

Ameritas Investment Partners, Inc.
5945 R Street / Lincoln, NE 68505



Date: 4/30/2024

Representations regarding Anti Money Laundering (“AML”) program

Ameritas Investment Partners, Inc. (“AIP”) is a registered investment adviser and wholly-owned subsidiary of Ameritas Holding Company, which is owned by Ameritas Mutual Holding Company (Ameritas Companies or Ameritas). AIP’s affiliates and others administer required AML programs for two products/programs that AIP manages or sub-advises. These are:

- Calvert Variable Products, Inc. (a registered investment company) for which AIP sub-advises eight portfolios managed by Calvert Research and Management (“Calvert”, an affiliate of Eaton Vance). Calvert conducts all AML procedures for shareholders.
- Ameritas Investment Company (“AIC”, a registered broker-dealer and an affiliate of AIP) is the introducing broker-dealer for AIP’s Wrap Fee Program Accounts. AIC conducts all AML procedures for Wrap Fee Program investors.

The majority of AIP’s remaining advisory clients are affiliates and include Ameritas Life Insurance Corp. and Ameritas Life Insurance Corp of New York, among others.

Effective November 4, 2008, the U.S. Treasury withdrew its previously proposed rulemaking concerning AML and registered investment advisers. On August 25, 2015, the Treasury re-proposed a requirement for registered advisers to adopt AML programs and suspicious activity report filings, but no final rule has been adopted. AIP has not established an AML program to enable us to make any representation to you concerning AIP’s affiliated institutional clients or the few non-affiliated institutional separate accounts most of whom have been clients since before the AML program requirements of the USA PATRIOT Act.

Regulations issued by the Office of Foreign Assets Control (“OFAC”) of the Department of the Treasury require AIP to determine if customers appear on OFAC’s Specifically Designated Nationals List (SDN List). AIP certifies that it maintains an OFAC compliance program which includes procedures for checking customers against the names on the OFAC lists of sanctioned governments and specially designated nationals, terrorists and narcotics traffickers and for screening wire transfers and other payments against OFAC lists. AIP does not believe, and after appropriate due diligence, has no reason to believe, that any of its customers/investors is a prohibited foreign shell bank; is named on any available lists of known or suspected terrorists, terrorist organizations or of other sanctioned persons issued by the United States government and the government(s) of any jurisdiction(s) in which the undersigned is doing business.

AIP does not act as custodian for client accounts and does not take or have possession of client assets. Further, the assets in client’s accounts are deposited with a “qualified custodian” (as defined in Rule 206(4)-2 of the Investment Advisers Act of 1940, as amended) which is selected by the client. However, AIP is not required to nor does it conduct any level of due diligence to confirm the scope or adequacy of such programs. As such, you may need to consider completing alternative procedures to satisfy your AML/CIP requirements for these accounts.

Sincerely,

DocuSigned by:

Matthew J. Kinsella

Vice President & Chief Compliance Officer