



ITEM 1: COVER PAGE

METROPOLITAN WEST ASSET MANAGEMENT, LLC
(**“We”** or **“Us”**)

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

March 28, 2024

Metropolitan West Asset Management, LLC
515 South Flower Street
Los Angeles, CA 90071
www.tcw.com

This Brochure provides information about the qualifications and business practices of Metropolitan West Asset Management, LLC. If you have any questions about the contents of this Brochure, please contact us at 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 Metropolitan West Asset Management, LLC also is available on the SEC’s website at 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.

**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.

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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 1996. We are a California limited liability company.

We are wholly-owned by TCW Asset Management Company LLC, an investment adviser registered with the SEC under the Advisers Act. TCW Asset Management Company LLC is a wholly-owned subsidiary of 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 specialize in traditional fixed income management of low duration, intermediate fixed income, and total return portfolios, but we also offer more focused strategies and products described in Item 5, below. We offer fixed income portfolio management services to institutional investors, as well as individual investors through the Metropolitan West Funds (“the **Funds**”). We offer a strategy called “AlphaTrak”, which is designed for investors seeking returns linked to the equity market. We also provide investment advice for liability driven investment strategies as well as non-traditional fixed income strategies. In general, portfolios are designed to maximize total return consistent with price volatility benchmarks or mandates provided by portfolio specific investment guidelines.

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 and 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 \$102,769,702,909 in discretionary assets under management and \$1,010,313 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

OUR COMPENSATION.

The investment management fees we charge are generally computed as a percentage of the market value of assets under management in the Account or Fund, and are billed, rather than deducted from the assets we manage. Our clients typically pay our management fees quarterly in arrears, although some Accounts and Funds pay us monthly. A limited number of Accounts pay us in advance. Those clients will receive a pro-rata refund of their management fee if they terminate before the end of the period for which they have prepaid. 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 size of the account.

SEPARATE ACCOUNTS. The current fee schedule for separate accounts (“Accounts”) is given below, stated on a per annum basis for the amount of assets under management. In some instances, the fee may be negotiated. 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. Occasionally, we may recommend that clients invest in the Metropolitan West Mutual Funds (“**MetWest Funds**”) as part of their separate account portfolio. In those cases, we collect our fees through the MetWest Funds and add a credit to our management fee in an amount equal to the investment advisory fee paid by the MetWest Fund to us with respect to the client’s investment in the MetWest Fund for the portion of the portfolio invested in the MetWest Fund. This means that there would not be any net overall increase in advisory fees paid to us by the client as a result of an investment in the MetWest Funds (although there may be other operating expenses of the MetWest Funds paid by the client).

Institutional or Individual (High Net Worth)	
AlphaTrak	<i>Fixed Fee Schedule:</i>
We offer alternative fee schedules:	.275% on the first \$100 million
	.20% on remaining assets
	<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)

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

Institutional or Individual (High Net Worth)

Index Tracking Mortgage-Backed Securities	.20% on the first \$100 million .15% on remaining assets
Intermediate Fixed Income	.275% on the first \$100 million .20% on remaining assets
Investment Grade Credit Fixed Income	.275% on the first \$100 million .20% on remaining assets
Long Duration Credit Fixed Income	.275% on the first \$100 million .20% on remaining assets
Long Duration Government-Credit Fixed Income	.275% on the first \$100 million .20% on remaining assets
Low Duration Fixed Income	.22% on the first \$100 million .15% on remaining assets
Mortgage-Backed Securities	.275% on the first \$100 million .20% on remaining assets
Mortgage-Backed Short-Intermediate	.275% on the first \$100 million .20% on remaining assets
Opportunistic Core Plus Fixed Income	.375% on the first \$100 million .25% on remaining assets
Opportunistic Mortgage-Backed Securities	.70% on the first \$50 million .50% on remaining assets
Securitized Opportunities	.50% on the first \$500 million .32% on the next \$500 million .15% on the next \$500 million .10% on remaining assets
Specialized Cash	.20% on the first \$100 million .15% on remaining assets

Institutional or Individual (High Net Worth)

Strategic Income	.50% on the first \$100 million .40% on remaining assets
We, or our affiliates, also offer the Strategic Income strategy through other investment vehicles, which may have differing fee schedules.	
Sustainable Securitized	.275% on the first \$100 million .20% on remaining assets
TIPS Portfolios	.20% on the first \$100 million .15% on remaining assets
Total Return Mortgage-Backed Securities	.275% on the first \$100 million .20% on remaining assets
Ultra Short Fixed Income	.20% on the first \$100 million .15% on remaining assets
Unconstrained	.50% on the first \$100 million .40% on remaining assets

In addition to our asset-based investment advisory fee schedules described above, we may offer performance-based fees to certain institutional investors. These are determined on a case by case basis and will comply with the SEC's Rule 205-3 of the Advisers Act, 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 we manage. See Item 6, below for additional information about performance fees and their risks.

MUTUAL FUNDS AND OTHER INVESTMENT COMPANIES

Metropolitan West Mutual Funds. We also are the investment adviser of the Metropolitan West Funds, which currently include the following funds which pay us investment advisory fees at the annual rate shown. The fee is charged on the average daily value of the fund assets, payable monthly in arrears by a deduction from the applicable fund.

FUND	ADVISORY FEE
Metropolitan West Alpha Trak 500 Fund	0.40%
Metropolitan West Corporate Bond Fund	0.40%
Metropolitan West Flexible Income Fund	0.45%

Metropolitan West Floating Rate Income Fund	0.55%
Metropolitan West High Yield Bond Fund	0.50%
Metropolitan West Intermediate Bond Fund	0.35%
Metropolitan West Investment Grade Credit Fund	0.35%
Metropolitan West Low Duration Bond Fund	0.30%
Metropolitan West Opportunistic High Income Credit	0.50%
Metropolitan West Strategic Income Fund	0.65%
Metropolitan West Sustainable Securitized Fund	0.40%
Metropolitan West Total Return Bond Fund	0.35%
Metropolitan West Ultra Short Bond Fund	0.25%
Metropolitan West Unconstrained Bond Fund	0.65%

Additional information about the fees charged to the Metropolitan West Funds by the Adviser and other expenses, and risks of investing, can be found in the prospectus for the Metropolitan West Funds, which may be downloaded from www.TCW.com.

Other Investment Companies. We (or our affiliates pursuant to sub-advisory agreements) also serve as investment adviser or sub-adviser to affiliated and unaffiliated investment companies 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. We provide investment management advice for Investment Companies at fees negotiated with each such company. Fees generally range from .15% of average daily net assets to .75% 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 SEC's Rule 205-3 of the Advisers Act, 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 we manage. The actual fees, minimum investment amounts and other conditions relevant to maintaining an investment in any such Fund are disclosed in the offering documents of the Investment Companies.

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.
- **Mutual Funds.** In addition to our management fees, our Mutual Fund clients incur fees for distribution (pursuant to 12b-1), custodial, administrative, transfer agency,

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.

- 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 strategies are available through brokers and agents not affiliated with us. Those brokers or 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, as described in Item 5, above.

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, endowments, and foundations in the U.S., as well as mutual funds, other investment companies, foreign investors and high net worth individuals.

SEPARATE ACCOUNTS. Accounts in our investment strategies are generally subject to the minimum account size of \$75 million. In some instances, the minimum account size may be negotiated. Investment strategies that vary from the \$75 million minimum account size are as follows:

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

METROPOLITAN WEST MUTUAL FUNDS. The minimum account size for each of the Metropolitan West Mutual funds is:

- Class I - \$3 million
- Class I-2 - \$3 million
- Class M - \$5,000 (\$1,000 for IRA's)
- Administrative Class - \$2,500 (\$1,000 for IRA's)
- Plan Class - \$25 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. For descriptions of the strategies, methods of analysis, and risks of loss of any of the MetWest Mutual Funds we advise, see their prospectus or other offering documents.

OUR STRATEGIES.

- **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 OUR 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".



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 Registration. We are registered as a commodity trading adviser ("CTA"). TCW Asset Management Company LLC ("TAMCO") and TCW Investment Management Company LLC ("TIMCO") are registered investment advisers that are affiliated with us. TAMCO is also registered as a CTA. TAMCO and TIMCO are registered as Commodity Pool Operators ("CPOs"). 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 us or our affiliates for selling interests in Funds or for Accounts we or our 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)
- Sepulveda Management LLC (SEC Number: 801-108097; CRD Number: 284290)
- TCW Asset Management Company LLC (SEC Number: 801-6642; CRD Number: 105742)

- TCW Investment Management Company LLC (SEC Number: 801-29075; CRD Number: 106546)

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 trading. 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.

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.

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 provides a formal periodic forum for the review of the fixed income trading activities on behalf of client accounts. This Committee meets quarterly and more frequently as needed. Relevant topics may include broker concentrations; broker commissions; new approved brokers and suspension of brokers; 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.

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. 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, 2022.

ITEM 1: COVER PAGE

We updated the address of our primary office.

ITEM 4: ADVISORY BUSINESS

Assets Under Management. We have updated our assets under management to December 31, 2023. At that time, we had \$102,769,702,909 in discretionary assets under management and \$1,010,313 in non-discretionary assets under management.

ITEM 5: FEES AND COMPENSATION

Separate Accounts. We updated the fee schedules for the Corporate Bonds and Securitized Opportunities strategies. We renamed the ESG Securitized strategy as Sustainable Securitized.

Mutual Funds. We have renamed the Metropolitan West ESG Securitized Fund as Metropolitan West Sustainable Securitized Fund.

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

We updated the explanation of our allocation process to align with our disclosure of this process under Item 12.

ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK

OF LOSS

Separate Accounts. We have renamed the ESG Securitized strategy as Sustainable Securitized. We have revised our ESG and sustainable considerations for emerging markets fixed income. **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. Under Investment Products, we clarified our position on investment products for which we, our affiliates, or related persons have a financial interest.



ITEM 12: BROKERAGE PRACTICES

Block Trades. We updated our description of block trades to include 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.

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.