

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 Adaptive Allocation Account  
Principal Variable Contracts Funds, Inc. - Diversified Balanced Strategic Allocation Account  
Principal Variable Contracts Funds, Inc. - Diversified Growth Account  
Principal Variable Contracts Funds, Inc. - Diversified Growth Adaptive Allocation Account  
Principal Variable Contracts Funds, Inc. - Diversified Growth Strategic Allocation 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 S&P 500 Index Buffer April Account  
Principal Variable Contracts Funds, Inc. - U.S. LargeCap S&P 500 Index Buffer January Account  
Principal Variable Contracts Funds, Inc. - U.S. LargeCap S&P 500 Index Buffer July Account  
Principal Variable Contracts Funds, Inc. - U.S. LargeCap S&P 500 Index 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 June 30, 2025.

Tara Parks, VP & Assistant Controller

July 22, 2025

Signed by

Date