



T. ROWE PRICE

ESG POLICY

UPDATED AS OF MARCH 2023

This document reflects the ESG policy of T. Rowe Price Associates, Inc. (TRPA), and its investment advisory affiliates, including T. Rowe Price Investment Management, Inc. (TRPIM), and T. Rowe Price (Luxembourg) Management S.à r.l., collectively referred to as “T. Rowe Price.”

TRPIM was established as a separately registered U.S. investment adviser, with a separate ESG team from TRPA. Decisions for TRPA and TRPIM ESG teams are made completely independently, but use a similar approach, framework, and philosophy.

BACKGROUND

At T. Rowe Price, we incorporate environmental, social, and governance (ESG) considerations across our investment platforms. We believe that ESG issues influence investment risk and return, and therefore, we integrate them into our fundamental investment analysis. Additionally, we recognize that many of our clients’ goals are not purely financial. As such, we offer select investment products that seek to invest in ways that align with our clients’ values or have the potential to drive positive environmental or social impact.

ESG integration is the incorporation of environmental, social, and governance factors into investment analysis for the purpose of maximizing investment performance. Fiduciary duty remains the top priority. We view ESG integration as foundational—it is a core investment capability, which we have embedded in our investment research platforms across asset classes. ESG integration is applied to all of our investment products, where applicable. Additionally, we have some strategies that cater to clients who mandate us to reflect their values or a sustainable objective in their investments.

ESG INTEGRATION

Seeks to deliver competitive financial returns. Analyzes ESG factors for the **purpose of maximizing investment performance.**

We have embedded ESG through our investment research platforms. It is one of the many tools that support the **deep, fundamental research** performed by our investment professionals.

ESG ENHANCED

Seeks to promote specific ESG characteristics alongside financial returns by incorporating binding environmental and/or social commitments that will vary by product type, such as:

- Values- and conduct-based exclusions
- Greenhouse gas (GHG) reduction targets
- Alignment to sustainable investments
- Positive tilt to RIIM scores¹

We have different fund ranges that promote ESG characteristics through use of exclusions, alignment to sustainable investments, and positive tilts. Additionally, we manage separate accounts that promote ESG factors selected by the client.

IMPACT

Seeks to deliver positive societal and/or environmental impact alongside financial returns.

We have an impact fund range² that seeks to deliver positive impact through:

- Climate and resource impact
- Social equity and quality of life
- Sustainable innovation and productivity.

¹ RIIM = Responsible Investing Indicator Model.

² Strategies and funds currently managed by T. Rowe Price Associates, Inc (TRPA).
Not all vehicles are available in all jurisdictions.

ESG INTEGRATION

At T. Rowe Price, we are known for our deep fundamental investment research. Thomas Rowe Price, Jr., founded our company during the Great Depression with a belief that the long-term potential of companies could be determined by evaluating the risks and opportunities to their business. He committed to firsthand research, establishing one of the world's first dedicated research departments. Proprietary research is still at the heart of our approach, and this includes ESG integration.

Our philosophy is that ESG factors are a component of the investment decision—meaning that they are not the sole driver of an investment decision, nor are they considered separately from more traditional investment factors such as valuation, financials, industry trends, and macroeconomics.

ESG Factors—Part of the Investment Mosaic

Corporations are a part of the fabric of society—what impacts society impacts corporations. Identifying how a company or issuer is positioned to navigate specific ESG issues will often help inform their prospects for future success.



Integration of environmental, social, and governance factors into our investment process starts with the initial research at the inception of an investment idea and continues through the life of the investment. This analysis is applied to multiple stages and includes such steps as:

- Identification and monitoring of ESG data for security analysis;
- Consideration of ESG risks or “red flags” through fundamental analysis;
- Consideration of ESG risks and/or opportunities in portfolio construction;
- Engagement with Boards, managements, nonfinancial stakeholders, or government officials; and
- Proxy voting (for equities).

The primary responsibility for determining the impact of ESG factors on clients’ investments lies with our analysts and portfolio managers, who are supported by our specialist ESG teams. Our approach is driven by the following principles:

- **Integration**—As ESG integration requires balancing environmental, social, and governance factors with other investment factors, the responsibility for integrating ESG factors lies with our analysts and portfolio managers.
- **Collaboration**—In order to support our investment professionals’ capacity to incorporate ESG factors into their decision-making, we have specialists in ESG and regulatory research within our investment research teams who work closely with our analysts and portfolio managers and provide ESG research.
- **Materiality**—We focus on the ESG factors we consider most likely to have a material impact on the performance of the investments in our clients’ portfolios.

Process

The process of ESG integration takes place on two levels: first, with our research analysts as they incorporate ESG factors into security valuations and ratings, and second, with the portfolio managers as they balance ESG factor exposure at the portfolio level. Both the analysts and portfolio managers are able to leverage dedicated, in-house resources to assist them in analyzing ESG criteria.

Our specialist ESG teams provide investment research on ESG issues at the security level and on thematic topics. They have built tools to help proactively and systematically analyze the environmental, social, and governance factors that could impact our investments. One such tool is a proprietary scoring system called the Responsible Investing Indicator Model (RIIM), which forms the foundation of our ESG integration process. The RIIM framework provides two key benefits:

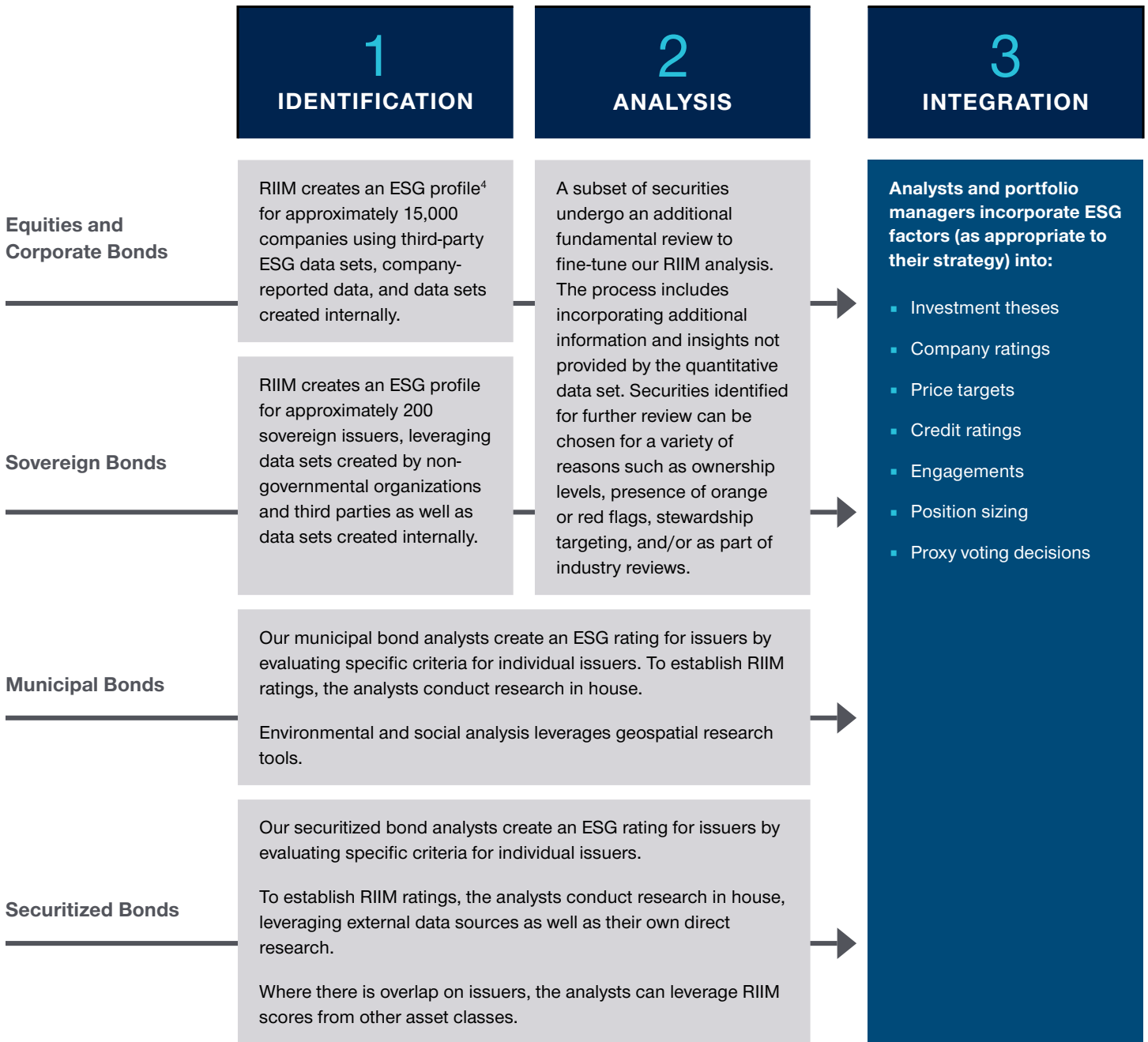
1. RIIM provides a uniform standard of due diligence on ESG factors across our investment platforms; and
2. RIIM establishes a common language for our analysts, portfolio managers, and ESG specialists to discuss how an investment is performing on ESG and to compare securities within the investment universe.

We have developed RIIM frameworks across asset classes covering equities and corporate bonds, sovereign bonds, municipal bonds, and securitized bonds³. The RIIM frameworks are unique for each asset class as the level and type of ESG data available vary across asset classes.

For equities, corporate bonds, and sovereign bonds, we are able to leverage ESG data sets and feed those directly into our RIIM framework. This allows us to generate a quantitative RIIM profile for a wide breadth of issuers. This quantitative set of scores is an important starting point in our ESG evaluation process as it helps us quickly identify any outliers, both positive and negative. Additionally, it creates a baseline of understanding of our investment universe from which we delve deeper using fundamental analysis on a narrower universe of securities. Having the breadth of coverage provided by using this quantitative data as a first step is also instrumental in informing our engagement program.

For municipal and securitized issuers, the ESG data universe is still developing. As we have not yet found ESG data sets that we believe are robust enough to directly integrate into the RIIM framework, we have a three-step ESG integration process: (1) identification, (2) analysis, and (3) integration. Our credit analysts conduct ESG analysis at a security level. To do this, they utilize the RIIM framework to ensure that a uniform standard to ESG due diligence is conducted at a security level. Our credit analysts leverage our in-house ESG specialists, third-party research, and their own fundamental research to develop a RIIM profile for each issuer.

³ The implementation and oversight of the RIIM for TRPA and TRPIM differ. The TRPIM RIIM covers equities and corporate bonds only. TRPA has RIIM coverage of approximately 15,000 corporate issuers, 200 sovereign issuers, 1,400 municipal issuers, and 1,200 securitized issuers. TRPIM has RIIM coverage of approximately 6,500 corporate issuers.



⁴ Note: The implementation and oversight of the RIIM for TRPA and TRPIM differ. The TRPIM RIIM covers equities and corporate bonds only.

Assessment of ESG factors⁵

When determining which data points to evaluate across an industry/region, we take a thoughtful analysis of each criterion and ask ourselves a series of questions, including:

- Is the factor material to the underlying investment?
- Is the factor a meaningful contributor to environmental or societal burdens/tailwinds?
- Is there a robust data point underpinning that factor?
- Is the data point a quantitative or qualitative assessment?
- If the data point is qualitative, what level of subjectivity has been incorporated?
- Are the data uniformly disclosed? Are issuers using the same reporting standard?
- Are the data commonly disclosed within an industry/region?

Our approach to environmental and social factor integration is highly differentiated at the sector and industry levels. Materiality to the underlying business model is one of the key determinants used in our analysis.

	ENVIRONMENTAL FACTORS	SOCIAL FACTORS
Consumer Discretionary	Eco-design product/electric vehicles Responsible sourcing (cotton, synthetic textiles, etc.) Waste management	Treatment of workers in the supply chain Employee relations (unions/"living wage" workers) Customer behavior (online shift)
Consumer Staples	Organic products hydrochlorofluorocarbons phaseout Responsible sourcing (palm oil and other agri-products)	Fair trade products Supply chain management (vulnerable agri-chains) Human health impact (sugar, tobacco, etc.)
Energy	Methane emissions Risk of stranded assets Refinery/chemical emissions	Employee and contractor health and safety Relations with local communities Bribery and corruption
Financials	Sustainable financing Environmentally related products (drought protection) Natural catastrophe risk	Human capital management (talent retention) Cybersecurity Business ethics
Health Care	Water usage Waste disposal	Product safety Cybersecurity Appropriate marketing/lobbying practices
Industrials	Energy-efficient products Intermodal transportation shifts Manufacturing environmental footprint	Bribery and corruption (aerospace and defense) Product safety Robotics
Information Technology	"Smart" appliances and infrastructure Water usage (semiconductors) Product end of life	Data privacy Responsible sourcing (conflict minerals) Human capital management (talent retention)
Materials	Emissions Efficient building products Responsible pesticide usage	Employee and contractor health and safety Relations with local communities Bribery and corruption
Real Estate	Eco-friendly buildings "New cities" infrastructure	Local communities/affordable housing Demographic shift/aging population
Telecommunications	Intelligent and efficient network infrastructure	Cybersecurity Improving lives through connectivity Responsible sourcing (conflict minerals)
Utilities	Shift toward distributed power Electric mix shift toward renewables/grid stability Stranded assets	Employee and contractor health and safety Relations with local communities Human health impact (particulate emissions)

⁵ The assessment of environmental and social factors for the RIIM for TRPA and TRPIM differ.

We focus on the governance factors that we consider to be most relevant given the issuer’s sector, region, and asset class. However, our objective is to support governance practices designed to enhance and preserve long-term shareholder value. We employ a governance lens to our company analysis throughout the life cycle of an investment. While we maintain a highly contextual, company-specific approach to assessing corporate governance, we believe the following principles can be applied to corporates across the globe:

- The importance of Board accountability to investors
- Shareholder rights in reasonable proportion to economic ownership
- A Board structure that fosters independence, a mix of perspectives, and effectiveness
- Incentive structures for Boards, management, and employees that are aligned with the company’s strategy

Other factors that we consider include the robustness of the internal controls framework and whether the external auditor provided a qualified opinion. We also expect to have independent directors on a company’s Audit Committee provide robust oversight of the financial reporting and control framework.

Particular attention will be paid to the Board’s handling of any ESG controversies, including those related to employee relations and tax. The company’s policies, practices, and level of disclosure will also be considered in the assessment of Board oversight. We employ both qualitative and quantitative approaches to the assessment of governance practices. Depending on the severity of the issues and whether there are any mitigating circumstances (e.g., where a company appears to be trying to remediate the problem), the company may be added to the T. Rowe Price significant governance concerns list.

Asset class considerations⁶

The following graphic includes a non-exhaustive list of factors used for ESG integration in each asset class.

	ENVIRONMENTAL	SOCIAL	GOVERNANCE
Equities and Corporate Bonds	<ul style="list-style-type: none"> Adaptability of sourcing Biodiversity impact Emissions intensity Environmental track record Hazardous chemicals use Impact of carbon taxation Integration of eco-design “New cities” infrastructure Pesticide safety standards Product end of life Regulatory dynamics Site restoration provisions Stranded asset risk Sustainable product sales Sustainable raw materials Waste recycling (mgmt.) Water intensity 	<ul style="list-style-type: none"> Access to skilled labor Bribery/corruption record Conflict minerals sourcing Customer preference shift Data privacy standards Diversity statistics Fair trade sourcing Health and safety record Lobbying standards Local community relations Marketing standards Product safety record Robotics integration Stakeholder relations Supply chain standards Talent retention Technology shift 	<ul style="list-style-type: none"> Accounting standards Audit practices Antitakeover provisions Board composition Board expertise Bond covenants Financial transparency Management remuneration Share issuance policies Shareholder rights
Sovereign Bonds	<ul style="list-style-type: none"> Agricultural capacity Air pollution/emissions Climate change impact Ecosystem quality Energy dependency Energy resources Risk of stranded assets Water resources 	<ul style="list-style-type: none"> Crime and safety Education levels Employment levels Food security Human rights Income inequality Institutional quality Poverty Public health 	<ul style="list-style-type: none"> Bond covenants Corruption Institutional strength Rule of law Institutional quality

⁶ RIIM asset class considerations vary between TRPA and TRPIM. The TRPIM RIIM only covers equities and corporate bonds.

	ENVIRONMENTAL	SOCIAL	GOVERNANCE
Securitized Bonds	<ul style="list-style-type: none"> Exposure to green activities—e.g., renewables, electric vehicles Exposure to energy transition risk Exposure to physical climate change risk Green building certifications Energy efficiency 	<ul style="list-style-type: none"> Exposure to affordable housing Income inequality Level of homeownership Population dynamics Contribution to wealth inequality 	<ul style="list-style-type: none"> Bond covenants ESG disclosure Internal controls and loan modification standards Originator ESG standards and track record Sponsor performance and legal history Originator underwriting practices Regulatory standards Timeliness and quality of financial reporting
Municipal Bonds	<ul style="list-style-type: none"> Exposure to green activities—e.g., renewables, electric vehicles, public transport Exposure to energy transition risk Exposure to physical climate change risk Issuer’s management of environmental footprint 	<ul style="list-style-type: none"> Accessibility of health care Crime and safety Education levels Employment levels Exposure to social activities—e.g., hospitals, schools, transport Income inequality Population dynamics and trends Positive social contributions Poverty levels Quality of infrastructure 	<ul style="list-style-type: none"> Bond covenants Quality of management Quality of governance and Board Quality of elected officials and key government staff Timeliness and quality of financial disclosure

ESG ENHANCED AND IMPACT—INVESTMENT PRODUCTS WITH ESG MANDATES

Some clients’ investment goals are not purely financial. As such, we offer select investment products that promote ESG characteristics through use of exclusions, alignment to sustainable investments, and positive tilts to RIIM scores. Additionally, we manage separate accounts that promote ESG factors selected by the client. While RIIM forms the cornerstone of our ESG analysis, it is supplemented by several other proprietary frameworks that we have developed in house to evaluate securities for investment products seeking to deliver on ESG-related objectives.

ESG-labeled bonds

We have built our own proprietary framework for evaluating the credentials of ESG-labeled bonds. It provides more robust analysis and aids in ongoing monitoring of bonds within this category.









ESG-Labeled Bond Evaluation Framework

<p>ISSUER’S ESG PROFILE</p> <ul style="list-style-type: none"> RIIM score Environmental and social commitments 	<p>POST ISSUANCE REPORTING</p> <ul style="list-style-type: none"> Detail on reporting plans Availability of audit report for allocation and/or impact reporting
<p>USE OF PROCEEDS</p> <ul style="list-style-type: none"> Credibility of use of proceeds or sustainability performance targets (SPTs) Unallocated proceeds Refinancing Time frame Provisions for unmet SPTs 	<p>FRAMEWORK AND STANDARDS</p> <ul style="list-style-type: none"> Alignment to International Capital Markets Association (ICMA) Second-party opinion verification Governance structure for project selections

Impact investing

We believe that impact investing goes beyond simply owning and capturing the economics and activities of certain types of companies. Impact investors direct capital toward desired environmental and/or social outcomes and utilize engagement with issuers and active proxy voting to help achieve the best results. We believe impact investing is possible in listed equity and credit markets and that expanding impact investing concepts across these asset classes will help truly make a difference.

All investments in our impact strategies start with an assessment of their potential to deliver positive environmental or social impacts. This considers both materiality and measurability. To aid this assessment, we have built a proprietary framework that we call our Impact Template. This framework helps to ensure we deploy a consistent standard for identifying impact activities, which feature the three proprietary impact pillars and eight sub-pillars outlined below. Our Impact Template also leverages RIIM analysis to ensure we comprehensively evaluate the potential of significant harm by a prospective investment alongside other ESG risks.

CLIMATE AND RESOURCE IMPACT		SOCIAL EQUITY AND QUALITY OF LIFE		SUSTAINABLE INNOVATION AND PRODUCTIVITY	
	Reducing Greenhouse Gases		Enabling Social Equity		Sustainable Technology
	Promoting Healthy Ecosystems		Improving Health		Building Sustainable Industry and Infrastructure
	Nurturing Circular Economies		Enhancing Quality of Life		

ENGAGEMENT

We believe it is incumbent on T. Rowe Price as an asset manager to safeguard our clients' interests through active ownership, monitoring, and engagement with companies and other issuers we believe to be applying a substandard level of oversight in certain key areas. In our experience, such engagement is most effective when it is directly led by our portfolio managers and reflects their view that a serious concern is present but potentially may be ameliorated through our efforts. These are the situations where we have and will continue to concentrate our investment of time and resources because we believe they have the highest probability of a successful outcome for our clients.

The central focus of our engagement program is at the issuer level. We believe our issuer-specific approach results in the highest impact because it is aligned with our core investment approach: active management rooted in fundamental investment analysis. Engagement targets are identified through fundamental research, RIIM analysis, and portfolio reviews. Additionally, we complement our issuer-led engagement approach with some thematic programs.

More information on our engagement practices is available in our [Engagement Policy](#) document.

PROXY VOTING

Proxy voting is a critical component of our approach to corporate governance. We offer our clients a high degree of transparency related to the votes we cast on their behalf. Disclosure of our proxy voting guidelines and voting record can be found on our corporate website: troweprice.com/esg.

Shareholder proposals of an environmental or social nature have become more frequent in recent years. T. Rowe Price takes a case-by-case approach to analyzing these proposals. To do this, we utilize research reports from our external proxy adviser, company filings and sustainability reports, public research from other investors and nongovernmental organizations, our internal industry research analysts, and our in-house sustainability experts. Generally speaking, we support well-targeted proposals addressing concerns that are particularly relevant for a company's business that have not yet been adequately addressed by management.

To learn more about the Proxy Voting Guidelines for [TRPA](#), [click here](#), and for [TRPIM](#), [click here](#).

COLLABORATIVE ENGAGEMENT AND ALIGNING TO GLOBAL FRAMEWORKS

We participate in collaborative industry initiatives on a selective and strategic basis. These initiatives support our core engagement program. We seek to understand where collaboration can provide the most viable and impactful supplement to our internal capabilities.

When considering participation in a collaborative engagement initiative, we weigh the following factors:

- Alignment
 - How closely aligned is this engagement opportunity with our investment holdings?
 - Does it include companies or other issuers where we are significant shareholders?
 - Do the members of the collaborative engagement share the same objective with the engagement?
- Impact potential
 - Do we believe there is potential for the engagement to result in a successful outcome for our clients' investment portfolios?
 - Is the intended outcome clear to all members of the collaborative engagement?
- Resource focus
 - Does the engagement make the most efficient use of our internally dedicated engagement resources?
- Practicality
 - Have we already undertaken the same engagement or very similar engagements unilaterally with success?
- Tangibility
 - Is the scope of the collaborative engagement clear, and are we confident that it will not change over time?

As an asset manager with significant assets under management, we believe we can play an important role in improving ESG disclosure and business practices on a market-wide level. As such, we have joined, or led, various industry-level initiatives aimed at facilitating opportunities for collaborative engagement, advocacy, and improving ESG disclosure and business practices. The following table details our current global memberships⁷.

Organization	Status	Joined
Council of Institutional Investors (CII)	Associate Member	1989
Principles for Responsible Investment (PRI)	Signatory	July 2010
UK Stewardship Code	Signatory	2010
Japan Stewardship Code Signatory	Signatory	August 2014
Associação de Investidores no Mercado de Capitais (AMEC)	Member	2015
Asia Corporate Governance Association (ACGA)	Member	2016
UK Investor Forum	Founding Member	August 2016
Investor Stewardship Group (ISG)	Founding Member	2017
Japan Stewardship Initiative	Founding Member	November 2019
Investment Association Climate Change Working Group	Member	2020
Institutional Investors Group on Climate Change (IIGCC)	Member	2020
PLSA Stewardship Advisory Group	Member	2020
Emerging Markets Investors Alliance	Member	2020
Task Force on Climate-related Financial Disclosures (TCFD)	Supporter	November 2020
Responsible Investment Association Australasia (RIAA)	Member	2020
Farm Animal Investment Risk & Return (FAIRR)	Member	2020
Access to Medicine Index	Signatory	2021
Task Force on Climate-Related Financial Disclosures (TCFD) Consortium (Japan)	Member	2021
Global Impact Investing Network (GIIN)	Member	2021
Sustainability Accounting Standards Board (SASB) Alliance	Member	March 2021
UN Global Compact Signatory	Signatory	2021
International Corporate Governance Network (ICGN)	Member	2021
IMEA (Investment Management Education Alliance) ESG Committee	Member	2021
30% Club Investor Group – UK Chapter	Member	2021
International Capital Market Association (ICMA)	Member	2017
- Member of the ICMA Principles - Green Bond Principles (GBP), Social Bond Principles (SBP), Sustainability Bond Guidelines (SBG) and Sustainability-Linked Bond Principles (SLBP)	Member	2022
- Member of ICMA Advisory Council	Member	2023
Net Zero Asset Managers Initiative	Signatory	2022
Access to Nutrition Initiative	Signatory	May 2022
Japan Impact-driven Financing Initiative	Signatory	July 2022
Taskforce on Nature-related Financial Disclosures (TNFD)	Forum Member	Oct 2022

As of March 2023.

⁷ At least one T. Rowe Price entity is a member of the organizations listed.

APPROACH TO EXCLUSIONS⁸

At T. Rowe Price, we implement limited sets of exclusions on our portfolios. The vast majority of our assets under management are only subject to a set of global exclusions, which target genocide and/or crimes against humanity. For some of our assets under management, additional exclusions are applied to vehicles in specific regions where market preferences exist and to specific strategies that have ESG-related objectives.

1. Global exclusions:

- (a) We maintain a global exclusion list on certain securities that, in our estimation, pose high risk due to their exposure to supporting governments carrying out genocide and/or crimes against humanity. The policy targets companies that exhibit a blatant disregard for due diligence on genocide and/or crimes against humanity and have repeatedly been involved in supporting governments carrying out these events.

2. Vehicle-specific exclusions:

- (b) For certain vehicles, we maintain an exclusion policy on certain issuers deemed to be engaged in the manufacture, production, or assembly of controversial weapons, which includes anti-personnel land mines, biological and chemical weapons, cluster munitions, and incendiary weapons.
- (c) For certain vehicles, we maintain an exclusion policy on issuers engaged in the manufacture of tobacco products.

3. Strategy-level exclusions:

- (d) For select ESG-enhanced funds, we maintain an exclusion policy that is aligned with our clients' most common ESG concerns, which includes the following categories:
 - Adult entertainment
 - Assault-style weapons for civilian use
 - Controversial weapons
 - Gambling
 - Thermal coal
 - Tobacco, and
 - Conduct-based exclusions.
- (e) For our impact strategies, we maintain a more extensive exclusion policy of issuers that do not align with our strategy philosophy of generating positive environmental or social impact, which include the following categories:
 - Adult entertainment
 - Alcohol
 - Assault-style weapons for civilian use
 - Controversial weapons
 - Conventional weapons
 - For-profit prisons
 - Fossil fuels
 - Gambling
 - Tobacco, and
 - Conduct-based exclusions.

Finally, all portfolios can be subject to sanction-related exclusions. At any point in time, a portfolio may be prohibited from investing in certain sovereign or corporate instruments associated with targeted U.S. or international sanctions.

⁸ Securities on the exclusion lists for TRPA and TRPIM may differ.

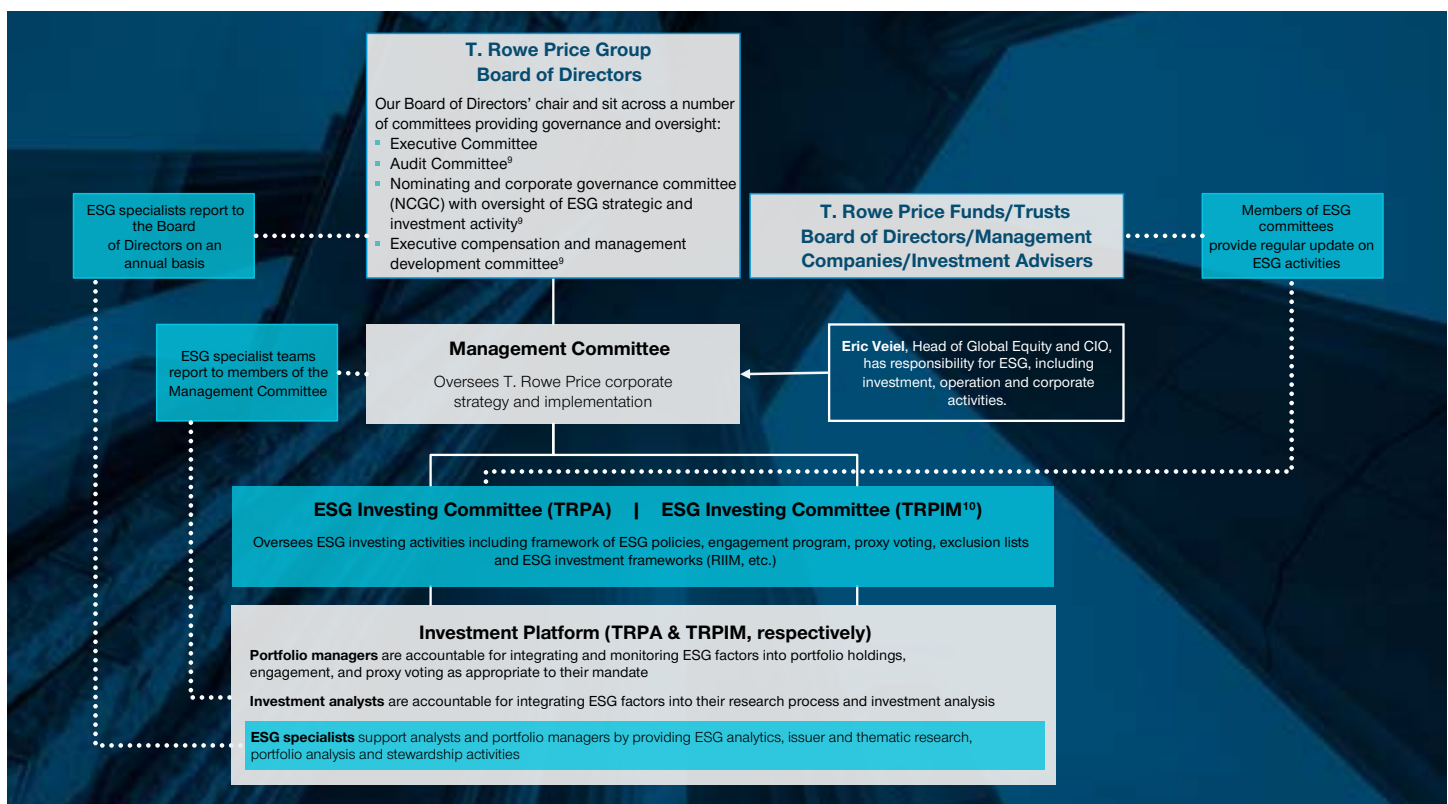
OVERSIGHT AND ACCOUNTABILITY FOR RESPONSIBLE INVESTING

The Nominating and Corporate Governance Committee of the Board of Directors of T. Rowe Price has oversight on ESG investment activity at the firm. The Board receives an update on ESG investment activities at T. Rowe Price on an annual basis (at minimum).

Oversight of our ESG policies, ESG integration, engagement, and proxy voting processes resides with the firm's ESG investment committees, which are made up of senior leaders at the firm. The ESG investment committees' primary purpose is to assist the U.S. Equity Steering Committee, International Steering Committee, Multi-Asset Steering Committee, Fixed Income Steering Committee, and TRPIM Steering Committee of T. Rowe Price Group in establishing the firm's frameworks for:

- Assessing environmental, social, and corporate governance issues,
- Maintaining an appropriate set of proxy voting guidelines, and
- Overseeing and approving exclusions lists for use in various investment capacities.

The committees report regularly, as appropriate, to the T. Rowe Price Funds'/Trusts' Board of Directors and Management Companies/Advisers to summarize voting results, policies, procedures, and other noteworthy items.



⁹ Independent Board members only.

¹⁰ T. Rowe Price Investment Management, Inc., was established as a separately registered U.S. investment adviser, with a separate ESG team from T. Rowe Price Associates, Inc. Decisions for TRPA and TRPIM ESG teams are made completely independently, but use a similar approach, framework, and philosophy.

MANAGEMENT OF CONFLICTS OF INTEREST

T. Rowe Price has adopted safeguards to ensure that our engagement and proxy voting activities are not influenced by interests other than those of our advisory clients. The core principles of the policy:

Individuals whose primary duties relate to client relationship management, marketing, or sales are not permitted to participate in discussions related to engagement.

With respect to personal conflicts of interest, T. Rowe Price's Code of Ethics and Conduct requires all employees to avoid placing themselves in a compromising position in which their interests may conflict with those of our clients, and it restricts their ability to engage in certain outside business activities. Investment professionals with a personal conflict of interest regarding a particular issuer must recuse themselves and not participate in any decisions with respect to that engagement.

All of our proactive, outbound engagements are initiated by T. Rowe Price investment professionals, including analysts, portfolio managers, or our specialists in responsible investment and corporate governance. Engagement plans are assessed and executed as described in our Engagement Policy, without regard to any business relationship between the issuer and T. Rowe Price.

REPORTING ON OUR RESPONSIBLE INVESTING ACTIVITIES

On an annual basis, we publish a report that details our comprehensive ESG investment integration, company engagement, and proxy voting activities for the year. The report also delves into a number of key themes that shaped the ESG agenda for the year. To download a copy of the report or to get more information on T. Rowe Price's approach to stewardship and responsible investment, please visit troweprice.com/esg.



Important Information

This material is provided for informational purposes only and is not intended to be investment advice or a recommendation to take any particular investment action.

The information contained herein is as of March 2023 and is subject to change without notice; these views may differ from those of other T. Rowe Price associates.

The information provided in this material does not include content relating to Oak Hill Advisors, L.P., an alternative credit manager, which T. Rowe Price Group, Inc., acquired on December 29, 2021.

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