

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 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 April Account
Principal Variable Contracts Funds, Inc. - U.S. LargeCap Buffer January 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 December 31, 2023.

Tara Parks, VP & Assistant Controller

January 19, 2024

Signed by

Date