T. Rowe Price®

2022

ESG

CORPORATE ANNUAL REPORT

How ESG impacts our corporate actions

Corporate Environmental, Social, and Governance Annual Report, Issued August 2023

About This ESG Corporate Report

Sustainability is an integral part of our operations and our culture. It is central to how we do business. Since 2012, we have shared our work and commitments related to corporate environmental, social, and governance (ESG) matters as part of our effort to embed sustainability into everything we do.

This 2022 ESG Corporate Report provides a well-rounded picture of our organizational initiatives related to our corporate environmental footprint, our social and human capital, and our leadership and governance framework.

We detail how we pursue our corporate ESG objectives by developing and implementing comprehensive policies, goals, and programs, allowing us to better respond to the needs of our clients, associates, shareholders, and other stakeholders.

We continued to enhance our ESG disclosures, centering them on the frameworks proposed by the Task Force on Climate-Related Financial Disclosures (TCFD) and the Sustainability Accounting Standards Board (SASB). We have focused on these two reporting standards given their focus on financial materiality. The TCFD standards have been adopted by some regulators around the world, and the principles of both standards have been incorporated in International Sustainability Standards Board (ISSB).

As participants in the United Nations Global Compact (UNGC), we also strengthened our alignment with the UNGC's Sustainable Development Goals (SDGs), specifically focusing on the following goals: quality education (SDG4), gender equality (SDG5), decent work and economic growth (SDG8), and climate action (SDG13). Wherever our efforts have supported these SDGs, the corresponding icon will be displayed in the appropriate section of this report.

Our firm's ESG Corporate Report is part of a suite of annual publications. Our aim is to provide a thoughtful and comprehensive view of our commitment to ESG, corporate responsibility, and sustainability across several publications, including our 2022 Annual Report and 2023 Annual Proxy Statement. T. Rowe Price also publishes the ESG Investing Annual Report, which is focused on our approach to responsible investing.

We are proud to provide this update on our ESG journey and, most importantly, our commitment to advancing progress.

For additional details on T. Rowe Price's community impact, please refer to the To Find Out More section in this report to access links to publicly released information on our efforts in these spaces.

The information included in this report is representative of all T. Rowe Price investment advisory entities except Oak Hill Advisors, L.P. (OHA), unless otherwise noted. OHA is an alternative credit manager that T. Rowe Price Group, Inc., acquired on December 29, 2021. All data points within this report are as of December 31, 2022, unless otherwise noted. All disclosures and data are unaudited, with the exception of the firm's greenhouse gas (GHG) inventory.

WE SUPPORT THE UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS

Source: United Nations.

Our ESG Journey

As of December 31, 2022

2006

Diversity and Inclusion

Established Diversity and Inclusion function and team in Human Resources

2007

Governance

Established dedicated Corporate Governance function

2008

Corporate Responsibility

Investment policy on corporate responsibility established

2010

PRI*

Signatory to the Principles for Responsible Investment (PRI)

2012

CSR Report

First Corporate Social Responsibility (CSR) Report issued

2013

"E" and "S" Research

Sustainalytics appointed as specialized ESG research provider

2014

Sustainalytics

Sustainalytics ESG ratings are embedded in company note templates

2017

Responsible Investing

Established dedicated Responsible Investing team

2018

RIIM Corporates**

Rollout of proprietary ESG rating system for equity and credit

2019

RIIM Sovereigns

Rollout of proprietary ESG rating system for sovereigns

2020

RIIM Municipal Bonds/RIIM Securitized Bonds

Rollout of proprietary ESG rating system for municipal bonds and securitized bonds

ESG Reporting

Implementation of portfolio-level ESG reporting

Launch of ESG Enhanced Products

Launch of first suite of funds with ESG characteristics in Europe

Corporate ESG

Established dedicated Corporate ESG team

TCFD Supporter

Became a supporter of the Task Force on Climate-Related Financial Disclosures

SASB Alliance

Became a member of the Sustainability Accounting Standards Board Alliance

2021

TRPIM* RIIM Corporates**

Rollout of proprietary ESG research tool that builds an ESG profile for companies within TRPIM's U.S. investment universe

Launch of Global Impact Equity and Global Impact Credit Strategies

Launch of first impact strategies

UN Global Compact

Became a signatory

2022

NZAM

Signatory of the Net Zero Asset Managers (NZAM) initiative

ESG Enablement

Established head of ESG Enablement team to optimize ESG initiatives and drive ESG strategy

Not all vehicles are available in all jurisdictions.
*The PRI is an independent investor initiative supported by, but not part of, the United Nations.
**RIIM = Responsible Investing Indicator Model.
***T. Rowe Price Investment Management, Inc. (TRPIM).

A Letter From Our CEO

As T. Rowe Price celebrated its 85th anniversary in 2022, I am reminded of the firm's enduring values that have sustained it through various market cycles and societal changes. To call out a few of our values, we put clients first, act with integrity and accountability, and embrace diversity and collaboration.

Our commitment to ESG has long been embedded in these values and predates the creation of the acronym in 2005. While new insights and science will inform the evolution of our ESG strategy, the core values that have defined our commitment will remain steadfast.

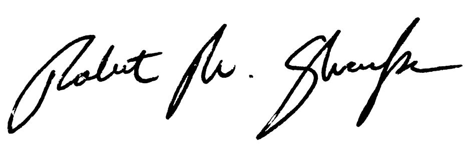
As the ESG landscape evolves, with increasing regulatory scrutiny and stakeholder expectations, the work we did in 2022 has positioned us well to navigate these changes and continue to advance our ESG strategy. We are proud of our progress.

You will learn more about our ESG strategy in this report, but I want to take a moment to highlight a few notable advancements:

- We consolidated responsibility for ESG investing and corporate sustainability under Eric Veiel, head of Global Equity, chief investment officer, and a member of the Management Committee. This strengthens our governance of ESG risks and opportunities and increases accountability for them.
- We established the ESG Enablement team and the global ESG Oversight Committee to ensure a consistent vision and global strategy for ESG, with better coordination across functions.
- We announced a new scope 1 and 2 greenhouse gas emission reduction target to reach net zero by year-end 2040.
- We committed to doubling our spending to foster economic inclusion for underrepresented suppliers in the U.S. by 2025.
- We reached our goals of increasing diversity in our global workforce and the percentage of senior roles held by underrepresented minorities three years ahead of schedule.
- We were named to Forbes' Best Employers for Women 2022—the first time our firm has received this designation.

We progressed important work in 2022—deepening the impact we have on our clients, our associates, and our communities. Our commitment to continuing our progress is unwavering.

Sincerely,



ROBERT W. SHARPS
Chief Executive Officer and President

Corporate ESG Summary

ENVIRONMENTAL

We support the goals of the Paris Climate Agreement to limit the increase of global temperatures to 1.5˚C. Our environmental impact strategy is focused on greenhouse gas (GHG) emission reduction and operational waste reduction.

We are proud to announce a new scope 1 and 2 GHG emission[1] reduction target to reach net zero by year-end 2040, which is supported by an interim target to reduce GHG emissions by 75% by year-end 2030 compared with our 2021 baseline. Both of these targets place us below the emissions reduction trajectory required to stay within a 1.5°C warming scenario as outlined by the United Nations' Intergovernmental Panel on Climate Change.

WE ARE COMMITTED TO THE FOLLOWING GOALS:

Greenhouse Gas Emissions:
Reduce scope 1 and 2 greenhouse gas emissions[1] by 75% by year-end 2030 and achieve net zero by year-end 2040.

Waste Reduction:[2]
Achieve zero operational waste in our global facilities by year-end 2025.

Phase out all single-use plastics from our facilities, with the goal of eliminating all single-use plastics by year-end 2025.

[1] Scope 1 (direct emissions from owned or controlled sources), scope 2 (indirect emissions from the generation of purchased electricity, steam, or cooling), and scope 3 (all other indirect emissions).
[2] The information provided in this report and related materials does not include content relating to Oak Hill Advisors, L.P. (OHA), an alternative credit manager that T. Rowe Price Group, Inc., acquired on December 29, 2021, unless otherwise noted.

SOCIAL

We are committed to supporting the well-being of our associates, clients, communities, and stakeholders at large. This commitment is intrinsic to our mission, vision, and values and can impact the sustainability and long-term success of our business. Moreover, it is a decisive factor in attracting, retaining, developing, and progressing talent in the asset management industry.

WE ARE ADVANCING PROGRESS IN THE FOLLOWING AREAS:[3]

By 2025, increase the diversity of our global workforce to **46%** women from 44% in 2022.

We have achieved our goal to increase women in global senior roles to **33%**, meeting our 2025 goal three years early.

By 2025, **10%** of senior roles in the U.S. to be held by underrepresented minorities.[4]

19% of our U.S. workforce are underrepresented minorities,[4] meeting our 2025 goal three years early.

Foster economic inclusion for underrepresented suppliers[5] in the U.S. by increasing our spend from USD 22 million in 2022 to **USD 50 million** by 2025 annually.

GOVERNANCE

Our ESG framework is centered on a strong foundation of governance and ethics, with our governance structure designed to ensure the Board's engagement and appropriate oversight of ESG across the organization.[6]

WE HAVE IMPLEMENTED THE FOLLOWING GOVERNANCE INITIATIVES:

Established a new team, ESG Enablement, to drive cross-functional consistency and coordination of our ESG strategy in alignment with business strategies and ESG investing capabilities.

Established the ESG Oversight Committee as a central and global oversight body to support governance around our ESG activities.

[3] 2021 is the baseline year. The information provided in this report and related materials does not include content relating to Oak Hill Advisors, L.P. (OHA), an alternative credit manager that T. Rowe Price Group, Inc., acquired on December 29, 2021, unless otherwise noted.
[4] Underrepresented minorities include Black, Hispanic, and/or Native Americans.
[5] Underrepresented suppliers include women, ethnic minorities, veterans, service-disabled veterans, disabled, LGBTQ+, and small disadvantaged-owned business enterprises.
[6] Additional information can be found in our sites dedicated to Corporate Governance policies, committees, 2023 Annual Proxy Statement, and other Investor Relations materials.

External ESG Ratings

Disclosures are a significant driver of ESG ratings performance. Throughout 2022, we continued to refine our disclosures and engage with ratings agencies and stakeholders, providing detailed information on our positions and policy statements. This contributed to greater transparency and an enhanced understanding of frameworks and methodologies. Across a set of key ESG ratings, our performance remained stable year on year.

RATINGS[7]

FTSE4Good

RUSSELL FTSE4GOOD

In June 2022, FTSE Russell (the trading name of FTSE International Limited and Frank Russell Company) confirmed that T. Rowe Price Group, Inc., had been independently assessed according to the FTSE4Good criteria and satisfied the requirements to become a constituent of the FTSE4Good Index Series.

Created by global index provider FTSE Russell, the FTSE4Good Index Series is designed to measure the performance of companies demonstrating strong ESG practices. The FTSE4Good indices are used by a wide variety of market participants to create and assess responsible investment funds and other products.[8]

SUSTAINALYTICS
a Morningstar company
RATED

SUSTAINALYTICS

17.1

In October 2022, T. Rowe Price Group, Inc., received an ESG Risk Rating of 17.1 out of 100, with 0 being the best possible score. Sustainalytics assessed the company to be at low risk of experiencing financial impacts from ESG factors.[9]

MSCI
ESG RATINGS
A

CCC	B	BB	BBB	A	AA	AAA

MSCI

A

In May 2022, T. Rowe Price Group, Inc., received a rating of A (on a scale of AAA–CCC, with AAA being the best possible score) in the MSCI ESG Ratings assessment.[10]

[7] The trademarks shown are the property of their respective owners. T. Rowe Price is not endorsed, sponsored, or otherwise authorized by or affiliated with any of the trademark owners represented by these trademarks.

[8] FTSE Russell (the trading name of FTSE International Limited and Frank Russell Company) confirms that T. Rowe Price Group, Inc., has been independently assessed according to the FTSE4Good criteria and has satisfied the requirements to become a constituent of the FTSE4Good Index Series.

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Sustainability Accounting Standards Board (SASB) Report

Improving sustainability disclosures is an ongoing, iterative process that we continue to evaluate and enhance. We started reporting SASB metrics in 2019, recognizing its importance among our stakeholders.

For the fourth year, we are following SASB's topical recommendations for our industry. All data presented in this iteration of our SASB Report are as of or for the year ended December 31, 2022, unless otherwise noted.

ASSET MANAGEMENT AND CUSTODY ACTIVITIES SUSTAINABILITY ACCOUNTING STANDARD

The contents presented in this section of our ESG Corporate Report should not be interpreted as an opinion on the materiality or financial impact of this information. Please see our Form 10-K filed on February 15, 2023. T. Rowe Price is committed to providing stakeholders with meaningful, relevant, and decision-useful sustainability information. Therefore, we use SASB standards to provide industry-specific disclosures of material ESG issues.

SASB connects businesses and investors on the financial impacts of sustainability. SASB guides disclosure of financially material sustainability information by companies to their investors.

TRANSPARENT INFORMATION AND FAIR ADVICE FOR CUSTOMERS

FN – AC – 270A.1	(1) Number and (2) percentage of covered employees with a record of investment-related investigations, consumer-initiated complaints, private civil litigations, or other regulatory proceedings

Fourteen of our registered representatives (covered employees[11]) employed as of December 31, 2022, had disclosures of investment-related investigations, client-initiated complaints, private civil litigations, or other regulatory proceedings.[12] This represents 1% of our total "covered employee" population as of year-end.

FN – AC – 270A.2	Total amount of monetary losses as a result of legal proceedings associated with marketing and communication of financial product-related information to new and returning customers

For the year ended December 31, 2022, T. Rowe Price did not sustain any monetary losses as a result of legal proceedings associated with marketing and communication of financial product-related information to new and returning customers.

FN – AC – 270A.3	Description of approach to informing customers about products and services

We are a fiduciary to many of our clients. It's critical that we provide timely information to our clients and prospects.

Every communication must be:

- Accurate
- Balanced
- Clear
- Not misleading in any way

We distribute this information through troweprice.com to 29 country-specific websites. Communications are tailored to each country's audience, which may include:

- Institutional clients
- Retail clients
- Consultants
- Financial intermediaries

Email and regular mail messages, along with in-person or virtual meetings, are the foundation of our communication strategy. In addition to our website, we provide ongoing communications through our social media channels.

[11] "Covered employees" is defined by SASB as employees subject to filing the following forms: Form U4, Form U5, Form U6, Form BD, and Form BDW, which are filed with the Central Registration Depository of the Financial Industry Regulatory Authority (FINRA).
[12] Covered employees with the identified disclosures referenced above on their Form U4 or Form U5 were included, regardless of the date of the event or whether they were employed by T. Rowe Price at the date of incident.

Our sales and marketing communications are reviewed by specially trained associates to ensure the communications comply with local regulatory requirements and firm policies for the intended audience. These associates also confirm that risks are clearly stated—not minimized—and that content is not too complex for the intended audience. All communications are produced in the appropriate language. We are committed to ensuring our data collection, use, and disclosure practices are transparent by publishing updated Privacy Notices on our websites, applicable for each region.

We recognize that availability is key. **Therefore, we've made the following product-specific documents available in many jurisdictions on our websites and through links in product-related communications:**

- Prospectuses
- Annual reports
- Key investor information documents
- Other legal documents relevant to the products and the countries where they're distributed

We maintain written policies and procedures that form our Compliance Manual. This applies to all T. Rowe Price advisers. Depending on an associate's responsibilities and/or location, they may need to register with the relevant securities authority. For example, registration in the U.S. as a securities representative and/or a principal, with the Financial Industry Regulatory Authority and appropriate state regulatory agencies through our broker-dealer, T. Rowe Price Investment Services, Inc. (TRPIS) may be required.

TRPIS also maintains written supervisory procedures (WSPs) to stay in compliance with applicable rules and regulations. These WSPs require certain associates to:

- Submit their fingerprints to FINRA
- Pass all qualifying examinations
- File an application for registration as an agent (Form U4)
- File all required registration updates in a timely manner

In the UK and EU, associates may be subject to minimum knowledge and competence standards and/or other fitness and propriety standards to engage clients. These requirements stem from the Markets in Financial Instruments Directive (MiFID) and, from a UK perspective, are contained in the Financial Conduct Authority (FCA) Handbook.

Because we have always believed that honesty, candor, and fairness are the best approach, we maintain a robust Global Code of Conduct, which sets standards of ethical conduct expected of all our associates. It also provides the framework for conducting business in a fair and ethical manner.

Additional information

Advisory clients of U.S.-registered advisers can also find our Forms ADV at adviserinfo.sec.gov.

Our Global Code of Conduct sets out basic principles to guide employee conduct. Our code is supported by other policies, programs, and employee training.

EMPLOYEE DIVERSITY AND INCLUSION

FN – AC – 330A.1 Percentage of gender and racial/ethnic group representation for (1) executive management, (2) non-executive management, (3) professionals, and (4) all other employees

Building on progress accomplished over the past few years, we have continued to look across our entire organization for ways to further diversify our firm, working toward racial and gender equity and strengthening a sense of belonging. With that in mind, we made significant progress on our diversity, equity, and inclusion (DEI) efforts, particularly in attracting and retaining diverse associates and fostering an inclusive culture for all.

Investing in these efforts is in the best interest of our associates, our clients, and the communities where we work and live. Our diversity makes us stronger and more resilient for the future. And we will continue to do more. While we acknowledge that the SASB seeks to measure diversity and inclusion, we want to reference our journey and highlight that we have deliberately chosen to add "equity" to our global DEI vernacular. We have always had a mindset of equity in our strategies and programs, and it is important that we formally enunciate our commitment. For more detailed information on our policies and programs for fostering equitable employee representation across our global operations, please refer to the "Social Impacts and Safeguards" section of this report.

The table below shows a breakdown of representation for U.S. employees.[13]

	Men								Women							
EEO Classification	Hispanic or Latino	White	Black or African American	Native Hawaiian or Other Pacific Islander	Asian	Native American or Alaska Native	Two or More Races	Total Men	Hispanic or Latino	White	Black or African American	Native Hawaiian or Other Pacific Islander	Asian	Native American or Alaska Native	Two or More Races	Total Women
1.1 Executive/Senior-Level Officials and Managers	1	58	6	–	4	–	1	70	–	37	4	–	3	–	1	45
1.2 First-/Mid-level Officials and Managers	18	682	41	1	135	2	15	894	16	504	61	–	48	–	15	644
2 Professionals	59	1,104	131	4	291	3	39	1,631	54	797	146	3	146	–	38	1,184
3 Technicians	–	1	–	–	–	–	–	1	–	1	–	–	–	–	–	1
4 Sales Workers	26	285	40	–	19	1	13	384	10	104	14	–	9	–	2	139
5 Administrative Support Workers	27	260	119	1	16	1	16	440	60	361	317	2	30	2	41	813
U.S. Total	**131**	**2,390**	**337**	**6**	**465**	**7**	**84**	**3,420**	**140**	**1,804**	**542**	**5**	**236**	**2**	**97**	**2,826**

[13] Definitions are based on the U.S. Equal Employment Opportunity Commission's EEO-1 Survey. As of December 31, 2022, our U.S. associate population (regular associate population, excluding interns, fixed terms, and contingent workers) represents 84% of our global workforce. The information provided in this report and related materials does not include content relating to Oak Hill Advisors, L.P. (OHA), an alternative credit manager that T. Rowe Price Group, Inc., acquired on December 29, 2021, unless otherwise noted.

INCORPORATION OF ESG FACTORS IN INVESTMENT MANAGEMENT AND ADVISORY

FN – AC – 410 A.1	Amount of assets under management, by asset class, that employ (1) integration of ESG issues, (2) sustainability themed investing, and (3) screening

We integrate ESG factors into our investment analysis for the purpose of maximizing investment performance across virtually all strategies managed by a T. Rowe Price investment adviser.[14] With ESG integration, fiduciary duty remains a top priority and is applied to all of our applicable investment products.

We offer select investment products that carry binding ESG commitments for clients whose investment goals also include sustainable objectives. These select investment products promote ESG characteristics through the use of exclusions, alignment to sustainable investments, and positive tilts to Responsible Investing Indicator Model (RIIM)[15] scores.

We are currently refining our methodology to calculate our assets under management in sustainability-themed accounts and accounts that apply ESG screens. Many of these assets are in separate accounts, which allow our clients to choose specific mandates and exclusions that align with their values. We will publish our assets under management in sustainability-themed accounts and accounts with ESG screens when the new calculation is complete, most likely in the fourth quarter of 2023.

We launched the firm's first impact investing strategies in 2021, which are considered sustainability-themed investments. As of December 31, 2022, we managed USD 94.4 million in impact strategies. This included USD 57.1 million in equities and USD 37.3 million in fixed income. These strategies are aligned to the United Nations Sustainable Development Goals to direct capital to specific impact outcomes.

FN – AC – 410 A.2	Description of approach to incorporation of ESG factors in investment and/or wealth management processes and strategies

ESG considerations form part of our overall investment decision-making process alongside other factors to identify investment opportunities and manage investment risk. At T. Rowe Price, this is known as ESG integration and is applied across our investment platform.

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.

We have 37 investment staff dedicated to ESG research at T. Rowe Price Associates (TRPA) and T. Rowe Price Investment Management (TRPIM), who 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 is RIIM, which forms the foundation of our ESG integration process. The RIIM frameworks provide two key benefits: a uniform standard on due diligence of ESG factors across our investment platforms and a common language among our analysts, portfolio managers, and ESG specialists to discuss ESG performance and compare securities.

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

[14] ESG integration is not applied to strategies in instances when it would not be appropriate, such as passively managed strategies and cash.
[15] Effective March 7, 2022, RIIM analysis at TRPIM was separated from other parts of T. Rowe Price and is different across advisers. TRPIM has a separate ESG team from that of TRPA, and TRPIM RIIM covers equities and corporate bonds only. TRPA and TRPIM ESG teams are both dedicated to supporting investment decisions and leverage a similar approach, framework, and philosophy.

We rolled out our proprietary RIIM framework for corporate securities (both equity and credit) in 2018, followed by similar frameworks for sovereigns in 2019 and for municipal bonds and securitized bonds in 2020.

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 of 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.

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.

Additional research and insights into our approach to sustainable investing may be accessed here.

FN – AC – 410 A.3	Description of proxy voting and investee engagement policies and procedures

Proxy voting is an investment function within T. Rowe Price and is subject to the oversight of the Boards of Directors of the various T. Rowe Price investment advisers. T. Rowe Price advisers have fiduciary responsibilities. Our view is that proxy voting is a key element of the stewardship responsibilities we execute on behalf of our clients. It is a responsibility we take seriously, centered on investments. In casting votes on behalf of clients, our goal is to foster long-term success for the company and its investors.

Portfolio managers are ultimately responsible for making the voting decisions within the strategies they manage. **To fulfill this responsibility, they receive recommendations and support from a range of sources, including:**

- The T. Rowe Price ESG Investing Committees (TRPA and TRPIM)
- Our global industry analysts
- Our corporate governance and responsible investing specialists
- Insights from RIIM
- Institutional Shareholder Services, our external proxy advisory firm

The ESG Investing Committees are made up of experienced investment professionals, from our Equity, Fixed Income, and Multi-Asset Divisions, as well as senior members of equity management. The ESG Investing Committees meet twice a year. The first meeting, held in the first quarter, focuses on proxy voting activity from the year before, reassesses the suitability of our voting guidelines, and considers amendments to the guidelines. The second meeting, which is typically held midyear, focuses on environmental and social issues.

Where proxy voting is concerned, our overarching objective is to vote our clients' shares in a thoughtful, investment-centered way—in support of the path most likely to foster long-term, sustainable success for the company and its investors.

In total, T. Rowe Price portfolios voted on 64,056 proposals, including 62,592 management proposals and 1,464 shareholder proposals, across all regions in 2022. Among the shareholder proposals, 583 were situations where shareholders were nominating directors to a company's board or technical proposals related to such nominations. Another 401 were resolutions asking companies to adopt specific corporate governance practices, and 480 were environmental and social resolutions.

We offer extensive public disclosure around proxy voting. Under U.S. securities regulation, the voting policies, procedures, and decisions of T. Rowe Price's U.S.-regulated mutual fund portfolios are required to be disclosed on an annual basis. Throughout 2022, we continued disclosing each U.S.-regulated mutual fund's full proxy voting record semiannually, instead of annually. Vote disclosures for the first and second halves of each year were posted eight weeks after each period-end.

In addition, we publish a report for our clients each autumn, highlighting important corporate governance trends from the prior 12 months and aggregating our proxy voting decisions into categories. We also provide our institutional clients with a customized record of their portfolios' voting activities upon request.

Within our content, we provided not only voting decisions, but rationales for key votes. These included votes against management, votes on shareholder proposals, and any other votes deemed controversial, informative, or significant.

In the 2022 proxy season, the number of environmental and social resolutions voted on at companies within the S&P 1500 Index rose by almost 70% from the previous year. This increase in volume coincided with a decrease in the overall quality of the resolutions. We observed more inaccuracies in proposals last year, more poorly targeted resolutions, and more proposals addressing non-core issues. In addition, we observed a marked increase in the level of prescriptive requests, such as requesting that a company immediately cease doing business with clients in certain sectors.

In fact, the category with the largest increase in volume was anti-ESG resolutions, which request that companies unwind their investments in environmental and social improvements. In 2021, TRPA voted only nine of these resolutions; in 2022 it was 46. TRPA did not support any anti-ESG resolutions in 2021 or 2022. Additional information is available in For or Against: The Year in Shareholder Proposals 2022.

Our proxy voting program is one element of our overall relationship with corporate issuers. We use our voting power in a way that complements the other aspects of our relationship with these companies. **Other contexts in which we might use our influence include:**

- Regular, ongoing investment diligence
- Engagement with management on ESG issues
- Meetings with senior management, offering our candid feedback
- Meetings with members of the Board of Directors
- Decisions to increase or decrease the weight of an investment in a portfolio
- Decisions to initiate or eliminate an investment
- On rare occasions, issuing a public statement about a company—either to support the management team or to encourage it to change course in the long-term best interests of the company

However, in an environment where large institutional shareholders are often rated by third parties according to how frequently they vote against board recommendations, we wish to be clear—it is not our objective to use our vote to create conflict with the companies in which our clients are invested. Instead, our objective is to use our influence—through the various avenues listed above—to increase the probability that the company will outperform its peers, helping to enable our clients to achieve their investment goals. A proxy vote is an important shareholder right, but its power is limited to the one day per year when a company convenes its annual meeting. Influence—earned over time and applied thoughtfully—is a tool we use every day.

Our investment-driven engagement program frequently identifies targets through our proprietary RIIM analyses, governance screening, and analysts' fundamental research. ESG engagement meetings are carried out by portfolio managers and analysts from our equity and fixed income teams, as well as by our ESG specialists.

While we engage with companies in a variety of investment contexts, ESG engagement focuses on learning about, guiding, or exchanging perspectives on the environmental practices, corporate governance, or social issues affecting their businesses.

Throughout the course of 2022, TRPA engaged with companies on 778 separate occasions on ESG topics. TRPIM undertook 96 ESG engagements. We classify these meetings as ESG engagements, as they contained a notable discussion on ESG issues.

BUSINESS ETHICS

FN – AC – 510 A.1	Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behavior, market manipulation, malpractice, or other related financial industry laws or regulations

For the year ended December 31, 2022, T. Rowe Price did not sustain any monetary losses as a result of legal proceedings associated with fraud, insider trading, antitrust, anti-competitive behavior, market manipulation, malpractice, or other related financial industry laws or regulations.

FN – AC – 510 A.2	Description of whistleblower policies and procedures

Any associate worldwide can report potential or actual violations of laws or regulations, regardless of location. **Questionable conduct can be reported:**

- Directly to their line manager. Managers should escalate issues to the Legal, Compliance, & Audit Department as necessary;
- Anonymously, via the Whistleblower Hotline (administered by an independent, external third party); or
- To the general counsel, respective chief compliance officer, senior compliance manager, or regional head of Human Resources verbally or in writing. This can be done on an anonymous basis in writing using internal mail and a confidential envelope.

Reports from the hotline go to our Legal, Compliance, & Audit Department, which promptly investigates the matter. The general counsel provides an annual summary of all complaints to our Audit Committee. No adverse action will be taken against anyone who in good faith reports a violation, or a potential violation, of a law, a regulation, or our Global Code of Conduct.

ACTIVITY METRICS[16]

FN – AC – 000.A	(1) Total registered and (2) total unregistered assets under management (AUM) as of December 31, 2022

Total Registered AUM:[17]	USD 1,085.2 Billion
Total Unregistered AUM:[18]	USD 189.5 Billion
Total AUM:	**USD 1,274.7 Billion**

[16] Includes Oak Hill Advisors, L.P. (OHA), an alternative credit manager that T. Rowe Price Group, Inc., acquired on December 29, 2021.

[17] Registered AUM is defined in the SASB Asset Management & Custody Activities Standard. For our purposes, registered AUM includes a variety of pooled investment funds, including U.S. common trust funds, Luxembourg SICAVs and FCPs, non-U.S. unit investment trusts, and other non-U.S. subadvised funds, as well as U.S. mutual funds, variable insurance product funds, Canadian pooled funds, and UK open-ended investment companies.

[18] Total unregistered AUM is total AUM minus total registered AUM. This includes AUM of accounts classified as separate accounts, distribution management services, and alternative investment funds. Some of these accounts may be subject to regulations of the Investment Company Act of 1940, managed under the Employee Retirement Income Security Act of 1974, subject to non-U.S. regulations like UCITS, or managed under the Commodity Futures Trading Commission regulations.

2022 SASB REPORT ADDENDUM

This addendum to T. Rowe Price Group's 2022 Sustainability Accounting Standards Board (SASB) Report, published in December 2023, provides information about the firm's amount of assets under management, by asset class, that employ integration of ESG issues, sustainability themed investing, and screening (FN – AC – 410 A.1).

As of December 31, 2022, USD 65 billion assets (5% of total assets under management) were deemed to be in accounts with a mandate that includes ESG criteria, defined by portfolios that apply screening or are sustainability themed. The entire USD 65 billion used more than one ESG strategy (e.g., screening and ESG integration). Our criteria for screening is that the account needs to apply exclusion lists aimed at ESG considerations (e.g., tobacco, gambling) or positive ESG screening criteria (e.g., sustainable investment alignment targets, GHG reduction targets), while sustainability themed includes impact products. Many of these assets are separate accounts, which allow our clients to choose specific screening criteria that align with their values and/or sustainability-related objectives.

	Equity AUM $Billions (USD)	Fixed Income AUM $Billions (USD)	Cash AUM $Billions (USD)	Other AUM $Billions (USD)	Totals $Billions (USD)
ESG Integration[19]	$648	$135	$0	$305[20]	$1,089
Sustainability themed	<$0.1	<$0.1	$0	$0	<$0.1
ESG Screening	$45	$19	$0	<$1	$65

Portfolios may be assigned to multiple ESG categories.

ESG AUM data are not audited. The ESG integration, Sustainability themed, and ESG Screening AUM exclude Oak Hill Advisors, L.P. (OHA), an alternative credit manager that T. Rowe Price Group, Inc. acquired on December 29, 2021.

[19] The AUM reflects portfolios where the portfolio manager uses ESG Integration. However, some of the asset classes or financial instruments in these portfolios are not part of the ESG Integration process due to the type or nature of those financial instruments or asset classes and/or lack of data (e.g., cash, currency positions, and particular types of derivatives).

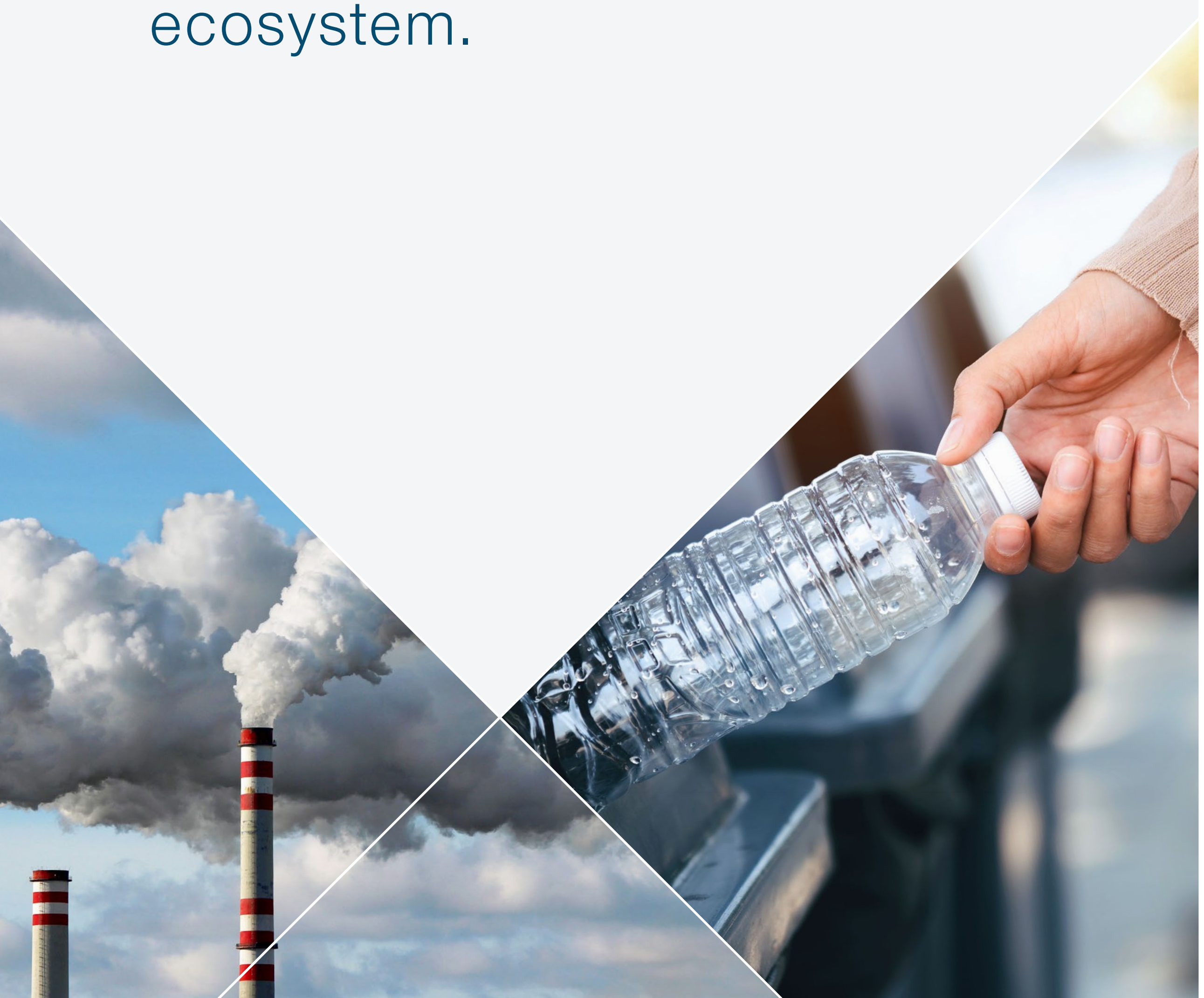
[20] This represents the underlying sub-investment strategies of our Multi-Asset products (e.g., target date portfolios, SICAV) that utilize ESG Integration, not the total AUM of those Multi-Asset products.

ENVIRONMENTAL

Task Force on Climate-Related Financial Disclosures (TCFD) Report

The following section contains our report aligning to the TCFD recommendations in our third year of disclosure. These disclosures reflect our current understanding of our risks and opportunities related to climate change.

Our support of the TCFD demonstrates that **we acknowledge climate as a material risk** and understand the need for improved disclosures across the asset management ecosystem.



GOVERNANCE

A Describe the Board's oversight of climate-related risks and opportunities.

We recognize that ESG touches all parts of our business. To ensure we are appropriately identifying and managing potential ESG-related risks and opportunities, such as climate risk, we have incorporated ESG considerations into our core business functions, including those of our Board of Directors.

Nominating and Corporate Governance Committee

The Nominating and Corporate Governance Committee (NCGC) oversees ESG across the firm. This includes ESG factors related to the firm's operations and investment activities. In 2020, amendments were introduced for the NCGC charter to monitor performance objectives and progress against our corporate goals and targets for climate-related issues. Additionally, the NCGC receives updates on the firm's ESG activities from the ESG Enablement team.

Audit Committee

The Audit Committee of the Board considers ESG matters as they impact any disclosures in our financial statements, including climate-related risks. In addition, the Audit Committee receives updates from the company's chief risk officer (CRO) on these topics and regularly discusses ESG legal and regulatory developments with our general counsel.

Executive Compensation and Management Development Committee

The Executive Compensation and Management Development Committee (ECMDC) is responsible for considering how ESG matters may impact the compensation of management. The ECMDC considers the firm's ESG efforts when reviewing and approving general salary and compensation policies for management.

Accountability*

The following chart illustrates the firm's ESG accountability framework.

BOARDS AND COMMITTEES

IMPLEMENTATION TEAMS

Provide regular updates to the Nominating and Corporate Governance Committee.

T. ROWE PRICE GROUP BOARD OF DIRECTORS

- Audit Committee
- Executive Compensation and Management Development Committee (ECMDC)
- Nominating and Corporate Governance Committee (NCGC)

T. ROWE PRICE FUNDS/TRUSTS BOARD OF DIRECTORS

MANAGEMENT COMPANIES/ INVESTMENT ADVISERS

Provide updates on proxy voting, exclusion policies, and other ESG investment processes.

T. ROWE PRICE MANAGEMENT COMMITTEE

Oversees corporate strategy and implementation.

Eric Veiel, head of Global Equity and CIO, TRPA, has responsibility for ESG, including investment, operations, and corporate activities.

INVESTMENT MANAGEMENT STEERING COMMITTEE (IMSC)

ENTERPRISE RISK MANAGEMENT COMMITTEE (ERMC)

INVESTMENT STEERING COMMITTEES

ESG OVERSIGHT COMMITTEE (ESGOC)

Oversees ESG operational activities, including development and implementation of ESG strategy, initiatives, and corporate ESG activities.

ESG INVESTING COMMITTEES

Oversees ESG investing activities, including ESG policies, engagement program, proxy voting, exclusion lists, and ESG investment frameworks (such as RIIM, impact, net zero, etc.).

ESG ENABLEMENT

Responsible for developing and implementing the firm's ESG strategy. This includes ESG activities outside those related to investment process, such as:

- T. Rowe Price's ESG strategy
- Execution of ESG initiatives
- Product, marketing, and corporate ESG
- Fostering ESG collaboration across the organization

RISK

Monitors the firm's risks from an investment and operational perspective. This includes climate risk and other ESG risks.

INVESTMENT PLATFORM (TRPA & TRPIM)

Portfolio managers are accountable for integrating and monitoring ESG factors across portfolio holdings, engagement, and proxy voting as appropriate to their mandate.

Investment analysts are accountable for integrating ESG factors into their research process and investment analysis.

ESG specialists support analysts and portfolio managers by providing ESG analytics, issuer and thematic research, portfolio analysis, and stewardship activities.

* As of June 30, 2023. The information provided in this report and related materials does not include content relating to Oak Hill Advisors, L.P. (OHA), an alternative credit manager that T. Rowe Price Group, Inc., acquired on December 29, 2021, unless otherwise noted.

B Describe management's role in assessing and managing risks and opportunities.

T. Rowe Price's Management Committee assesses climate-related risks and opportunities via the ERMC which is chaired by the firm's chief risk officer. The ERMC was recently formed after the Risk and Operating Steering Committee was split into the ERMC and the Strategic Operating Committee. The new governance structure allows the ERMC to serve as a standalone committee dedicated to risk management. Additionally, climate-related risks and opportunities related to investment processes are monitored through the Investment Steering Committees for our Equity, Fixed Income, and Multi-Asset Divisions.

In 2022, responsibility for ESG investing and corporate sustainability was consolidated under Eric Veiel, head of Global Equity, chief investment officer, and a member of the Management Committee. Under Mr. Veiel, our ESG Enablement and ESG Investing teams are responsible for developing and managing the firm's sustainability initiatives in their respective areas of focus. Day-to-day tasks involve the identification, assessment, tracking, and mitigation of climate risks and opportunities.

In recognition that ESG activities are present across multiple operating functions for investment management firms, the firm created the ESG Oversight Committee in 2023. Chaired by the firm's head of ESG Enablement, the ESGOC, a new central and global oversight body, will help support governance around our ESG activities and report into the IMSC, with regular updates to the ERMC. Eric Veiel and the firm's chief risk officer serve on the ESGOC.

The ESGOC is responsible for:

- Driving T. Rowe Price's ESG strategy
- Ensuring coordinated, consistent, and prioritized execution of ESG initiatives and management of ESG risks
- Fostering ESG collaboration across the organization
- Embedding operational support for ESG across the organization at scale

The firm also created the ESG Enablement team in 2022 for the purpose of developing and implementing T. Rowe Price's firmwide ESG strategy as well as fostering ESG collaboration across the organization.

Oversight of ESG investing policies, ESG integration, sustainable and impact investment, engagement, and proxy voting processes resides with T. Rowe Price's ESG Investing Committees, made up of senior leaders, managers, analysts, and ESG specialists at the firm.

T. Rowe Price's Investment Policy on Climate Change sets out our governance approach for the integration of climate risks into our investment processes.[21] Our practice at T. Rowe Price has been to embed ESG factors throughout our investment research platforms, including climate-related risks and opportunities.

Our organization relies on additional resources to identify and assess climate-related risks and opportunities and scope possible adaptation and mitigation strategies. These include:

- Shareholder engagements
- Trade associations
- ESG benchmarking, surveys, and ratings
- ESG disclosures (such as SASB and TCFD) and sustainability reporting frameworks, which we believe provide management, clients, and stakeholders decision-useful information on material ESG issues

[21] The information provided in this report and related materials does not include content relating to Oak Hill Advisors, L.P. (OHA), an alternative credit manager that T. Rowe Price Group, Inc., acquired on December 29, 2021, unless otherwise noted.

Addressing Climate Change as a Corporate Entity and as an Asset Manager

AS AN ASSET MANAGER

AS A CORPORATE ENTITY

APPROACH & CAPABILITIES

As an Asset Manager

ESG Integration

Central, dedicated ESG teams.

Proprietary ESG analytics and ratings, which include GHG analysis and net zero status.

ESG analysis conducted at the security and portfolio level.

Stewardship

Advocate for industry standards regarding climate disclosures.

Active stewardship program that incorporates climate issues.

Publish our engagement and proxy voting statistics.

Products & Mandates

Scope 3, Category 15

Suite of Impact products.

Specific offerings for clients with overriding climate or other environmental goals.

As a Corporate Entity

Corporate Net Zero Strategy

Scope 1 and 2

Net zero operations by year-end 2040 (scope 1 & 2).

Interim targets to reduce GHG emissions by 75% by year-end 2030 and 80% by year-end 2035, compared with our 2021 base year.

Waste Management

Scope 3, Category 5

Zero operational waste by year-end 2025.

Phasing out single-use plastic by year-end 2025.

Emissions From Business Travel

Scope 3, Category 6

Rail and air travel emissions offset using Climate Vault.

TRANSPARENCY & ACCOUNTABILITY

As an Asset Manager	As a Corporate Entity
Fund- and Mandate-Level Reporting	**TCFD and SASB Reports**
ESG Investing Report	**Corporate ESG Report**
Investment Policy on Climate Change	**Environmental Policy**

STRATEGY

A Describe the climate-related risks and opportunities the organization has identified over the short, medium, and long term.

We identified the most significant climate risks to our business as:

1. Impact on investment performance,
2. Impact on client preferences for investment products, and
3. Impact of acute disruptions brought on by major weather events as well as chronic implications of climate change.

Over the past several years, the corporate strategy has evolved in an effort to mitigate climate risks and benefit from potential opportunities. In 2017, we strengthened ESG analysis and stewardship as a core capability on our investment research platform, which totaled 39 investment personnel dedicated full time to ESG, as of December 31, 2022. Given the data-intensive nature of ESG research and the fact that ESG data have unique qualities that differ from traditional financial data, T. Rowe Price has also built a Technology team dedicated to supporting this effort. Recognizing the cross-functional capabilities required to successfully implement an ESG strategy, the ESG Enablement team was established in 2022, as mentioned above. It possesses expertise in strategy, product, marketing, and legislative affairs, among other functions, and was designed with the intent of fostering ESG collaboration across the organization.

The work done by these teams factors climate-related risks and opportunities into investment processes and decisions relevant to the products and investment strategies offered by the firm. In addition to growing its ESG Investment, Technology, and Enablement teams, we launched investment products with specific climate-related mandates, such as the impact strategy range, as well as other products and strategies that promote environmental and social objectives.

Investments

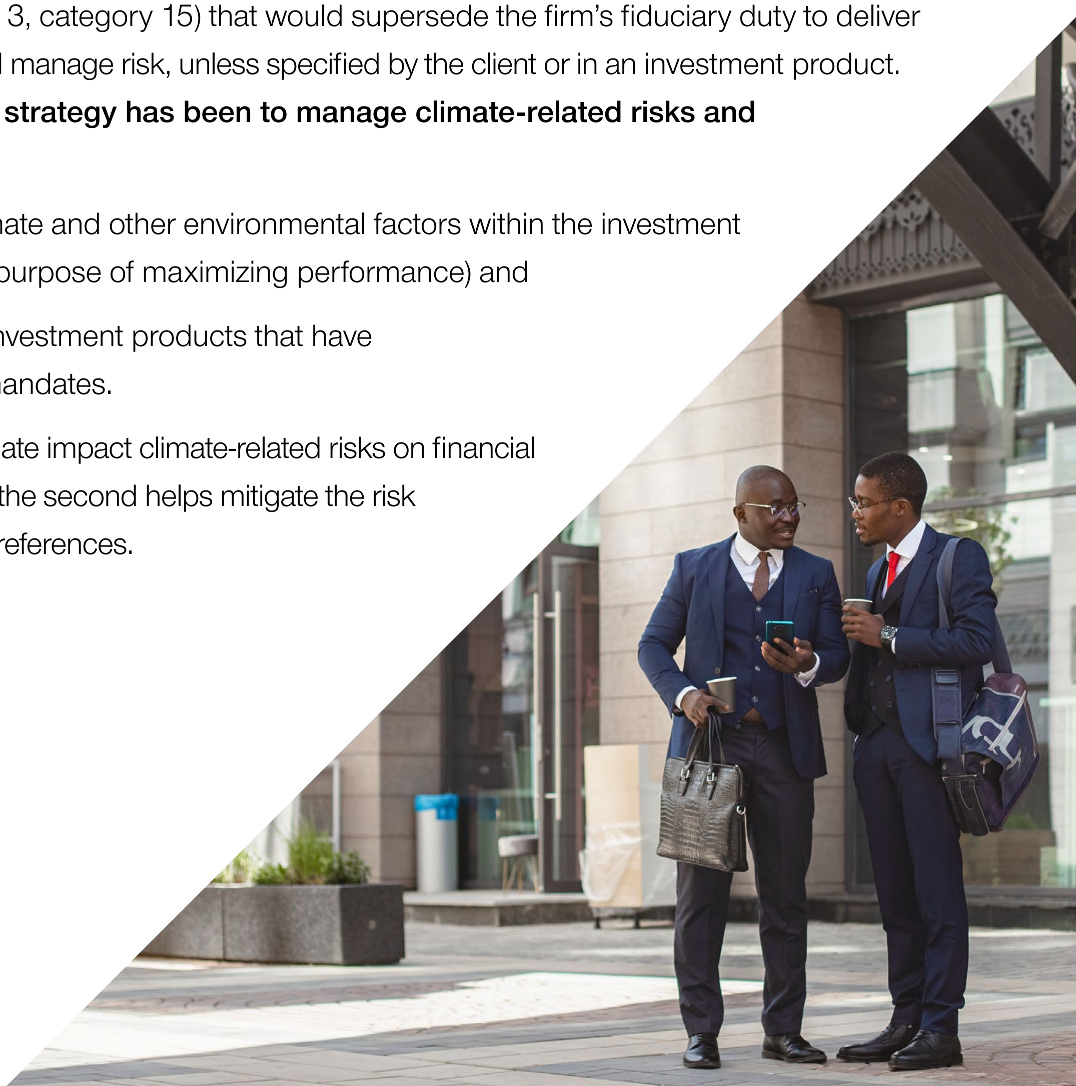
Asset managers have a significant impact on climate through the investments made on behalf of clients. We believe that climate risks and opportunities can impact investment performance and client demand for investment product offerings. The process for identifying, assessing, and managing climate-related risks and opportunities is outlined in the Risk Management section of this report.

We expect that financial market performance will experience more volatility in the event of a delayed and/or disorderly transition as the likelihood for physical climate risk will be greater and the regulatory impact may be more severe. While climate change risks and opportunities are present across all geographies and sectors, they will likely be more pronounced for issuers in regions taking limited action to address climate risk from a regulatory standpoint; in those that, for geographic or economic reasons, are more likely to experience greater physical impacts; and in high-emitting sectors. In the short and medium term, we believe that risk and opportunities that could stem from climate change impact on client preferences in our investment product offerings are more material in Europe, Japan, and Australia.

While investments make up the majority of total greenhouse gas emissions for asset managers, most of these investments are managed for clients with a mandate to deliver financial performance. As a result, we have not set a binding net zero target for our investments (scope 3, category 15) that would supersede the firm's fiduciary duty to deliver financial returns and manage risk, unless specified by the client or in an investment product. **Instead, the firm's strategy has been to manage climate-related risks and opportunities by:**

1. Considering climate and other environmental factors within the investment analysis (for the purpose of maximizing performance) and
2. Offering select investment products that have environmental mandates.

The first helps mitigate impact climate-related risks on financial performance, while the second helps mitigate the risk of changing client preferences.



Operations

Our climate risk strategy focuses on acute disruptions brought on by major weather events and chronic implications of climate change. Our operations are exposed to physical risks and transition risks derived from climate change. The risks associated with new climate-related regulations globally may result in increased energy and operational costs based on the current regulatory environment. Furthermore, emerging regulatory and legal requirements may be costly to implement from both a human resources and a budgetary perspective. To help mitigate risks associated with the prospect of increased energy costs and regulatory penalties for carbon emissions, we are seeking a long-term energy contract for our largest facilities in Maryland, U.S., that would develop a purpose-built solar array in the PJM region.

Various climate risks and opportunities are likely to manifest across different time horizons and with different impacts. While some are present over a short-term time horizon, we believe they have the potential to become more significant over the medium and long term. The following table outlines the climate-related risks that might impact the firm's products, investment strategies, and corporate operations.

S Short-term risk (less than 1 year) M Medium-term risk (2–5 years) L Long-term risk (5+ years)

Type	Climate-Related Risks and Mitigation Strategies	Potential Financial Impact
Risks		
Transition Risks	**Regulatory** M L Changes in regulation could lead to increased compliance costs, enhanced reporting obligations, regulation of existing products and/or services, and exposure to litigation.	▪ **Change in client preferences for investment products** ▪ **Increased compliance costs** ▪ **Carbon taxes levied or other environmental fines** ▪ **Increased costs for ESG data**
	Technology M L Transitioning to lower-emissions technologies for our own corporate footprint, along with the substitution of existing assets and related services with lower-emissions options, may require additional expenditure.	▪ **Substitution of obsolete assets** ▪ **Capital investments in new technologies** ▪ **Costs to adopt lower-emissions processes**
	Market ***Investment Performance Related*** M L Energy transition may drive volatility in financial market performance and/or deviation in performance across specific regions and industries. This risk may be further exacerbated in the event of a disorderly transition.	▪ **Volatile or unfavorable market conditions leading to underperformance of investment portfolios**
	Product Related M L Climate change may influence client preferences by increasing the demand for investment products oriented toward climate change mitigation. Clients may request more customization on their separate accounts in order to align with their individual climate goals.	▪ **Lower market share if product suite does not align with client preferences** ▪ **Increased costs associated with providing more customized products** ▪ **Increased costs for ESG data**

Type	Climate-Related Risks and Mitigation Strategies	Potential Financial Impact
	Operations Related M L Regulatory environmental standards may require participation in energy reduction initiatives, energy efficiency programs, or renewable energy programs.	▪ **Increased costs from carbon taxes or other environmental levies**
	Reputation M L If we fall short of stakeholder expectations on climate risks and sustainability, this may influence clients' willingness to do business with us and our workforce's willingness to remain.	▪ **Drop in stock price due to negative stakeholder feedback** ▪ **Negative impact on workforce management (i.e., employee attraction and retention)** ▪ **Reduced assets under management due to negative client feedback**
Physical Risks	**Acute** S M L External events, such as severe weather events or other natural disasters, receive ongoing attention, given their potential impact on executing business activities, facilities, and related infrastructure and technologies. An extreme weather event—such as a cyclone, wildfire, or flood—that impacts the firm's locations or the location of a vendor servicing the firm may affect our day-to-day operations, potentially resulting in increased costs and workforce disruptions.	▪ **Negative impact to valuations could result in declines in asset values and potential loss of revenue**
	Chronic *Investment Performance Related* S M L Within our investment portfolios, extreme weather-related events around the world can impact companies in which the firm invests on behalf of our clients. An extreme weather event may cause our investment professionals to reevaluate investments in affected companies. Valuations may be impacted, resulting in declines in asset values and potential loss of revenue. We incorporate climate-related investment analysis into our investment process to mitigate the potential impact on our portfolios.	▪ **Negative impact to valuations could result in declines in asset values and potential loss of assets under management**
	Operations Related M L Rising sea levels may increase the risk of flooding to our Baltimore office, and increasing wildfires could impact our operations in various locations. Additionally, because of extreme variability in weather patterns, we may experience increased costs related to more frequent cooling and heating needs inside our buildings. Additionally, attracting and retaining talent in high-risk locations could become more challenging.	▪ **Increased operating and capital costs** ▪ **Increased insurance premiums and potential for reduced availability of insurance** ▪ **Reduced ability to attract talent**

S Short-term risk (less than 1 year) M Medium-term risk (2–5 years) L Long-term risk (5+ years)

Type	Climate-Related Risks and Mitigation Strategies	Potential Financial Impact
Mitigation Strategies		
Reputation M L	Exhibiting robust management of climate issues across the business may influence clients' willingness to do business with the firm and our workforce's willingness to remain at the firm.	▪ **Increased assets under management** ▪ **Increased ability to attract and retain talent**
Market	*Investment Performance Related* M L The large systematic change driven by technological advances and/or regulation presents an opportunity for alpha generation by using environmental analysis as part of the investment process. As predominantly active investors, the firm is well positioned to evaluate the impact of this systematic change on a case-by-case basis.	▪ **Ability to generate better investment research insights could lead to better investment performance**
	Product Related M L Changing client preferences may increase demand for investment products.	▪ **Increased assets under management**
	Operations Related M L Our firm is currently implementing an operational net zero strategy and action plan based on these pillars: understanding our GHG footprint and trajectory; reducing our operational energy use; increasing our renewable energy supply; and offsetting remaining emissions, which we anticipate will represent less than 5% of our current GHG inventory. We are targeting net zero scope 1 and 2 emissions by year-end 2040 and a 75% reduction by year-end 2030 compared with our 2021 baseline. Our net zero strategy may help reduce long-term utility costs and avoid carbon penalties that would be imposed on our Maryland and Colorado operations in 2031 and 2024, respectively.	▪ **Reduced energy costs (e.g., through efficiency gains and cost reductions)** ▪ **Reputational benefits**

S Short-term risk (less than 1 year) M Medium-term risk (2–5 years) L Long-term risk (5+ years)

B Describe the impact of climate-related risks and opportunities on the organization's business, strategy, and financial planning. Asset managers should describe how climate-related risks and opportunities are factored into relevant products or investment strategies.

Consideration in Investment Product and Strategies

Our approach and consideration of climate-related factors are grounded in our existing fundamental investment and engagement practices, where we consider climate risks and opportunities as part of security selection, portfolio review, and discussions with companies as well as sovereign, securitized, and municipal bond issuers. We believe that environmental and social factors, including climate change, can impact financial performance of our investee companies and other issuers, and we therefore integrate analysis of these factors into our research process for the purpose of maximizing long-term risk-adjusted returns.

We use a combination of fundamental analysis, thematic research and our proprietary Responsible Investing Indicator Model (RIIM) to assess an issuer's net zero status and evaluate climate-related risks and opportunities. RIIM analysis provides two key benefits for our analysts and portfolio managers. First, RIIM proactively searches for environmental indicators and controversies on companies and sovereign issuers. This is an important feature as environmental data are not required to be disclosed nor are they standardized like financial data. Second, RIIM provides a framework for evaluating environmental factors, creating a common language for our analysts and portfolio managers to discuss how an investment is performing on environmental factors, as well as compare securities within the investment universe.

Our evaluation of climate-related factors focuses on energy transition and physical risk, but we also believe that an issuer's environmental footprint and track record are important indicators that can help in a tightening regulatory environment. As such, our RIIM framework includes a range of inputs, which are weighted by materiality, and the weight applied to each factor will vary based on industry or asset class. We determine materiality using the Global Industry Classification Standard (GICS), the Bloomberg Industry Classification Standard (BICS), and the Bloomberg Classification System. Materiality is initially assigned at the GICS subindustry level. If a GICS classification is not available for a security, we use BICS.

When considering climate-related risks and opportunities at the portfolio or investment universe level, we generally center on the five core evaluation metrics listed below. Recently, we have engaged a third-party vendor to provide us with climate scenario analysis and implied temperature rise (ITR) tools. While these new emerging evaluation metrics add some investment insights, data availability and quality are an issue.

Core Evaluation Metrics:

- RIIM environment scores
- Net zero status
- GHG footprint
- Climate solutions alignment
- Engagement and proxy voting stewardship

Emerging Evaluation Metrics:

- Climate scenario analysis
- Implied temperature rise

How each of the evaluation metrics is considered within a portfolio context will vary based on data availability and the investment strategy. For example, a portfolio with very limited data availability may not find a GHG footprint, climate scenario analysis, and ITR to be decision-useful metrics. Instead, that strategy may place a greater focus on RIIM environmental scores and climate solutions alignment (both of which can be generated through T. Rowe Price's own fundamental research and, as such, do not have to be dependent on third-party data providers), as well as stewardship. In other cases, data availability may be good, but the portfolio's investment strategy may be more aligned with specific indicators, and that will determine which of the evaluation metrics are weighted most heavily by the portfolio manager.

Our management of climate-related risks for a particular investment product is dependent upon the mandate given to us by the client. In the case where a client has set a sole mandate to deliver financial performance, climate-related risk mitigation is limited to evaluating environmental factors as part of our investment process for the purpose of maximizing financial performance.

A small but growing number of clients have elected to apply various net zero or GHG reduction targets to their investment portfolios. These clients have directed a dual mandate to deliver on climate-related outcomes as well as financial performance—these types of mandates tend to fall into the three areas outlined below.

Net Zero Stewardship

The portfolio analyzes net zero factors for the purpose of maximizing investment performance and deploys stewardship activities aimed at promoting a net zero objective.

- Specific targets are set for engagement with portfolio holdings that have a net zero status of Not Aligned or No Data (minimum 70% of financed emissions)
- Proxy voting reflects net zero objective
- Engagement also takes place on net zero issues with other holdings in the portfolio

Net Zero Mandate

The portfolio has a specific objective to reach net zero by 2050.

As part of this objective, the portfolio mandate:

- Sets firm targets on engagement with holdings that are Not Aligned (minimum 70% of financed emissions)
- Sets firm target for 2050 that 100% of holdings have to be Achieved on net zero status
- Sets firm target for 2040 that 100% of holdings have to be Achieved or Aligned on net zero status
- Sets comply or explain target on net zero status for five years forward
- Sets comply or explain target on GHG emissions reduction
- Tracks climate solutions alignment

Client-Specific Targets

Clients with separate accounts may be more targeted on the specific net zero factors they want to contribute to their net zero mandate—e.g., GHG reduction along specific trajectory, climate solutions, engagements, etc.

Some or all of the following are included in target setting and data tracking:

- Net zero status
- GHG emissions
- Alignment to climate solutions
- Engagement

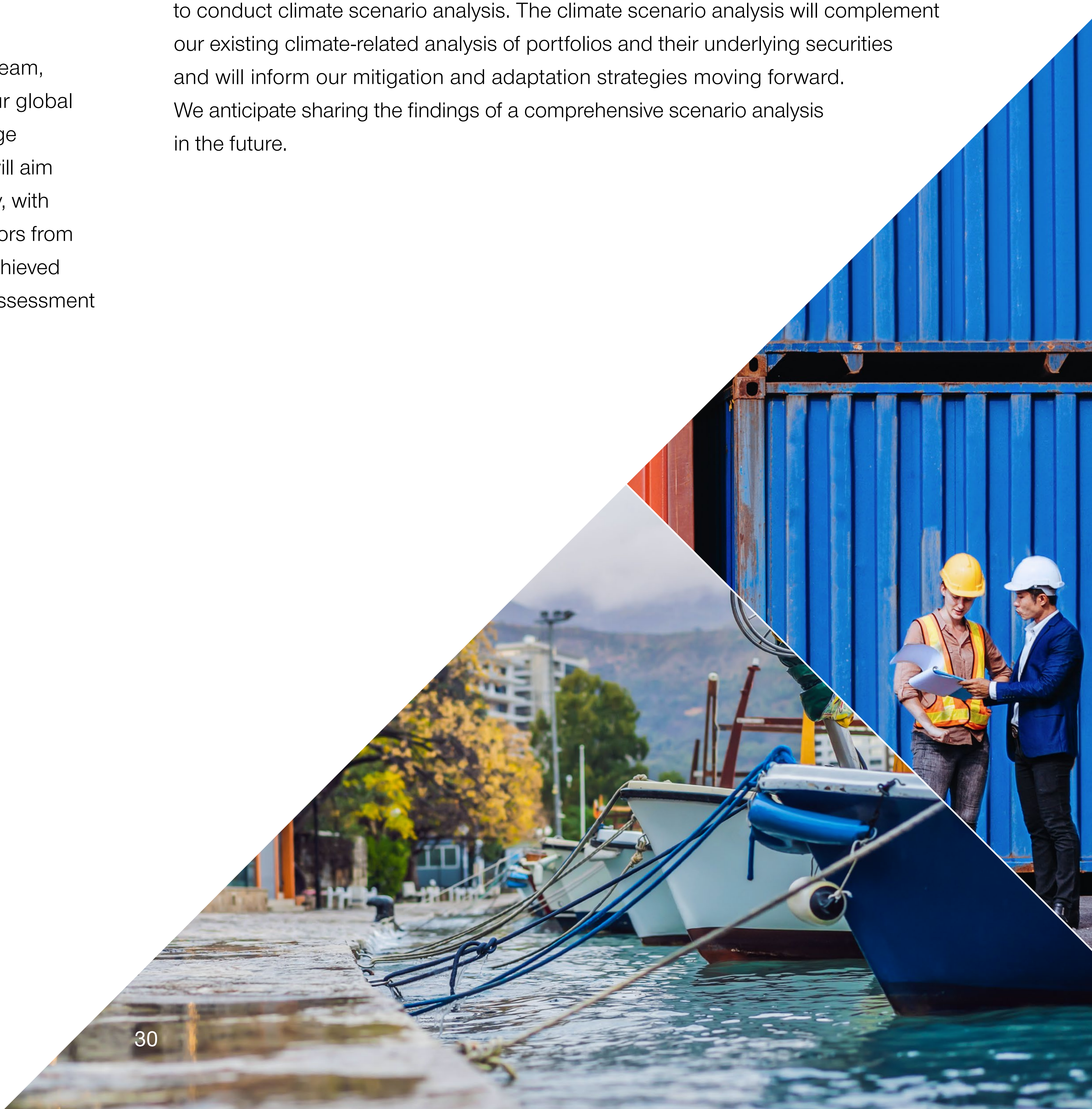
Consideration in Operational Strategy

Reducing and managing our GHG emissions is our primary sustainability priority from a corporate standpoint. We assessed the costs associated with continuing to use brown power compared with working toward net zero in scope 1 and 2 by year-end 2040.

Additionally, through our Corporate Real Estate and Workplace Services team, we regularly seek energy efficiency measures to implement throughout our global offices. Our firm aims to have at least 60% of its real estate by square footage environmentally certified by year-end 2025. Our new global headquarters will aim for excellence in terms of environmental sustainability and energy efficiency, with our Baltimore offices striving for LEED Platinum status for commercial interiors from the U.S. Green Building Council. Additionally, our new London office has achieved an Excellent standard in Building Research Establishment Environmental Assessment Methodology (BREEAM) for the design phase.

C Describe the resilience of the organization’s strategy, taking into consideration different climate-related scenarios, including a 2˚C or lower scenario.

To quantify the potential financial impact of climate, our firm identified a vendor to conduct climate scenario analysis. The climate scenario analysis will complement our existing climate-related analysis of portfolios and their underlying securities and will inform our mitigation and adaptation strategies moving forward. We anticipate sharing the findings of a comprehensive scenario analysis in the future.



RISK MANAGEMENT

A Describe the organization's processes for identifying and assessing climate-related risks. Asset managers should describe, where appropriate, engagement activity with investee companies to encourage better disclosure and practices related to climate-related risks to improve data availability and asset managers' ability to assess climate-related risks.

Our Risk Framework

Our comprehensive approach to identifying and assessing risks and opportunities—including climate change—is managed through established risk frameworks focusing on reputational risk, strategic risk, operational risk, business continuity risk, human capital risk, compliance risk, and financial risk. Identifying climate-related risks includes the consideration of extreme weather events, uncertainty surrounding regulation, reputational impacts, investment risk, and our product range.

As head of the Enterprise Risk Group (ERG), our chief risk officer (CRO) is primarily responsible, with support from the ERMC, for anticipating and addressing new risks, as well as ensuring the proper handling of risk across the firm. The CRO reports to the firm's chief operating officer (COO) and regularly updates the T. Rowe Price Group Board of Directors. The ERG is an independent, global team with seasoned experts specializing in enterprise and operational risk, investment risk, privacy, and business resiliency.

Our ERG conducts assessments of the risks that our firm faces in the short, medium, and long terms. The corporate risk profile informs the ERMC of the key risks the firm faces to help prioritize how we focus on risk mitigation across the firm. The ERG is responsible for leading our risk management efforts by partnering with business units to identify risks, understand acceptable levels of risk, and implement solutions that mitigate exposure to risk where appropriate. Individuals with functional expertise across the business are required to identify and address potential climate-related risks for their areas of responsibility. This is supplemented by the Enterprise Risk and Global Compliance functions, as well as Legal, Finance, Tax, and HR, which provide insight on external risks and existing and emerging regulatory requirements related to climate change. Review and prioritization of identified climate-related risks are undertaken by the ERMC.

This approach ensures quick identification and response to risks and opportunities, reducing the impact on the firm and its clients.

Analyzing Investment Risks

Within our investments, the firm uses RIIM analysis, net zero status, GHG footprint, and climate solutions alignment[22] analysis to identify and assess climate-related risks. Where data availability is adequate, the process has also started to incorporate climate value at risk (CVaR) and ITR. However, this type of analysis was limited in scope in 2022. With the onboarding of an ESG data vendor providing CVaR and ITR data, this analysis is expected to be incorporated more broadly as appropriate based on data availability.

[22] Percentage of revenues or use of proceeds aligned to economic activities that are climate solutions (e.g., renewable energy generation, sustainable agriculture, etc.).

Within the RIIM assessment, investments' environmental characteristics are considered holistically. At the issuer level, each area of focus is weighted in accordance with its materiality to the industry or subindustry. Portfolio-level assessments can also include a comparison with the benchmark. Key areas of focus include:

- Energy transition risk
- Net zero status
- Physical risk
- Biodiversity impact
- Circular economy contribution
- Exposure to climate solutions
- Land use
- Water use
- Track record on environment
- Accountability and transparency for ESG (including climate change)

Climate Stewardship

We believe climate-related risks can be financially material, especially in high-emitting industries, and, therefore, ongoing engagement with investee companies and other issuers on this topic is one way to mitigate risk. For equity investments, engagement can be supplemented with a proxy voting program that takes climate risk into account.

Engagement on climate change with management teams or boards of investee companies is usually conducted as part of a multifaceted discussion on many investment considerations for that particular company but occasionally could focus only on climate change implications. Given that T. Rowe Price has predominantly actively managed portfolios, portfolio managers may elect to screen out specific companies with onerous climate-related risk if they believe it will negatively impact the investment case. As a result, the profile of invested companies across portfolios may look meaningfully different from peers—particularly passive peers. That is why engagements on specific ESG issues like climate change tend to be in-depth discussions, where T. Rowe Price believes engagement can be effective.

One of the more difficult aspects of evaluating climate change risks and opportunities in corporate securities is the lack of disclosure on key environmental metrics, strategy, and accountability. T. Rowe Price expects companies to adopt industry best practice disclosure standards. To this end, we advocate for disclosures aligned to SASB and TCFD—both globally recognized frameworks that emphasize financial materiality.

Additionally, for smaller issuers of private credit and syndicated loan transactions that may find SASB and TCFD difficult to achieve in the near term, we advocate using the ESG Integrated Disclosure Project (ESG IDP) reporting template.

We strongly encourage all issuers to report their scope 1–3 GHG emissions. However, we recognize that reporting scope 3 emissions adds much more complication than reporting scope 1 and 2 emissions and that for some industries, estimating methodologies are still evolving. Given these issues, we do not think it is appropriate for us to unilaterally expect all issuers to report a full suite of scope 3 emissions; however, we do expect that the landscape and our expectations will evolve over the next 12–36 months. In the interim, we strongly encourage issuers to report the scope 3 emissions categories most material to their business. For high-emitting companies, our minimum expectation is they disclose absolute scope 1 and 2 GHG emissions on an annual basis. Failure by companies in these industries to disclose these data leaves investors unable to properly analyze their exposure to climate change risk. For this transparency gap, we will generally oppose the reelections of all non-executive incumbent directors at the next shareholder meeting.

Engagement is only part of the stewardship toolbox. If we do not see sufficient progress in a reasonable time frame, then we will typically escalate the dialogue in a number of ways. One option is to undertake collaborative engagement alongside our direct conversation. Another would be to use our vote to encourage the company to take a different approach. A third option would be to make a public statement, perhaps by pre-disclosing how we intend to vote before or around the time of the meeting.

B Describe the organization's processes for managing climate-related risks. Asset managers should describe how they manage material climate-related risks for each product or investment strategy.

The following table outlines the process for management of identified climate risks. Similar to the risks and opportunities tables provided in the Strategy section, these are considered in the context of the following time frames: short-term risk (less than one year), medium-term risk (one to nine years), and long-term risk (10 or more years).

S Short-term risk (less than 1 year) M Medium-term risk (1–9 years) L Long-term risk (10+ years)

Type	Climate-Related Risks and Mitigation Strategies
Transition Risks	**Market** ***Related to Investment Performance*** M L Analysts and portfolio managers are accountable for considering climate-related factors within their investment process as part of ESG integration. This is included as part of their year-end evaluation and compensation. Additionally, the firm's active stewardship program helps mitigate climate risks within investment portfolios.
	Related to Product Offerings M L The ESG Enablement team is responsible for working in partnership with the Product team to develop a strategy regarding investment product offerings with environmental and/or social mandates.
	Related to Operations M L These considerations are reflected in the firm's environmental management planning strategy and influence ongoing planning and budgeting exercises.
	Regulatory M L The risk of litigation claims, as well as existing and emerging regulatory requirements related to climate change, are continuously evaluated by our Legal, Compliance, & Audit Department and incorporated in the firm's overall risk management program.
	Technology M L T. Rowe Price tracks costs inherent to transitioning to lower-emissions technologies for its own corporate footprint, along with the substitution of existing assets and related services with lower-emissions options.
	Reputation M L T. Rowe Price has a comprehensive risk management program in place that is designed to quickly respond to any incident, minimize business interruption, and help reduce any impact on clients or the firm. The multilayered approach ensures that the firm routinely tracks shifts in consumer preferences and collects feedback from stakeholders.

Type	Climate-Related Risks and Mitigation Strategies
Physical Risks	**Acute External Events** S M L The firm has local crisis management plans that ensure business continuity by mobilizing resources—employees and facilities—to address the fallout of an acute event in order to sustain service levels for clients.
	Chronic ***Related to Investment Performance*** S M L Analysts and portfolio managers are accountable for considering climate-related factors within their investment process as part of ESG integration. This is included as part of their year-end evaluation and compensation. Additionally, the firm's active stewardship program helps mitigate climate risks within investment portfolios.
	Related to Operations M L The Business Continuity team is developing a long-term plan that seeks to assess and mitigate specific impacts over 10–30 years.

S Short-term risk (less than 1 year) M Medium-term risk (1–9 years) L Long-term risk (10+ years)

C Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management.

We identify and assess climate risks as part of our overall risk architecture, as led by our CRO. Our CRO manages the ERG and serves on the ERMC. Additionally, business unit leaders are responsible for overseeing operations and managing risks specific to their respective business areas.

The ERMC oversees, monitors, and communicates the firm's risk management structure, processes, and business unit risk management efforts. The ERMC monitors existing policies, makes policy recommendations on matters related to risk management, and ensures issues are elevated and risk is mitigated to acceptable levels. The committee meets monthly and is composed of senior business leaders from across the organization.

METRICS AND TARGETS

A **Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process.**

To support the goals of the Paris Climate Agreement to limit the increase of global temperatures to 1.5˚C, we are committed to reducing GHG emissions associated with our operations. We are focusing on actions that will have a real-world impact on emissions and are taking a comprehensive approach to achieve our 2040 net zero goal and 2030 interim target to reduce GHG emissions by 75%, compared with our 2021 baseline. This includes, but is not limited to, virtual power purchase agreements, project-specific renewable energy credits, and energy efficiency improvements in our operations.

While long-term targets are important, so are the short- and medium-term milestones that test our strategy and progress along the way. The NCGC recently agreed to set new short- and medium-term net zero climate targets designed to address our operational GHG emissions. This section provides an update of where we stand with each of our targets and their underlying metrics.

Key metrics:

- Scope 1 and 2 greenhouse gas emissions in 2022 were 20,150 MT CO_2e
- Percentage of global renewable electricity consumption in 2022 was 4%

Targets:

- Reduce scope 1 and 2 greenhouse gas emissions by 75% by year-end 2030, compared with our 2021 baseline, and achieve net zero by year-end 2040
- Achieve zero operational waste in our global facilities by year-end 2025
- Eliminate all single-use plastics from our facilities by year-end 2025
- Partnered with Climate Vault to purchase carbon allowances to address GHG emissions resulting from business travel[23]

[23] T. Rowe Price purchased carbon allowances from Climate Vault during 2023 in order to address 5,081 metric tons of CO_2e. This amount approximates emissions from business travel during 2022, which includes air and rail transportation. It is based on known business travel trips booked through the firm's corporate travel portal. Travel that may have been booked outside our corporate portal is not tracked.

B Disclose scope 1; scope 2; and, if appropriate, scope 3 GHG emissions and the related risks.

T. Rowe Price's GHG emissions are calculated according to the methodology set forth by the Greenhouse Gas Protocol. We are working to expand our reporting of scope 3 emissions and will add additional material categories in the future.

2022 EMISSIONS BY SCOPE[24]

Emissions reported in metric tons of CO_2 equivalent (MT CO_2e)

GHG Source Category	Emissions (MT CO_2e)	Percent of Total
Scope 1 Emissions	**941**	**2.7%**
Stationary Combustion	636	1.8%
Mobile Combustion	3	0.0%
Refrigerants	302	0.9%
Scope 2 Emissions	**19,210**	**54.9%**
Purchased Electricity	18,623	53.2%
Purchased Steam	586	1.7%
Scope 3 Emissions	**14,826**	**42.4%**
Category 5: Operational Waste[25]	193	0.6%
Category 6: Employee Business Travel[26]	5,081	14.5%
Category 7: Employee Commuting	8,595	24.6%
Category 13: Downstream Leased Assets	957	2.7%
Total GHG Emissions	**34,976**	**100.0%**

Note: Totals may not sum due to independent rounding.

[24] Unless otherwise noted, the information provided in this report and related materials does not include content relating to Oak Hill Advisors, L.P. (OHA), an alternative credit manager that T. Rowe Price Group, Inc., acquired on December 29, 2021.

[25] Underlying waste figures are unaudited and may be based on estimates. For owned facilities, waste is based on actuals. For leased facilities that do not have reported data, waste is estimated per employee or square foot. Waste streams for building operations include landfill waste, energy recovery, compost, and recycling.

[26] Employee business travel includes known air and rail travel.

YEAR-OVER-YEAR SCOPE 1 AND 2 GHG EMISSIONS

GHG Emissions	Unit	2016	2017	2018	2019	2020	2021	2022	% Change 2022 vs. 2021
Scope 1: Direct Emissions	MT CO_2e	1,050	1,259	2,162	1,424	796	877	941	-7.3%
Scope 2: Indirect Emissions	MT CO_2e	34,065	28,877	28,607	24,791	20,661	18,887	19,210	1.7%
Total Scope 1 & 2 Emissions	**MT CO_2e**	**35,115**	**30,135**	**30,769**	**26,215**	**21,457**	**19,764**	**20,150**	**2.0%**
Global Square Feet (SF)	Thou. SF	2,303	2,356	2,386	2,392	2,320	2,212	2,246	1.5%
Scope 1 & 2 Emissions per Square Foot	MT CO_2e/Thou. SF	15	13	13	11	9	9	9	0.4%

YEAR-OVER-YEAR OPERATIONAL WASTE MANAGEMENT[27]

Scope	Unit	2016	2017	2018	2019	2020	2021	2022	% Change 2022 vs. 2021
Landfill Waste	Tons	61	56	59	39	124	123	117	-4.3%
Recycling	Tons	465	572	573	604	216	232	335	44.4%
Compost	Tons	16	23	50	43	19	107	68	-36.0%
Energy Recovery	Tons	363	313	332	527	189	141	219	55.0%
Total Operational Waste	**Tons**	**905**	**964**	**1,014**	**1,213**	**548**	**603**	**739**	**22.7%**

[27] Underlying waste figures are unaudited and may be based on estimates. For owned facilities, waste is based on actuals. For leased facilities that do not have reported data, waste is estimated per employee or square foot. Waste streams for building operations include landfill waste, energy recovery, compost, and recycling.

C Describe the targets used by the organization to manage climate-related risks and opportunities and performance targets.

Scope 1 and 2 Targets

We have committed to reducing our scope 1 and 2 emissions by 75% by year-end 2030, compared with our 2021 baseline, and to net zero by year-end 2040. Additionally, we are targeting zero operational waste in our facilities by year-end 2025.

Scope 2 emissions represent 55% of our total emissions. Our Baltimore-based facilities generate the largest portion of our scope 2 emissions. Consequently, bringing renewable energy to our Baltimore-based facilities represents the largest step toward reducing our greenhouse gas emissions and is our first priority.

Our contract with our local energy provider in Baltimore expires in 2024, and we are currently reviewing supplier bids to procure off-site renewable energy. While we do not expect to fully transition our Baltimore locations to renewable energy by the contract expiration in 2024, we anticipate that by year-end 2028 all the electricity in our owned Maryland offices will be provided by renewable sources.

To address the remaining scope 2 emissions, we have developed a timeline to convert most of our remaining global offices to green power from brown power. The most immediate example of this is our office move in London to Warwick Court, scheduled for fall 2023, where our office will be powered by 100% renewable electricity from high-quality contracts that meet UK Green Building Council requirements for net zero carbon and RE10 requirements.

We have offices in select global locations that currently do not offer renewable energy. While these offices represent less than 4% of our emissions, we are hopeful that renewable energy options will become available in advance of our 2040 goal.

Furthermore, we have multiple leasing cycles for all of our leased sites before 2040, and we plan to work closely with our landlords to procure green energy. As older equipment becomes obsolete, we will install more efficient replacements, selected to specifically support our net zero strategy.

We share the view of the Science-Based Targets initiative and the Net Zero Asset Managers initiative that offsets involving long-term carbon removal should only be used where there aren't any technologically and/or financially viable alternatives to eliminate emissions.

Scope 3 Reduction Efforts

Net Zero Asset Managers Initiative

We are a fiduciary first and foremost. Our support for the Paris Climate Agreement is driven by the belief that a smooth climate transition will create a more stable economic environment, reduce uncertainty, and enable business investment. This should result in better long-term financial outcomes for the companies and other securities in which we invest on behalf of our clients.

In becoming a signatory to the Net Zero Asset Managers initiative (NZAM), we committed to two overarching goals:

- Set an interim target for the proportion of assets to be managed in line with the attainment of net zero emissions by 2050 or sooner, in line with fiduciary duty.
- Review the interim target at least every five years, with a view to ratcheting up the proportion of AUM covered until 100% of assets are included, in line with fiduciary duty.

NZAM acknowledges that the scope for asset managers to invest for net zero depends on the mandates agreed with clients and with regulatory environments and also that the commitments are made with the expectation that governments will follow through on their own commitments to ensure the objectives of the Paris Climate Agreement are met. Accordingly, T. Rowe Price's ability to meet the goals of the initiatives remains in the context of complying with its fiduciary duty.

In becoming a signatory to NZAM, we help support the establishment of robust and standardized methodologies for evaluating pathways to net zero. For years, climate transition has been considered as part of our ESG analysis and is fully integrated into our fundamental research and portfolio construction. Additionally, we have engaged constructively with companies to encourage a thoughtful approach to decarbonization and advocate for greater transparency of climate-related information and data. Consequently, the commitments made under NZAM were already in line with our existing business practices.

To determine our commitment to NZAM, we have adopted an approach that aligns with our ESG integration process. We include all accounts where the coverage of the greenhouse gas emission data is adequate. This is determined as 75% minimum coverage (including both reported and estimated data).

We exclude:

- Accounts invested in asset classes where there is no agreed net zero methodology today, such as sovereigns, municipal bonds, and securitized bonds.
- Accounts where the investment style and time frame are incompatible with net zero by 2050, such as quantitative, index, and money market accounts.
- Multi-asset accounts managed outside of T. Rowe Price where we have no ESG look-through.
- Accounts invested in regions where net zero targets stretch well beyond 2050 (e.g., emerging markets) or portfolios mandated to invest exclusively in natural resources.

T. Rowe Price is committing 59% of total assets managed on behalf of clients as of December 31, 2022, to be in line with the attainment of net zero emissions by 2050 or sooner.[28] Mandates with specific climate- and net zero-related objectives are included in this commitment and represent less than 1% of total AUM as of December 31, 2022. We anticipate that by 2040 100% of our assets managed on behalf of clients will align with the attainment of net zero emissions by 2050 or sooner, in line with fiduciary duty.

We will continue to work with our clients to determine how climate impacts their portfolios and provide solutions that meet their needs. For most of our clients, their sole objective is risk-adjusted financial performance. For these portfolios, integration of ESG-related risks and opportunities forms part of our fundamental research process. As an active investor, we use our research process to inform our management of climate risks and opportunities by taking environmental factors into account as part of our security analysis.

[28] AUM commitment figures are unaudited and may be subject to change. Commitments are nonbinding.

Fund Carbon Footprint Reporting

We assess and report on the carbon footprint of our equity and credit funds (for portfolios where we have more than 75% data coverage) on a quarterly basis to our clients. The report includes data on total emissions and weighted average carbon intensity. The carbon footprint reports for our investment strategies are available to eligible investors or institutional investors upon request.

Reducing Operational Waste

Within our operations, we aim to reduce our sources of waste by seeking out circular economy options. As part of this endeavor, we embrace the need to shift from managing waste once it is created to designing out waste before it is generated. We have set a target to have zero operational waste across our facilities by year-end 2025, aligning with criteria set by the Green Business Certification, Inc., for TRUE Zero Waste to achieve an average of 90% or greater overall diversion from landfill and incineration and the environment for solid, nonhazardous wastes. Additionally, we aim to phase out all single-use plastics from our facilities by year-end 2025.

ESG investment specialist Véronique Chapplow and portfolio managers Hari Balkrishna and Matt Lawton discussed impact investing at the Mid-Europe Investment Conference in September 2022.

Working With Our Supply Chain

Our Supplier Code of Conduct has a specific focus on environmental requirements, including the establishment of operational practices to minimize impacts on the environment and to implement measures that prevent and mitigate environmental harm. Through the Supplier Code of Conduct, we also expect suppliers to track performance and report environmental improvements, as well as to set targets and commitments to reduce their respective footprints.

Business Travel and Commuting

In 2022, total business travel emissions were 5,081 MT CO_2, which includes known air and rail travel and was overwhelmingly driven by air travel with 5,003 MT CO_2. Our emissions from air travel are down 48% since 2019. However, as we emerged from the pandemic, emissions from travel are up more than 1,000% since 2021.

We made a donation to Climate Vault to purchase carbon allowances in 2023 in order to offset 5,081 metric tons of CO_2e. This amount approximates total emissions from business travel during 2022. This is the second year we made donations to Climate Vault to purchase carbon allowances. We anticipate that our relationship with Climate Vault may be broadened to supplement select areas of our net zero strategy and address shortcomings in our ability to eliminate emissions. Climate Vault is an award-winning nonprofit that has been designated by the Carbon Disclosure Project as a Carbon Reduction and Science Based Target initiative accredited service provider. They purchase and "vault" carbon allowances on government-regulated compliance markets. Because the number of allowances is limited, keeping them off the market decreases CO_2 emissions and provides a quantifiable carbon reduction. Climate Vault's approach is easily measurable (1 permit = 1 metric ton of CO_2), provides price transparency, and is rigorously verifiable. Climate Vault will use the monetary value of the permits to fund carbon dioxide removal technologies to eliminate CO_2 already in our atmosphere.

For the first time, we surveyed our employees to understand and report the emissions generated from their commuting. We learned that even with a hybrid work schedule, commuting into work generated more emissions than business travel, with 8,595 MT CO_2 coming from our associates' commutes. To encourage the use electric cars, we provide free charging stations at most of our global facilities, providing access to 93% of our global workforce.

"We are focusing on actions that will have a **real-world impact** on emissions.

SOCIAL

Social Impacts and Safeguards

5 GENDER EQUALITY
8 DECENT WORK AND ECONOMIC GROWTH
4 QUALITY EDUCATION

We work to support a world where there is opportunity for all, within both our workforce and our communities. This approach guides our talent recruitment and retention strategy, our engagement with suppliers, and our efforts to advance social good. We also realize that safeguards are essential to ensuring opportunity is available to everyone and that basic human rights, such as privacy, are protected.

The following section describes how our work impacts the fabric of society.

OUR ASSOCIATES DRIVE OUR SUCCESS

At T. Rowe Price, our people set us apart. We strive for equity, opportunity, and equality for all associates at the firm. Having a diverse and inclusive workforce and providing equal opportunities to all associates is a business and cultural imperative.

Our Management Committee and Board of Directors ensure we are setting ambitious standards for the way we recruit, hire, mentor, and develop talent. We are prioritizing increased hiring, retention, and development of talent from underrepresented groups in asset management. This includes both ethnically diverse associates and women.

For 2022, the percentage of our global investment professional hires who were women was 25% (up from 23% during 2021), and firmwide, 66% of new hires were either women (global) or ethnically diverse (U.S. only). For every open role at the firm, our goal is that at least 40% of the candidate slate be ethnically diverse and/or women.[29]

[29] Unless otherwise noted, the information provided in this report and related materials does not include content relating to Oak Hill Advisors, L.P. (OHA), an alternative credit manager that T. Rowe Price Group, Inc., acquired on December 29, 2021.

CHANGES AND TRENDS IN OUR WORKFORCE

ASSOCIATE PROMOTIONS

49%
women

21%
underrepresented minorities[30]

SENIOR-LEVEL PROMOTIONS

Of the ~**123** senior-level promotions in 2022, **32** were women (36%) and **7** were underrepresented minorities (8%).

EXTERNAL HIRES

67%
ethnically diverse

49%
women

35%
underrepresented minorities

EXITS

44%
women

28%
underrepresented minorities

[30] Underrepresented minorities include Black, Hispanic, and/or Native Americans.

Supporting Our Diversity

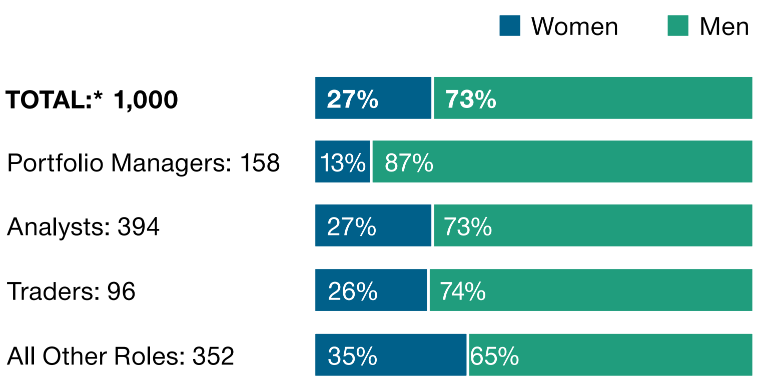
T. Rowe Price emphasizes a positive, welcoming, and collaborative culture where associates are encouraged to be themselves and bring their best selves to work. We want our associates to draw from their experiences and take the initiative to help our clients succeed.

According to our 2022 associate engagement survey, 62% of our workforce feels a sense of belonging. Accountability is a key component of our strategy, and our Diversity, Equity, and Inclusion Steering Committee meets bimonthly to discuss progress on specific diversity and inclusion initiatives and related challenges and concerns.

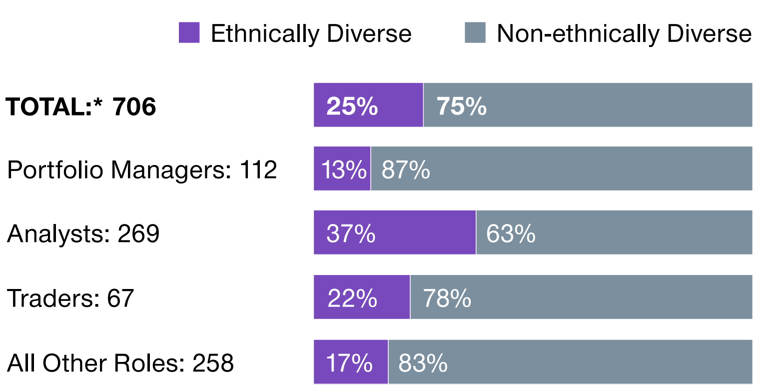
We are proud to continue sharing our progress toward these goals. This is the third time that, in addition to the EEO-1 data included in our SASB report, we are providing supplementary data on our workforce's global gender representation and ethnic diversity in the U.S. The numbers shown below are as of December 31, 2022.[31]

INVESTMENTS GROUP DIVERSITY BREAKDOWN[32]

Gender Representation—Global Population



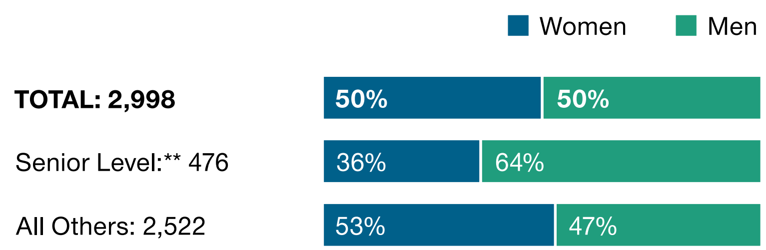
Ethnically Diverse—U.S. Population Only



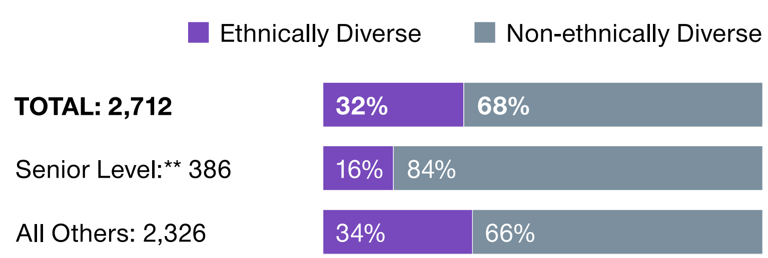
*Investments Group consists of Fixed Income, Global Equity, and Multi-Asset business units, which are composed of investment professionals and non-investment professionals.

GLOBAL DISTRIBUTION AND GLOBAL PRODUCT GROUP DIVERSITY BREAKDOWN

Gender Representation—Global Population



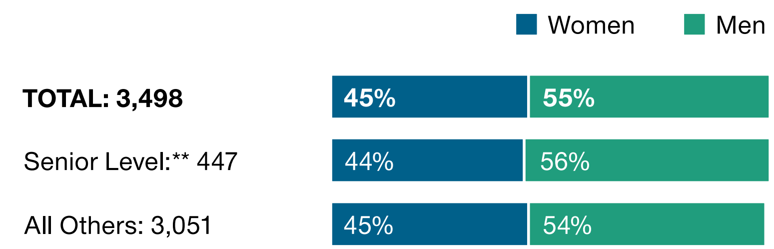
Ethnically Diverse—U.S. Population Only



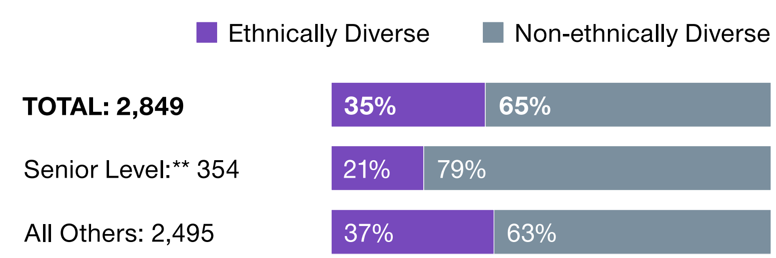
**Senior level is defined as people leaders and individual contributors with significant business or functional responsibility.

CORPORATE FUNCTIONS GROUP DIVERSITY BREAKDOWN

Gender Representation—Global Population



Ethnically Diverse—U.S. Population Only



Firmwide administrative support staff is included in all others.

[31] Unless otherwise noted, the information provided in this report and related materials does not include content relating to Oak Hill Advisors, L.P. (OHA), an alternative credit manager that T. Rowe Price Group, Inc., acquired on December 29, 2021.
[32] Portfolio managers include portfolio manager, regional portfolio manager, sector portfolio manager, and associate portfolio manager.

Attracting, Retaining, and Developing Diverse Talent

Attracting, retaining, and developing diverse talent globally helps us create greater value for our clients and a better experience for our associates.

In 2020, we set goals to increase the representation of women and underrepresented talent, specifically Black/African American, Hispanic/Latino, and/or Native American talent, within our workforce and in senior roles by 2025. Our strategy, programs, and investments have enabled us to make steady progress.

We experienced increases year over year and remain on track for or have surpassed our 2025 goals. Representation increased in all four measures, as represented below. In this journey, engagement and retention continued to be important levers.

To increase the pipeline of diverse candidates, we have created partnerships with colleges and universities from which we have had success in recruiting diverse talent in the United States and focused on deepening recruiting plans for Black and Hispanic candidates. Other initiatives connect with prospective and future underrepresented and female candidates from high school, through college, and on into graduate school.

We host on-site and virtual mentoring and recruitment initiatives in all U.S. offices and London to encourage diverse candidates to consider careers in asset management. Our signature programs, including Launching Your Legacy and Women's Stock Pitch workshop, are a few of the ways that we strive to reach early-career diverse talent, create exposure to our industry, and introduce opportunities for such talent to bring their perspective and insight to the firm.

TRACKING PROGRESS TOWARD OUR DEI GOALS[33]

	2020 Representation (Baseline Year)	2021 Representation	2022 Representation	2025 Goals
Female: All (Global)	44.4%	44.1%	44.8%	46%
Female: Senior Roles (Global)	28.1%	29.8%	32.7%	33%
Underrepresented Minorities: All (U.S.)	16.5%	16.9%	18.5%	19%
Underrepresented Minorities: Senior Roles (U.S.)	6.9%	8%	8.8%	10%

[33] Unless otherwise noted, the information provided in this report and related materials does not include content relating to Oak Hill Advisors, L.P. (OHA), an alternative credit manager that T. Rowe Price Group, Inc., acquired on December 29, 2021.

GOALS FOR DIVERSE REPRESENTATION WITHIN OUR WORKFORCE

46%

of our global workforce will be women by 2025, compared with **44% in 2022**.

33%

of global senior roles were held by women in 2022, **meeting our 2025 goal three years early**.

19%

of our U.S. workforce are underrepresented minorities,[34] **meeting our 2025 goal three years early**.

10%

of senior roles in the U.S. will be held by underrepresented minorities[34] by 2025, compared with **9% in 2022**.

[34] Underrepresented minorities include Black, Hispanic, and/or Native American.

“We experienced increases year over year and remain **on track for or have surpassed our 2025 goals**.

For the last 16 years, we have invited diverse first-year M.B.A. students to learn more about investment management, our firm, and careers in investing. We have earned a reputation among diverse M.B.A. students and our industry peers as a leader in attracting diverse investment talent. The MBA Day hosted in 2022 was no exception, as we welcomed our largest group of students to date. During this three-day signature program, we were proud to have an attendee makeup that was 48% female, 84% ethnically diverse, 35% underrepresented minorities, and 7% veterans.

We have partnered with multiple national organizations, such as National Black MBA, the Association of Latino Professionals for America, Grace Hopper, AfroTech, and others, to create access to diverse talent and to assist us in maintaining best practices.

Launch of Military.com partnership

In partnership with VALOR, one of our business resource groups (BRG), we formalized a partnership with Military.com, enabling us to enhance our employer brand presence with veterans and military spouses. Job opportunities will be promoted in targeted newsletters to Military.com subscribers. Updates on the performance and impact of this partnership will be shared in our 2023 ESG Corporate Annual Report.

On-site job offers extended for the first time in firm history at Grace Hopper diversity recruiting conference

With significant planning and preparation facilitated by our Diversity Talent Acquisition team, coupled with support and endorsement from the firm’s Global Technology leadership team, 11 on-site job offers were extended at the Grace Hopper diversity recruiting conference. While this is new for the firm, it is standard practice for many of our competitors in the talent market. This shift positions us to hire top talent.

Building on the success at Grace Hopper, on-site offers were also extended at AfroTech and Society for Hispanic Engineers

We attract and retain top candidates by developing key talent and succession plans, investing in DEI initiatives, creating opportunities for our associates to learn and grow, and providing competitive benefits. We believe our approach is yielding results. As of December 31, 2021, the average tenure of our associates is eight years, nine years for our investment professionals, and 15 years for our portfolio managers.

TOTAL ANNUAL EMPLOYEE TURNOVER[35]

Year	Percentage
2022	15.3%
2021	23.0%[36]
2020	8.5%

[35] Unless otherwise noted, the information provided in this report and related materials does not include content relating to Oak Hill Advisors, L.P. (OHA), an alternative credit manager that T. Rowe Price Group, Inc., acquired on December 29, 2021.
[36] In August 2021, T. Rowe Price transferred its recordkeeping responsibility, which resulted in about 800 operations and technology associates transitioning to FIS. Additional information is available in the announcement.

Learning and Development

We encourage associates to own their career journey in partnership with their manager by discussing development goals beyond formal performance reviews and engaging in regular conversations throughout the year. We encourage continuous learning by providing associates access to hundreds of live and self-paced training programs and a tuition reimbursement program.

Our associates completed approximately 205,000 hours of firm-sponsored training in 2022—which is equivalent to nearly 27.4 hours per associate. This year, we launched Degreed, a digital portal for learning, skill building, and career planning that brings together education, exposure, and experiential opportunities from a variety of firm-endorsed providers. Degreed makes development easier by presenting learning opportunities customized to associates—based on their roles and the skills they select. Associates can access curated pathways—learning plans designed internally—that are loaded into their profile on the platform to support role clarity and career pathing.

Approximately 34% of our open positions are filled by internal applicants, and almost all our portfolio managers have been promoted from within.

A new firmwide mentorship program was launched this year to standardize our mentoring practices, increase access to leaders across business units, and support associates' development along their career journeys.

TOTAL ANNUAL EMPLOYEE TRAINING HOURS[37]

Year	Total Hours	Average Hours per Associate	% Associates Completing Optional Training
2022	205K	27	76%[38]
2021	200K	21	85%
2020	140K	18	89%
2019	190K	26	77%

The program creates a more tailored mentoring experience by offering three kinds of mentorship—traditional, with one-on-one mentor and mentee pairs; reciprocal, or co-mentoring, with interchangeable mentor and mentee roles; and mentoring circles, groups that support one another in their interests and goals.

We are using MentorcliQ, an online one-stop platform where associates can select a mentoring program(s), access resources and training, schedule meetings, and track progress on goals and activities. The platform's artificial intelligence technology can help associates identify a mentor based on selection criteria that span functions, locations, and generations—giving much broader opportunities for forming bonds and developing skills.

With the program's launch in June, our goal was to reach 8% enrollment of eligible associates by year-end. We are pleased to have surpassed that goal with 15% of eligible associates enrolled.

[37] Unless otherwise noted, the information provided in this report and related materials does not include content relating to Oak Hill Advisors, L.P. (OHA), an alternative credit manager that T. Rowe Price Group, Inc., acquired on December 29, 2021.

[38] Change from 2021 to 2022 training hours is due in part to change in training trends and return to office.

ENSURING ASSOCIATES' VOICES ARE HEARD: 2022 ASSOCIATE SURVEY HIGHLIGHTS

To measure and help our firm's leaders understand associate experiences that impact their engagement, we launched an annual engagement survey.

The following results from our annual engagement survey reflect our efforts to foster a diverse, equitable, and inclusive culture:

"I can get the support I need from my manager right now."

– **78%** favorability

"Diverse perspectives are valued at T. Rowe Price."

– **70%** favorability

"I would recommend T. Rowe Price as a great place to work."

– **73%** favorability

Results are reviewed by our senior leadership and inform decision-making about a wide range of topics, including job satisfaction, work-life balance, and company culture.

We all share responsibility for strengthening our culture of inclusion. We launched Catalyst: Igniting Your Leadership Journey, a nine-month strategic investment in leadership development designed to give associates a better understanding of how leaders can achieve a multiplier effect by contributing effectively and strategically through others. We also introduced another class for the Excel: Your Leadership Path program, which empowers associates to design their personal and professional development path; to strengthen their workplace relationships; and, ultimately, to accelerate their career progression. Each associate receives a DEI performance objective that is cascaded from our CEO that outlines the expectation and accountability we have in achieving our shared DEI goals. Additionally, we launched two new learning offerings—Managing Inclusion, which is mandatory for people leaders, and Conscious Inclusion for all other associates. The Managing Inclusion course was completed by 94% of people leaders in 2022, and it has helped set the foundation for our DEI learning path.

Business resource groups provide important perspectives that help shape our company culture, especially in recruitment, talent acquisition, and retention. At the end of 2022, 44% of associates were members of at least one BRG, compared with 43% in 2021.

Our BRGs are open to all associates. These volunteer, associate-led groups provide valuable information and support programs to reinforce our inclusive culture, support career development, strengthen our brand in the community, and provide insights on delivering our services in the marketplace. T. Rowe Price also hosts “Diversity Dialogues” to support our associates and create allies in the workplace.

Additionally, our Management Committee formed a Black Leadership Council. Sponsored by the firm’s general counsel and corporate secretary, David Oestreicher, and composed of 13 Black associates serving in leadership roles, the council is charged with four priorities:

- Advise leadership
- Mentor talent
- Support DEI initiatives
- Engage community

Our BRGs include:

MOSAIC @ T. Rowe Price

MOSAIC: The group and its underlying heritage communities (the African, Asian, and Latinx Heritage Communities) and heritage groups (Jewish and Indigenous Peoples Heritage Groups) seek to strengthen the firm’s competitive advantage by attracting and retaining ethnically diverse associates, promoting an inclusive culture that values differences, and developing talent and business practices supporting the firm’s diversity, equity, and inclusion strategy.

PRIDE @ T. Rowe Price

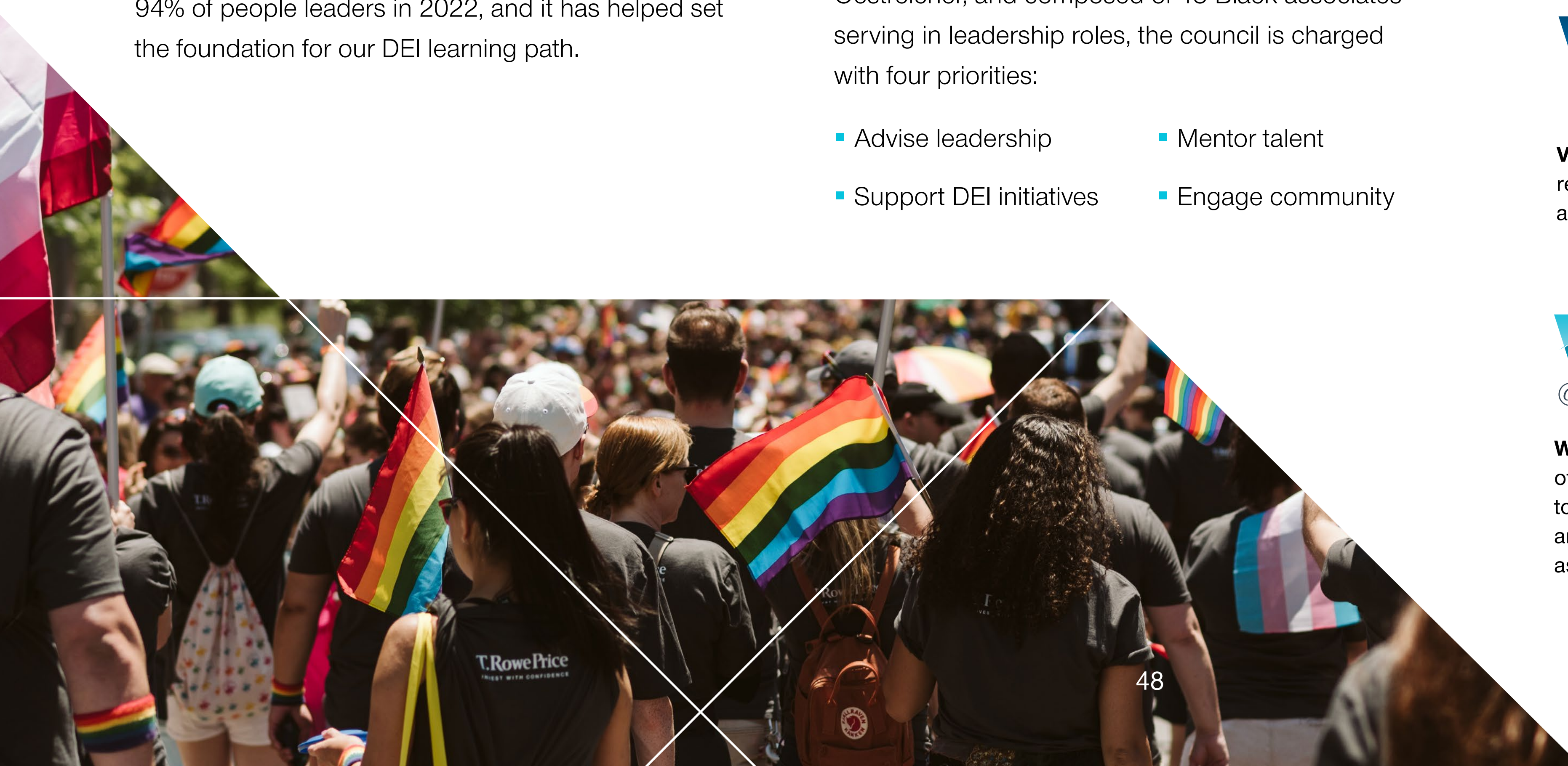
PRIDE: The group’s mission is to create an environment where LGBTQ+ associates can bring their full selves to work each day.

VALOR @ T. Rowe Price

VALOR: The group’s mission is to attract veterans and active reservists to the wide variety of roles available at T. Rowe Price and make sure they and their families are supported.

wave @ T. Rowe Price

WAVE: The group’s mission is to champion a culture of confident female leaders who will serve as agents of change to influence firm policy, promote active allyship for gender equity, and nurture a strong talent pipeline, enriching the overall associate experience.



Investing in Our Associates' Health and Well-Being

A robust benefits program is critical in today's competitive workforce. In all our global locations, we offer employee benefit solutions, including both health care and retirement benefits (where applicable), fitness club reimbursement, life insurance, and an Employee Assistance Program to support well-being. In the U.S., we also provide access to personalized assistance and education in all areas of financial planning to support associates' financial well-being. Benefit competitiveness and design is assessed within the relevant market for a given country, and offerings are aligned with our global principles and local market practice. For example, retirement programs are uniquely designed to support associates in meeting retirement goals while also reflecting regional and country-specific practices in Asia, Europe, and the U.S.

We offer a variety of benefits to support child-care and family planning needs. The firm provides fully paid maternity leave for birth mothers, in addition to fully paid parental leave to all new mothers and fathers. We also offer adoption assistance to associates looking to expand their families and have partnered with Progyny to offer an inclusive fertility benefit.

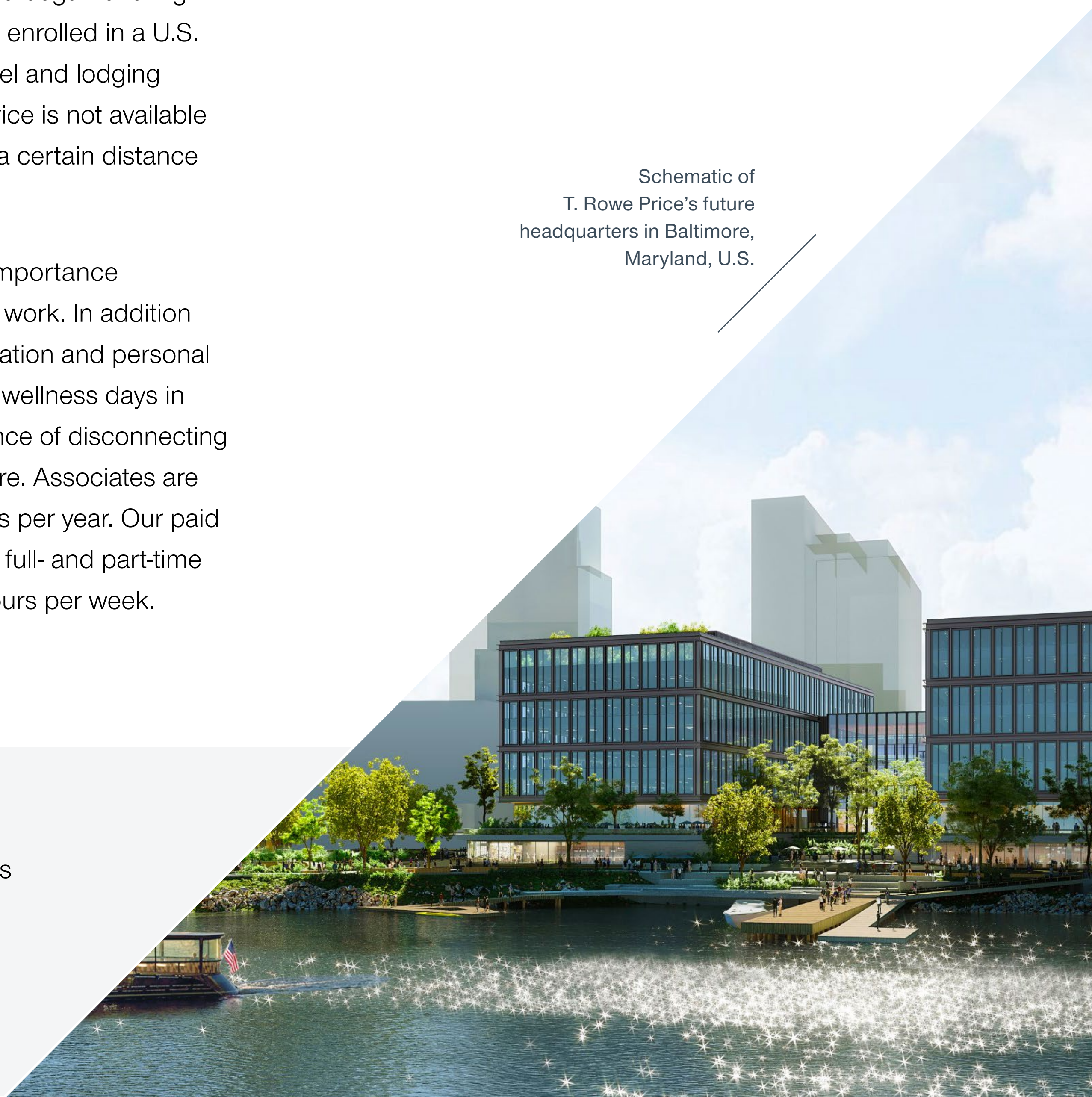
Progyny covers all eligible associates and their partners who want to have a child or preserve their fertility, including single parents and LGBTQ+ individuals and couples. In the U.S., the UK, and Canada, we offer our associates backup child-care and eldercare.

Our health care plan provides coverage of a variety of family planning services, including contraception and voluntary termination of pregnancy, as well as transgender-inclusive coverage, including gender confirmation surgeries, hormone therapy, and mental health counseling. This year, we also began offering an enhanced benefit for associates enrolled in a U.S. medical plan—covering eligible travel and lodging expenses if a covered medical service is not available from an in-network provider within a certain distance of their home address.

We have always emphasized the importance of spending quality time away from work. In addition to parental leave and generous vacation and personal time, the firm also began providing wellness days in 2020 in recognition of the importance of disconnecting from work and encouraging self-care. Associates are also eligible for up to six illness days per year. Our paid time off offerings are available to all full- and part-time associates who work at least 20 hours per week.

We understand that occasionally associates may need extended time away from work due to injury, illness, or related medical conditions or to care for a family member with a medical condition. In the U.S., we offer personal, sabbatical, military, and organ donor leave, in addition to providing all leave time required by federal and state law, including Family Medical Leave Act and disability.

Schematic of T. Rowe Price's future headquarters in Baltimore, Maryland, U.S.



Since 2017, we have published an annual UK Gender Pay Gap Report. This report details the average and median difference in pay between men and women in our UK office. Our 2022 report can be found here.

Our Hybrid Working Policy

Our objective is to enable flexibility regarding where and how work gets done, while maintaining our collaborative in-person culture. We believe it is vital to build a model that both sustains our culture and supports the well-being of our associates.

Since our associates returned to the office full time in March 2022, our flexible policy:

- Offers remote work up to two days a week for most of our associates—notable exceptions are in regulated and essential roles.
- Strengthens our ability to attract and retain diverse talent.
- Sustains our culture through purposeful, in-person connections.

We recognize that different associates have different considerations, and they may work with their managers to determine alternative schedules and remote options.

Managing Through a Turbulent Year

We recognized that the ongoing challenges of the pandemic and resulting economic conditions have impacted the lives and families of our associates. To reward their commitment, support cost-of-living increases, and remain an employer of choice, we implemented an additional 4% salary increase to 85% of our associates in the first half of the year.

As the year came toward a close, it was clear that our business was not exempt from the deepening impacts of those economic challenges. Market declines reduced our assets under management and revenues, while inflation raised many of the costs to support our business.

To address market conditions and protect our ability to invest for future growth, we implemented targeted expense reductions across the enterprise, including further reducing our third-party spending and eliminating roles, with approximately 2% of our associate population departing the firm. This was a difficult decision and one that we did not take lightly given the impact on our associates. We offered generous transition assistance, as well as outplacement support and resources in recognition of these associates' many contributions to our firm.

Recognition:

Seramount Inclusion Index

We have leveraged Seramount, previously Diversity Best Practices, for several years for DEI resources, benchmarking, and consulting. Although we have participated in several of Seramount's benchmarking surveys over the last few years, in 2022 we were recognized for the first time as an Inclusion Index Company based on our submission score of 60%. Organizations that score above 60% are recognized as role models in inclusion and equity.

We would like to highlight our score of 73% in the Culture section of the Seramount Inclusion Index.

- Our focus on manager accountability, assessing and auditing systems, and continued investment in DEI-adjacent programs positively impacted our score in the Culture section.
- Along with 91% of participants, our approach to holding managers accountable for DEI was noted as a best practice in advancing DEI priorities.
- We are among 92% of firms that have a decision tree for crisis communications, of which 84% seek input from DEI leadership in the process.
- Our supplier diversity efforts are aligned with our peers: 97% have a formal supplier diversity program, 92% set a spending goal, and 67% have a training or mentoring program for diverse suppliers.

Forbes' Best Employers for Women 2022

Our firm was named to *Forbes*' Best Employers for Women 2022, joining the ranks of 400 other companies across 24 industries. This is the first time our firm has received this designation.

The Best Employers for Women were identified in an independent survey from a vast sample of 50,000 U.S. employees working for companies employing at least 1,000 people within the U.S. The sample included more than 30,000 women.

Companies receiving the highest total scores were awarded the Best Employers for Women 2022 based on four criteria:

- Direct recommendation on general topics, such as work atmosphere and development, image, working conditions, salary and wage, workplace, and diversity.
- Direct recommendations on topics relevant to women, including parental leave, family support, flexibility, discrimination, representation, and career and pay equity.
- Indirect recommendations evaluating the diversity of other employers within the female survey respondents' industry.
- Diversity among top executives/board based on publicly available company information.

"We are proud to be named to ***Forbes*' Best Employers for Women 2022** list. As we are committed to sustaining and enhancing our inclusive culture for our associates, this award affirms our belief that our diverse global workforce is one of our most valuable assets.

Raymone Jackson
Head of Diversity, Equity, and Inclusion

Barron's **Most Sustainable Companies**

T. Rowe Price ranked 31st on *Barron's* Top 100 Most Sustainable Companies 2023 list. The firm earned the second-highest score among financial services companies. The list is developed by evaluating the largest 1,000 companies in the U.S., based on market value, and scoring them on 230 ESG performance indicators.

Fortune **World's Most Admired Companies**

For the 13th consecutive year, T. Rowe Price was named to *Fortune* magazine's World's Most Admired Companies list. About 1,500 companies are considered for inclusion on the list, which rates companies in nine different categories: innovation, people management, use of corporate assets, social responsibility, quality of management, long-term investment, financial soundness, quality of products and services, and global competitiveness.[39]

Newsweek **America's Most Responsible Companies**

Newsweek America's Most Responsible Companies 2023 were selected based on publicly available key performance indicators derived from sustainability reports. Additionally, an independent survey was conducted to evaluate companies' reputations by asking U.S. citizens about their perception of company activities related to corporate social responsibility. The final list recognizes the top 500 most responsible companies in the United States, spanning 14 industries. T. Rowe Price is included as one of 35 in the financial industry.

Human Rights Campaign Foundation's Corporate Equality Index (CEI)

For the sixth consecutive year, T. Rowe Price received a perfect score of 100 on the Human Rights Campaign Foundation's CEI, the nation's foremost benchmarking survey and report measuring corporate policies and practices related to LGBTQ+ workplace equality.[40]

Bloomberg Gender-Equality Index (GEI)

T. Rowe Price participated in the Bloomberg GEI for the second time during the 2023 cycle. The GEI is a modified market capitalization-weighted index that aims to track the performance of public companies committed to transparency in gender data reporting.

Forbes **World's Best Employers**

Out of 800 companies, T. Rowe Price ranked 74th overall and ranked 5th in the Banking and Finances Industry category. The World's Best Employers 2022 recognition is presented by *Forbes* and market research company Statista Inc. They identified the honorees through independent surveys of approximately 150,000 employees working part time or full time for employers in 57 countries worldwide.

[39] Fortune and World's Most Admired Companies are registered trademarks of Fortune Media IP Limited and are used under license.
[40] 2022 Best Places to Work for LGBTQ+ Equality by Human Rights Campaign Foundation 100% Corporate Equality Index™.

DATA RESPONSIBILITY

Safeguarding Privacy

One of our firm's core values is acting with accountability and integrity. When it comes to privacy, that means we comply with our obligations under applicable privacy and data protection laws and maintain a corporate culture that regards the ethical use and disclosure of personal data with utmost importance. Clients and associates entrust us with their personal data, and we embed privacy principles across our processes, technologies, and services to uphold their trust.

Privacy Governance and Accountability

We demonstrate our commitment to privacy through our dedicated Global Privacy Office (GPO). The GPO oversees privacy risks, compliance, and continuous program improvements. Compliance is reinforced through regular internal audits and risk assessments. The T. Rowe Price Group Board of Directors has ultimate oversight of our privacy program and receives regular updates and reporting as part of our Corporate Risk Assessment to ensure risks are properly handled across our program.

THE FOLLOWING PRINCIPLES ARE EMBEDDED IN OUR BUSINESS ACTIVITIES

Privacy by Design

Privacy and data protection are embedded in the early stages of design and development of new processes and technologies. Instilling Privacy by Design not only supports our risk management and compliance goals, but also ensures we consider the benefits to, and potential impacts on, the human rights of individuals whose personal data are involved.

Transparency

We are open with clients and associates about the collection, use, and disclosure of their personal data. We publish and maintain up-to-date privacy notices on our websites and ensure that our personal data processing aligns with our public notices. Our full privacy notices are available on troweprice.com.

Privacy Rights

We enable individuals to exercise their rights under applicable laws, as described in our privacy notices. We provide mechanisms for them to contact T. Rowe Price's Global Privacy Office with inquiries regarding their privacy and our privacy practices.

Keeping Our Associates Current

The worldwide regulatory landscape is changing rapidly. To keep pace with these changes, we educate our associates, providing them with the training and resources they need to comply with new and existing laws. Associates complete mandatory training on the appropriate use and handling of personal data, Privacy by Design, and core principles described in our Global Privacy Policy.

Cybersecurity

T. Rowe Price takes a holistic enterprisewide approach to protecting the organization and leverages a variety of protocols and technologies to guard our systems and data 24 hours a day. We understand that it's never been more important for T. Rowe Price to mobilize our resources to increase strong cybersecurity defenses.

We continually advance our controls to ensure a secure and resilient organization and infrastructure in the face of ever-present emerging threats. All our technology services and capabilities are provided while operating under a robust security and control framework, incorporating significant oversight measures. Our holistic approach to protecting our firm includes:

- Employ enterprisewide governance and security programs
- Establish executive engagement
- Leverage international and industry standards and best practices
- Collaborate with industry partners and threat intelligence-sharing groups
- Design and deploy a layered defense strategy

Cybersecurity Governance and Accountability

Enterprise Security is responsible for maintaining information security policies, standards, and guidelines and routinely works with our Enterprise Risk, Compliance, Internal Audit, and other key technology and corporate stakeholders to establish security policies, enforce them, and monitor their adherence on an ongoing basis.

T. Rowe Price has various layers of technology governance, risk, and compliance functions that play a role in identifying and assessing risks within our cybersecurity program and verifying compliance with our internal and external requirements.

A business unit's compliance and risk management functions are our first line of defense within Technology to effectively oversee our operations and manage risks. Various steering and governance committees also provide oversight, policy, and strategic direction.

The second line of defense is composed of the various control areas, such as the Enterprise Risk Group, including Technology Risk and others. These groups support Technology by providing subject matter expertise and programs with consistent policies, business processes, and tools for the organization. These areas work with Technology to proactively identify and manage risks, including establishment of monitoring and testing practices.

The third line of defense is independent assurance by the Internal Audit Department (IAD). IAD, which ensures that established internal controls are operating effectively, provides appropriate levels of assurance that our risks, including cybersecurity, are adequately controlled and monitored.

"

Integrating **diversity** into our sourcing and supply chain opens opportunities for **efficiency, innovation,** and **sustainability**...

SUSTAINABLE PROCUREMENT

Supplier Code of Conduct

Our Supplier Code of Conduct articulates our commitment to ensuring alignment with suppliers with the highest levels of integrity and ethics and promoting a culture of diversity, equity, and inclusion while providing safe working conditions. We seek to work with businesses whose values align with our own. As such, T. Rowe Price requires our suppliers and their employees, agents, and contractors to comply with all applicable laws and, in all cases, adhere to standards and principles outlined in our Supplier Code of Conduct. Compliance with laws and the standards in our Supplier Code of Conduct are material considerations for assessing every aspect of our supplier relationships.

Diversifying Our Supplier Relationships

Integrating diversity into our sourcing and supply chain opens opportunities for efficiency, innovation, and sustainability—while also enhancing the economic impact for diverse-owned and small disadvantaged-owned businesses and our surrounding communities. Our supplier diversity program prioritizes our relationships with small and diverse business owners. These groups include women, ethnic minorities, veterans, service-disabled veterans, disabled, LGBTQ+, and small disadvantaged-owned business enterprises.

Last year, we announced a goal to spend USD 50 million annually with diverse-owned and small disadvantaged-owned businesses in the U.S. We crafted a three-year supplier diversity strategic road map and implemented year one of our three-year strategic plan establishing the foundational practices necessary to support diverse supplier inclusion.

In 2022, we reached USD 22 million with diverse-owned and small disadvantaged-owned businesses, representing 1.8% of our total corporate addressable spend and a decrease from 2021 (USD 35 million). Factors contributing to the decline include the significant drop in spending and utilization with the top three diverse suppliers from 2021 to 2022. Additionally, actions to standardize data collection by conducting data cleaning initiatives improved our data quality, yet resulted in removing suppliers no longer maintaining the required diverse third-party certification or classification and shifting diversity spend allocations.

As we address these challenges and our program matures, supplier diversity programming will continue to prioritize and cultivate our relationships with small and diverse business owners. Once our U.S.-based program is solidified, we will look to expand these practices in Europe and Asia.

COMMUNITY INVESTMENT

Opportunity for all: We look to empower youth, inspire change agents, and find equitable solutions that drive social good. Our approach to supporting our community focuses on expanding opportunities for everyone.

T. Rowe Price Foundation: Investing in Community for 41 Years

Founded in 1981, the T. Rowe Price Foundation is steadfastly committed to its mission of pursuing the long-term success of communities through direct grant strategies, matching gifts, and a robust capacity-building program for nonprofits.

Since its inception and through December 2022, the T. Rowe Price Foundation has provided USD 170.2 million in direct grants and matching gifts. Total direct grant giving in 2022 was USD 6.5 million. Since 2016, our capacity-building program has served 830 nonprofits and more than 7,000 participants to strengthen organizational health and professional development opportunities for the nonprofit community. In 2022, more than 480 unique nonprofits and more than 1,300 participants joined the Foundation's capacity-building program. Additional details on some of the Foundation's initiatives are described below.

Supporting Education for All

We recognize the transformative power of education, particularly within underrepresented populations. We partner with numerous nonprofits and schools across the globe to provide educational opportunities, tutoring, mentoring, career-readiness training, scholarships, work experiences, enrichment programming, and financial education.

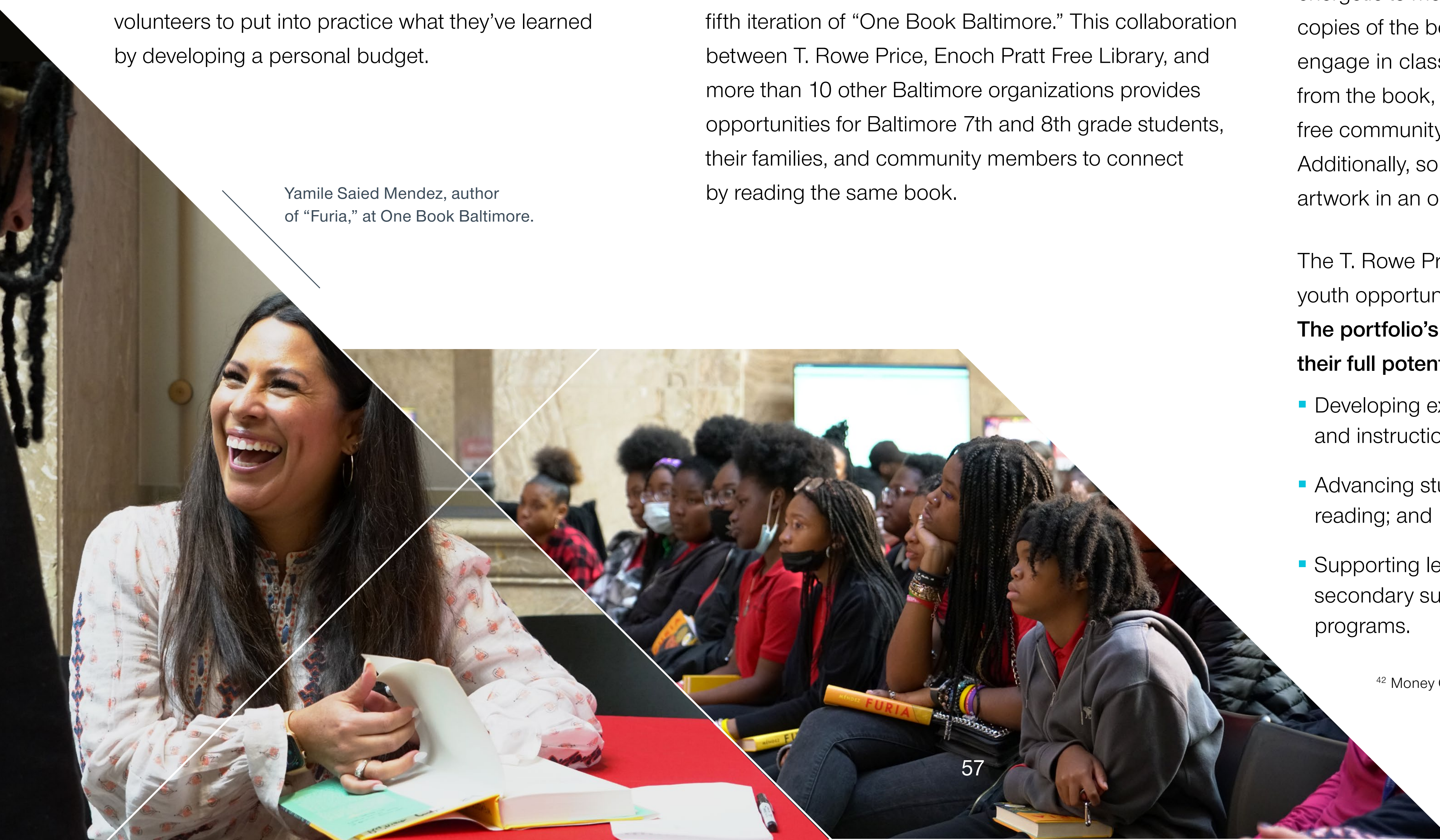
We have been working with both educators and parents since 2009 to help them develop children's financial knowledge and capabilities. Overall, we have reached more than 15.5 million people through our financial education programs.[41]

Renee Christoff, retired head of Global Associate Engagement and Corporate Responsibility, at the Junior Achievement Finance Park Ribbon Cutting.

[41] Total reach of websites, online games, apps, exhibits, programs with Hopscotch, MDR, and Junior Achievement and sponsored events since program inception in 2009.

Since 2013, T. Rowe Price has offered the Money Confident Kids® financial education program,[42] which teaches basic financial concepts such as prioritizing spending, asset allocation, and diversification to children ages 8 to 14.

This year, we opened a T. Rowe Price storefront at Junior Achievement's Finance Park in Baltimore. The interactive program offers personal financial planning lessons and career exploration opportunities that leverage topics from the Money Confident Kids® program. Middle and high school participants learn how to make decisions related to income, expenses, savings, and credit. They have the opportunity to engage with volunteers to put into practice what they've learned by developing a personal budget.



Yamile Saied Mendez, author of "Furia," at One Book Baltimore.

Additionally, the firm launched an initiative that expands financial education resources at Morgan State University, a historically Black university. Now, more than 8,000 students and faculty can increase their financial proficiency with Barron's in Education—one of the leading financial newspapers in the financial industry. The initiative provides free and unlimited access to *Barron's* magazine, industry events, career advice from industry experts, and experiential learning opportunities.

To promote literacy and facilitate community dialogue about important topics such as peace, nonviolence, and inspiring youth to pursue their ambitions, T. Rowe Price and its community partners successfully delivered the fifth iteration of "One Book Baltimore." This collaboration between T. Rowe Price, Enoch Pratt Free Library, and more than 10 other Baltimore organizations provides opportunities for Baltimore 7th and 8th grade students, their families, and community members to connect by reading the same book.

A recent study published about One Book Baltimore in the *Journal of Community Psychology* from the International Arts + Mind Lab at Johns Hopkins University reveals that the literary arts can effectively generate productive conversations and educate students about complex topics, such as violence and mental health. During the fourth quarter of 2022, a group of Baltimore City Public Schools (BCPS) students got the chance to meet the author of the year's One Book Baltimore selection, "Furia"—Yamile Saied Mendez. The author's young adult book tells the story of a young woman's quest to be a rising soccer star in Argentina. During the event, the students were energetic to meet the author and lined up to get signed copies of the book. Throughout 2023, students will engage in classroom programming based on topics from the book, and the Enoch Pratt Free Library will offer free community programs related to the book's theme. Additionally, some BCPS students will present their artwork in an open showcase event.

The T. Rowe Price Foundation's 2022 giving in the youth opportunity grant portfolio totaled USD 1.9 million. **The portfolio's goals are to empower youth to reach their full potential by:**

- Developing exceptional school leadership, capacity, and instruction;
- Advancing student achievement of grade-level reading; and
- Supporting learning, personal development, and post-secondary success through multifaceted, multiyear programs.

[42] Money Confident Kids® is available in Australia, the United Kingdom, and the United States.

Strengthening Our Communities' Small Businesses and Nonprofits

In partnership with Baltimore Corps, a nonprofit focused on creating equitable change, T. Rowe Price launched Moonshot, a program to support diverse-owned social good businesses, innovators, and entrepreneurs of color.

Eight Moonshot Innovators were selected—four nonprofit organizations and four for-profit start-ups. Each Innovator received a financial award from T. Rowe Price and was paired with T. Rowe Price associate pro bono volunteer advisers who partnered with each Innovator on a specific business challenge. The Innovators were brought together at a culminating networking event with T. Rowe Price associates, alumni, and community partners.

Additionally, each nonprofit Moonshot Innovator will participate in a two-year T. Rowe Price Foundation Entrepreneurship in Residence program, funded by the firm's USD 2 million racial justice grant, to receive additional mentoring and support.

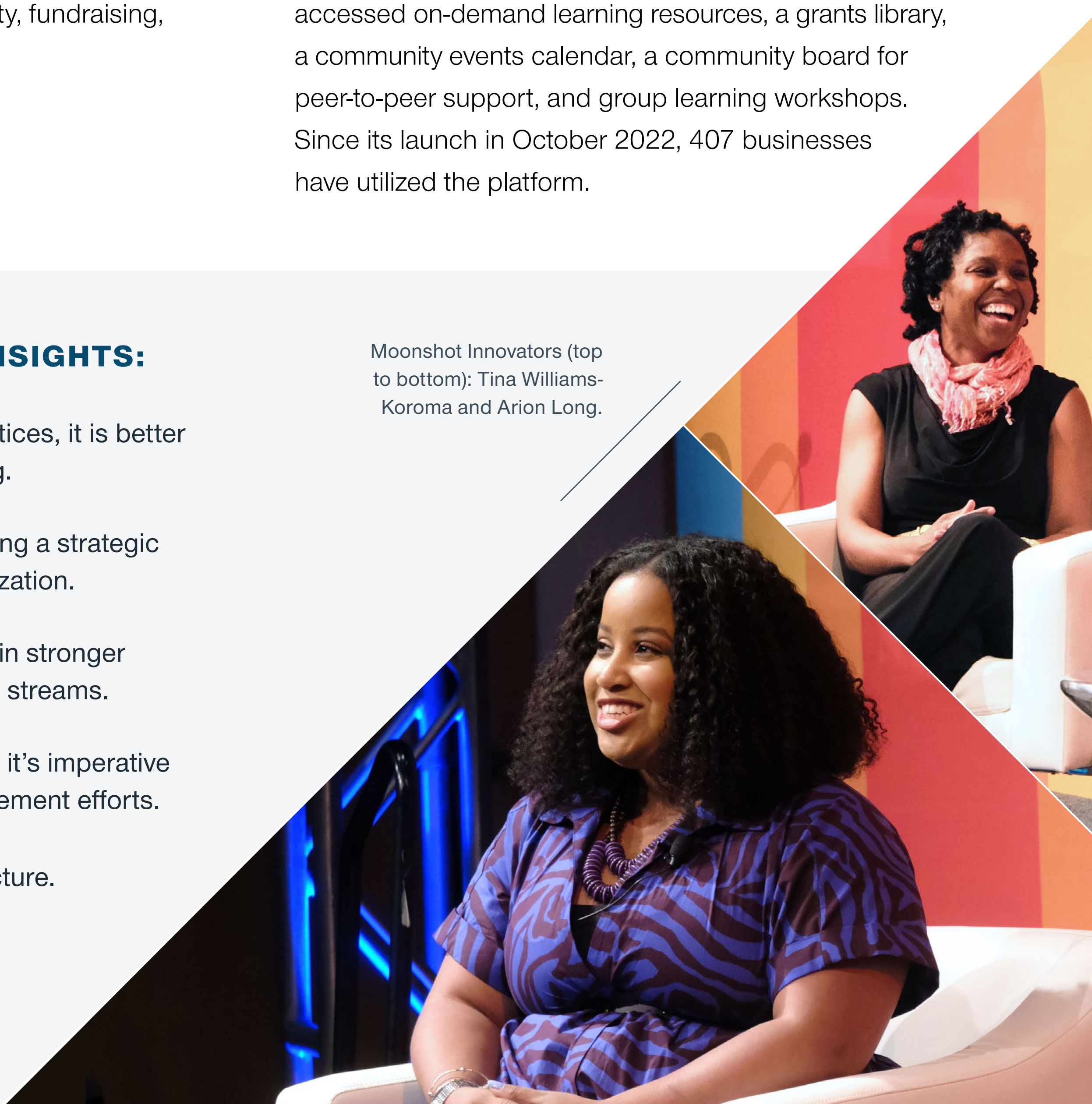
In 2022, the T. Rowe Price Foundation also released its first "State of the Baltimore Nonprofit Sector Report." The report provides data and insights into the health and capacity of Baltimore's nonprofit community, detailing 10 key insights covering topics pertinent to sustaining effective organizations within the nonprofit sector, including partnerships, diversity, fundraising, technology, and more.

The "State of the Baltimore Nonprofit Sector Report" is a result of years of collaboration between the T. Rowe Price Foundation and dozens of community partners throughout the city of Baltimore.

In Colorado Springs, the firm partnered with the City of Colorado Springs and two community partners to launch Access COS, a diverse supplier database and small business hub. The database fills a community need for a centralized reference to find and engage local minority-owned businesses. Within the small business hub, business owners and entrepreneurs have accessed on-demand learning resources, a grants library, a community events calendar, a community board for peer-to-peer support, and group learning workshops. Since its launch in October 2022, 407 businesses have utilized the platform.

STATE OF THE BALTIMORE NONPROFIT SECTOR REPORT'S 10 KEY INSIGHTS:

1. Partnerships are the key to strong organizations.
2. The nonprofit leadership pipeline remains tenuous at best.
3. Effective capacity building requires organizations to dig deep into financial realities and sometimes face hard truths.
4. To increase funding, organizations need dedicated staff and capacity to support it.
5. The best expense is technology.
6. When it comes to evaluation practices, it is better to focus on learning, not counting.
7. There's a difference between having a strategic plan and being a strategic organization.
8. Effective management can result in stronger programs and increased revenue streams.
9. To achieve diversity in leadership, it's imperative to target recruitment and advancement efforts.
10. Reimagine the governance structure.



Moonshot Innovators (top to bottom): Tina Williams-Koroma and Arion Long.

FUNDING HUMANITARIAN AID IN THE UKRAINE REGION

Following the invasion of Ukraine by Russia in February 2022, the T. Rowe Price Foundation conducted a thorough research and vetting process to determine how best to provide focused, sustainable support in the region. The Foundation donated USD 500,000 to the **United Nations Foundation's Ukraine Humanitarian Fund**, which works with local partners—often in dangerous environments—to help provide services to the people caught in the middle of this devastating conflict.

The fund directly assists 38 aid organizations—including UN agencies, national and international nongovernment organizations, and the Ukrainian Red Cross Society—that have implemented dozens of projects in every region of Ukraine. Since February, this work has included distributing 260,000 meals each day, delivering critical health care to 780,000 patients, and supplying clean water and hygiene supplies to more than 400,000 in the region.

Additional work the firm's donation is supporting includes providing shelter, protection services, rescue and evacuation, gender-based violence prevention and survivor counseling, and mobile medical treatment.

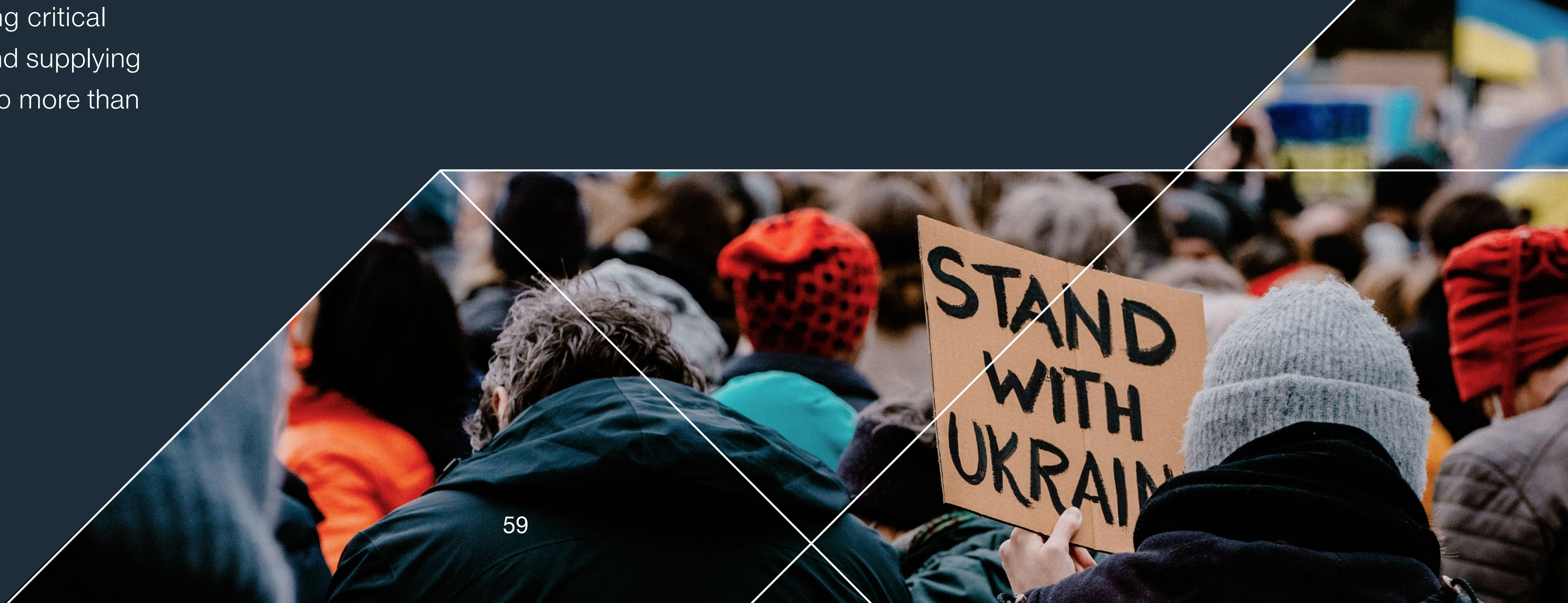
In addition to the UN Foundation's Ukraine Humanitarian Fund, the firm launched a giving campaign to support other humanitarian organizations that provide refugee relief services, medical assistance, and long-term recovery funding to help people in the region. Associates could select a category depending on their interest, (food, clothing, medical assistance, etc.) and donate to a nonprofit supporting that area. Since February, associates donated more than USD 104,000 to support this giving campaign.

USD 500,000 donated by the T. Rowe Price Foundation, and **USD 104,000** donated by T. Rowe Price associates

Distributed **260,000 meals**

Delivered **critical health care to 780,000** patients

Supplied **clean water to more than 400,000** people in the region



2022 GIVING BY THE NUMBERS

368

associates serving on **440 nonprofit boards**

28,700

volunteer hours

USD 6.4M

in matching gifts

USD 15.8M

in associate giving

Supporting Communities Through Service and Donations

We proactively support initiatives that associates care about by providing opportunities for them to contribute their time and expertise through:

- Paid volunteer workdays
- Volunteer rewards
- Sponsoring associates' favorite nonprofit events
- Pro bono volunteer opportunities
- Supporting board service

T. Rowe Price's generous Global Matching Gift Program enables our associates to double the impact of their charitable gifts. It also encourages volunteer service by awarding grants to organizations supported by our associates. Our 2022 community investments included:[43]

- Matching gifts: USD 6.4 million
- Associate giving: USD 15.8 million
- Volunteer hours: 28,700
- Board service: 368 associates serving on 440 nonprofit boards

The firm hosts year-round volunteer events catered to associates' interests and skills. To support pro bono volunteer opportunities, Business Volunteers Maryland and T. Rowe Price teamed up to host two scope-a-thons supporting nonprofits focused on veterans and the LGBTQ+ community. During skillCONNECT events, teams of volunteers from T. Rowe Price brought their expertise and ideas to help the nonprofits navigate business challenges related to strategic planning, finance, fundraising, human resources, marketing, and more. In 2022, we provided 240 hours and more than USD 46,000 in pro bono consulting services through skillCONNECT.

[43] Unless otherwise noted, the information provided in this report and related materials does not include content relating to Oak Hill Advisors, L.P. (OHA), an alternative credit manager that T. Rowe Price Group, Inc., acquired on December 29, 2021.

GOVERNANCE

Our Governance Framework

Sound corporate governance is part of our philosophy and a critical component of our ESG approach. Our Board and its oversight of sustainability issues impact the creation of long-term value for our clients and stakeholders. Furthermore, we believe that our Board's oversight of ESG, and the actions it has taken, reflects a responsible and proactive management of these matters and displays the importance ESG issues have on the future of the firm.

Our Board sets the strategic direction for the firm and provides oversight and advises the firm's senior management. Our directors represent a diverse group of leaders, elected by our stockholders, who bring a range of backgrounds, experience, education, and skills. The Board routinely assesses and monitors the capabilities of our existing directors and whether additional capabilities and new independent directors should be added.

The Board also continually assesses the needs of the company along with the expertise and background of our current Board. They also consider any expected director departures and retirements in its deliberations when evaluating whether to nominate new directors who they think could enhance and complement the specific skills and capabilities of our Board.

Of the independent directors, 40% joined the Board within the last five years; the average non-executive director tenure is six years. The Board's thoughtful approach to its composition ensures a proper balance between new directors, who bring fresh and diverse perspectives, and the stability of the Board overall.

Our directors reflect the Board's efforts and commitment to diversity, equity, and inclusion with respect to age, gender, race and ethnicity, and the need for periodic refreshment to maintain this commitment.

DIRECTOR ATTRIBUTES, SKILLS, AND QUALIFICATIONS

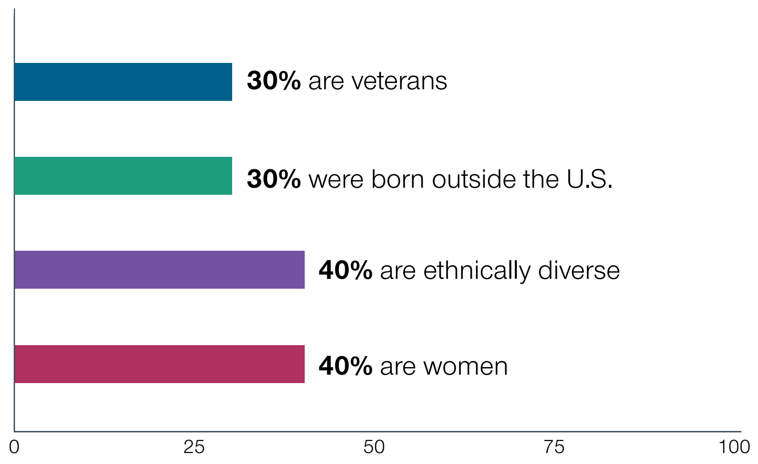
Name	Executive Leadership	Financial Management Representation	Investment Management Industry	International Business Experience	Technology	Strategy Formation/ Execution	Marketing/ Distribution	Government/ Regulatory	Diversity
William J. Stromberg	■	■	■	■		■	■		
Robert W. Sharps	■	■	■	■		■	■		
Glenn R. August	■	■	■	■		■	■		
Mark S. Bartlett	■	■				■		■	
Dina Dublon	■	■	■	■	■	■	■		■
Dr. Freeman A. Hrabowski III	■	■			■	■		■	■
Robert F. MacLellan	■	■	■	■		■	■	■	
Eileen P. Rominger	■	■	■	■		■	■	■	■
Robert J. Stevens	■	■		■	■	■	■	■	
Sandra S. Wijnberg	■	■	■	■	■	■	■	■	■
Alan D. Wilson	■	■		■		■	■		
Mary K. Bush[44]	■	■	■	■		■		■	■
Richard R. Verma[45]	■			■		■		■	■

[44] Mary K. Bush retired from the Board on May 9, 2023, after 11 years of service.
[45] Richard R. Verma resigned from the Board effective March 3, 2023, after he was nominated in December by President Joe Biden to be his deputy secretary of state for management and resources.

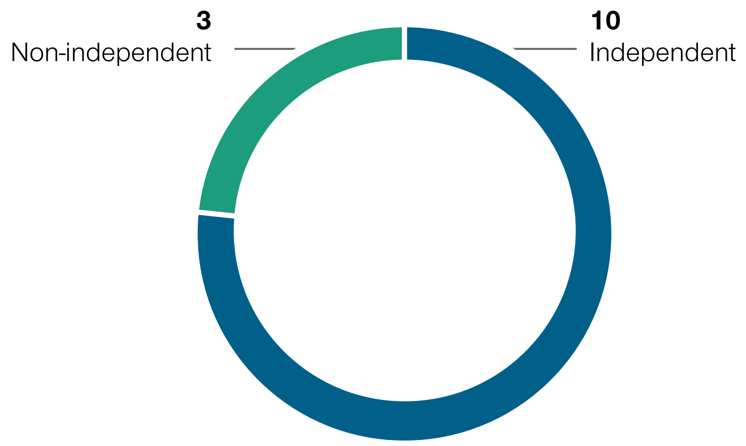
BOARD DIVERSITY MATRIX (AS OF MARCH 1, 2023)

	Female	Male	Nonbinary	Did Not Disclose Gender
Directors	4	9	0	0
Number of Directors Who Identify in Any of the Categories Below				
African American or Black	1	1	0	0
Alaskan Native or Native American	0	0	0	0
Asian	0	1	0	0
Hispanic or Latinx	1	0	0	0
Native Hawaiian or Pacific Islander	0	0	0	0
White	3	7	0	0
Two or More Races or Ethnicities	1	0	0	0
LGBTQ+	0	0	0	0
Did Not Disclose Demographic Background	0	0	0	0

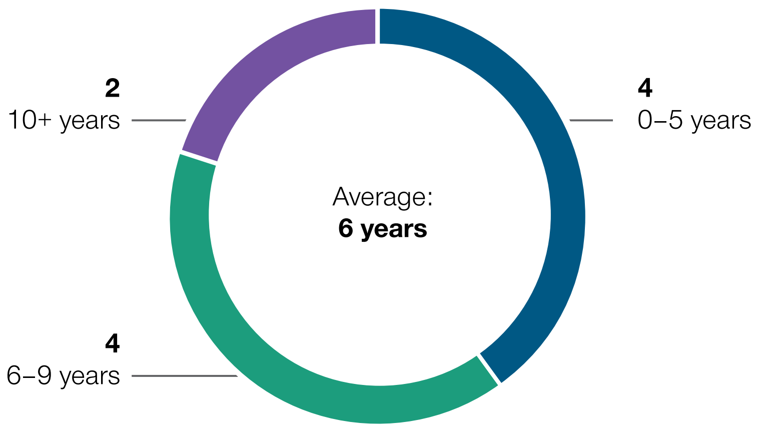
INDEPENDENT DIRECTOR COMPOSITION



DIRECTOR INDEPENDENCE



INDEPENDENT DIRECTOR TENURE



Director Engagement

In 2022, the Board held seven meetings and approved one matter via unanimous written consent. Each director attended at least 75% of the combined total number of meetings of the Board and Board committees of which he or she was a member. Consistent with the company's Corporate Governance Guidelines, the independent directors met in an executive session at each of the Board's regular meetings in 2022. Our Corporate Governance Guidelines provide that all directors are expected to attend the annual meeting of stockholders.

All nominees for director submitted to the stockholders for approval at last year's annual meeting on May 10, 2022, attended that meeting.

Committees of the Board of Directors

Our Board has an Audit Committee, an Executive Compensation and Management Development Committee, a Nominating and Corporate Governance Committee, and an Executive Committee.

Management Committee

The Management Committee works to ensure that our clients remain first—today and in the future. Profiles of T. Rowe Price's leadership team, which is composed of 15 experts with an average tenure of 15 years at the firm, may be found here.

Committee Charters

Current copies of the charters of the Audit Committee, the ECMDC, and the NCGC; our Corporate Governance Guidelines; and our Code of Ethics for Principal Executive and Senior Financial Officers can be found on our website.

COMPOSITION OF OUR BOARD AS OF DECEMBER 31, 2022:

10

of 13 members were independent under the Nasdaq Global Select Market standards (79%)

OF OUR 10 INDEPENDENT DIRECTORS:

4

were women (40%)

3

were born outside the United States (30%)

4

were ethnically diverse (40%)

3

were veterans (30%)

T. ROWE PRICE GROUP BOARD OF DIRECTORS[46]

BACK ROW

Alan D. Wilson
Retired Executive Chairman, McCormick & Company, Inc.

Glenn R. August
Founder and Chief Executive Officer, Oak Hill Advisors, L.P.

Sandra S. Wijnberg
Former Partner and Chief Administrative Officer, Aquiline Holdings LLC

Robert J. Stevens
Retired Chairman, President, and Chief Executive Officer, Lockheed Martin Corporation

Mary K. Bush
Chairman, Bush International, LLC

Richard R. Verma
General Counsel and Head of Global Public Policy, Mastercard

Robert F. MacLellan
Non-executive Chairman, Northleaf Capital Partners

FRONT ROW

Dr. Freeman A. Hrabowski III
Retired President, University of Maryland, Baltimore County

Eileen P. Rominger
Former Senior Advisor, CamberView Partners

Robert W. Sharps
Chief Executive Officer and President, T. Rowe Price Group, Inc.

Mark S. Bartlett
Retired Managing Partner, Ernst & Young

Dina Dublon
Retired Executive Vice President and Chief Financial Officer, JPMorgan Chase & Co.

William J. Stromberg
Non-executive Chair of the Board, T. Rowe Price Group, Inc.

[46] Note: photograph represents the Board as of December 31, 2022. Richard R. Verma resigned from the Board effective March 3, 2023, after he was nominated in December by President Joe Biden to be his deputy secretary of state for management and resources. Mary K. Bush retired from the Board on May 9, 2023, after 11 years of service.

Our Board governance encompasses the **responsible and proactive management** of our environmental and social issues.

Our Board and its **oversight of sustainability issues impact the creation of long-term value** for our clients and stakeholders.

The Nominating and Corporate Governance Committee **monitors performance objectives and progress against our climate-related targets**.

Throughout 2022, the NCGC **received biannual updates on corporate ESG activities**.

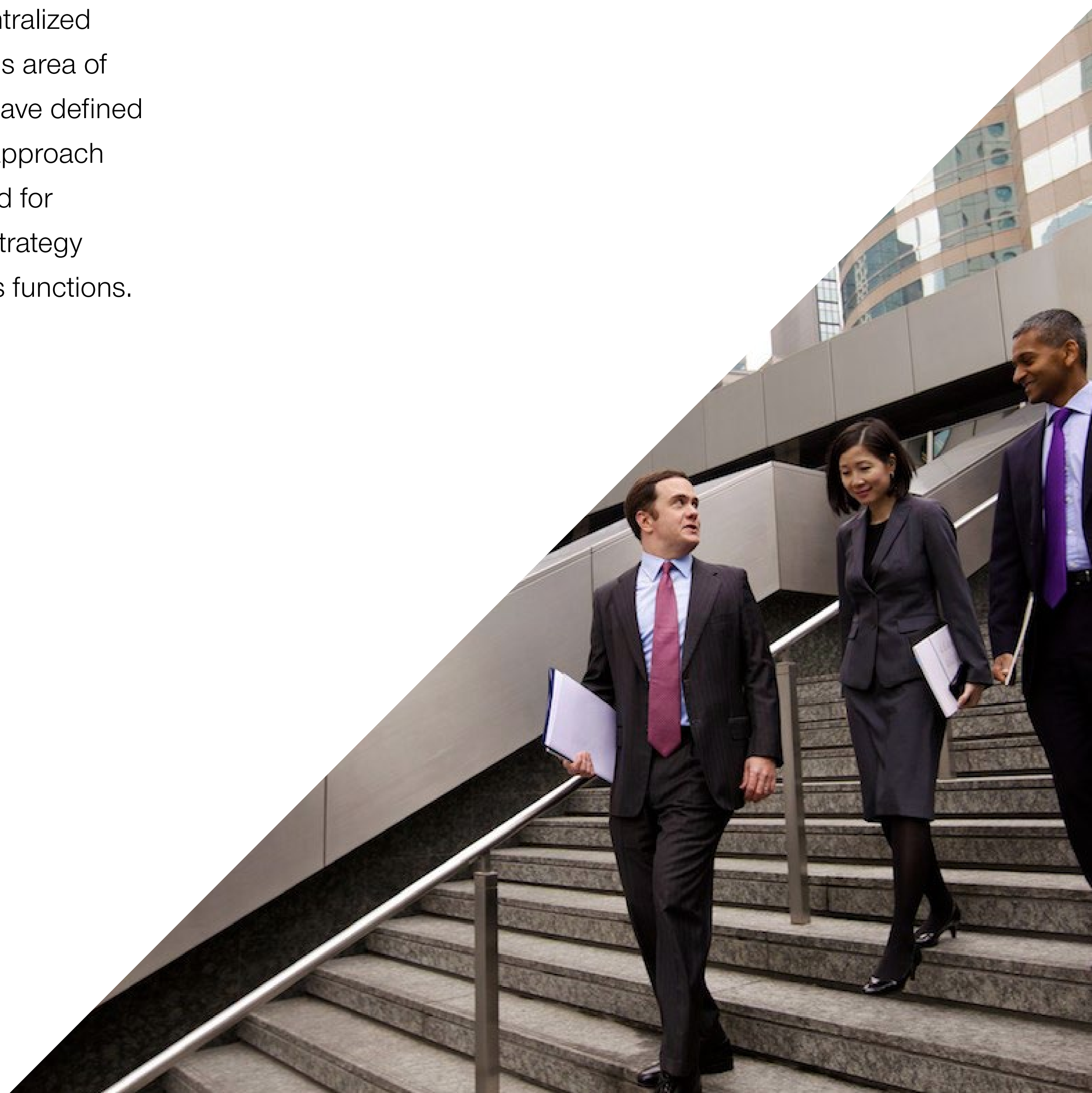
Steering Committees

Our Management Committee has established various steering committees to assist it in setting the strategic policy and direction for a specific area of the firm. These include Ethics; U.S. Equity; Fixed Income; International Equity; Multi-Asset; Investment Management; Risk and Operational; Diversity, Equity, and Inclusion; Retirement Leadership Council; Corporate Strategy; and Product Strategy.

ESG Enablement

Throughout 2022, we continued optimizing our firmwide ESG initiatives after creating a centralized team of associates dedicated full time to this area of focus. With this new operating model, we have defined accountability for the success of our ESG approach across Investments and Corporate ESG and for developing a consistent vision and global strategy for ESG, with improved coordination across functions.

In January 2023, the new global ESG Oversight Committee was established to provide greater transparency on ESG initiatives, drive T. Rowe Price's ESG strategy, and foster ESG collaboration across the organization. Chaired by Poppy Allonby, head of ESG Enablement, this committee reports to the Investment Management Steering Committee quarterly and to the Risk and Operational Steering Committee semiannually. Its membership includes senior leaders in investments, distribution, and other critical functions with all regions and advisory entities represented.



To Find Out More

Additional information on T. Rowe Price's ESG-related programs and policies and our commitment to our clients, associates, and communities is available in the following sections on the T. Rowe Price corporate website.

Corporate Responsibility

Leadership

Diversity, Equity, and Inclusion

Policies

ESG Investment Approach

Memberships and Associations

Final Verification Statement

Cventure LLC | March 29, 2023

REPORTING ENTITY: T. Rowe Price	**CONTACT:** Heather McDonold	**LEAD VERIFIER:** Kevin L. Johnson, Cventure LLC	Kevin L. Johnson

Emissions Inventory:

Global, corporate-wide FY2021 (January 1, 2022 – December 31, 2022) GHG emissions inventory: Scope 1 direct emissions from fuel combustion, mobile sources, and refrigerant losses; Scope 2 emissions from imported electricity and steam; and Scope 3 emissions associated with employee business travel and waste. Boundaries include owned/leased facilities over which T. Rowe Price maintains operational control. CO_2, CH_4, and N_2O direct combustion, electricity consumption, and mobile source combustion emissions, and HFC refrigerant gas and waste CO_2 equivalent emissions, were all calculated; T. Rowe Price has no SF_6, PFC, or NF_3 emissions.

Greenhouse Gas Management Plan:

T. Rowe Price's 2022 GHG emissions inventory and methodology were developed by ICF, according to ICF's 2022 Corporate GHG Inventory excel workbook tool. Raw data collection activities for boundary determinations and GHG emissions sources' characteristics and activity data were performed by T. Rowe Price and Jones Lang LaSalle. T. Rowe Price's GHG inventory was developed according to generally accepted GHG accounting standards: The Greenhouse Gas Protocol, A Corporate Accounting and Reporting Standard, Revised Edition, WRI/WBCSD, March 2004.

Verification Approach:

Tier II of the ERT Standard: "Corporate GHG Verification Guideline" by ERT, a CDP-approved verification standard. Tier II-level verification is appropriate for basic reporting purposes, including stakeholder and other external communications, and voluntary efforts for which there are no imminent requirements for GHG emissions compliance. This verification effort covered T. Rowe Price's FY2022 GHG emissions inventory. Cventure was not directly involved in the FY2022 GHG emissions inventory's data collection, management, or reporting; nor associated emissions calculation or estimates, and any subsequent assertions made by T. Rowe Price. Cventure has not provided any services to T. Rowe Price, which could compromise Cventures' independence as a third-party verifier. Cventure disclaims any liability for any decision made by third parties based on this verification statement. Cventure's conclusion is based on the findings described below.

The Tier II review was designed to provide a limited level of assurance that the GHG emissions assertion is materially correct. Reviews of methodologies, calculations, and data management processes used in T. Rowe Price's GHG inventory were conducted. All T. Rowe Price facilities and GHG emissions Scopes reported within the operational boundary determination were subject to the verification process. Twelve (12) facilities were selected for detailed reviews and data sampling, representing over 90% of T. Rowe Price's total building related GHG emissions, with purchased electricity and natural gas monthly billing records being examined for each of them. Root audit data records were also reviewed for travel agent-booked employee business air travel, and for waste management vendors. Error checking tests were performed on the data to assess the information collected, including missing data, limits and reasonableness, units of measure (UOM), and select re-computation crosschecks. No material errors or omissions were identified by Cventure during this verification project. Several minor, immaterial discrepancies between root data documentation and the GHG inventory report were identified; these were corrected by T. Rowe Price/ICF at that time. Boundary checks included a review of the 2022 lease management reports. Emissions aggregation and select inventory spreadsheet calculation checks were also made and compared against inventory reported data. No material errors or discrepancies were found in those types of verification review checks. We believe that our work provides a sound basis for our verification conclusion.

Conclusion:

This effort included sampling and testing of GHG emissions data and underlying root data and information, resulting in a limited level of assurance. Based on its verification review of T. Rowe Price's FY2022 GHG emissions inventory, Cventure has found no evidence that T. Rowe Price's GHG assertion is not presented fairly and accurately. Cventure found that the GHG inventory emissions estimates conform to generally accepted GHG accounting standards and are generally consistent with the WRI/WBCSD GHG accounting and reporting protocol. GHG emissions estimates were calculated in a consistent, transparent manner, and found to be a fair and accurate representation of T. Rowe Price's actual conditions, and to be free from material misstatements or omissions. Cventure verified a total of 26,381 metric tons of CO_2 equivalent emissions (941 Scope 1, 19,210 Scope 2, and 6,230 Scope 3 [excluding employee commuting]), with a limited level of assurance.

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