

TCW

# TCW Investment Management Company LLC

- Section I Form ADV Part 3, Form CRS
- Section II Form ADV, Part 2A (the “Brochure”)
- Section III Form ADV, Part 2B (the “Brochure Supplement”)
- Section IV Privacy Policy

October 2024

TCW

Section I Form ADV Part 3, Form CRS

December 1, 2023

### **Is an Investment Advisory Account Right for You?**

TCW Investment Management Company LLC is an investment adviser that has been registered with the SEC since 1987. Investment advisory services and fees differ from those of a broker, and it is important for you to understand the differences. You should carefully consider which types of accounts and services are right for you.

This document gives you a summary of the types of services we provide and how you pay. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/crs), which also provides educational materials about broker-dealers, investment advisers, and investing. Please ask us for more information, as indicated below. There are some suggested questions throughout this summary.

### ***What investment services and advice can you provide me?*** [Item 2.A.]

Services. We provide investment management and advice relating to U.S. Equities, U.S. Fixed Income, International and Alternatives investment strategies. Retail investors may invest through advisory accounts (“**Accounts**”), public open-end commingled investment vehicles (“**Funds**”), and wrap fee accounts sponsored by others (collectively “**Portfolios**”). The publicly-offered Funds include mutual funds. Generally, we are the adviser of the Account or Fund, but we sometimes are a sub-adviser. If you open an Account, you will pay an on-going asset-based fee at the end of each quarter for our services, based on the value of the cash and investments in your Account.

Monitoring & Discretionary Authority. Portfolios are typically monitored and reviewed by us on a continuous and ongoing basis. In addition, we have controls to monitor investment transactions and guidelines in your Account, which may occur daily, monthly, or quarterly. In the Accounts and Funds we manage, we typically have authority to buy and sell investments in your Account without asking you in advance for approval (a “**discretionary account**”).

Account Minimums. Accounts and Funds for our investment strategies are subject to a minimum account size, which can vary depending upon the type of Account or Fund and investment strategy.

#### **Key Questions to Ask.**

- ✓ *Given my financial situation, why should I choose an advisory account?*
- ✓ *How will you choose investments to recommend to me?*
- ✓ *What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?*

### ***What fees will I pay?*** [Item 3]

Principal Fees and Costs. The investment management fees we charge are generally computed as a percentage of the market value of assets under management in Accounts (“**Asset-Based Fee**”), and are billed, rather than deducted, from the assets we manage. However, for Funds, including mutual funds and for wrap fee accounts, the management fees are deducted from the assets we manage. Our clients typically pay our management fees on a quarterly basis, although mutual funds and some Accounts pay us on a monthly basis.

Other Fees and Costs. Our Account clients will typically pay fees to their custodian in addition to our management fees. Depending on the strategy in which the Account invests, the Account will incur brokerage fees for most equity trading, and the effect of the difference with respect to the bid/ask spread for trading in fixed income investments. If the strategy for the Account involves derivatives, the Account may be required to make payments to counterparties related to the derivatives. In addition to our management fees, our mutual fund clients incur product specific fees as set forth in each mutual fund’s prospectus and statement of additional information.

Conflicts of Interest. Asset-Based Fees may create a conflict of interest as the more assets you have in your Account means you will pay more in fees to us, therefore creating a potential incentive for us to encourage you to increase the assets in your Account. Our marketing representatives may have an incentive to recommend

our investment strategies and Funds based on the compensation received or those strategies with higher fees, rather than based on a client's needs. Additionally, our mutual fund and wrap accounts are available through unaffiliated brokers and other agents and are generally compensated through fees associated and disclosed by those products.

Additional Information. You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

✓ *Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

### **What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?** [Item 3.B]

*When we act as your investment adviser,* we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means.

Transactions Involving Related Persons. There are broker-dealers and other financial intermediaries and institutions that are controlled by or under common control with TCW. In any transaction with a related party, the related party may receive compensation. Furthermore, we may act as investment adviser for related persons and may act as investment adviser for pension vehicles of related persons. We may be restricted under certain circumstances from entering into principal and agency and other transactions with affiliates.

Investment Products. We may, from time to time, recommend to or purchase or sell on behalf of clients, securities or other investment products ("**Investment Products**") in which we, our affiliates or other related persons have a financial interest as the investment manager, general partner or trustee or as a co-investor in such Investment Products.

Consulting and Structuring Fees. We and our affiliates may receive fees from third parties for performing consulting, merger and acquisition structuring or other financial advisory services or acting as directors, officers or creditors' committee members. These fees can relate to actual, contemplated or potential investments of our clients. Such fees may be retained entirely by our affiliates or us.

✓ *How might your conflicts of interest affect me, and how will you address them?*

### **How do your financial professionals make money?** [Item 3.C.]

Generally, our investment professionals are remunerated through a base salary and performance-based compensation bonus. Portfolio managers are compensated through a combination of base salary, profit sharing based compensation, bonus and equity incentives. All TCW marketing professionals are generally compensated through a base salary and performance-based bonus. Certain marketing professionals' compensation also includes a portion made up of commission payments related to products they sell.

### **Do you or your financial professionals have legal or disciplinary history?** [Item 4.A.]

**No.** For free and simple search tools to research us and our financial professionals please go to [Investor.gov/CRS](http://Investor.gov/CRS). If you have a problem with your investments, account or financial professional, contact us in writing at *TCW, 515 South Flower Street, Los Angeles, CA 90071*.

Additional information about TCW Investment Management Company LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You may contact us at (877) 829-4768 to request up to date information or a copy of Form CRS. For an electronic copy of our Form ADV Part 2A in Acrobat (.pdf) format, please send an email, to: [ADVPART2@tcw.com](mailto:ADVPART2@tcw.com) with "TIMCO Part 2A" in the subject line or click here.

✓ *Who is my primary contact person? Who can I talk to if I have concerns about how this person is treating me?*

# Form CRS Information Script

## Introduction

This script was created to help you understand TCW's investment services and accounts. For additional information, please refer to the key questions found in *Form ADV Part 3, Form CRS*.

## 1 – Given my financial situation, why should I choose an advisory account?

*TCW offers a broad range of investment strategies across fixed income, equities, and emerging markets through our advisory accounts.*

*Some of the benefits advisory accounts provide are:*

- *Exposure to asset classes that can potentially offset the ups and downs of market volatility,*
- *Professional investment personnel to oversee your investment strategy and perform ongoing portfolio monitoring, and*
- *Predictable costs based on your asset level.*

## 2 – How will you choose investments to recommend to me?

*TCW begins with reviewing your financial situation and learning some important facts about you, such as your:*

- *Age;*
- *Financial situation and needs;*
- *Tax status;*
- *Investment objectives;*
- *Investment experience;*
- *Investment time horizon;*
- *Liquidity needs;*
- *Risk tolerance; and*
- *Any other information that you disclose to TCW.*

*Once we identify your investment goals, we will review the different investment strategies we offer and determine what strategy, or strategies, best fit your goals.*

## 3 – What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

*TCW marketing representatives hold a Series 7 securities license, and a Series 65 or 66 Uniform Investment Adviser Laws Exam License which means they can provide advisory services to you.*

#### **4 – Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?**

*The management fee TCW charges an advisory account is a percentage of the total value of the assets in your account and as a result, the total amount you pay will increase if the asset value of your account increases, and vice versa. This Asset-Based Fee is billed directly to you on a quarterly basis. However, for other types of accounts we manage, such as wrap accounts and mutual funds, the management fee is generally broken into monthly payments and deducted directly from your account.*

*Investment management fees are also based on the investment strategy and, in some cases, size of the account. In some cases, the fee schedule applied to an account for a particular strategy will take into consideration other assets we manage for you in other strategies.*

*Here's an example to help you understand the fee charged to an advisory account, say you have a balance of \$10,000 in your account, and you are charged a fee at an annual rate of 1% assets under management, then you'll pay \$100 in fees over the course of a year.*

#### **5 – How might your conflicts of interest affect me, and how will you address them?**

*As your investment adviser, TCW, and its marketing representatives, have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. Generally, our marketing representatives are compensated through a base salary and performance-based compensation bonus. Our portfolio managers are compensated through a combination of base salary, profit sharing based compensation, bonus and equity incentives. Here are a few examples to help you better understand what conflicts of interest means:*

- *The more assets you have in your advisory account, including cash, the more in fees you will pay TCW. We therefore have an incentive to increase the assets in your account in order to increase our fees.*
- *Certain marketing representatives may also receive commission payments as part of their compensation. This may give them an incentive to recommend investment strategies based on the compensation received or those strategies with higher fees, rather than based on your needs.*
- *To mitigate conflicts of interest with your account, TCW has implemented policies and procedures that employees have to follow. These include policies and procedures with respect to portfolio management, and when they engage in their own personal securities transactions.*

#### **6 – Do you have any disciplinary history?**

*No, TCW does not have a history of disciplinary violations. You may visit [www.investor.gov/crs](http://www.investor.gov/crs) for a search tool to research TCW and its marketing representatives.*

#### **7 – Who is my primary contact person? Who can I talk to if I have concerns about how this person is treating me?**

*A TCW marketing representative will be assigned to your account. If you have any concerns, please contact us at (877) 829-4768 and your concerns will be addressed immediately.*

TCW

Section II Form ADV, Part 2A (the “Brochure”)

March 28, 2024



## ITEM 1: COVER PAGE

TCW INVESTMENT MANAGEMENT COMPANY LLC  
(“**We**” or “**Us**”)

Form ADV, Part 2A  
(the “**Brochure**”)

March 28, 2024

TCW Investment Management Company LLC  
515 South Flower Street  
Los Angeles, CA 90071  
[www.tcw.com](http://www.tcw.com)

This Brochure provides information about the qualifications and business practices of TCW Investment Management Company LLC. If you have any questions about the contents of this Brochure, please contact us at [advpart2@tcw.com](mailto:advpart2@tcw.com). The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (“**SEC**”) or by any state securities authority.

Additional information about TCW Investment Management Company LLC also is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

We may refer to ourselves as a “registered investment adviser” or “**RIA**”. You should be aware that registration with the SEC or a state securities authority does not imply a certain level of skill or training.

For a hard-copy of any of these materials please send your inquiry to [advpart2@tcw.com](mailto:advpart2@tcw.com).



## ITEM 2: MATERIAL CHANGES

See Attachment 1 of this Brochure for a summary of the material changes that we have made to this Brochure since our annual Amendment filed March 29, 2023.

## ITEM 3: TABLE OF CONTENTS

<u>Item</u>		<u>Page</u>
1	Cover Page	1
2	Material Changes	2
3	Table of Contents	2
4	Advisory Business	3
5	Fees and Compensation	4
6	Performance-Based Fees and Side-By-Side Management	18
7	Types of Clients	19
8	Methods of Analysis, Investment Strategies and Risk of Loss	23
9	Disciplinary Information	54
10	Other Financial Industry Activities and Affiliations	54
11	Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	56
12	Brokerage Practices	60
13	Review of Accounts	71
14	Client Referrals and Other Compensation	73
15	Custody	74
16	Investment Discretion	75
17	Voting Client Securities	75
18	Financial Information	78
	Attachment 1 – Summary of Material Changes	79

## ITEM 4: ADVISORY BUSINESS

**WHO WE ARE.** We are an investment adviser registered with the SEC under the Investment Advisers Act of 1940, as amended (the “**Advisers Act**”) and have been since 1987. We are a Delaware limited liability company.

We are wholly-owned by The TCW Group, Inc., a Nevada corporation (“**TCW Group**”). In February 2013, TCW management and private investment funds affiliated with alternative asset manager The Carlyle Group (together with such affiliated funds, “**Carlyle**”) acquired TCW Group. On December 27, 2017, Nippon Life Insurance Company (“**Nippon**”) acquired a minority stake in TCW Group. At present, TCW Group is co-owned by TCW management and employees, Carlyle, and Nippon.

**THE SERVICES WE OFFER.** We provide investment management and advice for a wide array of U.S. Equities, U.S. Fixed Income, International and Alternatives investment strategies for institutional and individual investors through investment advisory accounts (“**Accounts**”), public and private open- and closed-end commingled investment vehicles (“**Funds**”) and wrap fee accounts sponsored by others (“**Wrap Accounts**”). The publicly-offered Funds include mutual funds (“**Mutual Funds**”), Exchange-Traded Funds (“**ETFs**”) and Undertaking for Collective Investment in Transferable Securities funds (“**UCITS**”). We also act as investment manager to Luxembourg domiciled UCITS organized as a société d’investissement à capital variable registered with the Commission de Surveillance du Secteur Financier of Luxembourg. We are typically the direct adviser for an Account or Fund, but we sometimes are a sub-adviser. We receive a share of the fees charged to clients of Wrap Accounts, and we may benefit from the marketing, reporting and client screening services of the Wrap Account sponsors.

Our clients include private or government investment funds and institutions, including pension funds, registered investment companies including mutual funds and foreign investment companies, high net worth individuals, family offices and others. Those clients are generally sophisticated investors and often have internal and external consultants and advisers to assist them with determinations of their individual needs, such as allocations among types of investments, and do not seek those determinations from us. We may agree with certain clients on investment guidelines that restrict the securities or types of securities that we invest in on their behalf.

**ASSETS UNDER MANAGEMENT.** As of December 31, 2023, we had \$39,896,609,596 in discretionary assets under management and \$0 in non-discretionary assets under management. The TCW Group of Companies, including affiliated entities, had approximately \$210 billion in assets under management as of that date.

## **IMPORTANT NOTICE**

**In no event should this Brochure be considered an offer of interests in a Fund or relied upon in determining to invest in a Fund. It is also not an offer of, or agreement to provide, advisory services directly to any recipient.** Rather, this Brochure is designed only to provide information about us to comply with regulatory requirements under the Advisers Act, which may cause information in this Brochure to differ from the information provided in the prospectus for the Fund. If there is any conflict between the information in this Brochure and similar information in the Fund's prospectus, you should rely on the information in the offering material.

## **ITEM 5: FEES AND COMPENSATION**

The investment management fees we charge are generally computed as a percentage of the market value of assets under management in Accounts, and are billed, rather than deducted from the assets we manage. However, for Funds, including Mutual Funds and for Wrap Accounts the management fees are deducted from the assets we manage. Our clients typically pay our management fees quarterly in arrears, although Mutual Funds and some Accounts pay us monthly in arrears. Accounts are generally subject to a minimum account size as shown in Item 7, below. Investment management fees are based on the investment strategy and, in some cases, size of the account. In some cases, the fee schedule applied to an Account for a particular strategy will take into consideration other assets managed by us in other strategies for that Account or that Account's owner and its affiliates.

### **A. MARKETABLE SECURITIES DIVISION**

**Mutual Funds, ETFs, and Other Investment Companies.** We (or our affiliates pursuant to sub-advisory agreements) serve as investment adviser to affiliated and unaffiliated investment companies, including mutual funds registered under the 1940 Act and foreign investment companies ("**Investment Companies**") under written agreements pursuant to which we manage the investments of such



Investment Companies' assets in our Marketable Securities Division. We provide investment management advice for unaffiliated Investment Companies at fees negotiated with each such company. Fees generally range from 0.10% of average daily net assets to 0.60% of average daily net assets, and may vary based on account size, depending upon the strategy offered by the Investment Companies but may be negotiable. Fees may also include incentive fees, which would comply with the SEC's Rule 205-3, if applicable, which provides an exemption from a prohibition on our receiving compensation based on a share of capital gains or appreciation in a client's account that we manage. We may also place orders for the purchase and sale of securities and provide other management functions to Investment Companies, pursuant to our investment management agreement. The fees, minimum investment amounts and other conditions relevant to making and maintaining an investment in any such Fund are disclosed in the offering materials of the Investment Companies.

**TCW Funds, Inc.** The annual rate of our contractual advisory fees for each of the Mutual Funds offered by TCW Funds, Inc. is shown as a percentage of assets in the table below. See the prospectus for each Mutual Fund for detailed information about the investment strategy, the advisory fees and other expenses, minimum investment amounts, investment risks and other matters relevant to making and maintaining an investment in each Mutual Fund.

- **U.S. FIXED INCOME FUNDS:**

<b>TCW Core Fixed Income Fund</b>	.40%
<b>TCW Enhanced Commodity Strategy Fund</b>	.50%
<b>TCW Global Bond Fund</b>	.50%
<b>TCW High Yield Bond Fund</b>	.45%
<b>TCW Short Term Bond Fund</b>	.35%
<b>TCW Total Return Bond Fund</b>	.40%

- **U.S. EQUITIES FUNDS:**

<b>TCW Artificial Intelligence Equity Fund</b>	<b>.70%</b>
<b>TCW Global Real Estate Fund</b>	<b>.80%</b>
<b>TCW New America Premier Equities Fund</b>	<b>.65%</b>
<b>TCW Relative Value Dividend Appreciation Fund</b>	<b>.60%</b>
<b>TCW Relative Value Large Cap Fund</b>	<b>.60%</b>
<b>TCW Relative Value Mid Cap Fund</b>	<b>.70%</b>
<b>TCW Select Equities Fund</b>	<b>.65%</b>

- **INTERNATIONAL FUNDS:**

<b>TCW Emerging Markets Income Fund</b>	<b>.75%</b>
<b>TCW Emerging Markets Local Currency Income Fund</b>	<b>.75%</b>

- **ALLOCATION:**

**TCW Conservative Allocation Fund.** The TCW Conservative Allocation Fund, as a shareholder of certain underlying funds in which it invests, indirectly bears its pro rata share of the advisory fees charged to, and expenses of operating, such underlying funds. We do not charge a separate advisory fee, in addition to the fees of the underlying funds.

**TCW Strategic Income Fund, Inc.** TCW Strategic Income Fund, Inc. (“TSI”) is a closed-end fund listed on the New York Stock Exchange. We are paid a monthly



fee by TSI computed at the annual rate of 0.75% of the first \$100 million of TSI's average managed assets and 0.50% of TSI's average managed assets in excess of \$100 million. See TSI's annual report for additional information.

**TCW ETF Trust.** The annual rate of our contractual advisory fees for each of the ETFs offered by TCW ETF Trust is shown as a percentage of assets in the table below. See the prospectus for each ETF for detailed information about the investment strategy, the advisory fees, investment risks and other matters relevant to making and maintaining an investment in each ETF.

- **EQUITY ETFs:**

<b>TCW Transform 500 ETF (VOTE)</b>	.05%
<b>TCW Transform Systems ETF (NETZ)</b>	.75%
<b>TCW Transform Supply Chain ETF (SUPP)</b>	.75%

**TCW UCITS.** The range of the annual rate of our contractual advisory fees as a percentage of assets for each of the UCITS funds offered by TCW Funds is shown in the table below. See the prospectus for each UCITS fund for detailed information about the investment strategy, the advisory fees and other expenses, minimum investment amounts, investment risks and other matters relevant to making and maintaining an investment in each UCITS fund.

<b>TCW Core Plus Bond Fund</b>	.40% to .80%
<b>TCW Global Multi Asset Opportunities Fund</b>	.80% to 1.60%
<b>TCW Global Securitized Fund</b>	.60% to 1.20%
<b>TCW High Yield Sustainable Bond Fund</b>	.50% to 1.50%
<b>TCW Income Fund</b>	.54% to 1.50%

<b>TCW Unconstrained Bond Fund</b>	.70% to 1.40%
<b>TCW Emerging Markets Sustainable Income Fund</b>	.50% to 1.50%
<b>TCW Global Artificial Intelligence Sustainable Equity Fund</b>	.80% to 2.00%
<b>TCW Global Premier Sustainable Equities Fund</b>	.80% to 1.80%
<b>TCW Relative Value Sustainable US Equities Fund</b>	.70% to 1.80%
<b>TCW Select Sustainable Equities Fund</b>	.75% to 1.80%

**SEPARATE ACCOUNTS.** The current fee schedule for Accounts is given below, stated on a per annum basis. In some instances, the fee may be negotiated.

- **U.S. FIXED INCOME STRATEGIES:**

	<b>Institutional or Individual (High Net Worth)</b>
<b>AlphaTrak</b>	<i>Fixed Fee Schedule:</i>
	.275% on the first \$100 million
	.20% on remaining assets
We offer alternative fee schedules:	<i>Performance Fee Schedule:</i>
	Base Fee: \$0
	Incentive Fee: No fee on first 10 basis points of outperformance; 25% of remaining value added. Maximum Fee: 55 basis points

**Institutional or Individual (High Net Worth)**

<b>Bank Loans</b>	.40% on the first \$100 million .25% on remaining assets
<b>Conservative Unconstrained</b>	.50% on the first \$100 million .40% on remaining assets
<b>Core Fixed Income</b>	.275% on the first \$100 million .20% on remaining assets
<b>Core Plus Fixed Income</b>	.275% on the first \$100 million .20% on remaining assets
<b>Corporate Bonds</b>	.275% on the first \$100 million .20% on remaining assets
<b>Enhanced Commodity</b>	.375% on the first \$100 million .20% on remaining assets
<b>Flexible Income</b>	.50% on the first \$100 million .40% on remaining assets
<b>Global Fixed Income</b>	.375% on the first \$100 million .25% on remaining assets
<b>Global Mortgage-Backed Securities Plus</b>	.375% on the first \$100 million .25% on remaining assets
<b>Global Securitized</b>	.50% on the first \$100 million .40% on remaining assets



**Institutional or Individual (High Net Worth)**

<b>High Yield Fixed Income</b>	.40% on the first \$100 million .25% over \$100 million
<b>Index Plus Mortgage-Backed Securities</b>	.25% on the first \$100 million .20% on remaining assets
<b>Index Tracking Mortgage-Backed Securities</b>	.20% on the first \$100 million .15% on remaining assets
<b>Intermediate Fixed Income</b>	.275% on the first \$100 million .20% on remaining assets
<b>Investment Grade Credit Fixed Income</b>	.275% on the first \$100 million .20% on remaining assets
<b>Long Duration Credit Fixed Income</b>	.275% on the first \$100 million .20% on remaining assets
<b>Long Duration Government-Credit Fixed Income</b>	.275% on the first \$100 million .20% on remaining assets
<b>Low Duration Fixed Income</b>	.22% on the first \$100 million .15% on remaining assets
<b>Mortgage-Backed Securities</b>	.275% on the first \$100 million .20% on remaining assets
<b>Mortgage-Backed Short-Intermediate</b>	.275% on the first \$100 million .20% on remaining assets
<b>Opportunistic Core Plus Fixed Income</b>	.375% on the first \$100 million .25% on remaining assets

**Institutional or Individual (High Net Worth)**


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<b>Opportunistic Mortgage-Backed Securities</b>	.70% on the first \$50 million .50% on remaining assets
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<b>Securitized Opportunities</b>	.50% on the first \$500 million .32% on the next \$500 million .15% on the next \$500 million .10% on remaining assets
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<b>Specialized Cash</b>	.20% on the first \$100 million .15% on remaining assets
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<b>Strategic Income</b>	.50% on the first \$100 million .40% on remaining assets
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We, or our affiliates, also offer the Strategic Income strategy through other investment vehicles, which may have differing fee schedules.

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<b>Sustainable Securitized</b>	.275% on the first \$100 million .20% on remaining assets
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<b>TIPS Portfolios</b>	.20% on the first \$100 million .15% on remaining assets
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<b>Total Return Mortgage-Backed Securities</b>	.275% on the first \$100 million .20% on remaining assets
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<b>Ultra Short Fixed Income</b>	.20% on the first \$100 million .15% on remaining assets
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<b>Unconstrained</b>	.50% on the first \$100 million .40% on remaining assets
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- **EQUITIES STRATEGIES:**

	<b>Institutional</b>	<b>Individual (High Net Worth)</b>
<b>Concentrated Core</b>	.70% on all assets	1.00% on all assets
<b>Global Artificial Intelligence Equity</b>	.75% on all assets	1.00% on all assets
<b>Global Entertainment Technology Equity</b>	.75% on all assets	1.00% on all assets
<b>Global Green Equity Income</b>	.75% on all assets	1.00% on all assets
<b>Global Low Volatility Equities</b>	.50% on the first \$100 million .40% on the next \$500 million .30% on remaining assets	1.00% on all assets
<b>Global Premier Sustainable Equities</b>	.80% on all assets	1.00% on all assets
<b>Global REIT</b>	.75% on all assets	1.00% on all assets
<b>Global Relative Value Dividend Appreciation</b>	.75% on all assets	1.00% on all assets
<b>Global Space Technology Equities</b>	.75% on all assets	1.00% on all assets
<b>Market Neutral Income Equities</b>	1.00% on all assets, plus a performance fee of 15% (subject to a high-water mark)	1.00% on all assets, plus a performance fee of 15% (subject to a high-water mark)

	<b>Institutional</b>	<b>Individual (High Net Worth)</b>
<b>New America Premier Equities</b>	.75% on all assets	1.00% on all assets
<b>Next Generation Mobility Equity</b>	.75% on all assets	1.00% on all assets
<b>Relative Value Large Cap</b>	.70% on the first \$25 million .50% on the next \$75 million .40% on remaining assets	1.00% on all assets
<b>Relative Value Mid Cap</b>	.80% on the first \$25 million .65% on the next \$25 million .60% on remaining assets	1.00% on all assets

- **BALANCED STRATEGY:**

	<b>Institutional or Individual (High Net Worth)</b>
<b>Core Balanced*</b>	.50% on the first \$50 million .40% on the next \$50 million .30% on remaining assets

\* Consists of an Equity component and a Fixed Income component. Concentrated Core and Relative Value Large Cap are the choices for the equity component.

- **INTERNATIONAL STRATEGIES:**

	<b>Institutional or Individual (High Net Worth)</b>
<b>Emerging Markets Asia High Yield</b>	.50% on the first \$100 million .40% on the next \$400 million .35% on remaining assets
<b>Emerging Markets Fixed Income 50% Hard Currency/ 50% Local Currency Blend</b>	.40% on the first \$500 million .35% on remaining assets

	<b>Institutional or Individual (High Net Worth)</b>
<b>Emerging Markets Fixed Income Total Return</b>	.40% on the first \$500 million .35% on remaining assets
<b>Emerging Markets Income Focus</b>	.35% on the first \$500 million .30% on remaining assets
<b>Emerging Markets Local Currency Absolute Return</b>	.75% on all assets
<b>Emerging Markets Local Currency Income</b>	.40% on the first \$500 million .35% on remaining assets
<b>Emerging Markets Opportunistic Credit</b>	.65% on the first \$100 million .50% on remaining assets
<b>Emerging Markets Opportunistic Credit High Yield</b>	.65% on the first \$100 million .50% on remaining assets
<b>Emerging Markets Opportunistic Credit Investment Grade</b>	.65% on the first \$100 million .50% on remaining assets
<b>Emerging Markets Sustainable Income</b>	.40% on the first \$500 million .35% on assets over \$500 million
<b>EMFI Quality Sovereign/Quasi-Sovereign</b>	.435% on the first \$100 million .390% on the next \$200 million .365% on the next \$200 million .350% on remaining assets

- **GLOBAL MULTI-ASSET ALLOCATION**

We also offer asset allocation investment management that combines one or more investment strategies. Allocations may be made to separate accounts, limited partnerships, commingled investment trusts or mutual funds that we or our affiliates manage. Investment management fees are charged with respect to each allocation in accordance with the investment strategy in which each allocation is invested or based on a blended rate applicable to specified investment strategies.

## **B. MANAGED ACCOUNTS DIVISION.**

**Separate Accounts.** The current fee schedule for Managed Accounts Division separate accounts is given below stated on a per annum basis. The investment management fees generally are computed as a percentage of the market value of the assets under management. The fee schedule is generally not negotiable but in some instances the fee may be negotiated.

We offer investment management services through wrap fee and dual contract ("mini-institutional") managed account programs that are sponsored by banks, broker dealers or other investment advisers ("Sponsors"). In a traditional wrap fee program, we provide our investment management services pursuant to an advisory or service agreement with the wrap fee program Sponsor.

- Each wrap fee client enters into an agreement with the Sponsor who provides an array of services, including, but not limited to, custody, asset allocation, selection of investment advisers, trade execution and reporting covered by a single bundled or "wrap" fee payable to the Sponsor.
- In a dual contract program, we provide our investment management services pursuant to an Investment Management Agreement directly with the client. Typically, the client separately arranges with the Sponsor for custody, financial advisory and certain trading services to be provided on a bundled fee arrangement.

### **Dual Accounts:**

**Core Balanced**

On all assets

(Includes Concentrated Core)

.65%

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<b>Concentrated Core</b>	
On all assets	.75%
<b>New America Premier Equities</b>	
On all assets	.75%
<b>Relative Value Balanced</b>	
On all assets (Includes Relative Value Large Cap)	.65%
<b>Relative Value Dividend Appreciation</b>	
On first \$25 million	.70%
On next \$75 million	.50%
On remaining assets	.40%
<b>Relative Value Large Cap</b>	
On first \$25 million	.70%
On next \$75 million	.50%
On remaining assets	.40%
<b>Relative Value Mid Cap</b>	
On first \$25 million	.80%
On next \$25 million	.65%
On remaining assets	.60%

**Wrap Accounts.** The general range of annual fees by investment strategy is shown below.

<b>Strategies</b>	<b>Fee Range</b>
Large Cap Equity and Balanced	0.28% - 0.50%
Mid Cap Equity	0.35% - 0.50%
Multi Cap Equities	0.34% - 0.34%

Wrap program clients should refer to the disclosure brochure provided by their sponsor for the investment management fees and other information for that sponsor's program.

#### **OTHER EXPENSES IN CONNECTION WITH ACCOUNTS AND FUNDS.**

- **Accounts.** Our Account clients will typically pay fees to their custodian in addition to our management fees. Depending on the strategy in which the account invests, the Account will incur brokerage fees for most equity trading, and the effect of the difference with respect to the bid/ask spread for trading in fixed income investments. See Item 12, Brokerage Practices, of this Brochure. If the strategy for the Account involves derivatives, the Account may be required to make payments related to the derivatives contracts to counterparties.
- **U.S. Mutual Funds.** In addition to our management fees, our Mutual Fund clients incur fees for distribution (pursuant to 12b-1), custodial, administrative, transfer agency and sub-transfer agent/record keeper services, state registration, Securities and Exchange Commission registration, membership in the Investment Company Institute (a mutual fund industry association), state and city taxes, audit, printing, mailing, legal, compliance, as well as independent director's expenses.
- **TCW ETF Trust.** All expenses incurred by the ETFs are shown in the contractual advisory fee above.
- **UCITS Funds.** In addition to our management fees, our UCITS fund clients incur service fees and transaction charges.
- Expenses are allocated among our Funds and products, including its strategies, and such expenses may be allocated differently depending on the type of product or strategy. Within the specific product or strategy, the allocation of expenses is based on the nature of the expenses and the reasonableness of the allocation. Generally, fund organizational and administrative expenses are usually charged to the respective Fund or account to which they relate in accordance with the offering and governing documents of the respective Fund or accounts. Certain shared administrative expenses may be charged to Funds and products based on an allocation methodology that seeks to fairly and reasonably allocate such administrative expenses among the relevant Funds and products. In these cases, the allocation methodology generally may be based on their respective proportionate share of assets under management, management



fee revenues, and other relevant factors, including the applicable offering and governing documents, taken into consideration.

## **COMPENSATION OF OUR EMPLOYEE MARKETING REPRESENTATIVES.**

Our employees who act as our marketing representatives are not normally paid a sales commission by our Funds for marketing those Funds to our clients. If they were to be paid a sales commission by any of our Funds, we would fully disclose that in the Fund documents provided to potential investors prior to investment.

We do, however, compensate our marketing representatives from the management fees we earn on Accounts that they are responsible for and for their clients who invest in our Funds. This practice presents a conflict of interest and gives our marketing representatives an incentive to recommend our investment strategies and Funds based on the compensation received, rather than on a client's needs. Our mutual fund and wrap accounts are available through brokers and other agents not affiliated with us. For the mutual funds, those brokers and agents are generally compensated through a portion of our advisory fees, and in some cases through 12b-1 fees disclosed in the mutual fund documents.

## **ITEM 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT**

We receive investment advisory fees for some of the Accounts and Funds that we manage that are performance fees. For investment strategies invested in marketable securities, the performance fee normally consists of an increased asset-based fee which is tied to the performance of the Account or Fund to a benchmark. For some marketable securities accounts, the performance fees are based on the Account or Fund achieving net gains over a stated rate of return.

Our portfolio managers share in performance fees. In each case the fees are specifically authorized by the Account or Fund documents and disclosed in any Fund disclosure documents. For other Accounts and Funds we manage that make the same or similar investments, we receive investment advisory fees based only on a percentage of assets or a fixed fee.

### **Performance fees create a risk that:**

- we have an incentive to allocate more attractive investment opportunities to Accounts or Funds with performance fees; and

- we cause the Account or Fund that has performance fees to make investments that are more speculative than we would for an Account or Fund with similar investment guidelines that does not have performance fees. However, we receive no performance fee or a reduced fee if the Account or Fund has losses, which can align our interest with the client and temper this risk.

Accounts and Funds that make similar investments, but do not pay us performance fees, may have different investment advisory fees from each other, which also can create the risk that we allocate more attractive investment opportunities to Accounts and Funds with greater investment advisory fees.

To mitigate these risks, we monitor Accounts and Funds for compliance with investment guidelines and follow investment allocation policies. Under our allocation policies, when a particular investment would be appropriate for several Accounts and Funds we manage, we apportion the investment in a manner that we determine in good faith to be fair and equitable. Our apportionment may not be pro rata and is based on such considerations as investment objectives, guidelines and restrictions, availability of cash, amount of existing holdings (or substitutes) of the security in the accounts, an eligible account's proximity to our desired target allocation, exposure or weight compared to other eligible accounts, investment horizon and directed brokerage instructions, if applicable. We follow similar good faith apportionment policies when disposing of investments for our Accounts and Funds. These allocation policies could in certain circumstances adversely affect the price paid or received by our Accounts and Funds. See Item 12 of this Brochure, describing our Brokerage Practices, for more information.

## **ITEM 7: TYPES OF CLIENTS**

Our clients include many of the largest corporate and public pension plans, financial institutions, registered investment companies, endowments and foundations in the U.S., as well as a number of foreign investors, foreign investment companies and high net worth individuals.

Accounts in our investment strategies are subject to a minimum account size. In some instances, the minimum account size may be negotiated.

- **TCW Mutual Funds.** The minimum account size for each of the TCW Mutual Funds is \$2,000 (\$500 for IRAs) for Class N and I shares and \$25 million for Plan Class shares.
- **TCW ETF Trust.** The ETFs do not have a minimum investment requirement.
- **TCW UCITS Funds.** The minimum investment participation amount for each of the TCW UCITS Funds is disclosed in the current prospectus.
- **Dual Accounts.** The minimum account size for the managed accounts listed in Item 5 above is generally \$1,000,000.
- **Wrap Accounts.** The minimum account size for each of the wrap fee programs listed in Item 5 is generally \$100,000.
- **Separate Accounts.** The minimum account size for each of the strategies for the separately managed accounts are as follows:

**U.S. FIXED INCOME STRATEGIES:**

Accounts in our U.S. fixed income investment strategies are generally subject to the minimum account size of \$75 million. Investment strategies that vary from the \$75 million minimum account size are as follows:

- Bank Loans \$100 million
- High Yield Fixed Income \$40 million

**EQUITIES STRATEGIES:**

	<b>Minimum Account Size</b>	
	<b>Institutional</b>	<b>Individual (High Net Worth)</b>
<b>Concentrated Core</b>	\$25 million: U.S \$50 million: International	\$5 million
<b>Global Artificial Intelligence Equity</b>	\$10 million	\$5 million

	<b>Institutional</b>	<b>Individual (High Net Worth)</b>
<b>Global Entertainment Technology Equity</b>	\$10 million	\$5 million
<b>Global Green Equity Income</b>	\$10 million	\$5 million
<b>Global Low Volatility Equities</b>	\$10 million	\$5 million
<b>Global Premier Sustainable Equities</b>	\$10 million	\$5 million
<b>Global REIT</b>	\$10 million	\$5 million
<b>Global Relative Value Dividend Appreciation</b>	\$10 million	\$5 million
<b>Global Space Technology Equities</b>	\$10 million	\$5 million
<b>Market Neutral Income Equities</b>	\$10 million	\$5 million
<b>New America Premier Equities</b>	\$10 million	\$5 million
<b>Next Generation Mobility Equity</b>	\$10 million	\$5 million

	<b>Institutional</b>	<b>Individual (High Net Worth)</b>
<b>Relative Value Large Cap</b>	\$10 million	\$5 million
<b>Relative Value Mid Cap</b>	\$10 million	\$5 million

**BALANCED STRATEGY:**

**Minimum Account Size**

	<b>Institutional or Individual (High Net Worth)</b>
<b>Core Balanced</b>	\$50 million

**INTERNATIONAL STRATEGIES:**

**Minimum Account Size**

	<b>Institutional or Individual (High Net Worth)</b>
<b>Emerging Markets Asia High Yield</b>	\$100 million
<b>Emerging Markets Fixed Income 50% Hard Currency/ 50% Local Currency Blend</b>	\$100 million
<b>Emerging Markets Fixed Income Total Return</b>	\$100 million
<b>Emerging Markets Income Focus</b>	\$100 million
<b>Emerging Markets Local Currency Absolute Return</b>	\$50 million
<b>Emerging Markets Local Currency Income</b>	\$100 million



	<b>Institutional or Individual (High Net Worth)</b>
<b>Emerging Markets Opportunistic Credit</b>	\$25 million
<b>TCW Emerging Markets Opportunistic Credit High Yield</b>	\$100 million
<b>TCW Emerging Markets Opportunistic Credit Investment Grade</b>	\$100 million
<b>Emerging Markets Sustainable Income</b>	\$100 million
<b>EMFI Quality Sovereign/Quasi-Sovereign</b>	\$100 million

## **GLOBAL MULTI-ASSET ALLOCATION**

The minimum account size for investments in Global Multi-Asset Allocation is \$50 million.

## **ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS**

An investment in any of our strategies involves risk, including the risk that an investor can lose money. An investment in any of these strategies by itself is not a balanced investment program for purposes of an investor's portfolio diversification needs. Investors should consult with their investment professional regarding the appropriateness of an investment in any of these strategies for their overall investment program.

The following are general descriptions of our current investment strategies, not descriptions of any particular Mutual Fund or other Investment Company. For

descriptions of the strategies, methods of analysis, and risks of loss of any of the TCW Mutual Funds or other Investment Companies we advise or sub-advise, see their prospectus or other offering documents. Certain of the strategies listed below may not be offered for Wrap Accounts or Dual Accounts, such as the fixed income strategies that invest in mortgage-backed securities, because of the dollar amount of the securities typically traded.

## A. FIXED INCOME STRATEGIES

### The fixed income strategies we offer are:

- **AlphaTrak.** We have designed this strategy for investors looking for equity market returns. The portfolios are managed in an effort to produce an investment return that will exceed the total return of the S&P 500 Index. AlphaTrak uses a combination of S&P 500 futures contracts, along with an enhanced cash or low duration fixed income portfolio. (The AlphaTrak strategy also may use S&P 500 swap contracts or exchange-traded funds (ETFs) that track the S&P 500 Index with or in lieu of the S&P index futures.) The actual dollars invested in the enhanced cash portfolio approximately equal the notional value of the S&P futures contracts held. Outperformance relative to the S&P 500 can be obtained provided the enhanced cash portfolio outperforms the implied financing rate of the S&P 500 futures contracts. Hence, the investor achieves his or her equity "alpha" by relying on our fixed income skills to manage an enhanced cash portfolio with the goal of outperforming the short-term implied financing rate embedded in the pricing of the futures contracts.

Outperformance of the short-term financing rate can be achieved by utilizing a strategy which emphasizes investments in short maturity fixed income instruments whose yields exceed the short-term financing rate. These additional yields are achievable by investing in U.S. Treasury securities, corporate bonds, U.S. Government Agency Securities, asset backed securities and mortgage securities, among others, and by utilizing a longer average maturity structure than that embedded in the financing rate.

- **Bank Loans.** The strategy seeks primarily to maximize current income, with a secondary objective of long-term capital appreciation. The strategy normally invests primarily in floating rate investments and in investments that are the economic equivalent of floating rate investments. These investments may include, but are not limited to, any combination of the

following items: (i) senior secured floating rate loans or debt; (ii) second lien or other subordinated or unsecured floating rate loans or debt; (iii) fixed-rate loans or debt, such as corporate bonds, preferred securities, convertible securities, mezzanine investments, collateralized loan obligations, senior loans, second lien loans, structured products and U.S. government debt securities, with respect to which the strategy has entered into derivative instruments that have the effect of converting the fixed-rate interest payments into floating-rate interest payments; and (iv) writing credit derivatives, which would give the strategy exposure to the credit of a single issuer or an index. The strategy may also purchase, without limitation, participations, or assignments in senior floating rate loans or second lien floating rate loans. Debt instruments include convertible or preferred securities that produce income.

- **Conservative Unconstrained.** An opportunistic, value driven strategy that invests in all sectors of the global fixed income marketplace with the goal of achieving attractive risk-adjusted total returns (and no traditional benchmark). With broad flexibility in the average duration, sector allocation, quality profile and country exposure (though typically U.S. dollar), the strategy emphasizes capital preservation through in-depth security-level analysis and absolute return via the recognition of market mispricing. The constrained approach to Unconstrained Fixed Income will typically limit less than investment grade exposure to no more than 20% of portfolio market value.
- **Core Fixed Income.** With a typical interest rate duration range of 3 to 6 years, this strategy invests across U.S. Fixed Income sectors, seeking to outperform the aggregate bond market by applying specialized management expertise and allocating capital among the U.S. government, corporate, mortgage and asset-backed bond sectors. In addition to the risk factors for all fixed income strategies, see the risk factors for mortgage-backed and asset-backed securities, below.
- **Core Plus Fixed Income.** With a typical interest rate duration range of 3 to 6 years, the strategy seeks to outperform the broad bond market by applying specialized management expertise to and allocating capital among the U.S. government, investment grade and high yield corporate, mortgage and asset-backed, and international and emerging markets bond sectors. In addition to the risk factors for all fixed income strategies, see the risk



factors for derivatives and mortgage-backed and asset-backed securities, below.

- **Corporate Bonds.** A value-oriented strategy capitalizing on our fundamental credit analysis capabilities. The focus is on identifying investment grade corporate bonds offering attractive yields with a particular emphasis on avoiding deteriorating credits as well as selecting improving credits. In addition to the risk factors for all fixed income strategies, see the risk factor for asset-backed securities, below.
- **Enhanced Commodity.** A strategy that replicates the commodity index return via derivative instruments and then invests the underlying cash in a high quality, short duration fixed income securities to generate incremental alpha over time.
- **Flexible Income.** This strategy seeks a high level of current income with a secondary objective of long-term capital appreciation through a flexible investment approach that allocates investments across a range of global investment opportunities related to credit, currencies, and interest rates.
- **Global Fixed Income.** Drawing on fixed income issues from across the U.S., developed and emerging markets, this value-oriented strategy seeks to outperform its benchmark through active decision making across the dimensions of country weighting, currency exposure, duration management, yield curve positioning, sector allocation and security selection. In addition to the risk factors for all fixed income strategies, see the risk factors for derivatives and mortgage-backed and asset-backed securities, below.
- **High Yield Fixed Income.** For this strategy, we construct portfolios that are primarily invested in securities rated BB+ / Ba1 and below. The High Yield strategy focuses on identifying credits with substantial underlying asset value relative to the market price of their debt. The portfolio managers generally emphasize the debt of companies with hard asset value and resilient operating cash flow and de-emphasize those companies and industries with limited asset value protection. Generally, there is a preference within the strategy for bank loans or bonds that are senior in the capital structure and/or closer to the company's assets.

- **Intermediate Fixed Income.** This strategy constructs portfolios to normally maintain an average interest rate duration of between 2 and 4.5 years. Investments can include U.S. government and corporate debt securities, mortgage and asset-backed securities, money market instruments and derivatives, although other fixed income securities may be used in the portfolio.
- **Investment Grade Credit Fixed Income.** A value-oriented strategy capitalizing on TCW's fundamental credit analysis capabilities. The focus is on identifying investment grade corporate bonds offering attractive risk-adjusted yields. Particular emphasis is placed on recognition of market mispricing and the selection of cheaper, stable to improving credits, and the avoidance of weaker issuers that buyers have overpriced.
- **Long Duration Credit Fixed Income.** Designed for investors seeking to align all or a portion of portfolios with longer dated liabilities such as pension benefits or insurance obligations, TCW's deflation-hedging long duration (10 years or greater) strategies allow for the extension of average portfolio maturities in a diversified corporate-specific account. These strategies blend top-down risk control with bottom-up sector/industry allocation and fundamental security analysis to drive outperformance of associated benchmarks. In some instances, client discretion may extend portfolio latitude to a modest allocation of up to 20% of portfolio exposure to sub-investment grade holdings to enhance the yield profile.
- **Long Duration Government-Credit Fixed Income.** Designed for investors seeking to align all or a portion of portfolios with longer dated liabilities such as pension benefits or insurance obligations, TCW's deflation-hedging long duration (10 years or greater) strategies allow for the extension of average portfolio maturities in a diversified government-credit account. These strategies blend top-down risk control with bottom-up sector/industry allocation and fundamental security analysis to drive outperformance of associated benchmarks.
- **Low Duration Fixed Income.** For this strategy, we construct portfolios to normally maintain an average interest rate duration of between 1 and 3 years. Investments can include U.S. government and corporate debt securities, mortgage and asset-backed securities, money market

instruments and derivatives, although other fixed income securities may be used in the portfolio.

- **Opportunistic Core Plus Fixed Income.** With a typical interest rate duration range of 3 to 6 years, the strategy seeks to outperform the broad bond market by applying specialized management expertise to and allocating capital among the U.S. government, corporate, high yield, international and mortgage and asset-backed bond sectors. In addition to the risk factors for all fixed income strategies, see the risk factors for derivatives and mortgage-backed and asset-backed securities, below.
- **Strategic Income.** This strategy is designed to generate absolute return through bond market investments, while bearing generally low correlation to equity and fixed income performance. Much of the time, this approach will exhibit the profile of an unconstrained fixed income strategy, allocating investments across a range of global opportunities related to credit, currencies, and interest rates, with less restrictive constraints than Core Plus portfolio management. Fewer limitations allow for a broader expression of portfolio duration and off-index exposures. When conditions are suitable, in terms of an attractive return-risk proposition, this strategy may undertake opportunities to exploit market inefficiencies through capital structure arbitrage, inter-sector arbitrage and rating agency arbitrage. These arbitrage strategies can be implemented in both the cash bond and derivative markets (including credit default swaps), both intended to benefit from mean-reverting top-down characteristics of the bond market and a strong value-oriented bottom-up perspective.
- **Sustainable Securitized.** This strategy seeks to generate returns in excess of its designated benchmark over a market cycle through a combination of current income and capital preservation (or appreciation). The investment universe from which the strategy draws includes collateralized public market issues from among mortgage-backed securities, commercial mortgage-backed securities, and asset-backed securities, with selection criteria favoring positive ESG and sustainable factors based on TCW's proprietary research and screening.
- **TIPS Fixed Income.** We invest in securities commonly known as TIPS (Treasury Inflation-Protected Securities). The strategy attempts to select TIPS at various maturities that appear more advantageous while striving to

outperform against the chosen index and providing protection against inflation.

- **Ultra Short Fixed Income.** With this strategy, we attempt to maintain a dollar-weighted average portfolio maturity normally exceeding one year, while normally maintaining an average portfolio interest rate duration of up to one year. Investments can include government and corporate debt securities, mortgage and other asset-backed securities, money market instruments and derivatives, although other fixed income securities may be used in the portfolio.
- **Unconstrained.** This strategy seeks a long-term rate of return by utilizing a flexible approach that allocates investments across a range of global investment opportunities related to credit, currencies, and interest rates. The use of the term “unconstrained” in the strategy’s name means that it has few limitations with respect to types of investments, is flexible in the use of interest rate duration and is not managed to be compared to an index. The portfolio management team expects to actively evaluate each investment idea based on its potential return, its risk level and how it fits within the Fund’s overall portfolio in determining whether to buy or sell investments.

*Note: In addition to the risks of all our fixed income strategies, the following are subject to the mortgage-backed securities, asset-backed securities and derivatives risks described below.*

- **Global Mortgage-Backed Securities Plus.** A fixed income strategy that seeks high income and total returns in excess of the broad investment grade bond market through investing in mortgage-backed securities across the U.S., developed and emerging markets. Strategy is implemented primarily through investment grade securities but will be extended when prevailing conditions provide for more opportunistic deployment of capital.
- **Global Securitized.** Drawing on fixed income issues across the U.S., developed and emerging markets, an aggressive, total return fixed income strategy, emphasizing complex mortgage-backed securities designed to offer high absolute returns. The strategy is not managed within a prescribed duration range and may vary greatly over time.

- **Index Plus Mortgage-Backed Securities.** A fixed income strategy that seeks high income and total returns in excess of the broad investment grade bond market through investing in U.S. dollar-denominated mortgage-backed securities. This strategy generally involves tighter constraints on the investments it makes, such as non-agency mortgage-backed securities, than our Mortgage-Backed Securities strategy.
- **Index Tracking Mortgage-Backed Securities.** A strategy designed to largely replicate the return of or slightly outperform a designated mortgage-backed securities index with very limited differentiation from the composition of the benchmark.
- **Mortgage-Backed Securities.** A fixed income strategy that seeks high income and total returns in excess of the broad investment grade bond market through investing in U.S. dollar-denominated mortgage-backed securities.
- **Mortgage-Backed Short-Intermediate.** A fixed income strategy investing primarily in mortgage-backed securities of U.S. government agencies. The strategy seeks to capture much of the higher yields of traditional long-term bond portfolios with relatively less volatility.
- **Opportunistic Mortgage-Backed Securities.** The Opportunistic Mortgage-Backed Securities strategy offers investors the opportunity to take advantage of the pockets of inefficiencies that exist due to the significant repricing of mortgage credit risk. With extensive experience in all sectors of the MBS markets, we are well equipped to exploit these opportunities.
- **Securitized Opportunities.** An aggressive, total return fixed income strategy, emphasizing complex mortgage-backed securities designed to offer high absolute returns. The strategy is not managed within a prescribed duration range and may vary greatly over time.
- **Specialized Cash.** A fixed income strategy investing in adjustable rate and other short-term mortgage-backed securities issued by U.S. government agencies. The strategy seeks to outperform short-term U.S. Treasuries and other “AAA” credits.

- **Total Return Mortgage-Backed Securities.** A fixed income strategy that seeks high income and total returns in excess of the broad investment grade bond market through investing in U.S. dollar-denominated mortgage-backed securities. This strategy generally involves fewer restraints on the investments it makes, such as non-agency mortgage-backed securities, than our Mortgage-Backed Securities strategy.

#### **Our methods and sources for analysis for domestic fixed income strategies:**

We maintain a value-oriented investment approach. As such, our investment process focuses on preserving capital for our clients, while extracting value utilizing deep, fundamental, “bottom-up” research and analysis.

For the credit sector, our research focuses on asset value, seniority in the capital structure, covenant strength, and the ability to generate free cash flow. We utilize several measures to determine a company's asset value (including discounted cash flow analysis, multiples of cash flow, multiples of free cash flow, percentage of replacement cost, required IRR, etc.) and then compare that to the market price of their debt. We conduct a detailed examination of the company's organizational and capital structure to determine seniority. We consider both structural and payment seniority, as well as limitations on the company's ability to incur debt senior to us. In addition, we concentrate on the actual cash flow generated by reconstructing the components that make up the change in cash from period to period. This removes accrual accounting distortions. Other firm specific factors and risks such as liquidity, management, operations, labor relations, the overall competitive position and business environment, or other financially material environmental, social, or governance factors and risks that impact a firm are also considered.

We employ quantitative research that is driven by proprietary models that aid in the analysis of fixed income securities. These models assist us in establishing independent criteria for bond valuation. We believe that the process of developing quantitative fixed income tools in-house improves our understanding and knowledge of different securities. These proprietary analytics also help us to understand and focus on how a portfolio is structured relative to the benchmark and how a portfolio will perform across a variety of interest rate, yield curve, and volatility scenarios.

Our proprietary quantitative models assist us in analyzing the following sectors of the fixed income market: Treasury securities, Treasury futures, callable corporate

bonds, mortgage pass-throughs, and collateralized mortgage obligations (“**CMOs**”). In addition, we have a proprietary portfolio management system, which aids in risk management, scenario analysis, portfolio risk metrics, client reporting, and compliance. By having a proprietary portfolio management system rather than vended software, we are able to adapt faster to changes in the market, create analysis and reporting that is specific to our particular portfolios and management style and to do customized reporting or implement risk management projects from clients and consultants.

In the mortgage sector, our loan level database of over 30 million loans provides original and current loan characteristics that are updated monthly. The original information provided includes loan to value (“LTV”), zip code, property type, documentation, loan type, FICO score, etc. Current information is updated monthly to include payment status, modification details, loss amounts, prepayments and liquidation amounts necessary for us to estimate information and real estate owned or “REO” sale prices. Additionally, utilizing data from external vendors, we analyze climate physical risk for commercial and residential mortgages.

The research and analytics generate deal and zip code level metrics including delinquency roll rates, prepayment rates, REO sales index, mark-to-market LTV, negative/positive equity, and many other factors historically critical in the analysis of the complex non-agency MBS sector. In today’s market, the most important factor is the loan-to-value ratio, as it is the primary driver of a borrower’s default decision, a key input to loss severity calculations and a significant indicator of prepayment speeds. Our ability to determine a more accurate LTV than is observable in the broader market statistics is a critical way we add incremental value to portfolio analysis and security selection. The output of this analysis shapes our market analysis/insight and pricing and determines vintage rankings, alt-A vs. subprime vs. prime vs. option-arm comparative analysis, absolute and relative rankings at the deal level as well as security level.

In addition to our proprietary resources, we also use tools available from external vendors. One example is our utilization of Bloomberg. Another example is our utilization of The Yield Book. This tool enables us to model client indexes with an additional database containing 50,000+ issues. The Yield Book allows us to provide clients, by request, with third-party risk metrics for their portfolio.

The output of our analysis shapes our view of the markets and pricing helps to point out when further in-depth research is needed to determine relative value.

**Our methods and sources for analysis for international fixed income strategies:**

We utilize a value-seeking investment approach developed to identify and exploit the best reward-risk opportunities in emerging markets fixed income. Our integrated top-down and bottom-up investment process emphasizes global and multi-sector diversification to generate attractive risk-adjusted returns from income and capital appreciation. Scenario analysis is an important element in the investment process. This probabilistic approach includes the widest range of potential outcomes in the determination of expected returns, allowing us to establish a dynamic link between credit fundamentals, market valuations, and portfolio strategy.

All sovereign and corporate credits are evaluated utilizing proprietary credit models designed and developed by us. This phase of the research process serves three important functions: isolate key credit strengths and weaknesses and other risk factors; analyze the momentum of credit fundamentals; and standardize the framework for comparing credits.

Sovereign credits are evaluated using a standardized set of quantitative and qualitative variables falling into seven general categories: exchange rates, fiscal policy, debt service capacity and debt dynamics, financial sector strength, structural reforms, political outlook, and environmental, social and governance (ESG) and sustainability factors.

Our corporate and quasi sovereign credit research is undertaken utilizing a similar standardized approach. We evaluate corporate credit fundamentals utilizing 24 separate financial and qualitative variables divided into seven categories: operating performance, debt service capacity, management, competitive position, covenant, operating trends and ESG and sustainability factors.

The integration of ESG and sustainability considerations into our Emerging Markets Fixed Income analysis is driven by a view that these considerations can help identify attractive investment opportunities and signal upside potential and downside risks. Sovereigns and corporates with stronger and/or improving ESG and sustainability metrics are likely, in our view, to be the beneficiaries of investment capital, and vice versa. Furthermore, our view of ESG and sustainability momentum, taking into account not only where an issuer is now, but whether its ESG and sustainability metrics are improving or deteriorating, is a factor in allocation decisions.



In our process, ESG and sustainable evaluations are an input in country allocation and security selection decisions. It should be noted that ESG and sustainable factors are one input into the investment process, along with traditional fundamental economic and political analysis.

In addition to primary research, which comprises 60%-70% of our research inputs, the portfolio managers, sovereign risk analysts, and corporate credit analysts utilize a wide variety of outside research sources. These include sell side banks, local banks, and investment banks such as JP Morgan, Deutsche Bank, Citibank, Bank of America Merrill Lynch, and Morgan Stanley; international multilateral organizations such as the IMF, IBRD, IADB, EBRD, and ADB; in-country political and economic consultants; and a variety of outside data services, including Bloomberg and FactSet.

Risk management plays an important role in our portfolio construction process. The first level of our risk management methodology is an elaborate scenario building process that isolates the strengths and weaknesses of each investment and constructs baseline, best, and worst-case outcomes from the interplay of investment fundamentals. The aforementioned process is integral to the development of our investment strategy and risk management techniques with explicit probabilities and market valuations assigned to each scenario. For each investment, expected return forecasts are derived that capture the full range of possible outcomes. This scenario framework is utilized to define specific performance benchmarks for each investment. From these benchmarks, we can more easily track the performance of each investment in relation to its baseline, best, and worst-case outcomes through time. Through the scenario analysis, the team creates a dynamic link between investment fundamentals, market valuations, and investment strategy and a robust portfolio strategy that emphasizes maximum global and multi-sector diversification to diffuse and minimize investment risks.

#### **RISKS FOR FIXED INCOME STRATEGIES:**

**The principal risks for all fixed income strategies are:**

- **interest rate risk:** the risk that debt securities will decline in value because of changes in interest rates or a decline in interest rates will lower their yield. Interest rate risk also includes the exposure of the portfolio to the outright level of both Treasury and swap rates across the entirety of the maturity curves. It also includes the level of Treasury and swap rates relative to each other and to other market indicators. Interest rate management will

encompass all of those factors and will seek to hedge those exposures on an outright basis, relative to the stated benchmark, or relative to other risks in the portfolio.

- **liquidity risk:** the risk that there may be no willing buyer of the portfolio securities and we may have to sell those securities at a lower price or may not be able to sell the securities at all, each of which would have a negative effect on performance.
- **credit risk:** the risk that an issuer will default in the payment of principal and/or interest on a security.
- **price volatility risk:** the risk that the value of the investment portfolio will change as the prices of its investments go up or down.
- **issuer risk:** the risk that the value of a security may decline for reasons directly related to the issuer such as corporate governance or management performance, earnings, financial leverage, the value of assets and reduced demand for the issuer's goods or services, as well as other material ESG and/or sustainability risks.
- **market risk:** the risk that returns from the securities in which we invest will decline in value due to factors affecting securities markets generally or particular industries represented in the securities markets. Normal markets are generally characterized by a benign credit environment with only isolated idiosyncratic credit events, good liquidity as demonstrated by regular and consistent two-way trading across markets, and a risk posture on the part of the managers that is neutral to positive, i.e., not defensive with respect to credit risk.
- **securities selection risk:** the risk that the securities we invest in will underperform others investing in the same asset class or benchmarks that are representative of the asset class because of our choice of securities.
- **portfolio management risk:** the risk that an investment strategy may fail to produce the intended results.
- **non-diversification risk:** the risk that the portfolio we invest in may be subject to wider fluctuations in value than if it were subject to broader diversification requirements.
- **globalization risk:** the risk that the growing inter-relationship of all global economies and financial markets has increased the effect of conditions in one country or region on issuers of securities in a different country or region.

- **market disruptions, geopolitical, and physical/natural risk:** market disruption can be caused by economic, financial or political events and factors, including but not limited to, international wars or conflicts (including Russia's military invasion of Ukraine, and any global consequences), geopolitical developments (including trading and tariff arrangements, sanctions and cybersecurity attacks), instability in regions such as Asia, Eastern Europe and the Middle East, terrorism, natural disasters (including earthquakes and significant hydrometeorological hazards) and other unanticipated events. The extent and duration of such events and resulting market disruptions cannot be predicted but could be substantial and could magnify the impact of other risks to investors. These and other similar events could adversely affect the U.S. and foreign financial markets and lead to increased market volatility, reduced liquidity in the securities markets, significant negative impacts on issuers and the markets for certain securities and commodities and/or government intervention. They may also cause short- or long-term economic uncertainties in the United States and worldwide. As a result, whether or not an investor invests in securities of issuers located in or with significant exposure to the countries directly affected, the value and liquidity of the investments in an account may be negatively impacted. Further, due to closures of certain markets and restrictions on trading certain securities, the value of certain securities held could be significantly impacted, which could lead to those securities being valued at zero.
- **cybersecurity risks:** the risk that investment strategies and operations are increasingly reliant on technology and digital platforms and may expose us and clients to cybersecurity risks. Cyber threats such as ransomware, phishing, hacking could compromise the confidentiality, integrity, and availability of sensitive information. To address these risks, we have a designated Cybersecurity team directly responsible for cybersecurity risk, and which is overseen and accountable to our Cybersecurity Committee.
- **public health emergency risks:** the risk that pandemics and other public health emergencies, including outbreaks of infectious diseases such as the current outbreak of the novel coronavirus ("**COVID-19**"), can result, and in the case of COVID-19 is resulting, in market volatility and disruption, and materially and adversely impact economic conditions in ways that cannot be predicted, all of which could result in substantial investment losses. Containment efforts and related restrictive actions by governments and businesses have significantly diminished and disrupted global economic activity across many industries. Less developed countries and their health

systems may be more vulnerable to these impacts. The ultimate impact of COVID-19 or other health emergencies on global economic conditions and businesses is impossible to predict accurately. Ongoing and potential additional material adverse economic effects of indeterminate duration and severity are possible. The resulting adverse impact on the value of an investment in the Fund could be significant and prolonged.

- **inflation risk:** the risk that the value of assets or income from investments will be less in the future as inflation decreases the value of money. As inflation increases, the present value of assets and distributions may decline. Inflation creates uncertainty over the future real value (after inflation) of an investment. Inflation rates may change frequently and drastically as a result of various factors, including unexpected shifts in the domestic or global economy, and investments may not keep pace with inflation, which may result in losses to investors.
- **ESG and sustainable investing risk:** the risk an ESG and/or sustainable investment strategy may select or exclude securities of certain issuers for non-financial reasons, and that the strategy's performance will differ from accounts that do not utilize an ESG or sustainable investing strategy. For example, the application of this strategy could affect an account's exposure to certain sectors or types of investments, which could negatively impact the account's performance. ESG investing is qualitative and subjective by nature, and there is no guarantee that the criteria used by us, or any judgement exercised by us will reflect the opinions of any particular investor. Accounts with sustainable investment strategies are generally suited for long-term rather than short-term investors.

There are no universally agreed upon objective criteria for assessing ESG factors for investments. Rather, these criteria tend to have many subjective characteristics, can be difficult to analyze, and frequently involve a balancing of numerous factors. ESG and sustainable factors can vary over different periods and evolve over time. They may also be difficult to apply consistently across different types of investments. For these reasons, ESG and sustainable standards may be aspirational and tend to be stated broadly and applied flexibly. In addition, investors and other bodies may disagree as to whether a certain investment satisfies ESG and sustainability standards given the absence of mandated or generally accepted criteria.

- **ETF, ETC and ETN risk:** the risk that the value of the investment portfolio's investments in these instruments will fluctuate in response to the performance of underlying or reference investments.

*The following are risks of strategies that invest in mortgage-backed securities:*

- **underlying collateral risk:** the risk that the impairment of the value of the collateral underlying the non-agency security in which we invest, such as non-payment of mortgage loans, will result in a reduction in the value of the security.
- **extension risk:** the risk that in times of rising interest rates, mortgage prepayments will slow causing portfolio securities considered short or intermediate term to be long-term securities which fluctuate more widely in response to changes in interest rates than shorter term securities.
- **prepayment risk:** the risk that in times of declining interest rates, the higher yielding securities will be prepaid and we will have to replace them with securities having a lower yield.

*The following are risks of strategies that employ derivatives or leverage:*

- **derivatives risk:** the risk of investing in derivative instruments, including liquidity, interest rate, market and management risks, mispricing, or improper value. Changes in the value of a derivative may not correlate perfectly with the underlying asset, reference rate or index and could lose more than the principal amount invested.
- **leveraging risk:** the risk that leverage created from borrowing or certain types of transactions or instruments, including derivatives, may impair the investment portfolio's liquidity, cause it to liquidate positions at an unfavorable time, increase volatility or otherwise not achieve its intended result.
- **counterparty risk:** the risk that the other party to a contract, such as a swap agreement, will not fulfill its contractual obligations.

*The following are risks of strategies that invest in asset-backed securities:*

- **underlying collateral risk:** the risk that the impairment of the value of the collateral underlying a security in which we invest such as non-payment of loans, will result in a reduction in the value of the security. The asset-backed securities (ABS) sector includes not only traditional collateral types such as credit card receivables, auto loans, and home equity lines of credit, but also non-traditional collateral types such as student loans, franchise loans, structured legal settlements, shipping containers, etc. ABS will also include instruments which have collateral that is comprised of other securities, such

as collateralized debt/bond/loan obligations (CDOs/CBOs/CLOs). For a variety of reasons, many of these collateral types are not included in the specified benchmark but may be attractive investments consistent with the desired risk profile of the portfolio.

- **extension risk:** the risk that in times of rising interest rates, prepayments will slow causing portfolio securities considered short or intermediate term to be long-term securities which fluctuate more widely in response to changes in interest rates than shorter term securities.

*The following are special risks for international strategies:*

- **emerging market country risk:** the risk that the value of investments will decline due to the greater degree of economic, political, and social instability of emerging market countries as compared to the developed countries.
- **foreign currency risk:** the risk that the value of the investments denominated in foreign currencies will decline in value because the foreign currency has declined in value relative to the U.S. dollar.
- **market disruptions, geopolitical, and physical/natural risk:** please refer to the description above under “Principal Risks”.

## **B. EQUITIES STRATEGIES**

**The equity strategies we offer and the principal methods and sources of analysis we use are:**

- **Concentrated Core.** A highly focused approach primarily targeting top large cap companies with strong and enduring business models. An active strategy utilizing proprietary fundamental research focused on identifying companies with improving operating prospects. The strategy also uses macroeconomic risk analysis. Sources of information include financial news, review of corporate activity, internal and third-party research, company reports and press releases, due diligence meetings with management and interviews with suppliers, customers, and competitors.
- **Global Artificial Intelligence Equity.** A global strategy that focuses on investing in the equity of growth businesses in information technology, consumer discretionary, industrials, health care, and other sectors. The emphasis is on the technological leaders in position to grow over the medium- and long-term as global industry demand increases. The strategy

- invests in those businesses expected to benefit from the rising influence of artificial intelligence in analysis, forecasting, efficiency, automation, consistency, and scale. The strategy uses fundamental research to identify these companies. Sources of information include financial news, review of corporate activity, internal and third-party research, company reports and press releases, due diligence meetings with management and interviews with suppliers, customers, and competitors.
- **Global Relative Value Dividend Appreciation.** A global strategy which employs a highly disciplined, analytically-driven investment process utilizing quantitative and qualitative resources to generate investment ideas. Primarily invests in equities of companies with dividend paying records. There is an option on this strategy to apply a Shariah-compliant overlay. The strategy uses bottom-up, fundamental analysis, proprietary data and analytical systems, discounted cash flows, and discussions with third parties. Sources of information include financial news, inspection of corporate activity, internal and third-party research, company reports and press releases, due diligence meetings with management, court filings, interviews with suppliers, customers and competitors and audited financial reports.
  - **Global Space Technology Equities.** In managing the strategy, the portfolio manager seeks to invest in what he considers to be attractively valued equity securities of cash generating businesses that benefit from demand for aerospace/space-oriented technology, equipment, and tools. Fundamental research is used to identify these companies. The portfolio manager will use both qualitative and quantitative screening criteria to supplement the fundamental research. The portfolio manager's screening focuses on companies whose shares are trading at prices the portfolio manager believes are below their intrinsic values.
  - **New America Premier Equities.** In managing the strategy, the portfolio manager seeks to invest in what he considers to be attractively valued equity securities of cash generating businesses with prudently managed environmental, social, and financial resources. Fundamental research is used to identify these companies. The portfolio manager will use both qualitative and quantitative screening criteria to supplement the fundamental research. The portfolio manager's screening focuses on

companies whose shares are trading at prices the portfolio manager believes are below their intrinsic values.

- **Next Generation Mobility Equity.** A global strategy that focuses on investing in the equity of businesses providing technology for the next generation of mobility to reduce pollution, improve safety, enable autonomous vehicles, and the connected experience. The emphasis is on the technological leaders in position to grow over the medium- and long-term to benefit from these long-term trends. The strategy invests in those businesses expected to benefit from the electrification, active safety, autonomy, and connectivity. The strategy uses fundamental research to identify these companies. Sources of information include financial news, review of corporate activity, internal and third-party research, company reports and press releases, due diligence meetings with management and interviews with suppliers, customers, and competitors.
- **Relative Value Large Cap.** A strategy seeking undervalued, large cap stocks where the company has a fundamental catalyst or competitive advantage which will ultimately be recognized by the marketplace and appreciate in value. The strategy uses bottom-up, fundamental analysis, proprietary data and analytical systems, discounted cash flows, and discussions with third parties. Sources of information include financial news, inspection of corporate activity, internal and third-party research, company reports and press releases, due diligence meetings with management, court filings, interviews with suppliers, customers, and competitors, and audited financial reports.

*Note: In addition to the risks of all our equities strategies, the following are subject to small and mid-capitalization risk described below:*

- **Global Entertainment Technology Equity.** A global strategy that focuses on investing in the equity of businesses that benefit from the growth of demand for entertainment products and services, primarily in the communications services, information technology, and consumer discretionary sectors. The emphasis is on those businesses embracing technological change to disrupt and expand the entertainment industry and provide a better consumer experience. The strategy uses fundamental research to identify these companies. Sources of information include financial news, review of corporate activity, internal and third-party



research, company reports and press releases, due diligence meetings with management and interviews with suppliers, customers, and competitors.

- **Global Green Equity Income:** A concentrated all-cap equity portfolio of high quality, well managed, global, exchange-listed, dividend-paying renewable energy companies. The strategy seeks to acquire common or preferred shares of high quality dividend-paying renewable energy at a substantial discount to their intrinsic value. To identify opportunities, it employs a disciplined “bottom-up” investment process, with emphasis on asset/cash flow/management quality. Sources of information include financial news, inspection of corporate activity, inspection of assets, internal and third-party research, corporate rating services, company reports and press releases, due diligence meetings with management, court filings, interviews with suppliers, customers, and competitors, and audited financial reports.
- **Global Low Volatility Equities.** A global equity portfolio of listed companies who exhibit low share price and business fundamental volatility. The strategy’s investment objective is to outperform the MSCI World Minimum Volatility Index with low tracking error. To identify opportunities, it employs a disciplined “bottom-up” investment process, with emphasis on asset/cash flow/management quality to select top holdings. Factor analysis is used to manage exposures and remove unintended bets. Sources of information include financial news, inspection of corporate activity, inspection of assets, internal and third-party research, corporate rating services, company reports and press releases, due diligence meetings with management, court filings, interviews with suppliers, customers, and competitors, and audited financial reports.
- **Global Premier Sustainable Equities.** In managing the strategy, the portfolio manager seeks to invest in businesses whose leaders prudently manage their environmental, social, and financial resources and whose shares are attractively valued relative to the free cash flow generated by the businesses. The portfolio manager analyzes such companies through a combination of in-house research performed by TCW and by reviewing data provided by third-party sources, the information is used to develop performance scores and rankings for each company, which are then compared against their peers on their fundamental performance and disclosure performance. The portfolio manager believes that applying this ESG and sustainability data driven lens at the start of the investment

research process helps to eliminate underperforming businesses and identify better managed businesses that are often overlooked or underappreciated by market participants.

- **Global REIT.** A concentrated all-cap global equity portfolio of high quality, well managed real estate companies. The strategy seeks to acquire common or preferred shares of high quality real estate stocks at a substantial discount to their intrinsic value. To identify opportunities, it employs a disciplined “bottom-up” investment process, with emphasis on asset/cash flow/management quality. Sources of information include financial news, inspection of corporate activity, inspection of assets, internal and third-party research, corporate rating services, company reports and press releases, due diligence meetings with management, court filings, interviews with suppliers, customers and competitors, and audited financial reports.
- **Market Neutral Income Equities.** A concentrated all-cap long/short equity portfolio with a focus on the real estate and financials ecosystems as well as adjacent industries (e.g., retail, consumer, infrastructure, hotels, lending, etc.) The strategy seeks to be market neutral, as defined by having a beta of approximately 0 relative to major indices such as the S&P 500 or the Russell 2000. It accomplishes this through a disciplined and focused process of “bottom-up” security selection – both with long and short candidates – and tight beta control. Sources of information include financial news, inspection of corporate activity, inspection of assets, internal and third-party research, corporate rating services, company reports and press releases, due diligence meetings with management, court filings, interviews with suppliers, customers, and competitors, and audited financial reports.
- **Relative Value Mid Cap.** An aggressive capital appreciation style that generally invests in small- and medium-sized cap companies deemed to be undervalued relative to the equities market. The strategy uses bottom-up, fundamental analysis, proprietary data and analytical systems, discounted cash flows, and discussions with third parties. Sources of information include financial news, inspection of corporate activity, internal and third-party research, company reports and press releases, due diligence meetings with management, court filings, interviews with suppliers, customers and competitors and audited financial reports.

**RISKS FOR EQUITIES STRATEGIES:****The principal risks of investing in our equity strategies are:**

- **equity risk:** the risk that stocks and other equity securities generally fluctuate in value more than bonds and may decline in value over short or extended periods based on changes in a company's financial condition and in overall market economic and political conditions.
- **liquidity risk:** the risk that there may be no willing buyer of the portfolio securities and it may have to sell those securities at a lower price or may not be able to sell the securities at all, each of which would have a negative effect on performance.
- **price volatility risk:** the risk that the value of the investment portfolio will change as the prices of its investments go up or down.
- **market risk:** the risk that returns from the securities in which we invest will decline in value due to factors affecting securities markets generally or particular industries represented in the securities markets.
- **securities selection risk:** the risk that the securities in the investment portfolio will underperform other accounts or funds investing in the same asset class or benchmarks that are representative of the asset class because of the choice of securities. In addition, security selection for an investment portfolio using machine learning is dependent upon the Advisor's use of its proprietary machine learning process and, as a result, the Advisor's skill in utilizing and implementing that process.
- **ETF, ETC and ETN risk:** the risk that the value of the investment portfolio's investments in these instruments will fluctuate in response to the performance of underlying or reference investments.
- **portfolio management risk:** the risk that an investment strategy may fail to produce the intended results.
- **issuer risk:** the risk that the value of a security may decline for reasons directly related to the issuer such as corporate governance or management performance, earnings, financial leverage, the value of assets and reduced demand for the issuer's goods or services, as well as other material ESG and/or sustainability risks.
- **investment style risk:** the risk that the particular style or set of styles that we primarily use may be out of favor or may not produce the best results

over short or longer time periods and may increase the volatility of the value of the investment portfolio.

- **globalization risk:** the risk that the growing interrelationship of all global economies and financial markets has increased the effect of conditions in one country or region on issuers of securities in a different country or region.
- **non-diversification risk:** the risk that the portfolio in which we invest may be subject to wider fluctuations in value than if it were subject to broader diversification requirements.
- **foreign investing risk:** the risk that the asset prices will fluctuate with market conditions and the economic and political climates where investments are made.
- **foreign currency risk:** the risk that the value of the investments we make that are denominated in foreign currencies will decline in value relative to the U.S. dollar.
- **small and mid-capitalization risk:** for certain of our strategies identified above, the risk that the stock performance of small and mid-capitalization companies can be more volatile than the stock performance of large capitalization companies, and they face the risk of business failure which increase the risk of loss.
- **market disruptions, geopolitical, and physical/natural risk:** market disruption can be caused by economic, financial or political events and factors, including but not limited to, international wars or conflicts (including Russia's military invasion of Ukraine, and any global consequences), geopolitical developments (including trading and tariff arrangements, sanctions and cybersecurity attacks), instability in regions such as Asia, Eastern Europe and the Middle East, terrorism, natural disasters (including earthquakes and significant hydrometeorological hazards) and other unanticipated events. The extent and duration of such events and resulting market disruptions cannot be predicted but could be substantial and could magnify the impact of other risks to investors. These and other similar events could adversely affect the U.S. and foreign financial markets and lead to increased market volatility, reduced liquidity in the securities markets, significant negative impacts on issuers and the markets for certain securities and commodities and/or government intervention. They may also cause short- or long-term economic uncertainties in the United States and worldwide. As a result, whether or not an investor invests in securities of

issuers located in or with significant exposure to the countries directly affected, the value and liquidity of the investments in an account may be negatively impacted. Further, due to closures of certain markets and restrictions on trading certain securities, the value of certain securities held could be significantly impacted, which could lead to those securities being valued at zero.

- **cybersecurity risks:** the risk that investment strategies and operations are increasingly reliant on technology and digital platforms and may expose us and clients to cybersecurity risks. Cyber threats such as ransomware, phishing, hacking could compromise the confidentiality, integrity, and availability of sensitive information. To address these risks, we have a designated Cybersecurity team directly responsible for cybersecurity risk, and which is overseen and accountable to our Cybersecurity Committee.
- **public health emergency risks:** the risk that pandemics and other public health emergencies, including outbreaks of infectious diseases such as the current outbreak of the novel coronavirus (“**COVID-19**”), can result, and in the case of COVID-19 is resulting, in market volatility and disruption, and materially and adversely impact economic conditions in ways that cannot be predicted, all of which could result in substantial investment losses. Containment efforts and related restrictive actions by governments and businesses have significantly diminished and disrupted global economic activity across many industries. Less developed countries and their health systems may be more vulnerable to these impacts. The ultimate impact of COVID-19 or other health emergencies on global economic conditions and businesses is impossible to predict accurately. Ongoing and potential additional material adverse economic effects of indeterminate duration and severity are possible. The resulting adverse impact on the value of an investment in the Fund could be significant and prolonged.
- **machine learning risk:** the risk that an investment strategy’s proprietary “machine learning” security selection process, as well as data and information supplied by third parties that are utilized in that process, may fail to identify profitable opportunities at any time. To the extent the machine learning process is used and does not perform as designed or as intended, the investment strategy may not be successfully implemented, and the investment portfolio may lose value. If the input data is incorrect or incomplete, any decisions made in reliance on those data may lead to the inclusion or exclusion of securities that would have been excluded or included had the data been correct and complete.

- **Inflation risk:** the risk that the value of assets or income from investments will be less in the future as inflation decreases the value of money. As inflation increases, the present value of assets and distributions may decline. Inflation creates uncertainty over the future real value (after inflation) of an investment. Inflation rates may change frequently and drastically as a result of various factors, including unexpected shifts in the domestic or global economy, and investments may not keep pace with inflation, which may result in losses to investors.
- **ESG and sustainable investing risk:** the risk an ESG and/or sustainable investment strategy may select or exclude securities of certain issuers for non-financial reasons, and that the strategy's performance will differ from accounts that do not utilize an ESG and/or sustainable investing strategy. For example, the application of this strategy could affect an account's exposure to certain sectors or types of investments, which could negatively impact the account's performance. ESG and/or sustainable investing is qualitative and subjective by nature, and there is no guarantee that the criteria used by us, or any judgement exercised by us will reflect the opinions of any particular investor. Accounts with ESG and/or sustainable investment strategies are generally suited for long-term rather than short-term investors.

There are no universally agreed upon objective criteria for assessing ESG and sustainability factors for investments. Rather, these criteria tend to have many subjective characteristics, can be difficult to analyze, and frequently involve a balancing of numerous factors. ESG and sustainability factors can vary over different periods and evolve over time. They may also be difficult to apply consistently across different types of investments. For these reasons, ESG and sustainability standards may be aspirational and tend to be stated broadly and applied flexibly. In addition, investors and other bodies may disagree as to whether a certain investment satisfies ESG and sustainability standards given the absence of mandated or generally accepted criteria.

*The following are special risks for real estate and income-related strategies:*

- **REIT and real estate company risk:** the risk that the value of the investments in REITs and real estate companies may generally be affected by factors affecting the value of real estate and the earnings of companies engaged in the real estate industry. REITs are also subject to heavy cash

flow dependency, self-liquidation, and the possibility of failing to qualify for tax-free “pass-through” of income under the federal tax law.

- **real estate industry concentration risk:** the risk that the investments may be susceptible to the impact of market, economic, regulatory, and other factors affecting the real estate industry and/or the local or regional real estate markets because of its concentrated investments in the real estate industry. At times of such impact, the value of the investments may fluctuate more widely than it would for a strategy that invests more broadly across varying industries and sectors.
- **mortgage/loan REIT risk:** the risk that REITs that invest in mortgages or loans may also be indirectly subject to various risks associated with those investments, including, but not limited to: interest rate risk, credit risk and distressed and defaulted securities risk as discussed below:
  - **interest rate risk:** the risk that debt securities will decline in value because of changes in interest rates.
  - **credit risk:** the risk that an issuer will default in the payment of principal and/or interest on a security.
  - **distressed and defaulted securities risk:** the risk that the repayment of defaulted securities and obligations of distressed issuers is subject to significant uncertainties.
- **frequent trading risk:** the risk that frequent trading will lead to increased portfolio turnover and higher transaction costs, which may reduce the portfolio’s performance and may cause higher levels of current tax liability clients of the portfolio.
- **derivatives risk:** the risk of investing in derivative instruments, which include liquidity, interest rate, market, credit, and management risks as well as risks related to mispricing or improper valuation. Changes in the value of a derivative may not correlate perfectly with the underlying asset, reference rate or index and could lose more than the principal amount invested.
- **leverage risk:** the risk that leverage created from borrowing or certain types of transactions or instruments, including derivatives, may impair the investment portfolio’s liquidity, cause it to liquidate positions at an unfavorable time, increase its volatility or otherwise cause it not to achieve its intended result.

- **counterparty risk:** the risk that the other party to a contract, such as a derivatives contract, will not fulfill its contractual obligations.
- **options strategy risk:** the risk that the investment portfolio's opportunity to profit from an increase in the market value of its investments may be limited by writing call options.
- **other investment company risk:** the risk that investments in the shares of other investment companies, including exchange-traded funds and REITs, are subject to the risks associated with such investment companies' portfolio securities. Accordingly, investments in shares of another investment company will fluctuate based on the performance of such investment company's portfolio securities.

### C. INTERNATIONAL STRATEGIES:

#### The international strategies we offer are:

- **Emerging Markets Asia High Yield.** The objective of this strategy is to outperform the benchmark over the long term by investing primarily in high yield Asia ex-Japan corporate credit, primarily denominated in U.S. dollars and opportunistically in local currency. The strategy uses top-down and bottom-up fundamental analysis, including analysis of security structure, country and political risk, credit, discounted cash flows, and discussions with third parties. Sources of information include primary research, financial news, inspection of corporate activity, research from secondary sources, corporate rating services, company reports and press releases, due diligence meetings with management, court filings, independently prepared engineering and technical reports, interviews with suppliers, customers, and competitors, third party analytical systems and audited financial reports. This strategy is subject to the same risks as U.S. fixed income strategies described above, including derivatives and counterparty risk. In addition, it is subject to the special risks for international strategies described below.
- **Emerging Markets Fixed Income 50% Hard Currency / 50% Local Currency Blend.** This strategy seeks high current income and total returns by investing in emerging market fixed income securities, including the debt obligations of public and private sector issuers. The strategy uses fundamental, technical, and relative value analysis, including analysis of security structure, country and political risk, credit, discounted cash flows, and discussions with third parties. Sources of information include primary



research, financial news, inspection of corporate activity, research from secondary sources, corporate rating services, company reports and press releases, due diligence meetings with management, court filings, independently prepared engineering and technical reports, interviews with suppliers, customers, and competitors, third party analytical systems and audited financial reports. This strategy is subject to the same risks as U.S. fixed income strategies described above, including derivatives, and counterparty risk. In addition, it is subject to the special risks for international strategies described below.

- **Emerging Markets Fixed Income Total Return.** This strategy seeks high current income and total returns by investing in emerging market fixed income securities, including the debt obligations of public and private sector issuers. The strategy uses fundamental, technical, and relative value analysis, including analysis of security structure, country and political risk, credit, discounted cash flows, and discussions with third parties. Sources of information include primary research, financial news, inspection of corporate activity, research from secondary sources, corporate rating services, company reports and press releases, due diligence meetings with management, court filings, independently prepared engineering and technical reports, interviews with suppliers, customers, and competitors, third party analytical systems and audited financial reports. This strategy is subject to the same risks as U.S. fixed income strategies described above, including derivatives and counterparty risk. In addition, it is subject to the special risks for international strategies described below.
- **Emerging Markets Income Focus.** The objective of this strategy is to seek current income and long-term capital appreciation by investing in emerging markets hard currency sovereign, quasi-sovereign, and corporate debt, all with an emphasis on investment grade. The strategy uses top-down and bottom-up fundamental analysis, including analysis of security structure, country and political risk, credit, discounted cash flows, and discussions with third parties. Sources of information include primary research, financial news, inspection of corporate activity, research from secondary sources, corporate rating services, company reports and press releases, due diligence meetings with management, court filings, independently prepared engineering and technical reports, interviews with suppliers, customers and competitors, third party analytical systems and audited financial reports. This strategy is subject to the same risks as U.S. fixed income strategies

described above, including derivatives and counterparty risk. In addition, it is subject to the special risks for international strategies described below.

- **Emerging Markets Local Currency Absolute Return.** This strategy seeks an absolute return with reduced volatility in the emerging market local currency markets. The strategy employs a rules-based investment approach through a combination of high risk-adjusted carry, diversification, and systematic downside risk management. Investments include high-yielding low duration local currency bonds, medium-duration local currency bonds and foreign exchange.
- **Emerging Markets Local Currency Income.** This strategy seeks high current income and total returns by investing in emerging market fixed income securities, including the debt obligations of public and private sector issuers, denominated in local currency. For this strategy our managers employ fundamental, technical, and relative value analysis, as well as analysis of security structures, country and political risks, proprietary data and analytical systems, credit, discounted cash flows and discussions with third parties.
- **Emerging Markets Opportunistic Credit.** This strategy seeks current income and long-term capital appreciation primarily by investing in corporate and quasi-sovereign emerging markets fixed income assets, including bonds, bank loans, floating rate notes and inflation linked bonds. The strategy uses top-down and bottom-up fundamental analysis, including analysis of security structure, country and political risk, credit, discounted cash flows, and discussions with third parties. Sources of information include primary research, financial news, inspection of corporate activity, research from secondary sources, corporate rating services, company reports and press releases, due diligence meetings with management, court filings, independently prepared engineering and technical reports, interviews with suppliers, customers, and competitors, third party analytical systems and audited financial reports. This strategy is subject to the same risks as U.S. fixed income strategies described above, including derivatives and counterparty risk. In addition, it is subject to the special risks for international strategies described below.
- **Emerging Markets Opportunistic Credit High Yield.** This strategy is a dedicated High Yield version of the TCW Emerging Markets Opportunistic Credit strategy.

- **Emerging Markets Opportunistic Credit Investment Grade.** This strategy is a dedicated investment grade version of the TCW Emerging Markets Opportunistic Credit strategy.
- **Emerging Markets Sustainable Income.** The strategy seeks high total return provided by current income and capital appreciation by investing mainly in Emerging Markets sovereign and corporate debt within the guidelines of Article 9 of the Sustainable Finance Disclosure Regulation (SFDR). The strategy targets a 30% lower carbon intensity of the quasi-sovereign/corporate issuers in the portfolio relative to the broad EM quasi-sovereign and corporate universe. The strategy employs a proprietary ESG and sustainable research framework to evaluate and score EM sovereigns, quasi-sovereigns, and corporates. Factors in the proprietary scores include indicators linked to the United Nations' Sustainable Development Goals ("SDGs"), such as governance, transparency, corruption, rule of law, climate policies, civil liberties, natural resource protection, and gender equality. The strategy actively invests in green/social/sustainable bonds to help support the transition to a low carbon economy and promote progress toward achieving the SDGs.

In addition, the strategy uses top-down and bottom-up fundamental analysis, including analysis of security structure, country and political risk, credit, discounted cash flows, and discussions with third parties. Sources of information include primary research, financial news, inspection of corporate activity, research from secondary sources, corporate rating services, company reports and press releases, due diligence meetings with management, court filings, independently prepared engineering and technical reports, interviews with suppliers, customers, and competitors, third party analytical systems and audited financial reports. This strategy is subject to the same risks as U.S. fixed income strategies described above, including derivatives and counterparty risk. In addition, it is subject to the special risks for international strategies described below.

- **EMFI Quality Sovereign/Quasi Sovereign.** This strategy seeks to outperform its benchmark over the long term by investing primarily in dollar-denominated sovereign and quasi-sovereign debt. The investible universe is limited to a subset of countries in the EMBI Global Diversified Index rated BB- and above and limits quasi-sovereigns to a maximum of 10% of the portfolio. The strategy uses top-down and bottom-up fundamental analysis,

including analysis of security structure, country and political risk, credit, discounted cash flows, and discussions with third parties. Sources of information include primary research, financial news, inspection of corporate activity, research from secondary sources, corporate rating services, company reports and press releases, due diligence meetings with management, court filings, independently prepared engineering and technical reports, interviews with suppliers, customers, and competitors, third party analytical systems and audited financial reports. This strategy is subject to the same risks as U.S. fixed income strategies described above, including derivatives and counterparty risk. In addition, it is subject to the special risks for international strategies described below.

#### **RISKS FOR INTERNATIONAL STRATEGIES:**

*The following are special risks for international strategies in addition to the risks above for fixed income and equity strategies, excepting those risks related to using leverage or investing in mortgage-backed securities which are not applicable:*

- **emerging market country risk:** the risk that the value of investments will decline due to the greater degree of economic, political, and social instability of emerging market countries as compared to the developed countries.
- **foreign currency risk:** the risk that the value of the investments denominated in foreign currencies will decline in value because the foreign currency has declined in value relative to the U.S. dollar.
- **market disruptions, geopolitical, and physical/natural risk:** market disruption can be caused by economic, financial or political events and factors, including but not limited to, international wars or conflicts (including Russia's military invasion of Ukraine, and any global consequences), geopolitical developments (including trading and tariff arrangements, sanctions and cybersecurity attacks), instability in regions such as Asia, Eastern Europe and the Middle East, terrorism, natural disasters (including earthquakes and significant hydrometeorological hazards) and other unanticipated events. The extent and duration of such events and resulting market disruptions cannot be predicted but could be substantial and could magnify the impact of other risks to investors. These and other similar events could adversely affect the U.S. and foreign financial markets and lead to increased market volatility, reduced liquidity in the securities markets,

significant negative impacts on issuers and the markets for certain securities and commodities and/or government intervention. They may also cause short- or long-term economic uncertainties in the United States and worldwide. As a result, whether or not an investor invests in securities of issuers located in or with significant exposure to the countries directly affected, the value and liquidity of the investments in an account may be negatively impacted. Further, due to closures of certain markets and restrictions on trading certain securities, the value of certain securities held could be significantly impacted, which could lead to those securities being valued at zero.

#### **D. BALANCED STRATEGY**

- **Core Balanced.** A strategy which consists of an equity component, either the TCW Concentrated Core Equity Strategy or the TCW Relative Value Large Cap Strategy and a fixed income component and seeks to provide high total return from equity and fixed income markets by investing in a managed asset allocation portfolio of high quality stocks and bonds. The risks for the Core Balanced strategy include the principal risks noted above for the fixed income and equities strategies.

#### **ITEM 9: DISCIPLINARY INFORMATION**

Not Applicable.

#### **ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

As a global asset manager with personnel operating out of multiple offices worldwide, we may conduct operations through affiliates that are also subsidiaries of our parent company, The TCW Group, Inc., in other jurisdictions. Some of the services provided to our clients in our Accounts and Funds may from time to time be conducted by, or in conjunction with, TCW Europe Limited (“TCW UK”). TCW UK’s investment personnel report to portfolio management teams based in the U.S., are subject to direct oversight by us, and must comply with all of our applicable policies and compliance rules, in addition to local rules and policies. Regardless of where services are conducted, we remain fully responsible to our clients for all of our obligations and for all actions of TCW UK’s personnel to the

same extent we are responsible for our own actions. There are no additional costs to our clients for advisory services provided by personnel of TCW UK.

**Broker-Dealer.** TCW Funds Distributors LLC (“TFD”) is a registered broker-dealer that is affiliated with us. Some of our employees are registered representatives or principals of TFD. These registered representatives and principals may receive compensation from us for selling interests in open- and closed-end commingled investment vehicles that we manage. They do not receive sales commissions from those investment vehicles, unless specifically disclosed.

**Commodities Registrations.** We are registered as a commodity pool operator (“CPO”). TCW Asset Management Company LLC (“TAMCO”) and Metropolitan West Asset Management, LLC (“MetWest”) are registered investment advisers that are affiliated with us. TAMCO is also registered as a CPO. Both TAMCO and MetWest are registered as commodity trading advisers (“CTA”). Some of our officers are, in turn, registered as “associated persons” of those affiliates that are registered as a CPO or CTA. These associated persons may receive compensation from those affiliates for selling interests in funds or for accounts those affiliates manage. They do not receive sales commissions or other compensation from those funds or accounts, unless specifically disclosed.

**Investment Advisers.** For certain investment strategies, we may retain related registered investment advisers on a fully-disclosed basis. See the Brochure of each of these related investment advisers for additional information about their investment management services.

- Buchanan Street Partners, L.P. (SEC Number: 801-78627; CRD Number: 169052)
- Metropolitan West Asset Management, LLC (SEC Number: 801-53332; CRD Number: 104571)
- Sepulveda Management LLC (SEC Number: 801-108097; CRD Number 284290)
- TCW Asset Management Company LLC (SEC Number: 801-6642; CRD Number: 105742)

**Other Advisers We May Recommend to Clients.**

We from time to time recommend to our clients unaffiliated investment advisers that are not subsidiaries of The TCW Group, Inc. (together “**Non-TCW Advisers**”). The Non-TCW Advisers pay us compensation, including a portion of the management and performance fees that they receive, for any of our clients that invest with the Non-TCW Adviser. This could create the risk that we refer our clients to the Non-TCW Advisers solely to receive the compensation, without consideration of the interests of the client. However, we review each Non-TCW Adviser, as well as their investment strategies and funds that we recommend, to determine that the adviser has appropriate business capability and capacity and that they offer investment alternatives that may not be available from us. We disclose to the clients we refer to Non-TCW Advisers that we are compensated if the client establishes an Account or invests in a Fund of the Non-TCW Adviser.

The following are Non-TCW Advisers we refer our clients to:

- Amundi Group and its subsidiaries

**ITEM 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING****SUMMARY OF OUR CODE OF ETHICS**

Our officers, directors and employees are generally subject to our Code of Ethics (the “**Code**”). We will provide a copy of our Code of Ethics to any client or prospective client upon request. Our contact information appears on the first page of this Brochure.

The Code includes:

- **Conduct Principles.** General principles of conduct for all employees.
- **Restrictions on Personal Investment.** We maintain restrictions on investment transactions in which our officers, directors and certain other persons have a beneficial interest to avoid any actual or potential conflict or abuse of their fiduciary position. The Code permits personnel subject to the Code to invest in securities, but contains restrictions and procedures designed to eliminate conflicts of interest including: (a) pre-clearance of non-exempt personal investment transactions; (b) quarterly reporting of

- personal investment transactions and initial and annual reporting of securities holdings; (c) a prohibition against personally acquiring securities in initial public offerings, initial coin offerings and single stock ETFs; (d) a five day “black out period” prior or subsequent to a client transaction during which investment personnel are prohibited from making certain transactions in securities which are being purchased or sold by a client of the firm; (e) a prohibition, with respect to certain investment personnel, from profiting in the purchase and sale, or sale and purchase, of the same (or equivalent) securities, within 60 calendar days; (f) a prohibition against buying or selling any security that we are trading for our clients at the time a pre-clearance request is made; (g) a prohibition on acquiring any shares of a third party, non-exchange traded, mutual fund we advise or sub-advise, and (h) prohibition on short selling any ETF that is TCW advised, sub-advised, or otherwise managed by TCW.
- **Insider Trading Rules.** A policy statement on insider trading that provides generally that none of our officers, directors, or employees (a) may buy or sell a security either for themselves or others while in possession of material non-public information about the company, or (b) communicate material, non-public information to others who have no official need to know. The policy statement provides guidance about what is material non-public information, lists common examples of situations in which our personnel could obtain that information, and describes our procedures regarding securities maintained on our "Restricted Securities List" and for establishing ethical walls. It also identifies parties to contact for questions in connection with the requirements of the policy statement.
  - **Gifts & Entertainment: Anti-Corruption Policy.** A policy statement requiring compliance with our gifts and entertainment rules and applicable anti-corruption laws and rules, including the Foreign Corrupt Practices Act. The policy also prohibits any of our employees from making any gift, payment, or other inducement for the benefit of any person, including a foreign or domestic official, with the intent that the recipient misuses their position to aid our firm in obtaining, retaining or directing business. The policy explains the process by which our personnel may provide or accept gifts and entertainment. It also describes the approval process to engage third-party representatives to act on behalf of our firm. The statement identifies possible anti-corruption compliance “red flags” and requires our personnel and third-party representatives to report to our firm any potential violation of this policy of which they may become aware.



- **Restrictions on Employee Outside Activities.** A policy governing an employee's activities outside of their employment with us, including outside employment, service in any capacity for any non-affiliated company or institution, fiduciary appointments, and serving in any ongoing capacity for any non-investment related organization that is exclusively charitable, fraternal, religious, or civic and is recognized as tax exempt. The policy provides guidance on the approval and reporting of such outside business activities.
- **Restrictions on Political Contributions and Activities.** A policy on political activities and contributions, containing general rules governing contributions and solicitation, responsibility of individuals for personal contribution limits, quarterly reporting of political activities by certain employees and rules for political activities on our premises and for using our resources. The policy further requires employees and certain of their related parties to obtain pre-clearance of political contributions, solicitations, and volunteer activity.
- **Confidentiality Requirements.** Policies governing the confidentiality of our client and business information.
- **Whistleblower Provisions.** A policy stating it is our practice that employees report illegal activity or activities not in compliance with our written policies and procedures, including the Code.

## **PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS**

**Transactions Involving Related Persons.** There are broker-dealers and other financial intermediaries and institutions that are controlled by or under common control with TCW. With respect to those related persons:

- We will enter into transactions or services involving related persons only in accordance with applicable laws and where we determine that the transactions or services are being done on an arm's length basis at fees or rates comparable to: (i) those generally available to the related person's other clients and (ii) those available to us in the marketplace from unrelated parties.
- Where required under Section 206(3) of the Advisers Act, and related rules, or Section 17(e) of the Investment Company Act, and related rules, we will obtain client consent prior to effecting transactions with related parties,

either on a case-by-case basis or on a blanket basis, as required or permitted by law. Certain funds we manage specifically authorize transactions with related parties and us, or an affiliate consents to those on behalf of those funds.

- From time to time, we take the following actions on behalf of our clients, or recommend to our clients that they take such actions:
  - buy or sell securities in which persons related to us have a financial interest;
  - effect transactions through related persons, including broker-dealers acting as principal or as agent for non-clients;
  - buy or sell securities to or from related persons who are broker-dealers;
  - buy or sell securities in which we, parties related to us or our other client's accounts are at the same time effecting a sale or purchase; and
  - effect transactions with brokers that have clearing relationships with related persons who are broker-dealers.

In any transaction with a related party, the related party may receive compensation. Furthermore, we may act as investment adviser for related persons and may act as investment adviser for pension vehicles of related persons. We are restricted under certain circumstances from entering into principal and agency and other transactions with affiliates. We have adopted procedures to identify affiliated brokers, and such procedures are designed generally to prevent the purchase for certain clients of securities issued by certain affiliates. We have also adopted policies and procedures with respect to permitted transactions with our affiliates designed to assure that client interests are not adversely affected.

**Investment Products.** We recommend to or purchase or sell on behalf of clients, securities, or other investment products ("**Investment Products**") in which we, our affiliates or other related persons have a financial interest as the investment manager, general partner or trustee or as a co-investor in such Investment Products.

**Consulting and Structuring Fees.** We and our affiliates receive fees from third parties for performing consulting, merger and acquisition structuring or other

financial advisory services or acting as directors, officers, or creditors' committee members. These fees can relate to actual, contemplated, or potential investments of our clients. Such fees are retained entirely by our affiliates or us.

**Transactions by Different Accounts, Funds and Strategies.** We, from time to time, recommend or enter into for clients of any investment strategy:

- sales of or short positions (if allowed) in securities of an issuer, at the same time other of our or our related investment strategies purchase securities of the same issuer for their clients; or
- investments in securities in the same and/or different parts of the capital structure of an issuer than other of our, or our related, strategies.

In the above circumstances, investment opportunities in the same security may be pursued or held by both investment strategies so long as either (i) the investment issuer is a marketable security, or (ii) in the event of a non-marketable security an independent decision-making process is followed.

**Securities We Purchase, Hold or Sell.** We, from time to time, recommend, buy or sell securities of issuers in which we or related persons also purchase, hold or sell securities. These securities are either publicly traded or private placements. Our Code of Ethics described above establishes various procedures with respect to investment transactions in which our related persons have a beneficial interest that are designed to reduce the potential for conflicts of interest.

**Board of Director Memberships.** Our officers or employees from time to time serve as members of the boards of directors of publicly or privately held companies which may be permitted investments of various investment strategies we offer. In these cases, we take steps, such as establishing appropriate "ethical wall" procedures or placing the security in question on a restricted list, which may limit or preclude us from purchasing or selling such securities for our clients.

## **ITEM 12: BROKERAGE PRACTICES**

**GENERAL.** We and our affiliates seek to achieve best execution when selecting broker-dealers to execute securities transactions. Generally, this means seeking to achieve the best overall terms for a transaction available under the circumstances by employing an efficient trading process and does not necessarily result in the lowest available price or commission for any particular transaction. Best execution is not easily quantifiable, or definable, because it encompasses

many potential factors such as: (i) price; (ii) commission; (iii) speed of execution; (iv) confidentiality/transparency; (v) market depth; (vi) market volatility; (vii) capital commitment; (viii) relationship with broker (including: responsiveness, accuracy, reputation, timeliness, credit strength); (ix) services offered by the broker; (x) access to company information; and (xi) recent order flow. Some or all of these factors may play a role in determining what constitutes best execution. We do not necessarily measure best execution by the circumstances surrounding a single transaction and may seek best execution over time across multiple transactions. Other goals include execution of trades on behalf of clients in a timely and cost-effective manner, fairness to clients, both in priority of order execution and in the allocation of the price obtained in execution of trades, and compliance with client trading related mandates and investment restrictions.

In addition to the general factors that may impact best execution for any security, best execution for fixed income securities is complicated by the unique profile of each individual CUSIP. Accordingly, the approach to best execution for fixed income securities typically depends on an assessment of a number of factors that may include broker activity in the security and comparable securities, market conditions for comparable securities, the overall liquidity of the security, taking into consideration potential variance of that liquidity in the future, the security's sector, type, structure, tenor/maturity, priority, amortization, coupon, covenants, collateral if any, trading restrictions if any, issue size, and other characteristics, and the issuer's creditworthiness and stability. Fixed income securities may be traded as individual securities or as portfolios. For less liquid fixed income securities, traders may also need to consider potential market or price impact, particularly if the order size is significant relative to the market or a limited number of brokers are making markets in the security.

**EQUITIES.** Transactions in equities are not always executed at the lowest available commission, and we may effect transactions which cause the client to pay a commission in excess of a commission that another broker-dealer would have charged. We do that if we determine that such commission is reasonable in relation to the value of the brokerage and research services we or any client accounts receive.

- **Block Trades.** In an effort to achieve efficiencies in execution and reduce trading costs, we and our affiliates frequently aggregate securities transactions on behalf of a number of accounts at the same time, generally referred to as "*block trades*." When executing block trades, trades will be allocated among accounts using procedures that we consider fair and

equitable. Participation of an account in the allocation is based on such considerations as investment objectives, guidelines and restrictions, availability of cash, amount of existing holdings (or substitutes) of the security in the accounts, an eligible account's proximity to our desired target allocation, exposure or weight compared to other eligible accounts, investment horizon and directed brokerage instructions, if applicable. Therefore, there are various reasons why we may decide not to include trades for certain strategies or accounts by us and our affiliates in a block trade for a given day or period. We may also execute securities transactions alongside or interspersed between block orders when we expect that such execution will not interfere with our ability to execute the order in a manner believed to be most favorable to our clients as a whole. Certain strategies, such as the ETFs we manage, may employ different trading strategies, such as market on close or "MOC" orders, and different traders in the same securities as other strategies we and our affiliates manage, which means they would not otherwise participate in a block trade and may use other broker-dealers and obtain different prices. We may exclude trades for accounts that direct brokerage or that are managed in part for tax considerations from block trades.

In some cases, various forms of pro rata allocation are used, and in other cases, random allocation processes are used. However, considerations such as lot size, relative liquidity of the position, existing or targeted account weightings in particular securities, account size, cash availability, diversification requirements and investment objectives, restrictions and time horizons may result in more particularized allocations. In connection with multi-account purchase or sale programs, and in other circumstances, if practicable, if multiple trades for a specific security are made with the same broker in a single day, those securities are allocated to accounts based on a weighted average purchase or sale price.

- **Order Sequencing.** Regardless of the liquidity level of a security proposed to be traded, all equity accounts (including fully directed and non-directed equity accounts and wrap accounts), except those that have chosen to Opt Out as described below, will generally be queued in a random process over the course of the full order, which for any particular account may be either closer to the beginning or the end of the order ("Random Sequencing Methodology"). Institutional orders (including those from institutional clients who have provided institutional grade algorithmic trading equipment and

tools) and non-institutional orders will be treated as concurrent orders that may be executed at any point in any given sequence. In the event that a portfolio management team determines it is in the best interest of accounts within a particular strategy to trade employing a tiered sequencing methodology other than Random Sequencing Methodology, the portfolio management team may request an “Opt Out” from the Random Sequencing Methodology. Reasons for the Opt Out might include, for example, trading in equity securities with smaller market capitalization, or concerns that trades may generally be less liquid. Subject to our internal review, our equity trading desk will give effect to the Opt Out by employing a Tiered Sequencing Methodology designed to determine the trading order of these equity accounts. The Tiered Sequencing Methodology takes into account the liquidity of the security being purchased or sold, the size of the order, and the potential market impact. The Tiered Sequencing Methodology is designed to produce overall better net execution for certain types of trades, but not to ensure (nor to expect) that all clients will receive the same execution terms with respect to orders placed pursuant to this methodology.

In the event that more than one strategy intends to trade in a particular security at the same time, and at least one of the strategies trades in the Random Sequencing Methodology, or in the event of another potential conflict relating to the Tiered Sequencing Methodology, all trades will use the Random Sequencing Methodology. Additionally, we may trade in a manner not dictated by the sequencing methodology if we determine, at our discretion, that to do so will improve the overall quality of execution, considering all of the potential factors for best execution enumerated above.

- **Allocation of Public Offerings.** We generally share allocations of equity securities in a pro rata fashion based upon assets under management of those accounts eligible to participate in the initial public offering. We may, however, determine not to allocate shares to Accounts or Funds below a certain minimum threshold. Portfolio managers are also required to designate whether their interest in an equity new issue allocation is to establish a long-term position or is for trading purposes, and priority is given to allocations for long-term positions. Our CIO of Equities may determine that the New Issue should be allocated to the Accounts managed by the portfolio manager or team that has been researching the New Issue most extensively. In all other cases, the share allocation among “Position” Equity Accounts and, separately, among “Trade” Equity Accounts will be pro rata based on the AUM of each Equity Account within the two respective groups;

provided, however, that the Head of U.S. Equity Trading may determine not to allocate shares to Equity Accounts below a certain de minimis threshold. In that event, such Equity Accounts will not receive any allocations from the New Issue. In addition, fully directed equity accounts will not be allocated shares in initial public offerings.

- **Client Directed Brokerage.** Clients may expressly direct us to place, or set expectations that we place, some or all of the transactions for their accounts with one or more broker-dealers they specify. Clients may do so for several reasons, including offsetting consulting and other fees or participating in a bundled services program. In such circumstances, we may not be able to negotiate commissions, obtain volume discounts or select a broker based on the most favorable price and execution for the transaction. Because of that, such accounts may pay higher commissions than those that do not direct brokerage and may not get best execution. Depending upon the amount of directed brokerage, accounts with directed brokerage instructions may be excluded from block trades and their directed orders will generally be executed following completion of any non-directed trades. As a result, performance results for these accounts may vary from other client accounts we manage in the same strategy. In some instances, the client may direct us to make all or substantially all of their account trades with specific broker-dealers (“*fully directed*” accounts). Fully directed account clients may be required to sign certain acknowledgments, including the fact that such direction regarding brokerage may compromise best execution and that the client’s account may trade after other accounts. Clients may also prohibit us from placing transactions for their accounts with certain broker-dealers. This may prevent us from selecting a restricted broker-dealer even though such broker-dealer may offer a more favorable price and execution for the transaction. Clients should understand that for any amount directed by the Client, it may not be feasible to meet all of the above factors of best execution, as we may be limited in our ability to negotiate/obtain some or all of these factors. In addition, the client may lose the possible advantage that non-designating and unrestricted clients may derive from block trades, utilizing alternative trading venues, or alternative trading techniques for the purchase or sale of a particular security. We require all requests for directed brokerage to be in writing and originate from the client. Generally, we limit directed brokerage to 20% of total commissions for any Account (except wrap and similar Accounts) but Clients may request directed brokerage in excess of 20%. Any such request must be reviewed and approved by both our Equity Trade Review

Committee and our Legal Department and may be subject to additional conditions if approved.

- **Wrap Fee Program Accounts.** In some instances, we provide investment advisory services under an arrangement offered by a broker-dealer sponsor, under which the sponsor may recommend us or make our services available, pay our investment advisory fee on behalf of the client, monitor and evaluate our performance, execute the client's portfolio transactions without commission charge or provide any combination of these or other services, all for a single fee paid by the client to the sponsor. These are commonly known as "*wrap fee*" accounts or programs. Our investment advisory fee under a wrap fee program may differ from that offered to other clients.

In evaluating the wrap fee program, the client should recognize that we do not negotiate brokerage commissions or the execution terms of transactions in the client's account and that securities transactions are executed "net", which means without a commission. Trades are generally executed through the program sponsor to avoid incremental brokerage costs that would be incurred by use of other brokers. Because of this, we may not be free to seek best price and execution by placing transactions with other brokers. Wrap Account clients should satisfy themselves that the program can provide adequate price and execution of most or all transactions. The clients should also consider that their direction to execute orders through the wrap fee sponsor may result in that client receiving execution terms which are less favorable than those of clients who have not made such a direction. The client should also consider that, depending upon the level of the fee charged by the sponsor, the amount of portfolio activity in the client's account, the value of custodial and other services which are provided, and other factors, the final "all inclusive fee" may exceed the aggregate cost of such services if they were to be provided separately.

- **Client Commissions Used for Research.** When appropriate under its discretionary authority and consistent with its duty to seek best execution, we, from time to time, direct brokerage transactions for accounts to broker-dealers who provide brokerage and research services. In some cases, research is provided directly by an executing broker-dealer ("*direct research providers*") and in other cases, research may be provided by third party research providers such as a non-executing third party broker-dealer or other third-party research service ("*third party research providers*").



Research services furnished by direct research providers or third-party research providers generally may be used for any or all of our clients, as well as clients of affiliated entities, and in some instances may be used for specialty research that benefits only certain of our clients. In addition, research services generally may be used in connection with accounts other than those whose commissions were used to pay for such research services. This may occur for various reasons, including the restrictions or prohibitions applicable to certain clients on the payment of commissions for soft dollars by their accounts, such as those imposed in the European Union by the "Markets in Financial Instruments Directive" and related requirements.

We use an internal allocation procedure to identify those direct research providers who provide us with research services and endeavor to place sufficient transactions with them to ensure the continued receipt of research services we believe are useful. Our procedures also seek to compensate third party research providers that provide us with research by directing executing broker-dealers to cause payments to be made to third party research providers, through cash payments from the executing broker, commission sharing arrangements between the executing broker and a research provider broker or through the use of stepout transactions. A "*stepout transaction*" is a securities trade executed by the executing broker-dealer but settled by the non-executing research broker-dealer permitting the non-executing research broker-dealer to share in the commission. The determination of the broker-dealers to whom commissions are directed generally is made using a system involving the Director of Equity Research, the portfolio managers and/or the research analysts and is periodically reviewed by the Trading Committee. The Director of Equity Research coordinates the evaluation of broker-dealer research services in most instances, taking into account the views of TCW's portfolio managers and analysts.

Research services include items such as reports on industries and companies, economic analyses, review of business conditions and portfolio strategy, and various trading and quotation services. They also include advice from broker-dealers as to the value of securities, availability of securities, availability of buyers, and availability of sellers. In addition, they include recommendations as to purchase and sale of individual securities and timing of transactions.

We maintain records of all services that are provided under client commission arrangements or directly for third-party research. The records include descriptions of research services and products, the costs of these services, and the brokers with whom we have these arrangements. We may receive products or services from broker-dealers that are used for both research services and other purposes, such as corporate administration or marketing ("*mixed-use products or services*"). We make a good faith effort to determine the relative proportions of mixed-use products or services that may be attributable to research services. The portion attributable to research services may be paid through the allocation of brokerage commissions, and we pay the non-research service portion in cash.

Upon request, we may provide clients with commission reports that show commissions paid to brokers with whom the client's account has traded in a given period. In addition, upon request, we may provide clients with reports that disclose the extent to which commissions paid on a client's account have been used to pay for research services.

We use client brokerage commissions to obtain research or other products or services and receive a benefit because we do not have to pay for the research, products, or services. We have a conflict of interest in that regard because of our incentive to select or recommend a broker-dealer based on our interest in receiving the research or other products and services, rather than on our clients' interest in trading at the most favorable prices.

- **Commission Rates.** The head of our Equity Trading Department, with the approval of senior management, determines the guidelines for commission rates paid to broker-dealers for equities (other than for directed brokerage orders, discussed above). Those guidelines can vary based on the types of equities traded (domestic, foreign, capitalization), method of trading (full-service brokerage, program trades, electronic communication network or ECN, dark pools, and others), as well as other factors. Both fixed income securities and equity securities may also be purchased from underwriters at prices that include underwriting fees. Because commission rates are fixed in some international markets, we may be unable to negotiate commissions to any meaningful degree in such markets.

**FIXED INCOME.** We take into account such factors as price (including the applicable dealer spread), size of order, and difficulty of execution when executing fixed income trades. Transactions are not always executed at the best available

price. Other goals include execution of trades on behalf of clients in a timely and cost-effective manner, fairness to clients, both in priority of order execution and in the allocation of the price obtained in execution of trades, and compliance with client trading related mandates and investment restrictions.

Fixed income securities are generally purchased from the issuer or purchased from/sold through a market maker acting as a principal. Pricing is on a net basis, reflecting a dealer spread within the quote, without an explicitly stated and charged commission. Fixed income securities may also be purchased from underwriters at prices that include underwriting fees. Because of this pricing structure, research, and products and other services are not paid for from trades in fixed income securities.

- **Block Trades.** In an effort to achieve efficiencies in execution and reduce trading costs, we and our affiliates frequently aggregate securities transactions on behalf of a number of accounts at the same time, generally referred to as "*block trades*." When executing block trades, trades will be allocated among accounts using procedures that we consider fair and equitable. Participation of an account in the allocation is based on such considerations as investment objectives, guidelines and restrictions, availability of cash, amount of existing holdings (or substitutes) of the security in the accounts, an eligible account's proximity to our desired target allocation, exposure or weight compared to other eligible accounts, investment horizon and directed brokerage instructions, if applicable. Therefore, there are various reasons why we may decide not to include trades for certain strategies or accounts by us and our affiliates in a block trade for a given day or period. We may also execute securities transactions alongside or interspersed between block orders when we expect that such execution will not interfere with our ability to execute the order in a manner believed to be most favorable to our clients as a whole. Certain strategies we and our affiliates manage may employ different trading strategies and different traders in the same securities as other strategies we manage, which means they would not otherwise participate in a block trade and may use other broker-dealers and obtain different prices. We may exclude trades for accounts that direct brokerage or that are managed in part for tax considerations from block trades.

In some cases, various forms of pro rata allocation are used, and in other cases, random allocation processes are used. However, considerations such as lot size, relative liquidity of the position, existing or targeted account

weightings in particular securities, account size, cash availability, diversification requirements and investment objectives, restrictions and time horizons may result in more particularized allocations. In connection with multi-account purchase or sale programs, and in other circumstances, if practicable, if multiple trades for a specific security are made with the same broker in a single day, those securities are allocated to accounts based on a weighted average purchase or sale price.

- **Allocation of New Issues.** For new issues of fixed income securities, various forms of pro rata allocations among eligible accounts are generally used, and in other cases, other allocation processes that we consider appropriate, including random allocation processes are used. If a small amount of par value is allocated to us, we may allocate disproportionately, taking into consideration lot size, existing or targeted account weightings in particular securities and/or sectors, account size, diversification requirements and investment objectives/restrictions.
- **Client Directed Brokerage.** We may not be able to obtain volume discounts or negotiate price with a broker for accounts that direct brokerage. Because of that, such accounts may not get best execution. Accounts with directed brokerage instructions may be excluded from block trades and their directed orders will generally be executed following completion of any non-directed trades. As a result, performance results for these accounts may vary from other client accounts we manage in the same strategy. In some instances, the client may direct us to make all or substantially all of their account trades with specific broker-dealers (“*fully directed*” accounts). Fully directed account clients may be required to sign certain acknowledgments, including the fact that such direction regarding brokerage may compromise best execution and that the client’s account may trade after other accounts. Our fixed income strategies typically do not participate in directed brokerage.

**CROSS-TRADES.** We may seek to adjust or rebalance Account and Fund portfolios by effecting transactions between or among those portfolios, which are commonly referred to as “cross-trades,” (for example, by causing an Account to sell securities to one or more other Accounts). We will effect a cross-trade for an Account or Fund only if we believe that the transaction would be in the best interests of all participating clients, and the cross-trade would not be prohibited by the Account or Fund agreements, firm policy or applicable law. As of September

8, 2022, effecting cross trades in fixed income securities on behalf of a Mutual Fund is expressly prohibited. Nevertheless, for cross-trades involving equity securities or cross-trades of fixed income securities between Accounts and Funds, in effecting these cross-trades, we seek to improve the overall quality of the transaction for participating Accounts and Funds compared to what we believe could be achieved through a transaction with the market. Improvements could include reduced transaction costs, lower market impact or improved execution certainty and quality. All such cross-trades will be consistent with the investment objectives and policies of each Account or Fund involved in the trades in addition to our firm policies. However, cross-trades present an inherent potential conflict of interest because we or an affiliate represent the interests of both the selling party and the buying party in the same transaction. As a result, Account portfolios for whom we execute cross-trades bear the risk that one participating client in the cross-trade is treated more favorably by us than another participating client, particularly in cases where the participating client pays us a higher management or performance-based fee. Additionally, there is a risk that the price of a security or other instrument bought or sold through the cross-trade is not as favorable as it might have been had the trade been executed in the open market or that a participating client receives a security that is difficult to dispose of in a market transaction. This could happen, for example, if market quotations used to determine the cross-trade price do not reflect the price that would be obtained in an actual market transaction. To address these and other concerns with cross-trades, we require that cross-trades to be effected at the independent current market price.

For securities that trade on an exchange, the independent current market price is the last reported sales price on the principal exchange on which the security trades or, if no sales were reported on that day, the average of the highest current independent bid and lowest current independent offer for such security. For securities and other investments that do not trade on an exchange (excluding municipal securities), the independent current market price is determined by taking the average of the highest bid and the lowest offer obtained from three brokers. Municipal securities are priced at the price specified by the independent pricing vendor. In addition, fixed income securities for which there are no bid and ask prices available or where those prices are not considered to be reliable, are priced for cross trades using the price specified by the independent pricing vendor.

If a Mutual Fund is one of the participants, then the price and other terms would comply with additional requirements under Rule 17a-7 adopted under the Investment Company Act of 1940, as amended. The Accounts or Funds involved

in cross-trades will not pay any brokerage commissions or mark-ups in connection with the trades but may reimburse their custodian or broker-dealer for any customary costs and/or transfer fees. Effective September 8, 2022, no fixed-income securities, with the exception of municipal securities (or any other securities for which we can obtain readily available price quotations), are permitted in a cross-trade between Mutual Funds, or between a Mutual Fund and any other Account or Fund.

We prohibit broker-dealer interposed cross trades (i.e., the selling of a security to a broker-dealer followed by the repurchase of the security from the same broker-dealer for another client account).

We can effect securities transactions for a client with another party, which are commonly referred to as “agency cross-trades,” in accordance with Section 206(3) under the Advisers Act and Rule 206(3)-2. We receive compensation from the other party to execute the agency cross-trade. We have duties and obligations to both our client and the other party and a conflicting division of loyalty exists on our part in such transactions. At the time a client enters into an investment advisory agreement with us, the client will be asked whether it authorizes us to effect agency cross-trades on its behalf. If the client does authorize us to enter into agency cross-trades, the client may terminate such authorization at any time. In certain limited circumstances, we may sell securities to or purchase securities from our clients’ Account as principal, which are commonly referred to as “principal trades.” We will only engage in principal trades with client consent and if permitted by and in accordance with the applicable laws and the rules and regulations promulgated by the SEC.

**AFFILIATED BROKER-DEALERS.** Broker-dealers selected may include broker-dealers in which clients or their affiliates, or indirectly we or our affiliates, have some financial interest.

### **ITEM 13: REVIEW OF ACCOUNTS**

Our Accounts and Funds are divided among investment professionals according to the investment strategy of the portfolio. Portfolios are typically monitored and reviewed by the investment personnel who handle the strategy on an ongoing basis. The details of the monitoring vary based on the nature of the investment strategy. The Investment Risk & Quantitative Research Group, created in July, 2023, provides independent investment risk management oversight across multiple asset classes. This group supports cross-asset market risk management,

performance decomposition and attribution, security and portfolio analytics, derivatives risk management, and quantitative research to enhance investment risk management across multiple asset classes. It also provides the critical role of independent risk oversight across multiple asset classes to help better understand, identify, and mitigate risks for the benefit of our clients and to support our growth globally.

Separately, our investment operations and investment compliance functions perform account monitoring and review. Such review may include daily, monthly, or quarterly reviews of transactions and guidelines. In addition, our client services, investment compliance, compliance and legal groups periodically review client guidelines, discuss modifications to guidelines, and agree on guideline interpretation.

Our Portfolio Analytics Committee, a combined team including senior members of our portfolio analytics group, investment, legal, and compliance personnel, review quarterly and as needed, on an exception basis, the performance and risk analytics for each marketable security investment strategy. This Committee focuses on changes or shifts to investment style and anomalous results, as well as quantitative metrics, including performance, historical trends, and risk profiles. If necessary, the team holds additional formal or informal meetings with individual investment professionals to further review their respective strategy in order to gain a deeper understanding of the fundamental drivers of the performance metrics. Our Portfolio Analytics Committee also convenes for the purpose of approving changes to investment composites, benchmarks, portfolio management teams, and substantive changes which may have an impact on investment composites and maintaining compliance with GIPS Standards.

Separately, the Fixed Income Trading and Allocation Committee and the Equity Trading and Allocation Committee provide a formal periodic forum for the review of the equity and fixed income trading activities on behalf of client accounts. These Committees meet quarterly and more frequently as needed. Relevant topics may include broker concentrations; broker commissions; new approved brokers and suspension of brokers; directed brokerage; trade analysis; performance dispersion; allocation of new issues; trade exceptions, broker fails, best execution and the use of commissions for research. Committee members include certain portfolio managers, one or more representatives of the trading desks, and senior members of our operations, compliance, and legal departments. Equity trading and allocation issues are also monitored by independent consultant, Abel Noser.

In addition, investment activities for certain alternative investment strategies are reviewed quarterly and more frequently as needed. Participants in the review may include members of the investment committee for the strategy, senior portfolio management personnel from the investment strategy, members of legal and compliance teams and/or other personnel as appropriate.

In addition to our review of Accounts and Funds, we have implemented an enterprise-wide risk management process to assess, monitor, mitigate, and manage enterprise risk. We maintain an enterprise-wide risk matrix, and have identified over 250 business risks, which we monitor by reviewing and rating the probability and severity of the risk. We then identify steps that can be taken to mitigate the risks and review the implementation and effectiveness of the mitigation. We update our internal index of risks annually.

We employ a combination of decentralized and centralized risk controls. The fundamental risk analysis is decentralized, so that dedicated personnel are primarily responsible for addressing risks within their area of expertise. The key risk areas are also subject to the review of oversight committees. For example, a designated Cybersecurity team is directly responsible for cybersecurity risk, which is further reviewed by our Cybersecurity Committee. Similarly, the Portfolio Analytics Group monitors portfolio data including GIPS compliance, performance against benchmark, VaR, tracking error, and other metrics, subject to the review of the Portfolio Analytics Committee. Unresolved issues from these and our other oversight committees are escalated to the Enterprise Risk Management Committee. This committee consists of department heads throughout the firm and meets quarterly and as needed to review and address risks arising in any part of TCW's business. The key departments and groups provide reporting at least quarterly to the Enterprise Risk Management Committee. The Board of Directors of The TCW Group, Inc. has ultimate oversight over any significant business risks.

## **ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION**

**Referrals.** From time to time, we pay a non-affiliated third-party ("Solicitor") a fee or compensation for referral to us of a prospective client in a separate account or prospective investor in a private fund. The Solicitor is required to provide prospective clients and investors with certain information at the time of the referral. The Solicitor must clearly and prominently state that compensation was provided for the referral and identify the conflicts of interest associated with the referral relationship. In addition, the Solicitor must direct prospective clients and investors where they can find additional disclosures regarding the material terms



of any compensation arrangement, including a description of the compensation provided for the referral and a description of the conflicts of interest on the part of the Solicitor. We oversee these referral arrangements to ensure that they meet the requirements of Rule 206(4)-1 under the Investment Advisers Act of 1940.

At times we pay persons affiliated with us a fee or compensation for referring to us a prospective client in a separate account or a prospective investor in a private fund. Those persons are not required to provide the disclosures referenced above but are still subject to oversight by us. Such persons will disclose the nature of their affiliation with us at the time they solicit a prospective client or investor.

**Other Compensation.** We pay from time to time a portion of the cost of conferences, seminars, and other activities we attend that are sponsored by consultants.

## **ITEM 15: CUSTODY**

**Accounts.** Due to certain arrangements, we may be deemed to have “custody” of client accounts within the meaning of Rule 206(4)-2 under the Advisers Act because we may have access to or authority over client funds and securities for purposes other than issuing trading instructions. We do not serve in a custodian role for Funds registered under the 1940 Act. If we are deemed to have custody over an account, the custodian will send the client investor periodic account statements (generally on a quarterly basis) indicating the amounts of any funds or securities in the account as of the end of the statement period and any transactions in the account during the statement period. Clients should review these statements carefully. Additionally, a client should contact us immediately if he or she does not receive account statements from the custodian on at least a quarterly basis. As noted in Item 13, above, we may provide a client, separately, with reports or account statements providing information about the account. A client should compare these carefully to the account statements received from the custodian. If a client should discover any discrepancy between the account statements, please contact us immediately.

Except in very limited circumstances where we agree otherwise, we will not be considered to have custody of a client’s cash or assets for purposes of the custody rule specified above. Our authority under a client agreement to transfer cash or assets to a client’s own account(s) pre-authorized by the client with its custodian would not be regarded as custody. Also, our authority under a client agreement to

transfer cash or assets for settlement of transactions or to post collateral for transactions would not be regarded as custody. If, notwithstanding our absence of authority in our client agreement to make those transfers, the client's custody agreement with its broker or bank gives us greater authority that may result in custody, we may send a letter to the custodian disclaiming that additional authority, which we would regard as effective to limit our authority and to avoid our being deemed to have custody of a client's account assets for regulatory purposes.

## **ITEM 16: INVESTMENT DISCRETION**

We enter into written agreements for each Account and Fund that we manage that state our discretion to manage the Account or Fund. We typically have discretionary authority for the investments of these Accounts and Funds, subject to specific investment guidelines and restrictions of those agreements. We enter into these agreements after legal and compliance review on our behalf.

## **ITEM 17: VOTING CLIENT SECURITIES**

The following is a summary of our Global Portfolio Proxy Voting Policy and procedures (the "**Policy**"). A copy of our Policy is available on our website at [tcw.com](http://tcw.com). We will also provide a copy our Policy to any client or prospective client upon request. Engagement and active ownership are integral components of our research and investment processes, as we seek to deliver on our clients' financial objectives. We are guided by our role as fiduciaries and have implemented our active ownership practices in pursuit of strong financial performance. This Policy applies to all discretionary accounts over which we have proxy voting responsibility or an obligation to provide proxy voting guidance with respect to the holdings we advise.

### **Proxy Voting Procedures**

We will make every reasonable effort to execute on proxy votes on behalf of our clients prior to the applicable deadlines. However, we often rely on third parties, including custodians and clients, for the timely provision of proxy ballots. We may be unable to execute on proxy votes if we do not receive requisite materials with sufficient time to review and process them. For proxies of non-U.S. companies, although it may be both difficult and costly to vote proxies, we make every reasonable effort to vote such proxies.

**Proxy Committee.** In order to carry out its fiduciary responsibilities in the voting of proxies for our clients, we have established a proxy voting committee (the “**Proxy Committee**”). The Proxy Committee generally meets quarterly (or at such other frequency as determined by the Proxy Committee), and its duties include establishing and maintaining the Policy, overseeing the internal proxy voting process, and reviewing proxy voting proposals and issues that may not be covered by the Policy.

**Proxy Voting Services.** We also use outside proxy voting services (each an “**Outside Service**”) to help manage the proxy voting process. An Outside Service facilitates our voting according to the Policy (or, if applicable, according to guidelines submitted by our clients) by providing proxy research, an enhanced voting technology solution, and record keeping and reporting system(s). To supplement our own research and analysis in determining how best to vote a particular proxy proposal, we may utilize research, analysis or recommendations provided by the proxy voting service on a case-by-case basis. We do not as a policy follow the assessments or recommendations provided by the proxy voting service without our own determination and review. Under specified circumstances described below involving potential conflicts of interest, an Outside Service may also be requested to help decide certain proxy votes. In those instances, the Proxy Committee shall review and evaluate the voting recommendations of such Outside Service to ensure that recommendations are consistent with our clients’ best interests.

**Sub-Adviser.** If we have retained the services of a Sub-adviser to provide day-to-day portfolio management for a portfolio, we may delegate proxy voting authority to the Sub-Adviser; provided that the Sub-Adviser either (1) follows our Policy; or (2) has demonstrated that its proxy voting policies and procedures are in the best interests of our clients and appear to comply with governing regulations. We also shall be provided the opportunity to review a Sub-Adviser’s proxy voting policies and procedures as deemed necessary or appropriate by us.

**Conflicts of Interest.** In the event a potential conflict of interest arises in the context of voting proxies for our clients, we will cast our votes according to the Policy or any applicable guidelines provided by our clients. In cases where a conflict of interest exists and there is no predetermined vote, the Proxy Committee will vote the proposals in a manner consistent with established conflict of interest procedures.

**Proxy Voting Information and Recordkeeping.** Upon request, we provide proxy voting records to our clients (including, among others, the way we have voted) on our website in accordance with applicable law. In general, we will comply with voting transparency requirements applicable to asset managers provided by the applicable law. We or an Outside Service will keep records of the following items: (i) the Policy and any other proxy voting procedures; (ii) proxy statements received regarding client securities (unless such statements are available on the SEC's Electronic Data Gathering, Analysis, and Retrieval (EDGAR) system); (iii) records of votes cast on behalf of clients (if maintained by an Outside Service, that Outside Service will provide copies of those records promptly upon request); (iv) records of written requests for proxy voting information and our response; and (v) any documents prepared by us that were material to making a decision how to vote, or that memorialized the basis for the decision. Additionally, we or an Outside Service will maintain any documentation related to an identified material conflict of interest.

We or an Outside Service will maintain these records in an easily accessible place for at least five years from the end of the fiscal year during which the last entry was made on such record. For the most recent two years, we or an Outside Service will store such records at our or its principal office.

## **CLASS ACTION NOTICES AND PROOFS OF CLAIM**

From time to time, securities that our clients have owned are the subject of class action lawsuits. Generally, holders of securities within a given class period are entitled to participate in the recovery or settlement in a class action lawsuit by filing a proof of claim. All class members normally are bound by a court-approved settlement or judgment in a class action unless they have filed with the court or claims administrator a timely notice choosing to opt-out of the settlement.

We view the decision to file of a proof of claim in class actions as a corporate action that normally is to be performed by the custodian for our client. In addition, the decision to elect to opt out of a settlement is an individual decision to be made by our client.

Normally, custodians will receive notices of rights to participate in, or opt out of class action settlements. We sometimes receive such notices and have adopted procedures to assist our clients in the performance of class action processing functions. Our actions and responsibilities with respect to class action matters will depend on the role we have with respect to the client.



**ITEM 18: FINANCIAL INFORMATION**

Not applicable.

## ATTACHMENT 1 MATERIAL CHANGES

We have made the following material changes to this Brochure since our annual Amendment filed March 29, 2023.

### ITEM 1: COVER PAGE

We updated the address of our primary office.

### ITEM 4: ADVISORY BUSINESS

**The Services We Offer.** We noted we provide investment management services through ETFs.

**Assets Under Management.** We have updated our assets under management to December 31, 2023. At that time, we had \$39,896,609,596 in discretionary assets under management and \$0 in non-discretionary assets under management.

### ITEM 5: FEES AND COMPENSATION

**TCW Funds, Inc.** We removed two mutual funds we no longer offer, TCW Emerging markets Multi-Asset Opportunities Fund, and TCW Developing Markets Equity Fund.

**TCW ETF TRUST.** We have disclosed the annual advisory fees for our ETFs.

**UCITS.** We added the TCW Global Multi Asset Opportunities Fund and the range for its annual fee.

**Separate Accounts. Fixed Income Strategies.** We updated the fee schedules for the Corporate Bonds and Securitized Opportunities strategies. We renamed the ESG Securitized to Sustainable Securitized. **Equities.** We removed these strategies that we no longer offer: Global Healthcare; Q-Alpha U.S. Equity; Relative Value Dividend Appreciation; U.S. REIT Total Return; and the Shariah compliant overlay for Global REIT. We renamed Global Premier ESG Equities to Global Premier Sustainable Equities. **International Strategies.** We removed these strategies that we no longer offer: Concentrated Emerging Markets Equity; Developing Markets Equity; EM ECO Centric Opportunities; and Worldwide Opportunities Strategy.

**Other Expenses in Connection with Accounts and Funds.** We note that expenses incurred by the ETFs are reflected in the contractual advisory fee. **Private Funds.** We do not offer private funds and removed language regarding private funds.

### ITEM 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

We removed references to alternative investment strategies as we currently do not offer them. We updated the explanation of our allocation process to align with our disclosure of this process under Item 12.

**ITEM 7: TYPES OF CLIENTS**

**TCW ETF Trust.** We have noted the ETFs do not have a minimum investment requirement.

**Separate Accounts. Equities.** We removed these strategies that we no longer offer: Global Healthcare; Q-Alpha U.S. Equity; Relative Value Dividend Appreciation; U.S. REIT Total Return; and the Shariah compliant overlay for Global REIT. We renamed Global Premier ESG Equities to Global Premier Sustainable Equities. **International Strategies.** We removed these strategies that we no longer offer: Concentrated Emerging Markets Equity; Developing Markets Equity; EM ECO Centric Opportunities; and Worldwide Opportunities Strategy.

**ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS**

**Separate Accounts. Fixed Income Strategies.** We have renamed the ESG Securitized strategy as Sustainable Securitized. We have revised our ESG and sustainable considerations for emerging markets fixed income. **Equities.** We have removed these strategies that we no longer offer: Global Healthcare; Q-Alpha U.S. Equity; Relative Value Dividend Appreciation; and U.S. REIT Total Return. We have removed the option for a Shariah compliant overlay for Global REIT. We renamed Global Premier ESG Equities to Global Premier Sustainable Equities. **International Strategies.** We have removed these strategies that we no longer offer: Concentrated Emerging Markets Equity; Developing Markets Equity; EM ECO Centric Opportunities; and Worldwide Opportunities Strategy. **Risks.** We have added cybersecurity risk to our strategies. We clarified that our ESG and sustainable investing risk applies to ESG and sustainable investment strategies. We added ETC to ETF and ETN risk as a relevant investment instrument.

**ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

We have removed the following investment advisors which have withdrawn their SEC registrations: TCW-WLA JV Venture LLC; and TCW Special Situations.

**SPAC.** We removed reference to this dissolved entity.

**ITEM 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING**

**Summary of Our Code of Ethics.** We noted additional prohibitions for personal investments: initial coin offerings and single stock ETFs; and short selling any ETF that is TCW advised, sub-Advised, or otherwise managed by TCW.

**ITEM 12: BROKERAGE PRACTICES**

**Block Trades.** We updated our description of block trades to include our additional reasons certain strategies or accounts would not participate in a block trade.



**Cross-Trades.** We have specified that the independent pricing vendor prices fixed income securities if there are not bid and ask prices available or in the event those prices are not considered reliable.

**Commission Rates.** We have noted potential factors affecting our guidelines for commission rates paid to broker-dealers for equities.

**Women-Owned/Minority-Owned Brokers.** We removed this language as our overall duty is to seek best execution.

#### **ITEM 13: REVIEW OF ACCOUNTS**

We have detailed the Investment Risk & Quantitative Research Group and its role in client account reviews.

#### **ITEM 15: CUSTODY**

We have noted that we do not serve in a custodian role for Funds registered under the 1940 Act.

**Private Funds.** We do not have private funds and removed language regarding private funds.



TCW

Section III Form ADV, Part 2B (the “Brochure Supplement”)

October 22, 2024

# Table of Contents

Strategy	Portfolio Manager(s)
TCW Balanced Managed Accounts	Brandon D. Bond, CFA . . . . . 2 Bo Fifer, CFA. . . . . 6 Stephen M. Kane, CFA . . . . . 9 Brian McNamara . . . . . 10
TCW Concentrated Core (Large Cap Growth)	Brandon D. Bond, CFA . . . . . 2 Bo Fifer, CFA. . . . . 6 Brian McNamara . . . . . 10
TCW New America Premier Equities Managed Accounts	David Epstein, CFA. . . . . 4 Eli Horton. . . . . 7
TCW Relative Value Balanced Managed Accounts	Iman Brivanlou, PhD . . . . . 3 Diane E. Jaffee, CFA. . . . . 8 Stephen M. Kane, CFA . . . . . 9 Matthew J. Spahn . . . . . 11
TCW Relative Value Large Cap	Iman Brivanlou, PhD . . . . . 3 Diane E. Jaffee, CFA. . . . . 8 Matthew J. Spahn . . . . . 11
TCW Relative Value Mid Cap	Iman Brivanlou, PhD . . . . . 3 Mona E. Eraiba . . . . . 5 Diane E. Jaffee, CFA . . . . . 8

**Item 1: Cover Page**

October 22, 2024

**Brandon D. Bond, CFA**

TCW Investment Management Company LLC (each called “Us”)  
 515 South Flower Street | Los Angeles, California 90071 | 213 244 0000 | www.tcw.com

This Brochure Supplement provides information about Brandon D. Bond that supplements our brochure(s). You should have received a copy of that brochure from each of us that manages your account(s). Please contact us at [advpartII@tcw.com](mailto:advpartII@tcw.com) if you did not receive our brochure(s) or if you have any questions about the contents of this supplement.

**Item 2: Educational Background And Business Experience**

Brandon Bond is a Portfolio Manager for the Concentrated Core investment strategy, including the TCW Select Equities Fund. Previously, he was a Senior Analyst for the strategy with generalist research responsibilities. Prior to joining the Concentrated Core group in 2009, he was a Senior Equity Analyst on the Equity Research team covering the financial services sector. He first joined TCW in 2003 as part of the firm’s Summer Associate Program. He rejoined the firm full-time in 2004 after completing his MBA in Finance and Accounting from the UCLA Anderson School of Management where he was a Student Investment Fund Fellow and Edward W. Carter Fellow. Prior to business school, he worked as a consultant in Accenture’s Electronics and High-Tech Practice. Mr. Bond graduated Summa Cum Laude from Brigham Young University with a BA in Marketing Communications and minors in Business Management and Japanese. Mr. Bond is a Chartered Financial Analyst charterholder (“CFA”). The prerequisites/experience for a CFA is either: (i) undergraduate degree and four years of professional experience involving investment decision-making, or (ii) four years qualified work experience (full time, but not necessarily investment related). Charterholders must also complete 250 hours of self-study for each of three levels and pass an exam for each level.

Date of birth: 1975.

**Item 3: Disciplinary Information**

There are no disciplinary items to report.

**Item 4: Other Business Activities**

None.

**Item 5: Additional Compensation**

We compensate Mr. Bond for his investment advisory services, a portion of which may be based on the assets under management of the strategies he manages. Those assets can change with (i) fluctuations in their market value, (ii) client contributions and withdrawals, and (iii) new accounts.

**Item 6: Supervision**

Mr. Bond is directly supervised by Michael Reilly, Chief Investment Officer – U.S. Equities, who may be contacted at (213) 244-0000. Mr. Bond’s investment activities are normally reviewed at our quarterly Portfolio Analytics Committee meeting by a combined team led by members of our portfolio analytics and risk departments. This Committee, comprised of members of our executive management, compliance, legal, portfolio analytics, and risk teams, reviews investment activities and portfolio analytics with a focus on changes or shifts to investment style, as well as quantitative metrics, including performance, historical trends, and risk profiles. Additionally, some members of this Committee also meet independently with Mr. Bond, normally on a quarterly basis, to provide him with a comprehensive look at the performance and statistical trends of his investment strategies as well as how those strategies compare to their peer group. Separately, our compliance and risk functions perform monitoring and review, including daily transaction reviews for marketable securities strategies.

**Item 1: Cover Page**

October 22, 2024

**Iman H. Brivanlou, PhD**

TCW Investment Management Company LLC (each called “Us”)  
 515 South Flower Street | Los Angeles, California 90071 | 213 244 0000 | www.tcw.com

This Brochure Supplement provides information about Iman H. Brivanlou that supplements our brochure(s). You should have received a copy of that brochure from each of us that manages your account(s). Please contact us at advpartII@tcw.com if you did not receive our brochure(s) or if you have any questions about the contents of this supplement.

**Item 2: Educational Background And Business Experience**

Dr. Iman Brivanlou heads TCW’s Income Equities group. He is a Portfolio Manager of the Relative Value, High Dividend, Real Estate, Low Volatility and Market Neutral equity strategies. He is also the chairman of TCW’s Proxy Committee. He joined TCW in 2006 as an Analyst in the Equity Research group. His research coverage has spanned the real estate, insurance, business services, transportation, and consumer staples sectors. Prior to TCW, he developed and tested quantitative models aimed at predicting the sizes of catalyst “events” using option pricing for Kayne Anderson, a hedge fund in Century City. He is involved in a number of philanthropic activities and serves on the L.A. Opera Board of Directors, a position that he has held since 2015. Dr. Brivanlou was a Howard Hughes post-doctoral fellow in Molecular Neurobiology at the Salk Institute in La Jolla. He holds a BS in Physics from Massachusetts Institute of Technology (MIT), a PhD in Computational Neuroscience from Harvard University, and an MBA in Finance and Strategy from the UCLA Anderson School of Management.

Date of birth: 1971.

**Item 3: Disciplinary Information**

There are no disciplinary items to report.

**Item 4: Other Business Activities**

None.

**Item 5: Additional Compensation**

We compensate Dr. Brivanlou for his investment advisory services, a portion of which is based on the assets under management of the strategies he manages. Those assets can change with (i) fluctuations in their market value, (ii) client contributions and withdrawals, and (iii) new accounts.

**Item 6: Supervision**

Dr. Brivanlou is directly supervised by Michael Reilly, Chief Investment Officer – U.S. Equities, who may be contacted at (213) 244-0000. Dr. Brivanlou’s investment activities are normally reviewed at our quarterly Portfolio Analytics Committee meeting by a combined team led by members of our portfolio analytics and risk departments. This Committee, comprised of members of our executive management, compliance, legal, portfolio analytics, and risk teams, reviews investment activities and portfolio analytics with a focus on changes or shifts to investment style, as well as quantitative metrics, including performance, historical trends, and risk profiles. Additionally, some members of this Committee also meet independently with Dr. Brivanlou, normally on a quarterly basis, to provide him with a comprehensive look at the performance and statistical trends of his investment strategies as well as how those strategies compare to their peer group. Separately, our compliance and risk functions perform monitoring and review, including daily transaction reviews for marketable securities strategies.

**Item 1: Cover Page**

October 1, 2024

**David Epstein, CFA**

TCW Investment Management Company LLC (each called "Us")  
 515 South Flower Street | Los Angeles, California 90071 | 213 244 0000 | www.tcw.com

This Brochure Supplement provides information about David Epstein that supplements our brochure(s). You should have received a copy of that brochure from each of us that manages your account(s). Please contact us at advpartIII@tcw.com if you did not receive our brochure(s) or if you have any questions about the contents of this supplement.

**Item 2: Educational Background And Business Experience**

David Epstein is a Portfolio Manager and Senior Equity Analyst. Mr. Epstein is Co-Portfolio Manager of the TCW New America Premier Equities strategy, TCW Compounders ETF (ticker: GRW), and TCW Global Premier Sustainable Equities Fund. His analyst coverage responsibilities include consumer staples, transports, homebuilders/household durables, and business and consumer services. Prior to joining TCW, Mr. Epstein was an Associate Director and Equity Analyst at First Republic Investment Management from 2012 to 2014. While attending the UCLA Anderson School of Management, Mr. Epstein interned with TCW's Equity Research group. Prior to earning his MBA, Mr. Epstein worked as a Research Associate at Wedbush Securities from 2007 to 2010 and as a Research Analyst at William O'Neil & Co. from 2006 to 2007. Mr. Epstein holds a BS in Business Administration from the University of Redlands and an MBA, with an emphasis in Investment Management, from the UCLA Anderson School of Management. Mr. Epstein is a Chartered Financial Analyst charterholder ("CFA"). The prerequisites/experience for a CFA is either: (i) undergraduate degree and four years of professional experience involving investment decision making, or (ii) four years qualified work experience (full time, but not necessarily investment related). Charterholders must also complete 250 hours of self-study for each of three levels and pass an exam for each level.

Date of birth: 1984.

**Item 3: Disciplinary Information**

There are no disciplinary items to report.

**Item 4: Other Business Activities**

None.

**Item 5: Additional Compensation**

We compensate Mr. Epstein for his investment advisory services, a portion of which may be based on the assets under management of the strategies he manages. Those assets can change with (i) fluctuations in their market value, (ii) client contributions and withdrawals, and (iii) new accounts.

**Item 6: Supervision**

Mr. Epstein is directly supervised by Michael Reilly, Group Managing Director, who may be contacted at (213) 244-0000. Mr. Epstein's investment activities are normally reviewed at our quarterly Portfolio Analytics Committee meeting by a combined team led by members of our portfolio analytics and risk departments. This Committee, comprised of members of our executive management, compliance, legal, portfolio analytics, and risk teams, reviews investment activities and portfolio analytics with a focus on changes or shifts to investment style, as well as quantitative metrics, including performance, historical trends, and risk profiles. Additionally, some members of this Committee also meet independently with Mr. Epstein, normally on a quarterly basis, to provide him with a comprehensive look at the performance and statistical trends of his investment strategies as well as how those strategies compare to their peer group. Separately, our compliance and risk functions perform monitoring and review, including daily transaction reviews for marketable securities strategies.

**Item 1: Cover Page**

December 1, 2023

**Mona E. Eraiba**

TCW Investment Management Company LLC (each called “Us”)  
1251 Avenue of the Americas | Suite 4700 | New York, New York 10020 | 212 771 0000 | www.tcw.com

This Brochure Supplement provides information about Mona E. Eraiba that supplements our brochure(s). You should have received a copy of that brochure from each of us that manages your account(s). Please contact us at [advpartII@tcw.com](mailto:advpartII@tcw.com) if you did not receive our brochure(s) or if you have any questions about the contents of this supplement.

**Item 2: Educational Background And Business Experience**

Mona Eraiba, Senior Analyst, is responsible for the communication services and health care services sectors. In 2020 and 2022 (tied with Bo Fifer), Ms. Eraiba earned the group’s highest merit bonus based on stock selection. Ms. Eraiba is Co-Portfolio Manager of the TCW Relative Value Mid Cap strategy and fund. Previously, she was a Senior Analyst covering the technology and health care sectors for the Value Opportunities team. She has more than 30 years of investment experience. Prior to joining TCW in 2006, she spent 20 years as a sell-side equity research analyst for a variety of firms including Lehman Brothers, Salomon Brothers, and Gruntal & Company. During her tenure at Rosetta Group Research LLC, Ms. Eraiba served as a general partner and portfolio manager for Rosetta Management. She began her career as an electronic systems engineer after earning her BSEE in Electrical Engineering from Washington University in St. Louis, Missouri. Subsequently, she earned an MBA in Finance from Columbia University’s Graduate School of Business.

Date of birth: 1951.

**Item 3: Disciplinary Information**

There are no disciplinary items to report.

**Item 4: Other Business Activities**

None.

**Item 5: Additional Compensation**

We compensate Ms. Eraiba for her investment advisory services, a portion of which may be based on the assets under management of the strategies she manages. Those assets can change with (i) fluctuations in their market value, (ii) client contributions and withdrawals, and (iii) new accounts.

**Item 6: Supervision**

Ms. Eraiba is directly supervised by Diane Jaffee, Group Managing Director, who may be contacted at (212) 771-4000. Ms. Eraiba’s investment activities are normally reviewed at our quarterly Portfolio Analytics Committee meeting by a combined team led by members of our portfolio analytics and risk departments. This Committee, comprised of members of our executive management, compliance, legal, portfolio analytics, and risk teams, reviews investment activities and portfolio analytics with a focus on changes or shifts to investment style, as well as quantitative metrics, including performance, historical trends, and risk profiles. Additionally, some members of this Committee also meet independently with Ms. Eraiba, normally on a quarterly basis, to provide her with a comprehensive look at the performance and statistical trends of her investment strategies as well as how those strategies compare to their peer group. Separately, our compliance and risk functions perform monitoring and review, including daily transaction reviews for marketable securities strategies.

**Item 1: Cover Page**

October 22, 2024

**Bo Fifer, CFA**

TCW Investment Management Company LLC (each called “Us”)  
1251 Avenue of the Americas | Suite 4700 | New York, New York 10020 | 212 771 0000 | www.tcw.com

This Brochure Supplement provides information about Bo Fifer that supplements our brochure(s). You should have received a copy of that brochure from each of us that manages your account(s). Please contact us at advpartII@tcw.com if you did not receive our brochure(s) or if you have any questions about the contents of this supplement.

**Item 2: Educational Background And Business Experience**

Bo Fifer is Lead Portfolio Manager of TCW Global Artificial Intelligence Equity as well as other Thematic Equity products. He is also a Portfolio Manager for the TCW Concentrated Core strategy, which includes the TCW Select Equities Fund. Mr. Fifer previously was a Portfolio Manager of the TCW Relative Value Dividend Appreciation strategy and fund from 2012-2023 and was the Senior Analyst responsible for the information technology sector and the drug and device industries of health care for the Relative Value team. He has 30 years of investment experience, including 22 years at TCW. He previously spent nearly seven years as a sell-side Equity Research Analyst covering growth sectors including the telecommunications services, equipment, and software industries. Mr. Fifer holds a BS in Civil Engineering from Bucknell University. Mr. Fifer is a Chartered Financial Analyst charterholder (“CFA”). The prerequisites/experience for a CFA is either: (i) undergraduate degree and four years of professional experience involving investment decision making, or (ii) four years qualified work experience (full time, but not necessarily investment related). Charterholders must also complete 250 hours of self-study for each of three levels and pass an exam for each level.

Date of birth: 1972.

**Item 3: Disciplinary Information**

There are no disciplinary items to report.

**Item 4: Other Business Activities**

None.

**Item 5: Additional Compensation**

We compensate Mr. Fifer for his investment advisory services, a portion of which may be based on the assets under management of the strategies he manages. Those assets can change with (i) fluctuations in their market value, (ii) client contributions and withdrawals, and (iii) new accounts.

**Item 6: Supervision**

Mr. Fifer is directly supervised by Michael Reilly, Chief Investment Officer – U.S. Equities, who may be contacted at (213) 244-0000. Mr. Fifer’s investment activities are normally reviewed at our quarterly Portfolio Analytics Committee meeting by a combined team led by members of our portfolio analytics and risk departments. This Committee, comprised of members of our executive management, compliance, legal, portfolio analytics, and risk teams, reviews investment activities and portfolio analytics with a focus on changes or shifts to investment style, as well as quantitative metrics, including performance, historical trends, and risk profiles. Additionally, some members of this Committee also meet independently with Mr. Fifer, normally on a quarterly basis, to provide him with a comprehensive look at the performance and statistical trends of his investment strategies as well as how those strategies compare to their peer group. Separately, our compliance and risk functions perform monitoring and review, including daily transaction reviews for marketable securities strategies.

**Item 1: Cover Page**

December 1, 2023

**Eli Horton**

TCW Investment Management Company LLC (each called “Us”)  
 515 South Flower Street | Los Angeles, California 90071 | 213 244 0000 | www.tcw.com

This Brochure Supplement provides information about Eli Horton that supplements our brochure(s). You should have received a copy of that brochure from each of us that manages your account(s). Please contact us at [advpartII@tcw.com](mailto:advpartII@tcw.com) if you did not receive our brochure(s) or if you have any questions about the contents of this supplement.

**Item 2: Educational Background And Business Experience**

Eli Horton leads the firm’s active ETF investments. His investment career has spanned both public and private markets across a wide range of industries. Mr. Horton joined TCW as part of TCW’s acquisition of Engine No. 1. Previously, Mr. Horton was a Managing Director at Maverick Capital, a long-short investment firm where he invested in industrials and a broad range of industries. Previously, he was a member of the Technology and Retail private equity teams at KKR. Mr. Horton began his career in the Technology, Media & Telecom group within the investment banking division of Goldman Sachs. Mr. Horton received a Master of Accountancy and a BS in Accounting from the Marriott School of Business at Brigham Young University.

Date of birth: 1983.

**Item 3: Disciplinary Information**

There are no disciplinary items to report.

**Item 4: Other Business Activities**

None.

**Item 5: Additional Compensation**

We compensate Mr. Horton for his investment advisory services, a portion of which may be based on the assets under management of the strategies he manages. Those assets can change with (i) fluctuations in their market value, (ii) client contributions and withdrawals, and (iii) new accounts.

**Item 6: Supervision**

Mr. Horton is directly supervised by Kathryn Koch, President and Chief Executive Officer, who may be contacted at (213) 244-0000. Mr. Horton’s investment activities are normally reviewed at our quarterly Portfolio Analytics Committee meeting by a combined team led by members of our portfolio analytics and risk departments. This Committee, comprised of members of our executive management, compliance, legal, portfolio analytics, and risk teams, reviews investment activities and portfolio analytics with a focus on changes or shifts to investment style, as well as quantitative metrics, including performance, historical trends, and risk profiles. Additionally, some members of this Committee also meet independently with Mr. Horton, normally on a quarterly basis, to provide him with a comprehensive look at the performance and statistical trends of his investment strategies as well as how those strategies compare to their peer group. Separately, our compliance and risk functions perform monitoring and review, including daily transaction reviews for marketable securities strategies.



**Item 1: Cover Page**

December 1, 2023

**Diane E. Jaffee, CFA**

TCW Investment Management Company LLC (each called "Us")

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This Brochure Supplement provides information about Diane E. Jaffee that supplements our brochure(s). You should have received a copy of that brochure from each of us that manages your account(s). Please contact us at [advpartII@tcw.com](mailto:advpartII@tcw.com) if you did not receive our brochure(s) or if you have any questions about the contents of this supplement. Additional information about Ms. Jaffee is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Item 2: Educational Background And Business Experience**

Diane Jaffee is the Senior Portfolio Manager for the TCW Relative Value Large Cap and TCW Relative Value Mid Cap strategies and funds. She joined TCW through the acquisition of SG Cowen Asset Management in 2001. She had been a Senior Portfolio Manager at Cowen Asset Management since 1995 and continues in that role at TCW. She has over 40 years of investment experience. Before joining Cowen, she was Vice President and Portfolio Manager at Kidder, Peabody & Co from 1986 to 1995. Prior to that, she was Vice President at Lehman Management Company from 1985 to 1986 and an Equity Analyst with Prudential Insurance from 1982 to 1985. In 2007, Ms. Jaffee was named the Separately Managed Accounts Award winner in the Large Cap Equity category by Standard & Poor's and its award partners Prima Capital and Investment Advisor magazine. The TCW Relative Value Large Cap and Mid Cap mutual funds have been each awarded Wall Street Journal's "Category Kings" in their respective categories, multiple times in 2012. In 2013, the TCW Relative Value Large Cap mutual fund was ranked #1 fund for the first quarter and the #6 fund for the one-year period ending March 31, 2013 among Large Cap Value peers. Ms. Jaffee holds a BA in Economics from Wellesley College (1982). She has completed post-graduate work in Finance and Accounting at Rutgers University Graduate School of Management and is a CFA charterholder. Ms. Jaffee is also a member of CFA Society New York, the Economic Club of New York, and the CFA Society. Ms. Jaffee is a Chartered Financial Analyst charterholder ("CFA"). The prerequisites/experience for a CFA is either: (i) undergraduate degree and four years of professional experience involving investment decision-making, or (ii) four years qualified work experience (full time, but not necessarily investment related). Charterholders must also complete 250 hours of self-study for each of three levels and pass an exam for each level.

Date of birth: 1960.

**Item 3: Disciplinary Information**

There are no disciplinary items to report.

**Item 4: Other Business Activities**

Ms. Jaffee is a registered representative of TCW Funds Distributors ("TFD"), a registered broker-dealer. TFD is our affiliate that acts as distributor for our sponsored mutual funds and private investment funds.

**Item 5: Additional Compensation**

We compensate Ms. Jaffee for her investment advisory services, a portion of which is based on the assets under management of the strategies she manages. Those assets can change with (i) fluctuations in their market value, (ii) client contributions and withdrawals, and (iii) new accounts.

**Item 6: Supervision**

Ms. Jaffee is directly supervised by Kathryn Koch, President and Chief Executive Officer, who may be contacted at (213) 244-0000. Ms. Jaffee's investment activities are normally reviewed at our quarterly Portfolio Analytics Committee meeting by a combined team led by members of our portfolio analytics and risk departments. This Committee, comprised of members of our executive management, compliance, legal, portfolio analytics, and risk teams, reviews investment activities and portfolio analytics with a focus on changes or shifts to investment style, as well as quantitative metrics, including performance, historical trends, and risk profiles. Additionally, some members of this Committee also meet independently with Ms. Jaffee, normally on a quarterly basis, to provide him with a comprehensive look at the performance and statistical trends of his investment strategies as well as how those strategies compare to their peer group. Separately, our compliance and risk functions perform monitoring and review, including daily transaction reviews for marketable securities strategies.

**Item 1: Cover Page**

January 1, 2024

**Stephen M. Kane, CFA**

TCW Investment Management Company LLC (each called "Us")  
 515 South Flower Street | Los Angeles, California 90071 | 213 244 0000 | www.tcw.com

This Brochure Supplement provides information about Stephen M. Kane that supplements our brochure(s). You should have received a copy of that brochure from each of us that manages your account(s). Please contact us at [advpartII@tcw.com](mailto:advpartII@tcw.com) if you did not receive our brochure(s) or if you have any questions about the contents of this supplement. Additional information about Mr. Kane is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Item 2: Educational Background And Business Experience**

Stephen Kane is a Generalist Portfolio Manager in TCW's Fixed Income Group, a team that oversees over \$225 billion in fixed income assets including the nearly \$90 billion MetWest Total Return Bond Fund, one of the largest actively managed bond funds in the world. Under his co-leadership, the MetWest investment team was recognized as Morningstar's Fixed Income Manager of the Year for 2005. Mr. Kane has led the effort to launch a number of fixed income products, including AlphaTrak, Long Duration/LDI, Unconstrained, and Global. Prior to establishing MetWest, he was a fixed income portfolio manager at Hotchkis and Wiley. He also served as a Vice President at PIMCO. Mr. Kane earned a BS in Business from the University of California, Berkeley and an MBA from the University of Chicago Booth School of Business. Mr. Kane is a Chartered Financial Analyst charterholder ("CFA"). The prerequisites/experience for a CFA is either: (i) undergraduate degree and four years of professional experience involving investment decision-making, or (ii) four years qualified work experience (full time, but not necessarily investment related). Charterholders must also complete 250 hours of self-study for each of three levels and pass an exam for each level.

Date of birth: 1962.

**Item 3: Disciplinary Information**

There are no disciplinary items to report.

**Item 4: Other Business Activities**

Our registered advisers, Metropolitan West Asset Management Company, LLC, and TCW Asset Management Company LLC are also registered as Commodity Trading Advisors in connection with investment activity that is regulated by the Commodity Futures Trading Commission. Mr. Kane is registered as an associated person of these Commodity Trading Advisors.

**Item 5: Additional Compensation**

We compensate Mr. Kane for his investment advisory services, a portion of which may be based on the assets under management of the strategies he manages. Those assets can change with (i) fluctuations in their market value, (ii) client contributions and withdrawals, and (iii) new accounts.

**Item 6: Supervision**

Mr. Kane is directly supervised by Kathryn Koch, President and Chief Executive Officer, who may be contacted at (213) 244-0000. Mr. Kane's investment activities are normally reviewed at our quarterly Portfolio Analytics Committee meeting by a combined team led by members of our portfolio analytics and risk departments. This Committee, comprised of members of our executive management, compliance, legal, portfolio analytics, and risk teams, reviews investment activities and portfolio analytics with a focus on changes or shifts to investment style, as well as quantitative metrics, including performance, historical trends, and risk profiles. Additionally, some members of this Committee also meet independently with Mr. Kane, normally on a quarterly basis, to provide him with a comprehensive look at the performance and statistical trends of his investment strategies as well as how those strategies compare to their peer group. Separately, our compliance and risk functions perform monitoring and review, including daily transaction reviews for marketable securities strategies.

**Item 1: Cover Page**

October 22, 2024

**Brian McNamara**

TCW Investment Management Company LLC (each called “Us”)  
 515 South Flower Street | Los Angeles, California 90071 | 213 244 0000 | www.tcw.com

This Brochure Supplement provides information about Brian McNamara that supplements our brochure(s). You should have received a copy of that brochure from each of us that manages your account(s). Please contact us at [advpartII@tcw.com](mailto:advpartII@tcw.com) if you did not receive our brochure(s) or if you have any questions about the contents of this supplement. Additional information about Mr. McNamara is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Item 2: Educational Background And Business Experience**

Brian McNamara is a Portfolio Manager for the Concentrated Core investment strategy, which includes the TCW Select Equities Fund. He joined TCW in 2012, initially serving as an Analyst and Portfolio Specialist for these strategies. Prior to TCW, his investment experience included over 16 years at JPMorgan, Deutsche Bank and Jefferies as an Investment Banker, Analyst, and Regional Head of Institutional Equity Sales. Mr. McNamara received his BA from the University of California, Los Angeles (UCLA) and his MBA from the UCLA Anderson School of Management. Additionally, he holds Series 4, 7, 24, and 63 FINRA licenses.

Date of birth: 1970.

**Item 3: Disciplinary Information**

There are no disciplinary items to report.

**Item 4: Other Business Activities**

None.

**Item 5: Additional Compensation**

We compensate Mr. McNamara for his investment advisory services, a portion of which may be based on the assets under management of the strategies he manages. Those assets can change with (i) fluctuations in their market value, (ii) client contributions and withdrawals, and (iii) new accounts.

**Item 6: Supervision**

Mr. McNamara is directly supervised by Brandon B. Bond, Managing Director, who may be contacted at (213) 244-0000. Mr. McNamara’s investment activities are normally reviewed at our quarterly Portfolio Analytics Committee meeting by a combined team led by members of our portfolio analytics and risk departments. This Committee, comprised of members of our executive management, compliance, legal, portfolio analytics, and risk teams, reviews investment activities and portfolio analytics with a focus on changes or shifts to investment style, as well as quantitative metrics, including performance, historical trends, and risk profiles. Additionally, some members of this Committee also meet independently with Mr. McNamara, normally on a quarterly basis, to provide him with a comprehensive look at the performance and statistical trends of his investment strategies as well as how those strategies compare to their peer group. Separately, our compliance and risk functions perform monitoring and review, including daily transaction reviews for marketable securities strategies.

**Item 1: Cover Page**

December 1, 2023

**Matthew J. Spahn**

TCW Investment Management Company LLC (each called “Us”)  
 1251 Avenue of the Americas | Suite 4700 | New York, New York 10020 | 212 771 0000 | www.tcw.com

This Brochure Supplement provides information about Matthew J. Spahn that supplements our brochure(s). You should have received a copy of that brochure from each of us that manages your account(s). Please contact us at advpartII@tcw.com if you did not receive our brochure(s) or if you have any questions about the contents of this supplement.

**Item 2: Educational Background And Business Experience**

Matthew Spahn, Senior Analyst, specializes in the energy, industrials, materials and utilities sectors. Mr. Spahn is Co-Portfolio Manager of the TCW Relative Value Large Cap strategy and fund. He joined TCW through the acquisition of SG Cowen Asset Management. In 2006, 2007, 2008, and 2021 Mr. Spahn earned the group’s highest merit bonus based on stock selection. He has 25 years of investment experience having begun his career at Cowen & Company in 1994 in the Information Technology Service Group before being promoted to Quantitative Analyst in 1996. A devotee of lean thinking to drive operational excellence in manufacturing and transactional environments, Mr. Spahn is the only professional on the buy-side to have completed the Shingo Institute’s Site Examiner coursework. Additionally, he earned a Certificate of Achievement in Lean Six Sigma from Villanova University. He has been assisting with the management of the Relative Value Large Cap investment discipline since 1998. Mr. Spahn graduated from Villanova University with a BS in Economics and minors in English and History and graduated with Honors from Fordham University with an MBA in Finance and Communications and Media Management.

Date of birth: 1970.

**Item 3: Disciplinary Information**

There are no disciplinary items to report.

**Item 4: Other Business Activities**

None.

**Item 5: Additional Compensation**

We compensate Mr. Spahn for his investment advisory services, a portion of which may be based on the assets under management of the strategies he manages. Those assets can change with (i) fluctuations in their market value, (ii) client contributions and withdrawals, and (iii) new accounts.

**Item 6: Supervision**

Mr. Spahn is directly supervised by Diane Jaffee, Group Managing Director, who may be contacted at (212) 771-4000. Mr. Spahn’s investment activities are normally reviewed at our quarterly Portfolio Analytics Committee meeting by a combined team led by members of our portfolio analytics and risk departments. This Committee, comprised of members of our executive management, compliance, legal, portfolio analytics, and risk teams, reviews investment activities and portfolio analytics with a focus on changes or shifts to investment style, as well as quantitative metrics, including performance, historical trends, and risk profiles. Additionally, some members of this Committee also meet independently with Mr. Spahn, normally on a quarterly basis, to provide him with a comprehensive look at the performance and statistical trends of his investment strategies as well as how those strategies compare to their peer group. Separately, our compliance and risk functions perform monitoring and review, including daily transaction reviews for marketable securities strategies.

TCW

## Section IV Privacy Policy

January 2024

# Privacy Policy

**The TCW Group, Inc. and Subsidiaries**  
TCW Investment Management Company LLC  
TCW Asset Management Company LLC  
Metropolitan West Asset Management, LLC

TCW Funds, Inc.  
TCW Strategic Income Fund, Inc.  
Metropolitan West Funds

Sepulveda Management LLC  
TCW Direct Lending LLC  
TCW Direct Lending VII LLC

TCW Direct Lending VIII LLC  
TCW Star Direct Lending LLC  
TCW ETF TRUST

Effective January 2024

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## WHAT YOU SHOULD KNOW

At TCW, we recognize the importance of keeping information about you secure and confidential. We do not sell or share your nonpublic personal and financial information with marketers or others outside our affiliated group of companies.

We carefully manage information among our affiliated group of companies to safeguard your privacy and to provide you with consistently excellent service.

We are providing this notice to you to comply with the requirements of Regulation S-P, "Privacy of Consumer Financial Information," issued by the United States Securities and Exchange Commission.

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## OUR PRIVACY POLICY

We, The TCW Group, Inc. and its subsidiaries, the TCW Funds, Inc., TCW Strategic Income Fund, Inc., the Metropolitan West Funds, Sepulveda Management LLC, TCW Direct Lending LLC, TCW Direct Lending VII LLC, TCW Direct Lending VIII LLC, TCW Star Direct Lending LLC, and TCW ETF TRUST (collectively, "TCW") are committed to protecting the nonpublic personal and financial information of our customers and consumers who obtain or seek to obtain financial products or services primarily for personal, family or household purposes. We fulfill our commitment by establishing and implementing policies and systems to protect the security and confidentiality of this information.

In our offices, we limit access to nonpublic personal and financial information about you to those TCW personnel who need to know the information in order to provide products or services to you. We maintain physical, electronic, and procedural safeguards to protect your nonpublic personal and financial information.

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## CATEGORIES OF INFORMATION WE COLLECT

We may collect the following types of nonpublic personal and financial information about you from the following sources:

- Your name, address and identifying numbers, and other personal and financial information, from you and from identification cards and papers you submit to us, on applications, subscription agreements or other forms or communications.
- Information about your account balances and financial transactions with us, our affiliated entities, or nonaffiliated third parties, from our internal sources, from affiliated entities and from nonaffiliated third parties.
- Information about your account balances and financial transactions and other personal and financial information, from consumer credit reporting agencies or other nonaffiliated third parties, to verify information received from you or others.

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## CATEGORIES OF INFORMATION WE DISCLOSE TO NONAFFILIATED THIRD PARTIES

We may disclose your name, address and account and other identifying numbers, as well as information about your pending or past transactions and other personal financial information, to nonaffiliated third parties, for our everyday business purposes such as necessary to execute, process, service and confirm your securities transactions and mutual fund transactions, to administer and service your account and commingled investment vehicles in which you are invested, to market our products and services through joint marketing arrangements or to respond to court orders and legal investigations.

We may disclose nonpublic personal and financial information concerning you to law enforcement agencies, federal regulatory agencies, self-regulatory organizations or other nonaffiliated third parties, if required or requested to do so by a court order, judicial subpoena or regulatory inquiry.

We do not otherwise disclose your nonpublic personal and financial information to nonaffiliated third parties, except where we believe in good faith that disclosure is required or permitted by law. Because we do not disclose your nonpublic personal and financial information to nonaffiliated third parties, our Customer Privacy Policy does not contain opt-out provisions.

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## CATEGORIES OF INFORMATION WE DISCLOSE TO OUR AFFILIATED ENTITIES

- We may disclose your name, address and account and other identifying numbers, account balances, information about your pending or past transactions and other personal financial information to our affiliated entities for any purpose.
- We regularly disclose your name, address and account and other identifying numbers, account balances and information about your pending or past transactions to our affiliates to execute, process and confirm securities transactions or mutual fund transactions for you, to administer and service your account and commingled investment vehicles in which you are invested, or to market our products and services to you.

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## INFORMATION ABOUT FORMER CUSTOMERS

We do not disclose nonpublic personal and financial information about former customers to nonaffiliated third parties unless required or requested to do so by a court order, judicial subpoena or regulatory inquiry, or otherwise where we believe in good faith that disclosure is required or permitted by law.

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## QUESTIONS

Should you have any questions about our Customer Privacy Policy, please contact us by email or by regular mail at the address at the end of this policy.

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## REMINDER ABOUT TCW'S FINANCIAL PRODUCTS

Financial products offered by The TCW Group, Inc. and its subsidiaries, the TCW Funds, Inc., TCW Strategic Income Fund, Inc., the Metropolitan West Funds, Sepulveda Management LLC, TCW Direct Lending LLC, TCW Direct Lending VII LLC, TCW Direct Lending VIII LLC, TCW Star Direct Lending LLC, and TCW ETF TRUST.

- Are not guaranteed by a bank;
- Are not obligations of The TCW Group, Inc. or of its subsidiaries;
- Are not insured by the Federal Deposit Insurance Corporation; and
- Are subject to investment risks, including possible loss of the principal amount committed or invested, and earnings thereon.

TCW Funds, Inc.  
TCW Strategic Income Fund, Inc.  
Metropolitan West Funds

Sepulveda Management LLC  
TCW Direct Lending LLC  
TCW Direct Lending VII LLC

TCW Direct Lending VIII LLC  
TCW Star Direct Lending LLC  
TCW ETF TRUST

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