

DIMENSIONAL IRELAND LIMITED
(“Dimensional Ireland” or the “Company”)

Shareholder Engagement Policy

INTRODUCTION

The Company is subject to the terms of the Irish regulations implementing Directive (EU) 2017/828 amending Directive 2007/36/EC as regards the Encouragement of Long-Term Shareholder Engagement.

Accordingly, the Company is obliged to have and disclose a Shareholder Engagement Policy that describes how it integrates shareholder engagement into its investment strategy in the context of investment in shares of companies traded on an EU regulated market.

The Company: (i) has appointed its affiliated entities Dimensional Fund Advisors LP, Dimensional Fund Advisors Ltd. (“Dimensional UK”), DFA Australia Limited, Dimensional Japan Ltd., and Dimensional Fund Advisors Pte. Ltd. (the “Dimensional Affiliates”) as sub-investment managers in respect of Dimensional Funds plc and Dimensional Funds II plc (the “Funds”), pursuant to investment management agreements between the Company and the Dimensional Affiliates (the “IMAs”), and (ii) has appointed the Dimensional Affiliates as sub-investment advisors in respect of certain separately managed account(s) to which Dimensional Ireland is appointed investment manager (the “Accounts”), pursuant to sub-investment advisory agreements between the Company and the Dimensional Affiliates (the “Sub-Investment Advisory Agreements”, and together with the IMAs, “the Agreements”). Under the Agreements, the Company delegates to the Dimensional Affiliates responsibility for certain investment management activities, including, without limitation, assisting Dimensional Ireland in exercising voting rights attaching to investments acquired on behalf of the sub-funds of the Funds and/or the Accounts, as applicable.

Oversight by Designated Person

Dimensional Ireland’s Designated Person for Investment Management oversees the integration by the Dimensional Affiliates of shareholder engagement into the investment strategies applied to the Funds and the Accounts, including:

- how the Dimensional Affiliates integrate shareholder engagement into their respective investment strategies, when acting for clients, including the Company;
- whether and how the Dimensional Affiliates monitor investee companies on relevant matters including strategy, financial and non-financial performance and risk, capital structure, social and environmental impact, and corporate governance;
- whether and how the Dimensional Affiliates conduct dialogue with investee companies, where appropriate;
- how the Dimensional Affiliates exercise voting and other rights attaching to shares held by the Funds or the Accounts;

- whether and how the Dimensional Affiliates cooperate with other shareholders;
- whether and how the Dimensional Affiliates communicate with relevant stakeholders of investee companies; and
- how the Dimensional Affiliates manage actual and potential conflicts of interest in regard to engaging with investee companies.

The Dimensional Affiliates have policies and procedures of relevance to shareholder engagement, which includes, e.g., Dimensional UK's shareholder engagement policy which sets out how Dimensional UK, when acting in respect of its clients, including the Company, addresses the matters that are called to be dealt with in the Shareholder Engagement Policy as detailed above. This policy is available on the Company's website. The Company's website also discloses the Responsible Investment Statement and the Investment Stewardship Statement which set out the Company's, and the Dimensional Affiliates', approach to responsible investing and investment stewardship, respectively. Furthermore, the website provides information of their approach to corporate governance and proxy voting under the Proxy Voting Guidelines.

Disclosures

The Company intends to disclose on its website on an annual basis how the Shareholder Engagement Policy has been implemented by the Dimensional Affiliates, in their respective capacities as sub-investment manager to the Funds and sub-investment advisor to the Accounts, including a general description of voting behaviour, an explanation of the most significant votes undertaken, and the use of services of proxy advisors.

The Company also intends to publicly disclose on its website how votes were cast on the Funds' and the Accounts' behalf (subject to agreement with the relevant client) in general meetings of companies in which the Funds or the Accounts hold shares, excluding votes that are insignificant due to the subject matter of the vote or the size of the holding in the underlying company.

Dimensional UK also publishes on its website an annual UK Stewardship Code Report.

Date of Policy: July 18, 2024