

April 1, 2024

Annual Delivery of Certain Disclosures

Dear Valued Client:

We are pleased to provide you the following regulatory disclosures.

Form ADV Part 2A (Brochure)

There were no material changes to this the Brochure dated March 15, 2024, from the last annual update on March 24, 2023. There were non-material additions, changes and elaborations, including to fees, policies, affiliates, strategies, risk factors, and enhancements and clarifications throughout.

A Form ADV Part 2A (Brochure) for Nuveen Asset Management, LLC is available on the SEC's website at www.adviserinfo.sec.gov or upon request at (312) 917-7700 or (800) 257-8787.

Form ADV Part 2B (Brochure Supplement)

Enclosed please find Nuveen Asset Management, LLC's current Form ADV Part 2B (Brochure Supplement) dated as of April 1, 2024.

Form ADV Part 3 (Form CRS)

Enclosed please find Nuveen Asset Management, LLC's current Form ADV Part 3 (Form CRS).

Privacy Policy Notice

Nuveen Asset Management, LLC considers your privacy our utmost concern. In order to provide you with individualized service, we collect certain nonpublic personal information about you from information you provide on applications or other forms (such as your address or social security number), and information about your account transactions with us (such as purchases, sales and account balances). We may also collect such information through your account inquiries by mail, email, telephone, or web site.

We do not disclose any nonpublic personal information about you to anyone, except as permitted by law. So that we may continue to offer you Nuveen, LLC products and services that best meet your investing needs, and to effect transactions that you request or authorize, we may disclose the information we collect, as described above, to companies that perform administrative or marketing services on our behalf, such as transfer agents, or printers and mailers that assist us in the distribution of investor materials. These companies will use this information only for the services for which we hired them, and are not permitted to use or share this information for any other purpose.

If you decide at some point either to close your account(s) or to become an inactive customer, we will continue to adhere to the privacy policies and practices described in this notice.

With regard to our internal security procedures, we restrict access to your personal and account information to those employees who need to know that information to service your account. We maintain physical, electronic and procedural safeguards to protect your nonpublic personal information.

A copy of our privacy notice is posted at <https://www.nuveen.com/privacy>. If you have any questions about our policy or would like additional copies of this notice, please call us toll free at (800) 257-8787 or send us an e-mail through our website www.nuveen.com or write to us at Nuveen at 333 West Wacker Drive, Chicago, IL 60606.

For California residents, please visit the following link for more information:

<https://www.nuveen.com/privacy-ccpa>

For EU/UK residents, please visit the following link for more information:

<https://www.nuveen.com/en-us/resources/nuveen-european-union-united-kingdom-privacy-notice>

For information on our use of personal data in accordance with the Data Protection Law of the Cayman Islands, please visit the following link for more information:

<https://www.nuveen.com/en-us/resources/cayman-islands-privacy-notice>

For individuals located in Brazil, please visit the following link for more information:

<https://www.nuveen.com/en-us/resources/Brazil-privacy-notice>

Custody Matters

Our investment advisory clients typically select, negotiate and enter into custody agreements with custodians without our involvement. It is our understanding that certain such agreements or other agreements or documents may contain provisions that could result in us having inadvertent custody of client account assets as a result of language permitting us, as investment adviser, to withdraw client assets upon instruction to the custodian. Our agreements with our clients, however, are not intended to give us broad authority to withdraw client assets, and we disclaim such authority to the extent applicable.

With respect to these concerns, please consider our authority as it relates to custody to be limited in the ordinary course to customary trading and settlement of securities and investment transactions in the client's account, typically on a "delivery vs payment" basis for securities transactions, as well as fee deductions in certain cases, as applicable. We will deem you to have consented to this request unless you object in writing.

Clients are requested to contact their custodians directly for any matters regarding the withdrawal or transfer of advisory account assets to other accounts of the client or to third parties.

Clients are encouraged to obtain and review account statements sent directly from their custodian at least quarterly, identifying the amount of funds and of each security in the account at the end of the period and setting forth all transactions in the account during that period. With respect to any statements/reports sent by us to a client, such clients are urged to compare any holdings and transaction information provided in our statements/reports with those sent directly by their custodian.

Where we calculate advisory fees, we may rely on internal valuation procedures that may result in differences from the valuations reflected on your custodial statements for certain assets from time to time.

Proxy Report Offering

If you would like to request a copy of our proxy voting guidelines or a report outlining how proxies were voted with respect to the securities held in your account, please contact us.

Communications with Regulators

For the avoidance of doubt, nothing shall prohibit or impede a client from voluntarily or otherwise communicating directly with or providing information to any governmental or regulatory authority about their accounts, any underlying facts or circumstances, or disputes or concerns.

Individualized Services

We endeavor to provide managed account clients with individualized services. Please have your financial advisor contact us with any changes to your financial or risk profile that bear on our investment management services, or changes to restrictions.

Sincerely,

Nuveen Asset Management, LLC