



## T. ROWE PRICE

# IMPACT EXCLUSION LIST POLICY

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### NOVEMBER 2022

T. Rowe Price (Luxembourg) Management S.à r.l. recognizes that investment in certain corporate or sovereign securities may be contradictory to the firm's impact philosophy of delivering positive environmental and/or social impacts. The T. Rowe Price Impact Exclusion List, therefore, incorporates both category and conduct based exclusions that align with common environmental, social and ethical values. The nature of categories chosen to be excluded may change over time as market demands and trends evolve.

The T. Rowe Price Impact Exclusion List currently consists of the following categories:

- **Adult Entertainment:** companies that generate >5% of revenues from adult entertainment
- **Alcohol:** companies that generate >5% of revenues from alcohol
- **Assault-style Weapons:** companies that manufacture or retail semi-automatic weapons for civilian use
- **Controversial Weapons:** companies with direct exposure to anti-personnel land mines, cluster munitions, incendiary weapons, biological weapons, chemical weapons and/or nuclear weapons
- **Conventional Weapons:** companies that generate >5% of revenues from the production of conventional weapons
- **For-profit Prisons:** companies that generate >5% of revenues from for-profit prisons
- **Fossil Fuels:** companies that generate >5% of revenues from the production of thermal coal and companies that are identified within the Oil or Gas industry through the GICS and/or BICS classification
- **Gambling:** companies that generate >5% of revenues from direct gambling operations
- **Tobacco:** companies that produce tobacco or key components of tobacco products
- **Conduct-based:** corporate or sovereign issuers that, in the opinion of the investment manager, have been involved in an extreme environmental, social, ethical or governance breach as determined in reference to the UN Global Compact principles and are not taking adequate steps to remediate the issue.

The following table provides more detail on the parameters for exclusion within each category:

Category	Detail for exclusion
Adult Entertainment	Companies that derive more than 5% of their revenues through the retail or production of adult entertainment.
Alcohol	Companies that derive more than 5% of their revenues through the production of alcohol.
Assault-style Weapons	Companies that manufacture or retail semi-automatic or "assault-style" weapons.
Controversial Weapons	Companies that have direct exposure to anti-personnel land mines, cluster munitions, incendiary weapons, biological weapons, chemical weapons and/or nuclear weapons; which is defined as either: <ol style="list-style-type: none"> <li>1. The company is developing, producing, maintaining, distributing, storing or providing another service for a cluster munition, anti-personnel land mine, incendiary, biological, chemical and/or nuclear weapon;</li> <li>2. The company is developing, producing or providing another service for a component primarily developed for use in a cluster munition, anti-personnel land mine, incendiary, biological, chemical and/or nuclear weapon;</li> <li>3. The company is developing, producing or providing another service specialized or customized for the deployment of a cluster munition, anti-personnel land mine, incendiary, biological, chemical and/or nuclear weapon; or</li> <li>4. The company has an ownership stake of more than 50% in a company with direct exposure to cluster munitions, anti-personnel land mines, incendiary, biological, chemical and/or nuclear weapons.</li> </ol>
Conventional Weapons	Companies that derive more than 5% of their revenues through the production of conventional weapons.
For-profit Prisons	Companies that derive more than 5% of their revenues through for-profit prisons.
Fossil Fuels	Companies that derive more than 5% of their revenues through the production of thermal coal and companies that are identified within the Oil or Gas industry through the Global Industry Classification Standard (GICS) and/or Bloomberg Industry Classification Systems (BICS) classification.
Gambling	Companies that derive more than 5% of their revenues through gaming (gambling) activities or casinos.
Tobacco	Companies that have direct exposure to the manufacturing of tobacco and/or key tobacco components.
Conduct-based	Corporate or sovereign issuers that, in the opinion of the investment manager, have been involved in an extreme environmental, social, ethical or governance breach as determined in reference to the UN Global Compact principles and are not taking adequate steps to remediate the issue.

There may be circumstances where a fund has indirect exposure to a corporate or sovereign issuer involved in the excluded categories. Examples of these circumstances could include an investment in an instrument that gives exposure to an index, or an investment in a fund managed by an unaffiliated investment manager.

The Board of Managers of T. Rowe Price (Luxembourg) Management S.à r.l. has delegated the responsibility for the creation, analysis and maintenance of the lists of excluded issuers to the funds' investment manager and sub-investment managers, as appropriate, including their respective specialists in environmental, social and governance ("ESG") issues. More than one list of excluded issuers may be created and maintained by the investment manager and sub-investment managers, as appropriate. Considerations taken into account in determining the exclusion lists include the conclusions of external research providers, engagements with the company, the direct, indirect or ongoing nature of any involvement in a specific category or incident and evidence of exclusion by other investors. In conducting their analysis, the ESG specialists rely on a variety of sources for information about corporate issuers including:

- Sustainalytics
- MSCI ESG Research
- Company reports
- Research by non-governmental organizations (NGOs)
- T. Rowe Price's global team of equity and fixed income analysts
- UN Convention on Cluster Munitions data
- UN Anti-Personnel Mine Ban Convention
- Government reports
- UN Global Compact principles
- Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises
- UN Guiding Principles on Business and Human Rights

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