

Diversification Compliance Certification

Portfolios covered within this memorandum:

- Principal Variable Contracts Funds, Inc. - Blue Chip Account
- Principal Variable Contracts Funds, Inc. - Bond Market Index Account
- Principal Variable Contracts Funds, Inc. - Core Plus Bond Account
- Principal Variable Contracts Funds, Inc. - Diversified Balanced Account
- Principal Variable Contracts Funds, Inc. - Diversified Balanced Managed Volatility Account
- Principal Variable Contracts Funds, Inc. - Diversified Balanced Volatility Control Account
- Principal Variable Contracts Funds, Inc. - Diversified Growth Account
- Principal Variable Contracts Funds, Inc. - Diversified Growth Managed Volatility Account
- Principal Variable Contracts Funds, Inc. - Diversified Growth Volatility Control Account
- Principal Variable Contracts Funds, Inc. - Diversified Income Account
- Principal Variable Contracts Funds, Inc. - Diversified International Account
- Principal Variable Contracts Funds, Inc. - Equity Income Account
- Principal Variable Contracts Funds, Inc. - Global Emerging Markets Account
- Principal Variable Contracts Funds, Inc. - Government & High Quality Bond Account
- Principal Variable Contracts Funds, Inc. - LargeCap Growth Account I
- Principal Variable Contracts Funds, Inc. - LargeCap S&P 500 Index Account
- Principal Variable Contracts Funds, Inc. - LargeCap S&P 500 Managed Volatility Index Account
- Principal Variable Contracts Funds, Inc. - MidCap Account
- Principal Variable Contracts Funds, Inc. - Principal Capital Appreciation Account
- Principal Variable Contracts Funds, Inc. - Principal LifeTime 2010 Account
- Principal Variable Contracts Funds, Inc. - Principal LifeTime 2020 Account
- Principal Variable Contracts Funds, Inc. - Principal LifeTime 2030 Account
- Principal Variable Contracts Funds, Inc. - Principal LifeTime 2040 Account
- Principal Variable Contracts Funds, Inc. - Principal LifeTime 2050 Account
- Principal Variable Contracts Funds, Inc. - Principal LifeTime 2060 Account
- Principal Variable Contracts Funds, Inc. - Principal LifeTime Strategic Income Account
- Principal Variable Contracts Funds, Inc. - Real Estate Securities Account
- Principal Variable Contracts Funds, Inc. - SAM Balanced Portfolio
- Principal Variable Contracts Funds, Inc. - SAM Conservative Balanced Portfolio
- Principal Variable Contracts Funds, Inc. - SAM Conservative Growth Portfolio
- Principal Variable Contracts Funds, Inc. - SAM Flexible Income Portfolio
- Principal Variable Contracts Funds, Inc. - SAM Strategic Growth Portfolio
- Principal Variable Contracts Funds, Inc. - Short-Term Income Account
- Principal Variable Contracts Funds, Inc. - SmallCap Account
- Principal Variable Contracts Funds, Inc. - U.S. LargeCap Buffer July Account
- Principal Variable Contracts Funds, Inc. - U.S. LargeCap Buffer October Account

ARTICLE I. Certification

The funds were in compliance with the federal tax rules relating to diversification requirements under Section 817(h) of the Internal Revenue Code and Treasury Regulation 1.817-5, for the quarter ending September 30, 2022.

Tara Parks, VP & Assistant Controller

October 21, 2022

Signed by

Date