





The Trustees considered information about the historical performance of a proprietary mutual fund managed by the same Putnam portfolio management team that would manage the Fund using similar investment strategies (the “Putnam Comparable Performance”), which included a comparison of the Putnam Comparable Performance against a pertinent benchmark and an applicable peer group for the one-, three-, five- and 10-year periods as of June 30, 2024. Additionally, the Trustees considered the risk-adjusted returns of the Putnam Comparable Performance during certain periods.

The Board determined that Putnam’s performance record with respect to a similarly managed mutual fund was acceptable.

### **C. Sub-Advisory Fees**

The Trustees considered information regarding the comparative advisory fees charged under other investment advisory contracts of Putnam with regard to other funds with substantially similar investment strategies as the Fund. The Trustees also considered that the advisory fee schedule would remain unchanged but that the sub-advisory fee would be reduced from its current levels. The Trustees considered that PLFA was proposing to share these sub-advisory fee savings with shareholders through an advisory fee waiver and that PLFA will monitor and report to the Board the competitiveness of the advisory fee and the reasonableness of the advisory fee retention going forward and recommend further changes to the Board as deemed appropriate.

The Trustees noted that the fee rates were the result of arms’-length negotiations between PLFA and Putnam, and that the Fund’s sub-advisory fees are paid by PLFA and are not paid directly by the Fund. The Trustees also considered that there are certain costs associated with a sub-adviser change, but that the ongoing operating expenses paid by the shareholders were not expected to materially increase as a result of this sub-adviser change.

The Board concluded that the compensation payable under the Putnam Sub-Advisory Agreement is fair and reasonable.

### **D. Costs, Level of Profits and Economies of Scale**

The Trustees considered information regarding the anticipated costs to Putnam of sub-advising the Fund and the projected profitability of the Putnam Sub-Advisory Agreement to Putnam, to the extent practicable based on the information provided by Putnam. The Trustees noted that any assessment of projected profitability would involve assumptions regarding expense allocations and other factors. Given the arms’-length nature of the relationship between PLFA and Putnam with respect to the negotiation of sub-advisory fees, the fact that such fees are paid by PLFA, and the fact that the projected profitability of the Putnam Sub-Advisory Agreement to Putnam is an estimate because it had not yet begun to manage the Fund, the Trustees considered that projected profitability information for Putnam at this time was of limited utility.



written notice to the other parties and will terminate automatically in the event of its assignment as determined under the 1940 Act and any rules adopted by the SEC thereunder.

There was no change to the advisory fee rate payable by the Fund to PLFA in connection with the Putnam Sub-

Putnam acts as investment adviser or sub-adviser to the following registered investment companies that have similar investment objectives as the Fund.

Fund Name	Net Assets (as of November 1, 2024)	Compensation Rate (Advisory or Sub-Advisory Fee)	Waived/ Reduced/ Agreed to Reduce (Yes or No)
<b>Subadvised Accounts</b>			
Sub-Advised Account A	\$129 million	0.40% on the first \$250 million 0.35% on the next \$250 million 0.25% over next \$500 million	No

The names, principal occupations and addresses of the principal executive officers and directors of Putnam are set forth below:

<b>Name<sup>1</sup></b>	<b>Title(s) and Principal Occupation</b>
R. Shepherd Perkins	President, Chief Investment Officer and Head of Putnam Equity Investments
James F. Clark Leeor P. Avigdor	Chief Compliance Officer

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