportunity for timely escalation and resolution. We further ensure that workloads are appropriately balanced, particularly throughout AGM season so that each meeting receives the right amount of attention and engagement professionals are not overburdened. Engagement professionals receive an end-of-day overview of their implementations, to enable them to review the proposals that have been supported and opposed, as well as the accompanying rationales. This provides a prompt to review votes submitted and if necessary to make any correction on the same day they were input, prior to distribution to clients.

Historically the voting process was assured by our external auditors in accordance with Guidance AAF 01/06[4]. However, within the revised AAF 01/20 standard, proxy voting controls were no longer in scope. Operational voting processes are assured by an independent third-party assurer as part of a wider assurance programme covering voting and engagement-related processes. This assesses internal controls to ensure client ballots have been instructed prior to deadline, and that any errors have been reported. Each day where an overdue vote is flagged, we consider this as a control measure. The votes are tracked through to resolution by the EOS VEST team. This ensures we promptly provide a vote instruction and then alert clients manually via email as the automated alerts may not reach all clients before their relevant ultimate vote deadlines on the ISS platform.

Should the control fail, and EOS is deemed responsible for the late vote, it is disclosed internally to the Risk and Compliance department. If an error has led to a late and subsequently rejected vote, VEST investigates and reviews the controls and processes involved. If necessary, we make appropriate changes to prevent reoccurrence. For certain randomly selected days throughout the year, our auditors ask us to show evidence that we have followed the process.

We review the voting implementation outcomes each year to determine what tweaks to the policies or voting approach might be required. An additional quality control process has been rolled out to support this. Ex-post 'spot checks' of individual engagers' vote implementations are conducted to ensure proper process was followed, and to confirm that final implementations were either in-line with the relevant policy or justified where they deviated (for example, because of insights received through company engagement). This occurs at a rate of one vote per engager, per quarter, and is intended to complement the ex-ante escalation process which identifies potentially controversial or nuanced votes for further discussion and scrutiny, before final implementations are made.

Due to our downstream position from ISS in the voting process cycle, we benefit from ISS' quality control processes on the information it has received, and the research provided to us. Occasionally we may spot errors or inconsistencies in ISS-provided research and/or the application of the policy which we raise with our designated contact to be resolved. Inaccuracies in ISS' initial research or further updates to publicly available information may lead to EOS and its clients receiving revised research from ISS and for EOS to revise its implementations. Clients are informed where new instructions are issued. As our engagement professionals make policy implementations, they will further triangulate where necessary using their contacts with companies, company materials and other sources to help ensure the accuracy of information received.

[4] Standards and guidance | Assurance | ICAEW

Client policy development

Most EOS clients subscribe to the vote service. EOS supports its clients in different ways to develop and finalise their own voting policy, depending on their needs and concerns. EOS then implements each client's vote policy.

We encourage clients to make full use of the alerting and reporting functionality of our voting platform to ensure they stay apprised of votes that are of interest and make it as easy as possible for clients to instruct votes that differ from the initial indication. All clients of the voting service also have access to the ISS benchmark voting policy and associated research.

Feedback management and complaints

Clients

EOS' client advisory board and client advisory council provide regular feedback on our performance and are an opportunity for clients to raise any concerns about our service quality. No collective discussions take place on clients' voting policies. In addition to these mechanisms, clients are prompted to provide individual feedback each quarter and are offered the opportunity to participate in engagement meetings (including those around a vote) where appropriate. We encourage clients to raise questions about their individual votes as this ensures alignment with each client's interests, which contributes towards more accurate client policy implementation. Clients' ability to connect with our engagement professionals about individual companies is a key differentiator of our service offering.

While we aim to offer the best service possible, we do recognise that there may be occasions where we will receive a complaint. We are committed to resolving complaints through a robust, documented procedure.

Issuers

As noted elsewhere, EOS engagers will seek to engage with issuers on the voting watchlist, to the extent practicable, to identify any information relevant to accurate implementation of client vote policies. Following the relevant shareholder meeting, EOS will inform each issuer of its clients' vote implementation.

Issuers can make a formal complaint where they believe that proper process has not been followed regarding voting implementations. This should be directed via the same process as for clients (see following section: Complaints Process).

Further, issuers who wish to make a complaint about any signatory of the Best Practice Principles Group (BPPG) on the basis that they believe the signatory has breached one or more of the best practice principles may do so, following the BPPG complaints process. More information can be found here: Complaints & Feedback | Best Practice Principles for Shareholder Voting Research (bppgrp.info). Should issuers be dissatisfied and wish to escalate concerns further, they may directly contact the Best Practice Principles Oversight Committee of the BBPG (BPP OC) by emailing oversightchair@bppgrp.info.

Complaints Process

All formal complaints should in the first instance be made in writing to the Chief Compliance Officer, Federated Hermes Limited at Sixth Floor, 150 Cheapside, London EC2V 6ET.

The complaints handling procedure is applicable to all entities within Federated Hermes Limited, including associated undertakings and joint venture arrangements where Federated Hermes Limited has a controlling interest and to all members of staff across Federated Hermes Limited.

Principles:

The general principles governing the firm's policy are:

■ Complaint awareness: Requirement to provide appropriate information to inform all clients of our complaint handling process.

■ Complaint handling: Requirement to provide a written acknowledgement to the complainant within five working days of receiving their complaint and to seek to attempt to resolve all complaints within eight weeks of receipt.

■ Root cause analysis: Business areas with complaint handling responsibility must have processes to carry out effective root cause analysis.

Timeliness

Our process aims to provide voting implementations at the earliest possible opportunity once all the relevant materials (including the provisional client policy application published by ISS) are made available and relevant engagement has taken place. Implementations should be issued no later than one working day prior to our earliest custodian-confirmed cut-off. In some cases, we are unable to do so, primarily due to the availability of source information and research. On average, vote implementations are available 8 days prior to the cut-off. We make reasonable efforts to chase up outstanding research and challenge conservative deadlines set by custodians. We encourage engagement professionals to contact companies in good time. We issue client alerts to promptly notify clients of vote instructions. From time to time, companies will contact us with feedback regarding vote policy implementation which we pass on to the relevant engagement professional to consider. Where time allows, this may trigger additional engagement or a revised voting implementation which is then relayed to clients promptly.

As mentioned above, controls are in place to ensure timely submission of manually applied EOS votes by way of capturing fresh data each morning from the ISS platform and utilising a proprietary Excel tool to highlight outstanding tasks which are ultimately shared amongst the team. Where human error has led to delayed implementation, manually generated email alerts are triggered to ensure clients are promptly informed, which in most cases will still allow them sufficient time to review ahead of the ultimate ISS deadline. Should the ISS deadline be breached, EOS will inform the impacted clients and will submit a client-approved vote with ISS as soon as possible. Errors are investigated and disclosed to the Federated Hermes Limited Risk department for review. Error rates have historically been relatively low. In 2025 we had two errors resulting in a failed vote, and five in the last three years. We provide vote policy implementation for around 14,000 meetings each year, so this gives us a 99.99% success rate.

Client and supplier understanding

EOS seeks always to act in its clients' best interests. Accordingly, EOS takes all reasonable steps to identify conflicts of interest and maintain and operate arrangements to minimise the possibility of such conflicts giving rise to a material risk of damage to the interests of our clients. To this end we have established a conflict of interest approach which is detailed further under the section addressing Principle Two.

The service agreement between EOS and each client clarifies responsibilities and limitations of our service, including reliance on external parties and the constraints on timeliness indicated above. There are further limitations to our service such as:

Share blocking process

We apply a precautionary principle to ballots involving share blocking. To avoid affecting our clients' ability to trade, we ask each client to nominate an authorised person to approve such votes before the cut-off date. Once a vote is authorised, the underlying shares may be blocked and remain unavailable for trading until after the meeting date.

Special requirements and Powers of Attorney

We support clients by passing on special requirements without undue delay where we are made aware of them. Our clients are responsible for ensuring valid powers of attorney are in place, and an annual reminder is provided to clients.

Bondholder meetings and private/unlisted companies

Bondholder meetings and meetings of private/unlisted companies are not within the scope of our voting service. Where we are made aware of such events, we bring these to the attention of our clients as a prompt for them to make arrangements (typically via their managers) to instruct these events.

Client disclosure facilitation

We recognise that institutional investors may be subject to disclosure requirements of the use of our services. We support clients, upon their request, with disclosure relating to their discharge of stewardship responsibilities. Many voting service clients will disclose their voting outcomes on their own website, and we provide vote disclosure files for this purpose as standard at no extra cost. We further assist PRI signatory clients with inputs they can use to support their own reporting, also at no extra cost. Clients requiring more autonomous solutions can sign up to additional available services through EOS such as ISS's Vote Disclosure Service which provisions a live feed of data with the option of being embedded on the client's own website, and the SEC N-PX 'ready-to-upload' disclosure report.

Principle Two: Conflicts-of-Interest Management[5]

EOS seeks always to act in its clients' best interests. Accordingly, the firm takes all reasonable steps to identify actual or potential conflicts of interest and maintain and operate arrangements to minimise the possibility of such conflicts giving rise to a material risk of damage to the interests of our clients. We aim for a strong culture of responsibility, and we aspire both to maintain and further foster this client-focussed culture.

EOS does not offer consultancy services to issuers which may be subject to our engagement or voting service.

Federated Hermes has a policy regarding its Code of Business Conduct and Ethics, which is part of the mandatory Compliance induction process and annual refresher training. This policy covers various aspects of conduct including managing conflicts of interest and applies to all employees across the group, including at EOS.

Further, the Federated Hermes Pledge expresses the commitment of each member of staff to always put the interests of our clients and their beneficiaries first and in so doing manage conflicts of interest fairly between all affected parties. We also seek to align with international good practice on managing and reporting conflicts of interest.

Across the firm we take all reasonable steps to identify conflicts of interest between: Federated Hermes, including its managers, employees and appointed representatives or any person with a relevant direct or indirect link to them, and our clients as a body; or any one client of Federated Hermes and the client body.

Potential conflicts of interest

Employee share trading

As part of harmonising across the global business, Federated Hermes Limited adopted the Code of Ethics for Access Persons, which oversees personal trading within the firm. At Federated Hermes Limited, all employees are deemed to be Access Persons. This policy applies to all employees, including EOS staff. Trades are automatically checked in the Compliance Platform, which will flag any trades that require a compliance review.

Ownership

One potential conflict which has been identified for the group relates to our ownership structure. EOS is owned by Federated Hermes Limited which in turn is owned by Federated Hermes, Inc. We have internal procedures to regulate the processes and restrict the flow of information among, and within, business units so that activities are carried out with the appropriate level of independence.

EOS' policy is not to provide vote indications for any publicly listed investment trusts or funds owned by Federated Hermes, Inc. or Federated Hermes, Inc. itself, but rather to pass through the ISS benchmark policy outcome to clients, to avoid any potential conflicts.

Clients and prospects

EOS provides services not only to Federated Hermes, but also to other institutional investors, including pension funds sponsored by corporations, governments and other organisations, as well as fund manager clients. These services include voting and engagement with companies in which Federated Hermes' clients are equity shareholders and/or bond investors.

As a result, the following real or perceived conflicts may arise:

[5] This section draws on the Stewardship Conflicts of Interest Policy from Federated Hermes Limited which is published on our website: [Policies & disclosures | Federated Hermes Limited (hermes-investment.com)]

- We may provide voting services pertaining to a company which is the sponsor of one of our pension fund clients or is a company within the same group as one of our clients or prospects;
- We may provide voting services with respect to a corporate transaction, the outcome of which would benefit one client or prospect more than another;
- We may engage with and provide voting services relating to a company in which certain clients or prospects are equity holders and others are bond holders;
- We may hold meetings with companies for the dual purpose of delivering both our fund management and stewardship services; and/or
- We may otherwise act on behalf of clients who have differing interests in the outcome of our activities.

Where we provide voting services relating to sponsors of, or in the same group as our clients, we are careful to protect and pursue the interests of all our clients by seeking to enhance or protect the long-term value of the companies concerned. In the first instance, we make clear to all clients with corporate sponsors that we will treat their sponsoring parent or associated companies in the same way as any other company. In addition, we ensure that in such situations the relevant client relationship director or manager within Federated Hermes Limited including EOS, is not involved in providing the vote service to clients. This same approach would hold true with respect to any engagement with a company with whom we, our owners or our clients, have a strong commercial relationship, including suppliers.

EOS engagers are exposed to clients on a frequent basis. The operating structure of the team involves close alignment between voting service and client service activities. As such, it is not practicable for us to fully segregate our voting service from the client servicing function, and engagers will generally be aware of the identity of our clients and their sponsors (who may be taking voting services). We make efforts to avoid inadvertent influence or bias from sponsoring companies by following our standard engagement and voting protocols – including escalating manual votes relating to sponsoring companies and only communicating voting implementations to the client once they are final.

EOS has a process in place to identify actual or potential conflicts of interests and business relationships that may influence the preparation of our research, advice or voting service, which utilises several stages of assessment and escalation, as well as multiple members of both the EOS team and the broader Federated Hermes Limited senior management team. In such instances we provide clients with a client alert detailing the relationship as well as steps taken to mitigate or manage the actual/ potential conflicts of interests at the same time as delivering the voting service. Clients may further be provided with a copy of the research provided by a non-conflicted proxy advisor, to aid transparency.

We would acknowledge situations where we become aware that one of our clients is a shareholder proponent or a party to a proxy contest and seek to inform clients with an alert, where material.

There may be occasions where one of our clients seeks to influence the vote instructions we give to other institutional clients. In such circumstances there would be director-level involvement and an objective judgement reached based upon what we believe to be in the best long-term interest of each of our clients. If material, this potential conflict of interest is highlighted to clients. All clients retain full discretion over their final voting decision.

Clients, and internal investment teams, may at times have different immediate interests in the outcome of certain corporate activities, most notably, in the result of a takeover bid involving two public companies. When providing vote implementations on such transactions, we consider a range of factors in the context of seeking to protect and promote long-term, sustainable value. These include consistency with strategy; risks and opportunities (the key risks and opportunities and the extent to which these appear to have been managed); conflicts of interest; and price. We may provide different indications to holders on each side of the transaction depending on what we believe best serves their long-term interests. There may also be instances where certain clients have holdings on both sides of the transaction and may have conflicting interests.

Where appropriate, input from FHL investment team colleagues will be considered alongside other inputs, in line with the long-term interests of EOS clients. We make clear to our clients that we will at times seek input from investment team colleagues only as one of several inputs and will communicate to clients where this has been done for a particular transaction, together with any potential conflict of interest. As with all voting implementations, clients retain the final decision on voting. On the rare occasion that an FHL investment team and EOS disagree on the appropriate voting action, the matter is logged and escalated as described in the next section.

Our policies seek to avoid any potential conflicts for individual Federated Hermes staff members arising from engagements with companies in which they have personal investments or some material personal relationship with a relevant individual. When any staff member recognises a potential conflict of interest with a company in which they are engaging, he or she must raise this with their line manager. Any such instances are recorded and escalated as described in the next section. Where a staff member has a significant personal connection with a company – such as having been employed by the company within the last 12 months, or being related to an employee of the company in a position of influence – he or she is required to make this known and is not permitted to be involved in any relevant stewardship activities, including providing voting services.

Conflicts of interest EOS does not have

EOS does not offer consultancy services to issuers which may be subject to our engagement or voting service.

Recording and escalation

We maintain a register of instances of conflicts or potential conflicts as they arise. In those limited circumstances where a conflict over our approach to voting (aside from that directed by client-specific policies) arises which cannot be resolved, the matter will be escalated to an 'escalation group'. The escalation group comprises senior representatives from the Investment, Responsibility and Client Relations teams, the Chief Regulatory Officer and Head of Government Affairs and a Managing Legal Counsel from the Legal team. The group is guided in reaching its decisions by our mission to deliver enduring wealth creation by investing responsibly, our published Engagement Plan, client voting policies and other appropriate industry endorsed guidance. If there is no majority view from the group, then the CEO will make a final decision. All such instances would be documented and reported to the Risk, Compliance and Financial Crime Committee– an independent sub-committee of the board of Federated Hermes Limited. It is expected that votes cast by the investment teams of Federated Hermes Limited would be consistent with the voting service we provide to EOS' voting service clients other than in limited circumstances.

We review the Stewardship Conflicts of Interest Policy[6] annually to ensure it adequately reflects the types of conflicts that may arise so that we can ensure that they are appropriately managed and as far as is possible, mitigated. The Policy is publicly available on our website.

Conflicts of interest approach in practice

Our policy on conflicts may be best understood by considering its impact in practice. Our EOS conflicts of interest register contains a description of stewardship conflicts, what mitigation procedure and controls were put in place, whether it was then reported to the escalation group if necessary and any follow-up actions and

[6] Stewardship conflicts of interest policy

conclusions. It is reviewed by senior management on a regular basis. The following are examples of conflicts which we identified and managed in 2025:

Potential conflict due to investment team input:

An internal investment team and client reached out ahead of the client policy implementation period to suggest supporting remuneration proposals which were flagged by a current client policy application, and provided additional context gathered through engagement with the company. After conducting initial analysis of the client policy application, EOS agreed with the suggested implementations, which was in line with EOS analysis of the application of the client policy even without being approached by the investment team. This decision was escalated to a senior team member, who led the client policy development facilitation, who agreed and implemented the client policy supporting the remuneration proposals.

Potential conflict due to the issuer also being a client:

EOS implemented client policies for an AGM of an issuer which is also a sponsor of a client. This was escalated to a senior team member in charge of client policy development facilitation, who confirmed the intended vote implementation for the company, in line with two other internal investment teams. Additionally, the client team was notified and alerted the client of the implementations.

Principle Three: Communications Policy

Dialogue with issuers, shareholder proponents and other stakeholders

EOS actively seeks dialogue with issuers, shareholder proponents and other stakeholders which is a key feature of our approach. We communicate the outcomes of these dialogues to clients through our client reporting portal, EOSi, as well as through our regular alerting and reporting. Where relevant and practicable, we seek to engage with companies on our watchlist to discuss issues which are relevant to shareholder meetings. Any resultant dialogue helps us to take a fully informed view prior to applying the client policy to develop a final vote instruction. If in the final outcome, a client policy opposes management recommendations on any matter, we will endeavour to inform these companies of the relevant rationale following the meeting. EOS' client implementations are provided confidentially to our clients as part of our engagement and voting service and so are not systematically disclosed. However, the day after the relevant meeting date, Federated Hermes Limited discloses its own voting decisions, which are generally aligned with EOS indications on relevant holdings, save in certain circumstances explained under our response to Principle Two: Conflicts of Interest. These are made public through its corporate dashboard[7] and EOS encourages its voting clients to publicly disclose their final voting decisions in line with international best practice.

Stewardship activities are not carried out with the intention to obtain non-public information, nor is information used in any way to manipulate a market.

In the case that material non-public information is obtained through stewardship activities, our Compliance department is informed, and an information barrier is created for insiders until the information is publicly disseminated. During the application of the information barrier, stewardship professionals are not allowed to act upon or share the non-public material information. The EOS proprietary engagement management system requires that engagement professionals certify that they have either not received any inside information whilst conducting each engagement interaction, or if they have, that they have followed the applicable compliance procedure.

Dialogue with media and the public

In our experience, working constructively with boards and management through private engagement is most effective in achieving positive change and so we rarely comment in public on a company's shareholder meeting.

However, on some occasions, we may use the media and other public forums in the interests of our clients Engagement with the media is subject to our corporate communications policy and designated engagement professionals receive targeted training to manage media contact, including managing risks including those related to defamation, market abuse, and material non-public information. Our approach is to provide each vote implementation to relevant clients before disseminating to a wider audience in the rare cases where we would seek to publish these ahead of a meeting.

Complaints to the BPPG and BPP OC

As discussed earlier in the report, if stakeholders wish to make a formal complaint relating to the activity of a signatory to the BPPG, they can follow the escalation process outlined as part of the BPP OC's Annual Report. More detail can be found on pages 53-59 of the 2024 BPP OC Annual Report[8].

[7] Proxy voting dashboard - Global

[8] 2025 BPP OC Annual Report

Appendix 1: EOS workforce skills count

Skill area	Team member count (noting some team members have more than one skill)
Corporate	6
Finance/Investment/Accounting	8
Consulting	16
Law/Governance	3
Sustainability	20

Appendix 2: Changes to EOS practices and disclosures vs. 2024

For reference, this table summarises changes to EOS practices and/or disclosures since its previous BPP compliance statement (June 2024) and the rationale for these, including whether/how these relate to feedback provided by the BPP Oversight Committee on its previous statement.

Change	Rationale
Statistics tracking updated (across document): information on prior year data to enable any material shifts to be monitored	Suggested in feedback by the BPP Oversight Committee.
Updates to hyperlinks (across document)	Ensures relevance of documents for year under review
Updated information on use of external research providers, to include MSCI, Sustainalytics, Bloomberg, and ForestIQ in addition to previous year inclusions (page 8)	Transparency of resources data
Additional details around EOS' approach to factual errors and inaccuracies (page 10)	Providing additional information following feedback from BPP Oversight Committee to increase detail around this
Updates to client policy development (page 10)	Changes following annual policy review process to explain how EOS supports clients to develop their vote policy
Clarified disclosure report offerings for P-NX and PRI are both free of cost (page 12)	Providing clarification following feedback from BPP Oversight Committee regarding cost of additional report offerings
Additional disclosure around manual client alert process for delayed vote indications (page 14)	Provision of up-to-date information
Conflicts of interest in practice: new examples provided from 2025 (page 16)	Providing up to date disclosures and following feedback from the BPP Oversight Committee regarding timeliness of examples.

Additional information added around EOS team’s skills backgrounds (see Appendix 1)	Provided additional information following feedback from BPP Oversight Committee regarding team demographics

Disclaimers:

In our meetings with any company or client, EOS at Federated Hermes will endeavour to ensure the following:

No Exchange of Material Non-Public Information. *EOS at Federated Hermes will not solicit, and participants should not disclosure, material non-public or competitively sensitive information about any company or issuer wherever located. Disclosure or discussion of such material non-public or competitively sensitive information is not permitted.*

Long term value creation*: Any discussion will focus on investment stewardship, which includes engagement with issuers and companies on matters considered to be relevant to seeking to improve long-term risk adjusted returns for issuers and companies, and to create long-term value/wealth for clients and investors, consistent with applicable fiduciary duties and serving the objectives and pecuniary interests of clients and investors.*

No discussions seeking acquisition*: There will be no discussions seeking the acquisition of, or the exercise of influence or control over, any of the issuers or companies that we discuss.*

No divestment discussions*: There will be no discussion about whether, or to what extent, or under what terms and conditions, any client or investor will or may choose to reduce its equity in, or, if applicable, stop making loans or financing to, any of the issuers or companies we discuss.*

No Actions to Otherwise Influence of Control. *There will be no discussion of any action or strategy to directly or indirectly (or impliedly) threaten to vote for or against management of a company or an issuer, or to vote with another shareholder or group of shareholders, to achieve an outcome, target or goal, or to take or omit to take a specific action or otherwise influence or control an issuer or company that we discuss.*

Independent decisions*: Participation in, or support of, engagement discussions is voluntary on the part of each participant and subject to each participant's independent decision making. Decisions about whether to buy, hold or sell any investment (equity or debt) in any company, or how to exercise any voting rights associated with such investments, are decisions that each participant in these discussions will make independently for itself and not in coordination with any other participant.*