T.RowePrice

2023 Sustainability Report

Issued May 2024

INVEST WITH CONFIDENCE®

About This Report

Since 2012, we have published reports sharing our commitment to and the evolution of our corporate sustainability strategy with our clients, stockholders, and other stakeholders. Our 2023 Sustainability Report aims to deliver a comprehensive illustration of the many initiatives, policies, and metrics that the firm has developed and implemented.

As in previous years, the report contains a set of robust disclosures anchored in two globally recognized frameworks, the Task Force on Climate-Related Financial Disclosures (TCFD) and the Sustainability Accounting Standards Board (SASB). In addition, we are proud to publish our first Investor Climate Action Plan (ICAP), as part of our commitment to the Net Zero Asset Managers initiative (NZAM).

Although we are still in the early stages of our journey toward decarbonization, our ICAP represents a significant step forward and builds on the progress we've made through our commitment to sustainability initiatives and programs spanning more than a decade. These enhanced disclosures will continue to evolve over time in response to increased regulations around the globe.

Our 2023 Sustainability Report covers the operations of T. Rowe Price Group, Inc. It forms part of a suite of annual publications that also includes the T. Rowe Price Group Annual Report, Annual Proxy Statement, and ESG Investing Annual Report. Together, they provide a thorough, in-depth account of our commitment to sustainability.

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. Information on OHA's approach to environmental, social, and governance (ESG) can be found on its website.

The disclosures appearing under headings or subheadings with the symbol ‡ are included in the report of independent certified public accountants. Refer to Report of Independent Certified Public Accountants on page 96 for additional details.

This report has been formally approved by the Nominating and Corporate Governance Committee (NCGC) of the T. Rowe Price Group Board of Directors.

UK asset managers that exceed certain assets under management thresholds are required by the Financial Conduct Authority to publish TCFD entity-level annual disclosures. T. Rowe Price International Ltd (TRPIL) is in scope and will publish its second annual TCFD report. The TRPIL TCFD report will largely refer to the T. Rowe Price Group TCFD Report, as TRPIL's own approach to governance, strategy, and risk management is aligned with the broader approach of T. Rowe Price Group. The TRPIL TCFD report is not subject to review by independent certified public accountants.

All data points within this report are as of and/or for the period ending December 31, 2023, unless otherwise noted.

Forward-Looking Statements

This report, and other statements that T. Rowe Price may make, may contain forward-looking statements within the meaning of the Private Securities Litigation Reform Act, with respect to T. Rowe Price's future financial or business performance, strategies, or expectations. Forward-looking statements are typically identified by words or phrases such as "trend," "potential," "opportunity," "pipeline," "believe," "comfortable," "expect," "anticipate," "current," "intention," "estimate," "position," "assume," "outlook," "continue," "remain," "maintain," "sustain," "seek," "achieve," and similar expressions, or future or conditional verbs such as "will," "would," "should," "could," "may," and similar expressions.

Forward-looking statements in this report may include, without limitation, information relating to anticipated changes in revenues, our operations, expenses, earnings, liquidity, cash flows and capital expenditures, industry or market conditions, amount or composition of assets under management, regulatory developments, changes in our effective fee rate, demand for and pricing of our products, new products and services, effective tax rates, net income and earnings per common share, future transactions, our strategic initiatives, general economic conditions, dividends, stock repurchases, and other market conditions.

Actual results could differ materially from those anticipated in forward-looking statements, and future results could differ materially from historical performance. Forward-looking statements speak only as of the date they are made, and T. Rowe Price assumes no duty to and does not undertake to update forward-looking statements.

We caution investors not to rely unduly on any forward-looking statements and urge you to carefully consider the risks described in our most recent Form 10-K filed with the Securities and Exchange Commission.

A Letter From Our CEO

As we evolve to meet our clients' needs in a rapidly changing market environment, our core values remain constant. They are embedded in the principles and practices that have served us well since 1937 and underpin everything we do, including our long-standing commitment to sustainability.

It's this commitment that drives our work to progress and enhance our corporate sustainability strategy. In the coming pages, you will learn more about our strategy, but I'd like to highlight a few milestones we reached in 2023:

- We developed product solutions that specifically focus on climate change and the transition toward net zero, with the launch of our Net Zero Transition Framework for global equities and corporate bonds, and established a net zero voting policy for these mandates. We are actively working to expand this framework to sovereign securities.
- We partnered with the International Finance Corporation (IFC),[1] part of the World Bank Group, to deliver a pioneering global blue bond venture that will increase access to finance for blue projects in emerging markets. This innovative venture seeks to further the aims of the United Nations Sustainable Development Goals 6 (clean water and sanitation) and 14 (life below water) by supporting the health, productivity, and resilience of the world's oceans and water resources.
- Our London office relocation in September 2023 and construction of new global headquarters in Baltimore have provided opportunities to embed sustainability objectives into our buildings' design. We aim to have 60% of our global real estate square footage environmentally certified by year-end 2025.

Looking ahead, we expect corporate sustainability reporting to evolve, as voluntary reporting frameworks are becoming mandatory disclosure requirements in many jurisdictions. The new IFRS Sustainability Disclosure Standards developed by the International Sustainability Standards Board represent a significant step toward globally aligning disclosures to provide decision-useful information for investors. Our support for these standards is based on their emphasis on financial materiality.

We remain committed to pursuing investment excellence and providing world-class service—to deliver outstanding value for our clients, our associates, and our shareholders long into the future.

Robert W. Sharps
Chief Executive Officer and President

[1] T. Rowe Price and IFC are not affiliated companies.

About Us

At T. Rowe Price, we're guided by a purpose: to identify and actively invest in opportunities to help people thrive in an evolving world.

As a premier global asset management organization, we're deeply focused on our clients' investment objectives, working closely with them to help achieve their long-term financial goals. We take an active approach to investing, offering our dynamic perspective and meaningful partnership so our clients can feel more confident. With more than 80 years of experience, we provide a broad range of investment solutions across equity, fixed income, and multi-asset capabilities for clients around the world—from individuals to advisers and from institutions to retirement plan sponsors.

7,900+
Associates

$1.4 trillion
USD in assets under management[1]

51 countries
Where we serve clients

17 markets
Where we are located

900+
Investment professionals

$969 billion
USD in retirement assets under management

$744 billion
USD in equity assets under management

$170 billion
USD in fixed income assets under management

$483 billion
USD in multi-asset assets under management

$48 billion
USD in alternative assets under management

As of December 31, 2023. Includes Oak Hill Advisors, L.P. (OHA), an alternative credit manager that T. Rowe Price Group, Inc., acquired on December 29, 2021.
[1] Firmwide AUM includes assets managed by T. Rowe Price Associates, Inc., and its investment advisory affiliates.

Our Sustainability Journey

As of December 31, 2023

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
The firm rolls out 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

2021

IFRS Sustainability Alliance
Became a member (formerly the SASB Alliance)

UN Global Compact
T. Rowe Price becomes a signatory

Global Impact Strategies
T. Rowe Price launched its first impact strategies

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

2022

NZAM
Signatory of the Net Zero Asset Managers initiative (NZAM)

ESG Enablement
Head of ESG Enablement hired to optimize ESG initiatives and oversee a centralized team 100% dedicated to ESG

2023

First Net Zero Transition Fund
Launched the Global Growth Equity Net Zero Transition Fund in the SICAV

ESG Oversight Committee
Formalized governing body with oversight of ESG strategy, operations, policies, and disclosures

IFC Partnership
T. Rowe Price and the International Finance Corporation (IFC)**** announced plans to create first blue bond venture to support the sustainable blue economy across emerging markets

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).
**** T. Rowe Price and IFC are not affiliated companies.

Our UN SDG-Aligned Goals and Progress

We look to global standard-setters to help define our sustainability priorities. In 2021, we became a signatory to the United Nations (UN) Global Compact. We continue to strengthen our efforts to advance the UN's Sustainable Development Goals (SDGs).

We manage a number of investment strategies that align clients' investments with the SDGs. For example, our suite of impact investment strategies aligns with the SDGs and offers clients an opportunity to pursue both financial gain and their sustainability goals. In 2023, we partnered with the International Finance Corporation (IFC)[1] to launch a blue bond venture, which supports clean water and sanitation (SDG6) and life below water (SDG14).

Within our operations, we have made commitments to advance the following goals: gender equality (SDG5), reduced inequalities (SDG10), sustainable cities and communities (SD11), and climate action (SDG13). Additional details on our efforts to support these SDGs are noted throughout the report with the corresponding icon displayed in the appropriate section of this report.

UN SDG Goal[2]		Our Ambition	2023 Progress
5 GENDER EQUALITY	**5.5** Ensure women's full and effective participation and equal opportunities for leadership at all levels of decision-making in political, economic, and public life	Increase representation of women in our global workforce to 46% and 33% of global senior roles by 2025	▪ 44% of the firm's global workforce were women ▪ 32.5% of senior roles were held by women
10 REDUCED INEQUALITIES	**10.3** Ensure equal opportunity and reduce inequalities of outcome, including by eliminating discriminatory laws, policies, and practices and promoting appropriate legislation, policies, and action in this regard	▪ Increase representation of underrepresented talent in U.S. workforce to 19% and 10% in U.S. senior roles by 2025 ▪ Increase annual spend with underrepresented suppliers, including small disadvantaged-owned business enterprises, to USD 50 million annually by 2025	▪ 17.5% of the firm's U.S. workforce was underrepresented talent, and 7.9% of senior roles in the U.S. were held by underrepresented talent ▪ Efforts resulted in a USD 50 million spend with underrepresented suppliers in 2023
11 SUSTAINABLE CITIES AND COMMUNITIES	**11.6** By 2030, reduce the adverse per capita environmental impact of cities, including by paying special attention to air quality and municipal and other waste management	Achieve environmental certification for 60% of our global real estate by square feet by 2025	▪ 48% of our real estate by square footage was environmentally certified by year-end 2023 ▪ Pursuing LEED certification at new Baltimore headquarters ▪ LEED certification – Washington, D.C., office Floor 10 ▪ Pursuing BREEAM certification for London office post-construction
13 CLIMATE ACTION	**13.2** Integrate climate change measures into national policies, strategies, and planning	▪ Achieve net zero Scope 1 and 2 emissions by 2040 ▪ Reduce Scope 1 and 2 emissions by 75% by 2030 compared with our 2021 base year	▪ 4% reduction in Scope 1 and 2 emissions[3] since 2021 base year

[1] T. Rowe Price and IFC are not affiliated companies.
[2] Source: United Nations. 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.
[3] See Glossary of Terms for definitions of Scope 1 and 2 emissions.

Governance

Board Oversight

The T. Rowe Price Group, Inc., Board of Directors (Board) sets the strategic direction for the firm, provides oversight, and advises our senior management. Because the interests of our corporate shareholders are distinct from those of investment clients, as part of our governance structure, separate Boards of Directors represent the firm and our investment funds or trusts.

The Board represents a diverse group of leaders, elected by our stockholders, with a range of backgrounds, experience, education, and skills. The Board continually evaluates the needs of the firm and assesses and monitors the expertise of its directors. It takes these considerations into account, together with any expected director departures and retirements, when deciding whether to nominate new independent directors to enhance and complement its existing skills and capabilities.

Of the independent directors, 50% 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 commitment to diversity, equity, and inclusion with respect to age, gender, race, and ethnicity and its efforts to maintain this commitment through periodic refreshment.

Director Nominee Qualifications, Attributes, and Skills (As of May 10, 2024)

The chart below summarizes the specific qualifications, attributes, and skills for each director nominee. A "■" in the chart below indicates that the director has meaningfully useful expertise in that subject area. The lack of a "■" does not mean the director does not possess knowledge or skill. Rather, a "■" indicates a specific area of focus or expertise of a director on which the Board currently relies.

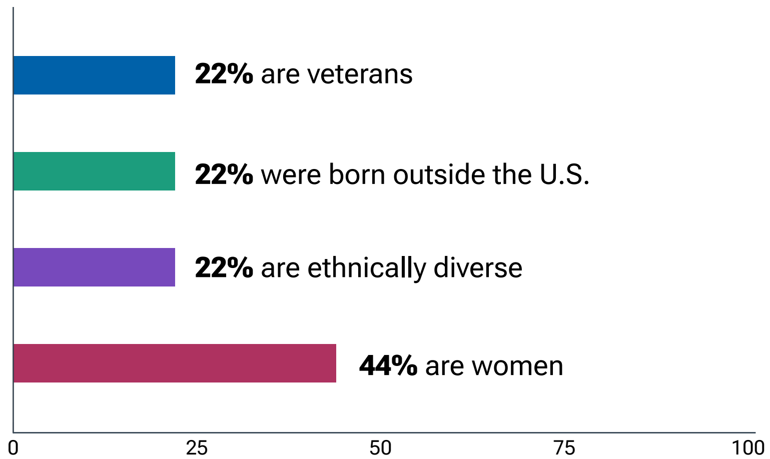
Name	Executive Leadership	Financial Management	Investment Management Industry	International Business Experience	Technology	Strategy Formation/ Execution	Marketing/ Distribution	Government/ Regulatory	Diversity
Robert W. Sharps	■	■	■	■		■	■		
Glenn R. August	■	■	■	■		■	■		
Mark S. Bartlett	■	■				■		■	
William P. Donnelly	■	■		■	■	■	■		
Dina Dublon	■	■	■	■	■	■	■		■
Robert F. MacLellan	■	■	■	■		■	■	■	
Eileen P. Rominger	■	■	■	■		■	■	■	■
Cynthia F. Smith	■	■	■		■	■			■
Robert J. Stevens	■	■		■	■	■	■	■	
Sandra S. Wijnberg	■	■	■	■	■	■	■	■	■
Alan D. Wilson	■	■		■		■	■		

Board Diversity Matrix (As of March 1, 2024)

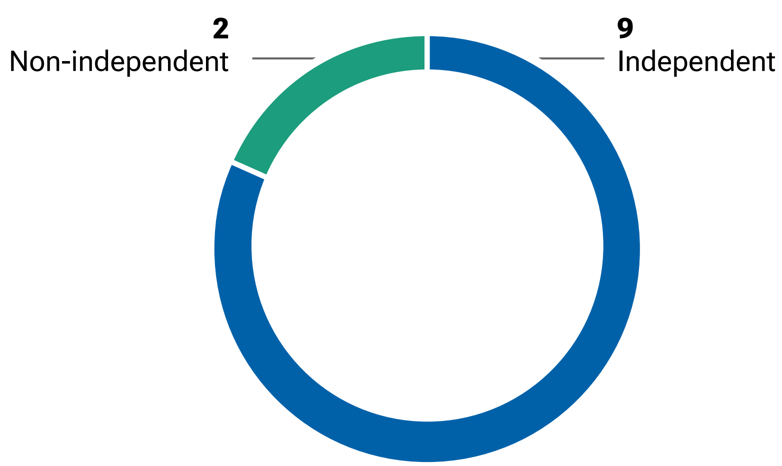
	Female	Male	Nonbinary	Did Not Disclose Gender
Directors	4	9	0	0
Number of Directors Who Identify in Any of the Categories Below				
African American or Black	1	1	0	0
Alaskan Native or Native American	0	0	0	0
Asian	0	1	0	0
Hispanic or Latinx	1	0	0	0
Native Hawaiian or Pacific Islander	0	0	0	0
White	3	8	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 Directors (As of May 10, 2024)

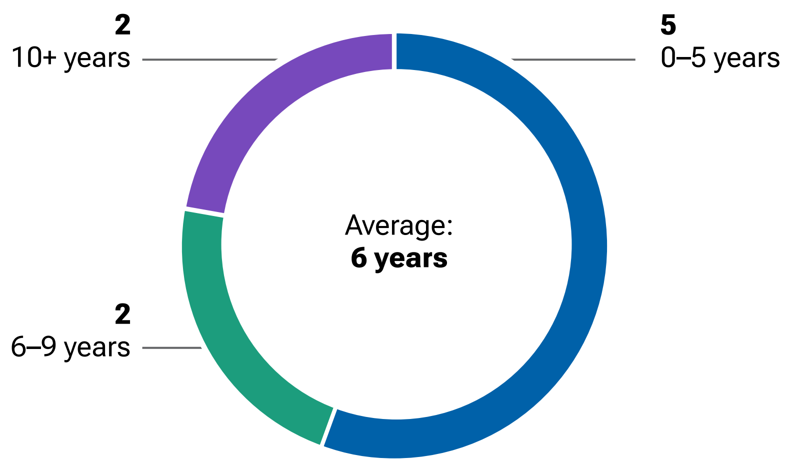
Independent Director Composition



Director Independence



Independent Director Tenure



Director Engagement

In 2023, the Board held six meetings and approved one matter via unanimous written consent. Each director attended at least 75% of the combined total number of Board meetings and Board committees of which he or she was a member. Consistent with the firm's Corporate Governance Guidelines, the independent directors met in an executive session at each of the Board's regular meetings in 2023. 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 9, 2023, attended that meeting.

Committees of the Board of Directors

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

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.

Committees With ESG Oversight‡

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

- **The Nominating and Corporate Governance Committee (NCGC)** oversees ESG across the firm. This includes ESG matters related to both the firm's operations and our investment activities, such as monitoring performance objectives and progress against our climate-related corporate goals and targets. The NCGC approved the firm's Scope 1 and 2 net zero target at its February 2023 meeting. The head of ESG Enablement generally briefs the NCGC biannually. As part of these regular briefings, the NCGC received an update on the firm's ESG strategy in October 2023. In January 2024, the head of ESG Enablement provided an update on progress against our corporate goals, including the firm's net zero emissions target. At the May 2024 meeting, the NCGC approved this report, including our Investor Climate Action Plan (ICAP), and disclosures for the Task Force on Climate-Related Financial Disclosures (TCFD) and the Sustainability Accounting Standards Board (SASB). Only independent non-executives serve on the NCGC. Additional details on the NCGC's responsibilities are available in its charter.
- **The Audit Committee** considers ESG matters as they impact any disclosures in our financial statements, including climate-related risks. The Audit Committee receives updates from the firm's chief risk officer (CRO) and regularly discusses ESG legal and regulatory developments with our general counsel. Additional details on the Audit Committee are available in its charter.
- **The Executive Compensation and Management Development Committee (ECMDC)** is responsible for considering how ESG matters may impact management compensation. The ECMDC considers the firm's ESG efforts when reviewing and approving general salary and compensation policies for management. Additional details on the ECMDC are available in its charter.

T. Rowe Price Group Board of Directors (From Left to Right)

Eileen P. Rominger
Former Senior Advisor, CamberView Partners

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

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

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

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

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

Cynthia Smith
Senior Vice President, Regional Business and Distribution Development, MetLife, Inc.

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

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

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

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

Mark S. Bartlett
Retired Managing Partner, Ernst & Young

William P. Donnelly
Retired Executive Vice President, Mettler Toledo International, Inc.

Note: Photograph represents the Board as of December 31, 2023. William J. Stromberg and Dr. Freeman A. Hrabowski III resigned from the Board effective May 7, 2024.

Management's Role‡

The Management Committee works to ensure that our clients' needs remain our first priority—today and in the future. Profiles of T. Rowe Price's leadership team, which is composed of 15 experts[1] with an average tenure of 15 years at the firm, may be found here.[2]

Responsibility for ESG strategy, risk, investing, and corporate sustainability is consolidated under Eric Veiel, head of Global Investments and chief investment officer at T. Rowe Price Associates. Mr. Veiel is a member of the Management Committee. Under his leadership, our ESG Enablement and ESG Investing teams are responsible for developing and managing the firm's sustainability initiatives in their respective areas of focus.

T. Rowe Price's Management Committee oversees risks, including climate-related risks, via the Enterprise Risk Management Committee (ERMC), which is chaired by the firm's chief risk officer (CRO).

Recognizing that ESG activities are present across multiple business units, the firm created the ESG Oversight Committee (ESGOC) in 2023. Chaired by the firm's head of ESG Enablement, the ESGOC serves as a central and global oversight body and supports governance around our ESG activities. The ESGOC reports to the Investment Management Steering Committee (IMSC), with regular updates to the ERMC. Mr. Veiel and the CRO serve on the ESGOC.

The ESGOC is responsible for:

- Developing and driving T. Rowe Price's overarching ESG strategy
- Approving ESG-related memberships, disclosures, and corporate sustainability policies
- 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
- Monitoring performance against goals and targets.

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, which are made up of senior leaders at the firm.

Further resources that our organization relies on to help identify and assess climate-related risks and opportunities and to scope possible adaptation and mitigation strategies include:

- Third-party research
- Trade associations
- Sustainability reporting frameworks from organizations such as SASB, TCFD, and the International Sustainability Standards Board (ISSB).

[1] Management Committee member Robert Higginbotham retired from the firm on December 31, 2023.
[2] Hyperlinked information is not subject to review by independent certified public accountants.

Accountability[‡*]

The following chart illustrates the firm's ESG accountability framework

Boards and Committees

The ESG Enablement team provides regular updates to the Nominating and Corporate Governance Committee, and Risk provides regular updates to the Audit 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 Investments 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 (TRPA and TRPIM)

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

Implementation Teams

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 Platforms (TRPA and 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 January 1, 2024. 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.

** RIIM refers to the proprietary responsible investing indicator models built by TRPA and TRPIM. RIIM rates issuers using a traffic light system where green indicates no/few ESG concerns, orange indicates medium ESG concerns, and red indicates high ESG concerns/risk. TRPA RIIM has a framework for rating corporate, sovereign, securitized, and municipal issuers, whereas TRPIM RIIM only has a framework for rating corporate issuers.

Steering Committees[3]

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

Incentive Alignment[3]

Our investment professionals are responsible for incorporating sustainability risks and ESG factors, including climate-related risks and opportunities, into their investment recommendations and investment decisions, as appropriate to the mandate. T. Rowe Price holds its portfolio managers and analysts accountable for doing so by incorporating the extent of the integration of such analysis into their individual investment processes as part of the assessment criteria in year-end performance reviews and compensation. ESG integration and sustainability risk incorporation are considered as qualitative components of the year-end performance assessment.

Our dedicated ESG specialist teams have clear objectives and are compensated with variable pay related to achieving these objectives. A development plan is set out and a full year-end appraisal is carried out to ensure expectations are met.

Compensation of our senior leaders is not tied directly to ESG-related key performance indicators; however, each Management Committee member has goals tied to diversity, equity, and inclusion.

[3] The following section is not subject to review by independent certified public accounting firm.

Training and Culture

Training on ESG Topics

We believe that continually building awareness and knowledge of ESG among our global associates is critical to help us meet the evolving needs of our clients and to strengthen our ESG capabilities. We have a number of ESG investing education programs tailored to different business groups, including:

- **New analyst orientation** - Each new investment analyst who joins T. Rowe Price is trained in responsible investing and corporate governance as part of an in-depth, multiday department orientation.
- **Discussion forums** - In addition to new analyst training, we hold forums with investment professionals across the firm to explore the integration of ESG factors in the investment process.
- **ESG global and regional training** - Our ESG investment specialists, product, and legal and compliance teams provide regular ESG education sessions throughout the year, spanning topics such as regional ESG regulation; ESG product initiatives; our proprietary RIIM tools; impact investing; ESG ratings; and our commitment to the Net Zero Asset Managers initiative (NZAM).
- **Chartered Financial Analyst (CFA)** - We support the development of our staff through training and development opportunities relevant to their roles, such as completion of the Chartered Financial Analyst qualification and CFA Institute Certificate in ESG Investing. (CFA® and Chartered Financial Analyst® are registered trademarks owned by CFA Institute.)

In addition to content designed specifically for our investing teams, our distribution teams receive updates on relevant ESG topics and our ESG capabilities to ensure that they maintain the skills, knowledge, and expertise needed to perform their roles effectively.

In 2023, we offered global associates training from **Fitch Learning**, an external supplier. The certification covered four modules: ESG factors, ESG market and engagement, integrating ESG into investment analysis, and integrating ESG into portfolio management. In 2023, we had a 95% successful completion rate for the Fitch ESG Foundation Certificate among the global associate population that registered, compared with a 76% completion rate in the previous year. In addition, in 2023, we partnered with Fitch Learning to roll out the Fitch ESG Advanced course for our Distribution teams globally. Modules included ESG Reporting Framework, Sustainable Finance, Impact Investing, and Climate Fundamentals. In 2023, we also offered certain global client-facing associates responsible investing-related training from **PRI Academy**, an external supplier.

We continue to expand our library of on-demand online content, including podcasts, recordings, interviews, and eLearning tools to support live sessions on a variety of topics that include:

- Responsible investing and corporate governance
- Integration of environmental and social factors in the investment process
- In-depth modules on specialties such as impact investing
- Proprietary ESG tools, capabilities, and products
- ESG regulations, such as the Sustainable Finance Disclosure Regulation (SFDR)
- Initiatives such as NZAM

Our Corporate Sustainability team partners with others in the organization to keep associates across our global business informed and updated on our internal corporate sustainability strategy.

Additionally, we held two internal general-audience events with the head of ESG Enablement—an Ask Me Anything event (April) and a T. Rowe Talk firm event (November). The latter was part of an internal series aiming to help further connect our associates with strategic focus topics for the firm, such as ESG.

As we look to the future, we will continue to develop more content and education sessions to meet the needs of our associates and evolve with regulatory and governance requirements.

Embedding Sustainability in Our Culture

Fostering a culture that embraces sustainability is essential to achieve the firm's environmental goals. We achieve this through programming managed by the ESG Enablement and Corporate Real Estate & Workplace Services teams and the firm's associate-led Global Sustainability Network.

To help associates understand their personal carbon footprint and consider actions to address it, the firm partnered with Climate Vault to launch a carbon emissions calculator for our workforce. After using the calculator to estimate their emissions, associates can consider making a donation to Climate Vault to address their partial or full carbon footprint. Donations to Climate Vault are matched by the firm as part of its global Matching Gift program. Climate Vault also serves as the firm's partner to address emissions from business travel. Additional information on the partnership is on page 65.

Recognizing the pivotal role each individual plays in shaping a sustainable future, the firm's Global Sustainability Network spearheads initiatives that integrate sustainability into our culture. The Global Sustainability Network works to engage our workforce through a variety of events and content throughout the year.

One such initiative is our e-waste recycling. This annual event actively involves our associates in the reduction of electronic waste, contributing significantly to our firm's broader efforts to minimize waste. Associates bring in their old electronics for recycling, aligning their actions with our commitment to the circular economy.

Additionally, each spring, the Global Sustainability Network hosts a nature photography contest. This initiative celebrates biodiversity and serves as a powerful awareness-raising tool. We plan to showcase the associate submissions in our new London headquarters.

The team's commitment to sustainability extends beyond events to regularly published communications. Our Global Sustainability Network continuously develops engaging content, such as blogs, articles, and internal communications, to keep our associates informed and inspired.

Business Ethics

Responsible Marketing‡

We are a fiduciary to many of our clients. It is critical that we provide timely information to our clients and prospects. Every communication must be:

- Accurate
- Clear
- Balanced
- Not misleading

We distribute this information through troweprice.com to 28 country-specific websites. Communications are tailored to each country's audience, which may include:

- Institutional clients
- Consultants
- Retail clients
- 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.

Our Global Marketing Communications Regulatory Review Policy helps ensure that our sales and marketing communications are reviewed by specially trained associates to ensure that the communications comply with local regulatory requirements and firm policies for the intended audience. These associates also confirm that risks are 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.

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

- Prospectuses
- Key investor information documents
- Annual reports
- 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, in the U.S., registration as a securities representative and/or a principal with the Financial Industry Regulatory Authority (FINRA) 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
- File an application for registration as an agent (Form U4)
- Pass all qualifying examinations
- File all required registration updates in a timely manner

In the UK and the European Union (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.

Compensation programs for our sales professionals are expected to focus on the best long-term interests of our clients and reward both qualitative and quantitative performance. We do not use solely formulaic incentives or commissions, as we believe these can place undue focus on shorter-term results at the expense of longer-term success. We provide competitive fixed salaries, annual cash bonuses, and for more senior roles, annual awards of long-term incentives.

Additional information[1]

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.

Whistleblower Policies and Procedures‡

As a global investment management firm, we are committed to conducting our business with the highest level of integrity and ethics. Every associate worldwide has an obligation to speak up if they encounter a situation that raises a real or potential legal or ethical concern, regardless of location. Questionable conduct can be reported:

- Directly to an associate's line manager. Managers should escalate issues to the Legal, Compliance, and Audit Department as necessary;
- Anonymously, via the Whistleblower Hotline[1] (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 anonymously in writing using internal mail and a confidential envelope.

Reports from the hotline are promptly investigated by our Legal, Compliance, and Audit Department. 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.

T. Rowe Price's whistleblower policy adheres to the following regulations:

- Section 1107 of the Sarbanes-Oxley Act of 2002: Criminal penalties for retaliation against whistleblowers (U.S., 18 U.S.C. § 1513(e))
- Section 21F of the Securities Exchange Act of 1934 (U.S., 15 U.S.C. 78u-6)
- Consumer Financial Protection Act (U.S., 12 U.S.C. § 5567)
- OSC Policy 15601 Whistleblower Program (Canada, 41 OSCB 7745)
- Whistleblower Protection Act (Japan, Act No. 122 of 2004)

During 2023, T. Rowe Price had no violations of whistleblower regulations.

[1] Hyperlinked information is not subject to review by independent certified public accountants.

Responsible Investing‡

Financially material 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 it is a core investment capability that we have embedded in our equity and fixed income investment research platforms.

The process of ESG integration takes place on two levels: first, with our research analysts as they consider ESG factors as part of the overall security valuations and ratings process; 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.

T. Rowe Price has 40[1] ESG investment professionals: 30 in T. Rowe Price Associates (TRPA), including seven dedicated to impact investing; seven in T. Rowe Price Investment Management (TRPIM)[2]; and three in Oak Hill Advisors[3] (OHA). Our specialist ESG teams at TRPA and TRPIM provide investment research on ESG issues at the security level and on thematic topics. They have each built a proprietary Responsible Investing Indicator Model (collectively RIIM[4]), which forms the foundation of our ESG integration process. RIIM provides two key benefits: a uniform standard on due diligence of ESG factors across our investment platforms and a common language for our analysts, portfolio managers, and ESG specialists to discuss how an investment is performing on ESG and to compare securities within the investment universe.

We have developed RIIM frameworks across asset classes covering equities and corporate bonds, sovereign bonds, municipal bonds, and securitized bonds.[5] The RIIM frameworks are unique for each asset class as the level and type of ESG data available vary across asset classes.

For equities, corporate bonds, sovereign bonds, and the majority of securitized bonds, we are able to leverage ESG datasets and feed those directly into our RIIM frameworks. 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. 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 some securitized issuers, the ESG data universe is still developing. As we have not yet found ESG datasets that we believe are robust enough to directly integrate into the RIIM frameworks, our ESG specialists and credit analysts conduct ESG analysis at a security level. To do this, they utilize the RIIM frameworks to ensure that a uniform standard of ESG due diligence is conducted. Our credit analysts and ESG specialists leverage third-party research and their own fundamental research to develop a RIIM profile for each issuer.

[1] As at December 31, 2023.
[2] T. Rowe Price Investment Management, Inc. (TRPIM), was established as a separately registered U.S. investment adviser, with a separate ESG team to T. Rowe Price Associates, Inc. (TRPA). Decisions for TRPA and TRPIM ESG teams are made completely independently but use a similar approach, framework, and philosophy.
[3] OHA – Oak Hill Advisors – a T. Rowe Price company since December 31, 2021.
[4] RIIM refers to the proprietary responsible investing indicator models built by TRPA and TRPIM. RIIM rates issuers using a traffic light system, where green indicates no/few ESG concerns, orange indicates medium ESG concerns, and red indicates high ESG concerns/risk. TRPA RIIM has a framework for rating corporate, sovereign, securitized, and municipal issuers, whereas TRPIM RIIM only has a framework for rating corporate issuers.
[5] The implementation and oversight of RIIM for TRPA and TRPIM differ. The TRPIM RIIM covers equities and corporate bonds only. TRPA has RIIM coverage of more than 15,000 corporate issuers, 200 sovereign issuers, 1,700 municipal issuers, and 1,400 securitized issuers. TRPIM has RIIM coverage of approximately 6,500 corporate issuers. For certain types of investments, including, but not limited to, cash, currency positions, and particular types of derivatives, an ESG analysis may not be relevant or possible due to a lack of data. Where ESG considerations are integrated into the investment research process, we may conclude that other attributes of an investment outweigh ESG considerations when making investment decisions.

RIIM Frameworks Across Asset Classes

	1 Identification	2 Analysis	3 Integration
Equities and Corporate Bonds	RIIM creates an ESG profile* for companies using third-party ESG datasets, company-reported data, and datasets created internally	A subset of securities undergoes an additional fundamental review to fine-tune our RIIM analysis. The process includes incorporating additional information and insights not provided by the quantitative dataset. Securities identified for further review can be chosen for a variety of reasons, such as ownership levels, presence of orange or red flags, stewardship targeting, and/or as part of industry reviews.	**Analysts and portfolio managers incorporate ESG factors (as appropriate to their strategy) into:** ▪ Investment theses ▪ Company ratings ▪ Price targets ▪ Credit ratings ▪ Engagements ▪ Position sizing ▪ Proxy voting decisions
Sovereign Bonds	RIIM creates an ESG profile for sovereign issuers, leveraging datasets created by nongovernmental organizations and third parties as well as datasets created internally.		
Municipal Bonds	Our municipal bond analysts create an ESG rating for issuers by evaluating specific criteria for individual issuers. To establish RIIM ratings, the analysts conduct research in-house. Environmental and social analysis leverages geospatial research tools.		
Securitized Bonds	Our securitized bond analysts create an ESG rating for issuers by evaluating specific criteria for individual issuers. To establish RIIM ratings, the analysts conduct research in-house, leveraging external data sources as well as their own direct research. Where there is overlap on issuers, the analysts can leverage RIIM scores from other asset classes.		

ESG integration is applied across applicable investment strategies comprising 86% of T. Rowe Price assets under management (AUM) as of December 31, 2023.[6] This includes our active and fundamental strategies across our equity and fixed income platforms. We currently do not integrate ESG analysis into our passive strategies or our cash and money market funds. Our multi-asset portfolio managers delegate the integration of ESG factors to the portfolio managers of the underlying internally managed equity and fixed income portfolios. The assessment of ESG factors for securities that are not covered by our RIIM frameworks is more qualitative in nature and is dependent on the mandate of the account in which they are held.

We share all outputs of our ESG research at an issuer or thematic level with our portfolio managers and analysts via our internal research and portfolio management systems, which are accessible via their desktops. In addition, we regularly share more comprehensive portfolio-level ESG assessments with portfolio managers.

We do not currently conduct climate scenario analysis at the portfolio or strategy level. Information on how climate-related risks and opportunities are considered is available in the TCFD-aligned sections of this report.

Our ESG policy and Investment Policy on Climate Change provide additional details.[7]

* RIIM asset class considerations vary between TRPA and TRPIM. TRPIM RIIM covers only equity and corporate bonds.
[6] This information is not in scope of the Report of Independent Certified Public Accountants. Excludes Oak Hill Advisors, L.P. (OHA), an alternative credit manager that T. Rowe Price Group, Inc. acquired on December 29, 2021.
[7] Hyperlinked information is not subject to review by independent certified public accountants.

Asset Class Considerations[8]

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

Asset Class	Environmental	Social	Governance
Equities and Corporate Bonds	▪ Adaptability of sourcing ▪ Biodiversity impact ▪ Emissions intensity ▪ Environmental track record ▪ Hazardous chemicals use ▪ Impact of carbon taxation ▪ Integration of eco-design ▪ "New cities" infrastructure ▪ Pesticide safety standards ▪ Product end of life ▪ Regulatory dynamics ▪ Site restoration provisions ▪ Stranded asset risk ▪ Sustainable product sales ▪ Sustainable raw materials ▪ Waste recycling (mgmt.) ▪ Water intensity	▪ Access to skilled labor ▪ Bribery/corruption record ▪ Conflict minerals sourcing ▪ Customer preference shift ▪ Data privacy standards ▪ Diversity statistics ▪ Fair trade sourcing ▪ Health and safety record ▪ Lobbying standards ▪ Local community relations ▪ Marketing standards ▪ Product safety record ▪ Robotics integration ▪ Stakeholder relations ▪ Supply chain standards ▪ Talent retention ▪ Technology shift	▪ Accounting standards ▪ Audit practices ▪ Antitakeover provisions ▪ Board composition ▪ Board expertise ▪ Bond covenants ▪ Financial transparency ▪ Management remuneration ▪ Share issuance policies ▪ Shareholder rights
Sovereign Bonds	▪ Agricultural capacity ▪ Air pollution/emissions ▪ Climate change impact ▪ Ecosystem quality ▪ Energy dependency ▪ Energy resources ▪ Risk of stranded assets ▪ Water resources	▪ Crime and safety ▪ Education levels ▪ Employment levels ▪ Food security ▪ Human rights ▪ Income inequality ▪ Institutional quality ▪ Poverty ▪ Public health	▪ Bond covenants ▪ Corruption ▪ Institutional strength ▪ Rule of law ▪ Institutional quality
Securitized Bonds	▪ Exposure to green activities—e.g., renewables, electric vehicles ▪ Exposure to energy transition risk ▪ Exposure to physical climate change risk ▪ Green building certifications ▪ Energy efficiency	▪ Exposure to affordable housing ▪ Income inequality ▪ Level of homeownership ▪ Population dynamics ▪ Contribution to wealth inequality	▪ Bond covenants ▪ ESG disclosure ▪ Internal controls and loan modification standards ▪ Originator ESG standards and track record ▪ Sponsor performance and legal history ▪ Originator underwriting practices ▪ Regulatory standards ▪ Timeliness and quality of financial reporting

[8] RIIM asset class considerations vary between TRPA and TRPIM. TRPIM RIIM covers only equities and corporate bonds.

Asset Class	Environmental	Social	Governance
Municipal Bonds	▪ Exposure to green activities—e.g., renewables, electric vehicles, public transport ▪ Exposure to energy transition risk ▪ Exposure to physical climate change risk ▪ Issuer's management of environmental footprint	▪ Accessibility of health care ▪ Crime and safety ▪ Education levels ▪ Employment levels ▪ Exposure to social activities—e.g., hospitals, schools, transport income inequality ▪ Population dynamics and trends ▪ Positive social contributions ▪ Poverty levels ▪ Quality of infrastructure	▪ Bond covenants ▪ Quality of management ▪ Quality of governance and Board ▪ Quality of elected officials and key government staff ▪ Timeliness and quality of financial disclosure

In 2023, ESG trends watched by the TRPA Responsible Investing team included greenhouse gas (GHG) mitigation, biodiversity loss, artificial intelligence, and treatment of employees, among other topics.

- **GHG mitigation** – Following the post-pandemic economic rebound and energy crisis, the tone and rhetoric on energy transition turned negative in 2022. While negative headlines persisted into 2023, TRPA found the number of companies adopting net zero or some other form of GHG reduction target continued to grow.
- **Biodiversity loss** – TRPA believes that biodiversity loss and climate change are inextricably linked twin crises. As such, biodiversity loss and ecosystem degradation are intrinsic elements of a systemic change that will likely have a material impact across the investment universe and be the source of both value creation and destruction. TRPA focuses on sectors with business activities or supply chains that are either highly dependent or heavily impactful on biodiversity, such as deforestation, agricultural practices, and land use change.
- **Artificial intelligence (AI)** – AI systems both reflect and produce social relations and understanding of the world. AI systems need extensive, computationally intensive training with large datasets or predefined rules and rewards. AI's impact on society is particularly evident in domains such as media and entertainment, finance, health, advertising, law enforcement, and human capital management. For example, we have seen that AI can help to improve accurate medical diagnosis or broaden financial inclusion. At the same time, AI may increase the risks of potential harm such as bias and discrimination; invasions of privacy; denial of individual rights; and nontransparent, unexplainable, or unsafe outcomes.
- **Treatment of employees** – Public policy will play an important role in driving economic stability in the current technological revolution. Previous revolutions have focused on replacing physical work with machines, while the information revolution is about replacing mental power with digital technologies and artificial intelligence. Not only does it displace workers, but the information revolution will likely create an altogether different type of displacement than previously experienced.

As bond investors, TRPA is focused on an issuer's ability and willingness to pay coupons and repay the principal. We would argue that, certainly for longer-dated maturities, sovereign-level emissions trajectories, biodiversity net positive ambitions, and broader ESG considerations could become even more important drivers of sovereign credit risk. This is particularly important in instances where there are likely to be bigger implications for a nation's gross domestic product prospects. For example, countries that are heavily dependent on agriculture will likely find that production is particularly vulnerable to changing weather patterns. In some cases, rising sea levels could threaten a sovereign issuer's very existence.

Investment Products With ESG Mandates[9]

Some clients' investment goals are not purely financial, and we are committed to working with them to meet their needs. We offer select investment products and mandates with ESG characteristics through use of exclusions, alignment to sustainable investments, and positive tilts to RIIM scores or targeting specific ESG objectives alongside financial return, such as the transition to net zero or positive environmental or societal impact.

As of December 31, 2023, USD 70 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 70 billion used more than one ESG strategy (e.g., screening and ESG integration). Our criteria for screening are that the account needs to apply exclusion lists based on involvement in activities that could be harmful to the environment or society (e.g., tobacco, gambling), or positive ESG screening criteria (e.g., sustainable investment alignment targets or positive tilts to RIIM scores), while sustainability-themed portfolios include impact products. Many of these assets are in separate accounts, which allow our clients to choose specific screening criteria that align with their values and/or sustainability-related objectives.

	Financial Only	ESG Enhanced	Net Zero	Impact
Objective	**Seeks to deliver competitive financial returns**	**Seeks to promote specific ESG characteristics alongside financial returns**	**Seeks to deliver financial returns while promoting the transition to net zero**	**Seeks positive societal and/or environmental impact alongside financial returns**
Approach	Analyzes ESG factors for the purpose of maximizing investment performance	Incorporates binding social and/or environmental commitments that vary by product type, such as: ▪ Customized exclusions ▪ Greenhouse gas (GHG) reduction targets ▪ Alignment to sustainable investments ▪ Customized benchmarks ▪ Positive ESG tilt	Customized mandate seeks to align with 1.5°C scenario by incorporating commitments, such as: ▪ Portfolio net zero status ▪ Net zero stewardship ▪ GHG emissions reduction ▪ Climate solutions alignment ▪ Climate-related Principle Adverse Impacts (PAIs) ▪ Customizable options	100% positive impact holdings that meet T. Rowe Price's impact criteria, including impact thesis, theory of change, and measurable key performance indicators. Multi-asset impact strategies can help clients meet additional objectives, such as risk/return profile optimization.

[9] The following section is not subject to review by independent certified public accounting firm.

ESG Assets Under Management

2023	Equity AUM $Billions (USD)	Fixed Income AUM $Billions (USD)	Cash AUM $Billions (USD)	Other AUM $Billions (USD)	Totals $Billions (USD)
ESG Integration[10]	$723	$135	$0	$345[11]	$1,204
Sustainability Themed	$0.3	$1	$0	<$0.1	$1
ESG Screening	$47	$21	$0	<$1	$70

ESG AUM data are not subject to review by independent certified public accounting firm. 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. Portfolios may be assigned to multiple ESG categories.

Proxy Voting‡

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, in line with their fiduciary duties. Our view is that proxy voting is a key element of our stewardship responsibilities. When casting votes on behalf of clients, our goal is to foster long-term success for the company and its investors.

The TRPA and TRPIM ESG Investing Committees develop our positions on all major proxy voting issues, create guidelines, and oversee the voting process for our respective investment advisers (excluding OHA). In establishing our proxy policies each year, the committees rely on our own fundamental research, independent research provided by an outside proxy adviser, and information presented by company managements and shareholder advocates. When deciding how to vote on a particular proxy, our governance specialists and industry analysts review the guidelines, with input from the Responsible Investing team if applicable, prior to sending their recommendation to the portfolio manager. Should a portfolio manager wish to cast a vote that is counter to the guidelines, they are required to document their reasons in writing to the committee.

The TRPA and TRPIM ESG Investing Committees are made up of experienced investment professionals, from our Equity, Fixed Income, and Multi-Asset Divisions as applicable, as well as senior members of equity management. The committees each meet twice a year. For the TRPA ESG Investing Committee, the first meeting, held in the first quarter, focuses on proxy voting activity from the year before, reassesses the suitability of TRPA's voting guidelines, and considers amendments to the guidelines. The second TRPA meeting, which is typically held midyear, focuses on environmental and social issues. TRPIM's first ESG Investing Committee meeting of the year reevaluates the proxy voting guidelines, considers changes to the guidelines, and reviews ESG policy updates. TRPIM's second ESG Investing Committee meeting of the year provides a review of TRPIM's proxy voting activity for that year's proxy season.

A separate set of proxy voting guidelines is administered for the TRPA impact strategies. These portfolios require a separate voting policy because they have two express mandates: competitive financial returns as well as positive social and environmental impact. A separate set of proxy voting guidelines is also administered for the TRPA strategies that are subject to an explicit net zero investment framework. These portfolios require a separate voting policy because they have two explicit mandates: competitive financial returns as well as alignment with net zero goals. In order to meet these objectives, portfolios under impact and net zero mandates may vote differently from other T. Rowe Price funds, particularly on director elections and shareholder proposals.

[10] 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).
[11] 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.

In total, TRPA portfolios voted on 73,067 proposals across all regions in 2023, including:

- 71,155 management proposals and 1,921 shareholder proposals.[12]
- Among the shareholder proposals, 1,031 were situations where shareholders were nominating directors to a company's Board or technical proposals related to such nominations.
- 363 were resolutions asking companies to adopt specific corporate governance practices.
- 527 were environmental and social resolutions.

TRPIM portfolios voted on 5,703 proposals across all regions in 2023, including:

- 5,487 management proposals and 216 shareholder proposals.
- Among the shareholder proposals, 20 were situations where shareholders were nominating directors to a company's Board or technical proposals related to such nominations.
- 69 were resolutions asking companies to adopt specific corporate governance practices.
- 127 were environmental and social resolutions.

All votes are cast exclusively by proxy.

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 2023, we continued disclosing for all of our proprietary products semiannually, instead of annually. Vote disclosures for the first and second half of each year were posted eight weeks after each period-end.

In addition, we publish a report for our clients, 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.

Our proxy voting program is one element of our overall relationship with corporate issuers. Other contexts in which we might use our voice 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

[12]The numbers total more than 73,067 due to how shareholder proposals are tracked when portfolio managers have differing votes.

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 voice—through the various avenues listed above—to increase the probability that the company will deliver better outcomes than 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 action per year when a company convenes its annual meeting.

Where a company is not making sufficient progress in line with our expectations, the investment analyst will have a perspective on a company's situation. Materiality is assessed on a case-by-case basis alongside other investment considerations. The ultimate decision on how to escalate—whether that be to vote against the directors if the company is held in an equity strategy or to divest—sits with the portfolio managers. Overweighting/underweighting is another tool at our disposal. When an ESG risk or benefit is identified, it may cause the portfolio manager to adjust his or her weighting of the holding.

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 our ESG specialists as well as by our portfolio managers and analysts from our equity and fixed income teams.

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 2023, TRPA engaged with issuers on 866 separate occasions on ESG topics. TRPIM undertook 214 ESG engagements. We classify these meetings as ESG engagements, as they contained a notable discussion of ESG issues.

We have begun systematically tracking ESG-related expectations, or targets, set with issuers in which we engage; the new process also supports the timely review of next steps we identified within ongoing engagements. These targets are then categorized into those seeking enhanced disclosure and those seeking a change in an issuer's practices. As of December 31, 2023, TRPA has tracked over 1,500 targets relating to engagements since late 2021.

Each target is tracked against a status, capturing whether it is in progress, achieved, closed but not met (failed or inactive), or escalated because the target is still in progress but has not been met in a timely fashion. Many of our targets have a multiyear time horizon of up to three years, particularly where we are requesting changes to practice. The chart below depicts the breakdown of targets by status as at the end of 2023.

Additional details on our approach to proxy voting, including regional considerations, are published in the TRPA Proxy Voting Guidelines and the TRPIM Proxy Voting Guidelines.[13]

TRPA: Status by Target Type

2022 and 2023 data

Target Type	Disclosure	Practice
Inactive	10	19
Failed	15	11
Escalated	10	16
Achieved	144	111
In Progress	70	65
Identified/Initiated	558	441
Total Number of Targets	807	663

[13] Hyperlinked information is not subject to review by independent certified public accountants.

Policy and Engagement

Our Public Policy Engagement and Political Participation Policy governs the firm's approach to advocacy, including through our participation in trade associations.

Our Legislative and Regulatory Affairs (LRA) team, together with other key internal stakeholders, participates in advocacy initiatives on a selective and strategic basis. We may provide input to relevant trade associations or engage individually on a particular regulatory consultation.

One of our key advocacy priorities is to support the improvement of climate-related financial reporting aligned to current and upcoming standards, including the International Sustainability Standards Board (ISSB). We believe that the adoption of both of the ISSB's IFRS S1 (general sustainability) and S2 (climate-related) disclosure standards represent a significant step toward aligning voluntary corporate sustainability reporting frameworks in order to provide decision-useful disclosures for investors. In this regard, in 2023, we responded to two consultations conducted by the UK government, where we expressed support for the UK's adoption of both of the ISSB standards: IFRS S1 (general sustainability) and S2 (climate-related) disclosure standards. Advocating for ISSB standards adoption supports our advocacy commitment under the Net Zero Asset Managers initiative (NZAM) of achieving global net zero emissions by 2050 or sooner.

In addition, our ESG investment professionals participate in a variety of working groups globally to help define and develop standards and frameworks that promote best practices. For example, TRPA's head of ESG, Fixed Income has joined the Sovereigns and Derivatives working groups of the Institutional Investors Group on Climate Change (IIGCC) to help develop a net zero framework for sovereign bonds, paving the way for inclusion of this asset class in future NZAM commitments.

ESG Advocacy Oversight

Following the establishment of the global ESG Oversight Committee (ESGOC) in 2023, we adopted new governance practices for our ESG advocacy. Starting in 2024, ESGOC will review on an annual basis how our direct and indirect ESG advocacy aligns with our commitment to NZAM and the Principles for Responsible Investment (PRI). The NZAM alignment assessment will specifically evaluate whether our lobbying activities support achieving global net zero emissions by 2050 or sooner. On an ongoing basis, the LRA team will assess this alignment for relevant advocacy projects and follow escalation procedures in case of nonalignment.

ESG Memberships[1]

In 2023, the ESGOC adopted a new process for joining and maintaining corporate ESG memberships, which includes an assessment of whether the organization's views align with our NZAM and PRI commitments.

Global initiatives and memberships

Principles for Responsible Investment (PRI)
Signatory since 2010

International Capital Market Association (ICMA)
Member since 2017; member of the ICMA Principles since 2022: Green Bond Principles (GBP), Social Bond Principles (SBP), Sustainability Bond Guidelines (SBG), and Sustainability-Linked Bond Principles (SLBP); member of the ICMA Advisory Council since 2023

International Corporate Governance Network (ICGN)
Member since 2021

United Nations Global Compact
2021 signatory

IFRS Sustainability Alliance (formerly the SASB Alliance)
Member since 2021

Regional initiatives and memberships

UK Stewardship Code
Signatory since 2020

Pensions and Lifetime Savings Association (PLSA)
Stewardship advisory group member since 2020

30% Club UK Investor Group
UK chapter member since 2021

UK Investor Forum
Founding member since 2016

Council of Institutional Investors (CII)
Associate member since 1989

Investor Stewardship Group (ISG)
Founding member since 2017

Japan Stewardship Code
Signatory since 2014

Asia Corporate Governance Association (ACGA)
Member since 2016

Japan Stewardship Initiative
Founding member since 2019

Associação de Investidores no Mercado de Capitais (AMEC)
Member since 2015

Emerging Markets Investors Alliance
Member since 2020

[1] As of December 31, 2023, at least one T. Rowe Price entity is a signatory, founder, or member of the following groups committed to change. T. Rowe Price may be a member of other initiatives, standards, principles, working groups, or other organizations not listed. Additionally, individual T. Rowe Price associates may be members of working groups not listed.

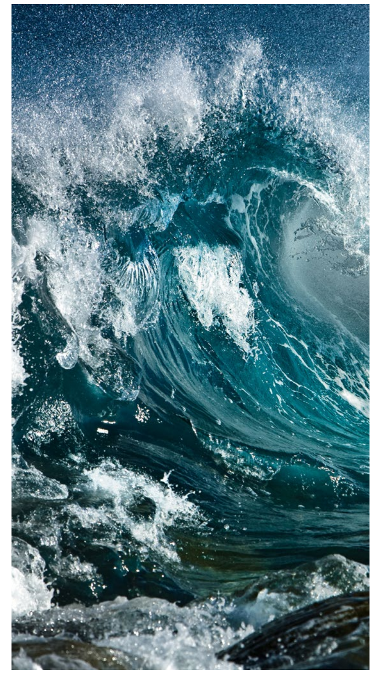
Climate related

Institutional Investors Group on Climate Change (IIGCC)
Member since 2020

Task Force on Climate-Related Financial Disclosures (TCFD)
Supporter since 2020

TCFD Consortium (Japan)
Member since 2021

Net Zero Asset Managers initiative
Signatory since 2022



Thematic engagement

Farm Animal Investment Risk & Return (FAIRR)
Member since 2020

Access to Medicine Index
Signatory since 2021

Access to Nutrition Initiative
Signatory since 2022

Impact investing

Responsible Investment Association Australasia (RIAA)
Member since 2020

Global Impact Investing Network (GIIN)
Member since 2021

Japan Impact-driven Financing Initiative
Signatory since 2022

Working groups

ACGA Japan Working Group
Member since 2020

Investment Association Climate Change Working Group
Member since 2020

IMEA (Investment Management Education Alliance) ESG Committee
Member since 2021

ACGA China Working Group
Member since 2022

ICMA (Impact Reporting, Social Bonds, Climate Transition Finance, Sustainability-Linked Bonds)
Member since 2022

Taskforce on Nature-related Financial Disclosures (TNFD)
Forum member since 2022

GC100 and Investor Group – Directors' Remuneration Reporting Guidance
Member since 2023

IIGCC (Sovereign Bonds and Country Pathways Working Group; Derivatives and Hedge Funds Working Group)
Member since 2023

Trade Associations

For a full list of the corporate memberships[2] that T. Rowe Price maintains with trade associations[3] and to which $25,000 or more in membership fees and/or dues were paid in the past 12 months, please refer to the Policies and Disclosures on Political Activities section on our Policies webpage.

[2] Corporate memberships refer to the memberships with trade associations that are maintained by T. Rowe Price as a corporate entity. The individual memberships of individual employees of T. Rowe Price are not included in this definition.
[3] T. Rowe Price defines "trade associations" as industry trade groups, business or sector associations, and other organizations that are focused primarily on promoting the specific interests of its members and providing a forum for collaboration between member entities. We do not consider organizations that are primarily focused on providing certifications or on providing educational opportunities for its members as trade associations.

Environmental

Strategy

Addressing climate change is the focal point of our environmental strategy. We recognize that climate change poses a significant risk to the global economy and the stability of financial markets. Our position on climate is outlined below:

- **As an asset manager, we are a fiduciary.** When managing investments, we view climate change considerations through a fiduciary lens, with a focus on financial performance and risk management.
- **We support the goals of the Paris Climate Agreement because we believe 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 outcomes for the companies and securities in which we invest on behalf of our clients.
- **Governments lead the way.** We believe that it is the role of governments to establish clear, coordinated, and stable policies and regulations to enable markets to transition to net zero in an orderly fashion.
- **We believe in active management of climate risks and opportunities.** We believe that, over time, climate change and the transition to net zero will impact almost all securities and asset classes. As active investors, we consider climate risks and opportunities by taking environmental factors into account as part of our security analysis. Through active management, we can help our clients navigate the transition by being dynamic and responsive to changes in valuation, technology, regulation, and investment time horizons.
- **We believe in active, engaged ownership.** We engage constructively with companies to encourage a thoughtful transition to net zero, which we believe will deliver better outcomes for investors. We advocate for greater transparency for climate-related information and data. We will generally vote against independent directors in high-emitting sectors where we believe there is a data transparency gap.
- **We believe our role is to help clients 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[1] risks and opportunities forms part of our fundamental research process. Some clients choose to extend their investment objectives beyond financial considerations alone, and in such cases, we will work with them to develop solutions that meet their needs.
- **As a corporate entity, we are committed to achieving net zero across our own operations.** We have set a target to achieve net zero in Scope 1 and 2 emissions by 2040.[2] We are committed to reducing Scope 1 and 2 emissions by 75% by year-end 2030 compared with our 2021 baseline.

[1] ESG considerations form a part of our overall research process, helping us alongside other factors to identify investment opportunities and manage investment risk. This is known as ESG integration. However, we may conclude that other attributes of an investment outweigh ESG considerations when making investment decisions.
[2] Scope 1 (direct emissions from owned or controlled sources) and Scope 2 (indirect emissions from the generation of purchased electricity, steam, or cooling). Targeting achievement by year-end 2040.

Climate Transition Plan Summary

To achieve the goals of the Paris Climate Agreement, companies will need to begin working toward decarbonization. An orderly transition requires coordinated and timely action, with businesses working together with governments. The development and publication of climate transition plans, with improved disclosures and data quality, will help advance these endeavors.

Our climate transition plan has been defined by our guiding philosophy, coupled with publicly available guidance from standard-setting organizations, such as NZAM. This helps ensure that our policies are science-based and linked to transition scenarios and pathways.

We view this as a journey, and while progress has been made through our sustainability programs over the years, we are in the early stages of decarbonization.

The summary below offers an overview of the critical elements of our climate transition plan, and details can be found throughout this report. Please refer to the Investor Climate Action Plan index (page 91) for references to specific topics and where insights on them can be located.

As an Asset Manager

Stewardship

- Advocate for industry standards regarding climate disclosures.
- Active stewardship program that incorporates climate issues.
- Publish our engagement and proxy voting statistics.

Products and Mandates

- Suite of impact products.
- Investment solutions that apply the Net Zero Transition Framework.
- ESG integration seeks to maximize risk-adjusted financial returns and considers climate risks and opportunities when financially material.

As a Company

Operations

- Achieve net zero Scope 1 and 2 emissions by year-end 2040.
- Reduce GHG emissions by 75% by year-end 2030 compared with 2021 base year.
- Initiatives to reduce Scope 3 emissions from operations.

Engagement with stakeholders and industry

Overview

The firm takes a comprehensive approach to identifying risks—including climate change—at the company and investment management levels through an enterprise risk management framework that focuses on managing reputational, strategic, operational, business continuity, human capital, compliance, and financial risks.

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

1. Impact on investment performance,
2. Impact on client preferences for investment products,
3. Regulatory impact,
4. Impact on the firm's reputation, and
5. Impact of acute disruptions to our operations brought on by major weather events as well as chronic implications of climate change.

The Enterprise Risk Group (ERG) is responsible for leading our corporate risk assessment efforts by partnering with business units to identify risks, determine acceptable levels of risk tolerance, and implement actions to mitigate such risks. The ERG recently formalized Environmental and Social Risk as a distinct risk category for monitoring, although components of these risks had been assessed in prior years.

Investments and Products

Asset managers have significant exposure to climate risks and opportunities through the investments made on behalf of clients. We believe that these 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 of 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, those more likely to experience greater physical impacts, and in high-emitting sectors.

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 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 investment analysis (for the purpose of maximizing risk-adjusted returns) and
2. Offering select investment products that have environmental mandates.

The first helps mitigate climate-related risks on investment strategy financial performance, while the second helps mitigate the risk of changing client preferences. In the short and medium terms, we believe that risks and opportunities that could stem from the impact of climate change on client preferences are most material in Europe, Japan, and Australia.

From an opportunity perspective, our Responsible Investing professionals work alongside analysts and portfolio managers to help identify and research environmental trends that increase the market opportunities for the companies in which we invest.

Operations

The firm's climate risk strategy considers 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.

External events, such as severe weather or natural disasters, receive ongoing attention, given their potential impact on business activities, including impacts to our facilities and related infrastructure and technologies. Our ERG oversees business continuity and factors extreme weather events into business continuity planning.

The risks associated with new climate-related regulations globally may result in increased energy and operational costs. Furthermore, emerging climate-related regulatory and legal requirements may be costly to implement from both a human resources and a infrastructure 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.

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

	As an Asset Manager			As a Corporate Entity		
Approach and Capabilities	**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 levels.	**Stewardship** Advocate for industry standards regarding climate disclosures. Active stewardship program that incorporates climate issues. Publish our engagement and proxy voting statistics.	**Products and Mandates** *Scope 3, Category 15* Suite of impact products. Specific offerings for clients with overriding climate or other environmental goals.	**Corporate Net Zero Strategy** *Scope 1 and 2* Net zero operations by year-end 2040 (Scope 1 and 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* Committed to reducing operational waste and phasing out single-use plastics in our global facilities where market alternatives exist. Reassessing the feasibility and timeline of a waste target for our facilities.	**Emissions From Business Travel** *Scope 3, Category 6* Partnered with Climate Vault to address emissions from rail and air travel, purchasing carbon allowances, and investing in long-term carbon removal solutions.
Transparency and Accountability	**Fund- and Mandate-Level Reporting**			**TCFD and SASB Reports**		
	ESG Investing Report			**Sustainability Report**		
	Investment Policy on Climate Change			**Environmental Policy**		

Climate-Related Risks and Mitigation Strategies‡

The following table outlines the climate-related risks that might impact the firm's products, investment strategies, and corporate operations.

X = Significant S = Short term (less than 1 year) M = Medium term (2–5 years) L = Long term (5+ years)

Description	Mitigation	Monitoring Process	Potential Impact
Transition Risks			
Regulatory X S M L New regulations and changes in existing regulation may lead to increased compliance costs, enhanced reporting obligations, regulation of existing products and/or services, exposure to litigation, and aggressive or inconsistent levels of regulatory enforcement globally. If regulators take differing approaches (versus adopting global standards), this could increase costs.	Dedicated resources to monitor and review global ESG/climate regulatory proposals (pre-implementation stage) and determine impact to T. Rowe Price, Project management and business resources are engaged to ensure final regulatory requirements are met and implemented in a timely manner.	The risk of litigation claims, as well as existing and emerging regulatory requirements related to climate change, are continuously evaluated by our Legal, Compliance, and Audit Department and incorporated into the firm's overall risk management program.	▪ Change in client preferences for investment products ▪ Increased compliance costs ▪ Regulatory fines ▪ Carbon taxes levied or other environmental fines ▪ Increased costs for ESG data
Technology S 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.	Evaluation of energy/power use per building. Invest in lower-emitting technology over time. Movement to cloud and Software as a Service from on-premise. Evaluation of energy costs within build versus buy analysis for new hardware and software.	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.	▪ Substitution of obsolete assets ▪ Capital investments in new technologies ▪ Costs to adopt lower-emissions processes
Market (Investment Performance Related) X M L Energy transition may drive volatility in financial market performance and/or deviation in performance across specific regions and industries. The risk may be further exacerbated in the event of a disorderly transition.	We consider material climate factors part of our investment process through our proprietary RIIM tools. Portfolio managers and analysts consider these data as a part of the investment process. As predominately active investors, the firm is well positioned to evaluate the impact of this systematic change and take action, as warranted, on a case-by-case basis.	Analysts and portfolio managers are accountable for considering climate-related factors within their investment process as part of ESG integration. This is considered as part of year-end performance evaluation and incentive compensation. Additionally, the firm's active stewardship program helps mitigate climate risks within investment portfolios.	▪ Volatile or unfavorable market conditions leading to underperformance of investment portfolios

Description	Mitigation	Monitoring Process	Potential Impact
Transition Risks			
Market (Product Related) X S 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 and/or pooled vehicles in order to align with their individual climate goals. Conversely, a climate backlash could negatively impact demand for climate- or transition-related products.	We have a range of Article 8 and impact products. In addition, we offer clients bespoke solutions to meet their needs. Our ESG commercialization strategy is expanding our client offer to include Net Zero Transition investment options and thematic strategies.	The ESG Enablement team is responsible for working in partnership with the Product team to execute our strategy for investment product offerings with environmental and/or social mandates.	▪ 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 ▪ Reduced assets under management
Operations M L Regulatory environmental standards may require participation in energy reduction initiatives, energy efficiency programs, or renewable energy programs.	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 strategy may consider evaluation of energy contracts and energy efficiency improvements in our operations, among other initiatives. Our net zero strategy may help reduce long-term utility costs and avoid expected carbon penalties that would be imposed on our Colorado operations (via the Energy Performance for Buildings HB21-1286 statute) beginning in 2026, and operations in Maryland (via the Maryland Building Energy Performance Standards as required by the Climate Solutions Now Act of 2022). Timing for Maryland penalties is unknown as the performance standards are still under review.	These considerations are reflected in the firm's environmental management planning strategy, managed by our Corporate Real Estate & Workplace Services team.	▪ Increased costs from carbon taxes or other environmental levies
Reputation X S M L If we are perceived to fall short of our own corporate commitments or stakeholder expectations on climate and sustainability, particularly in regard to our fiduciary duty to clients, this may impact our brand, influence clients' willingness to do business with us, and affect our workforce's willingness to remain. It also exposes us to potential litigation risk.	We have corporate sustainability goals related to GHG emissions reduction and our facilities. Our commitments are articulated in our public disclosures (e.g., TCFD, SASB, website, Stewardship Report). Furthermore, we believe that the work that we have done to strengthen our climate analysis since becoming a signatory of NZAM will benefit clients over the long term and enable us to deliver our fiduciary duty by helping portfolio managers make more informed investment decisions.	T. Rowe Price has a comprehensive risk management program in place that is designed to help reduce any impact on clients or the firm. This multilayered, cross-functional approach ensures that the firm routinely tracks shifts in client preferences, associate feedback, and stockholder ratings and assessments.	▪ 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

Description	Mitigation	Monitoring Process	Potential Impact
Physical Risks			
Acute X S M L An extreme weather even—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.	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. The Corporate Real Estate & Workplace Services team will be developing a future leasing strategy that will formally assess and consider the impact of physical climate risks on our facilities.	External events, such as severe weather or natural disasters, receive ongoing attention, given their potential impact on business activities, including impacts to our facilities and related infrastructure and technologies. Our ERG oversees business continuity and factors extreme weather events in business continuity planning.	▪ Loss of workforce productivity ▪ Disruptions to supplier engagements ▪ Negative impact to valuations could result in declines in asset values and potential loss of revenue ▪ Increased operating and capital costs to manage the impact of the event
Chronic (Investment Performance Related) S M L Within our investment portfolios, changes in weather patterns around the world can impact companies in which the firm invests on behalf of our clients. Weather pattern changes 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.	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.	▪ Negative impact to asset valuations could result in declines in assets under management and potential loss of revenue.
Chronic (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.	Corporate Real Estate & Workplace Services plans to embed physical risk considerations into a future leasing strategy, working with the Business Continuity team to ensure that there is sufficient considerations in business continuity planning.	Our headquarters is our largest waterfront location. The National Oceanic and Atmospheric Administration's Sea Level Rise Map shows that our new headquarters at Harbor Point will not be effected by sea level rises of seven feet. However, surrounding roadways and infrastructure may be impacted by sea level rises of three feet or more. Our remote work capabilities enable associates to work from home if roadways and infrastructure used to commute are compromised. Our Business Continuity team is developing a long-term plan that seeks to assess and mitigate specific impacts to all locations over 10 to 30 years.	▪ Increased operating and capital costs ▪ Increased insurance premiums and potential for reduced availability of insurance ▪ Reduced ability to attract talent

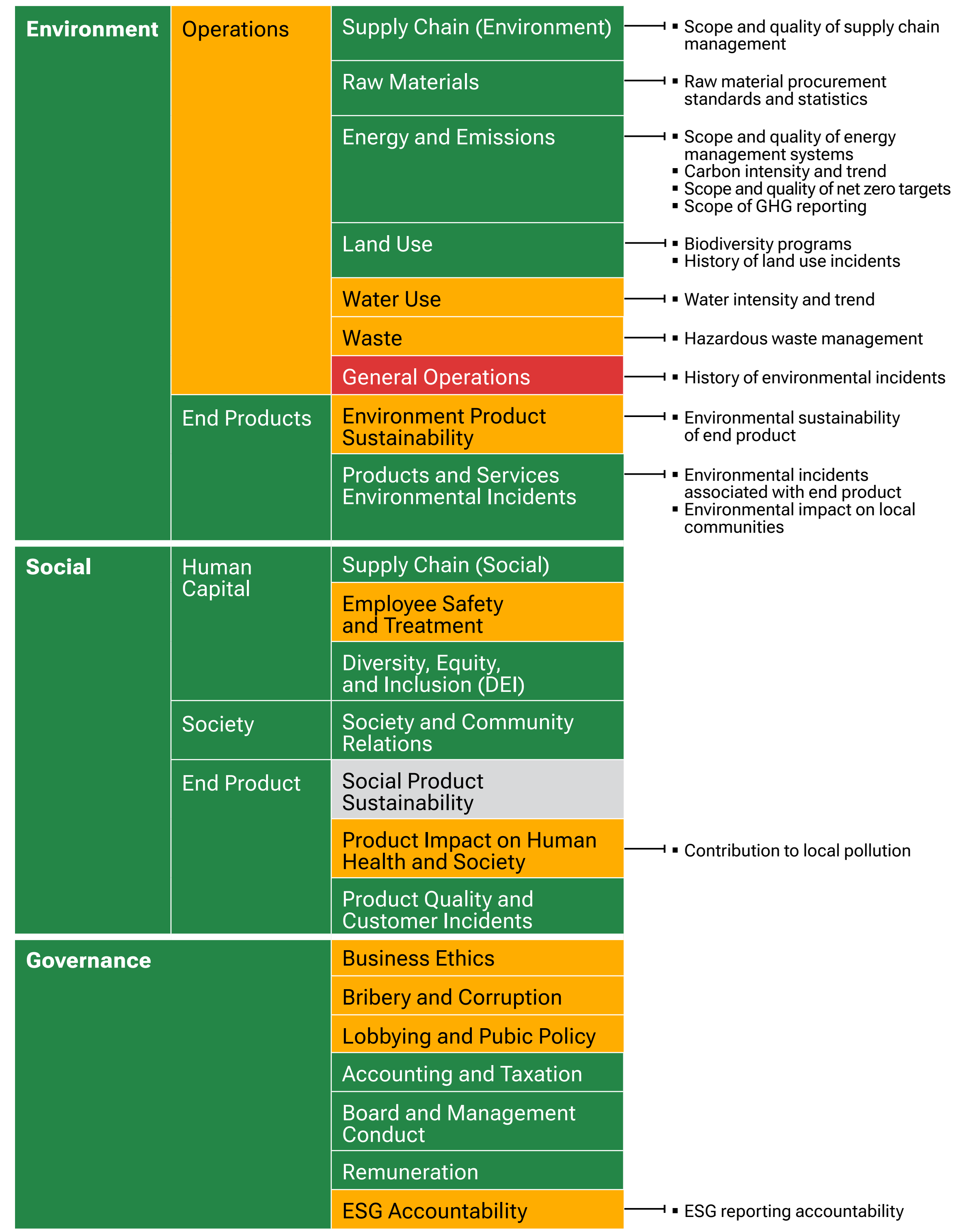
Business units (first line of defense) within T. Rowe Price are responsible for identifying and assessing emerging and existing climate risks in partnership with the ERG. The ERG (second line of defense) is responsible for providing guidance, oversight, and reporting with respect to the overall management of the firm's climate risks. Identified climate risks will be tracked in the firm's risk management software. The ERMC has oversight of the firm's risk management framework. The committee's responsibilities include oversight of climate risks, including review and approval of climate risks, with the corresponding time horizons and materiality, on an annual basis.

Consideration in Investment Products and Strategies‡

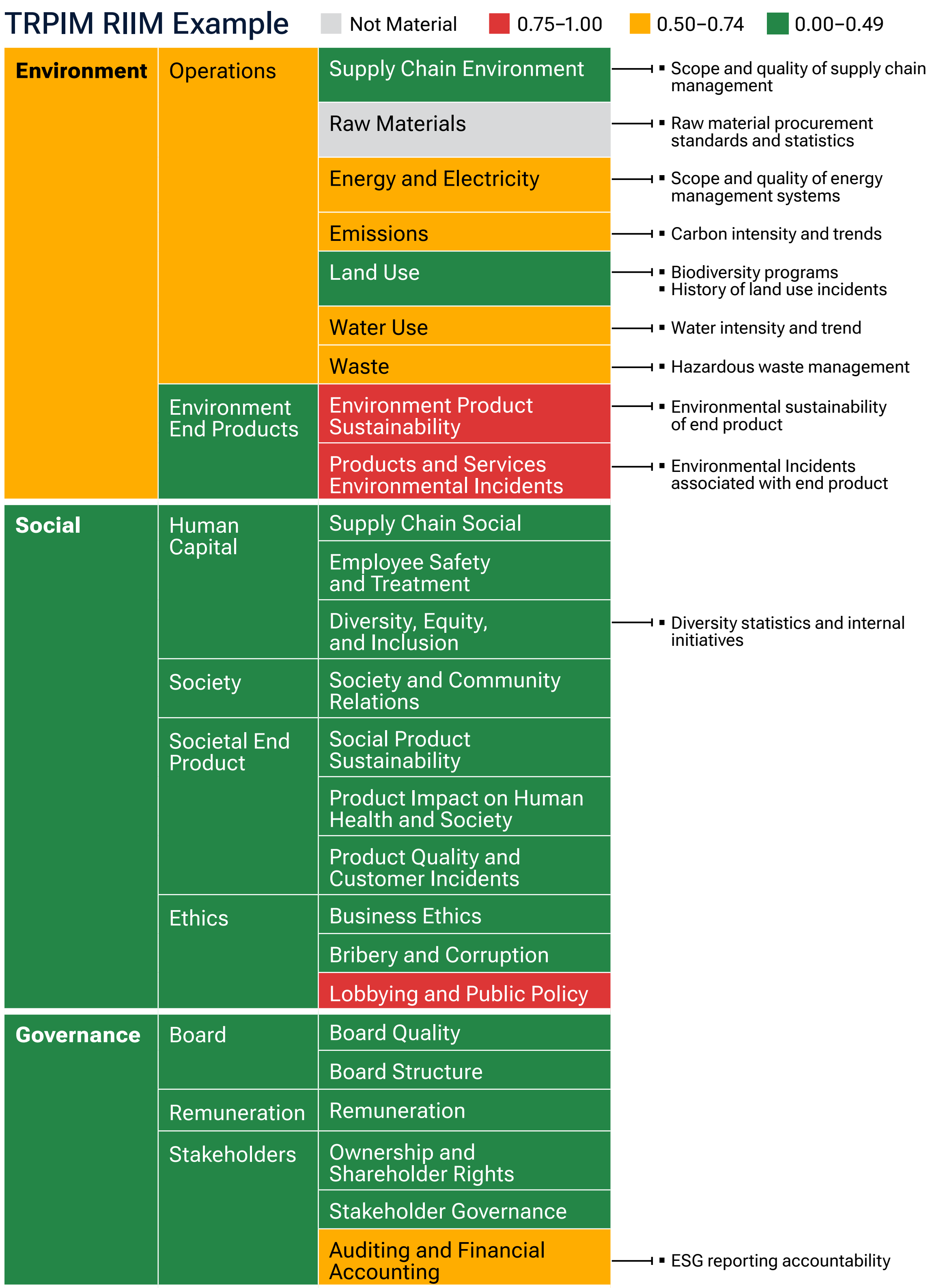
We believe that environmental and social factors, including climate change, can impact financial performance of our investee companies and other issuers, and we therefore integrate analysis of these factors into our research process for the purpose of maximizing long-term risk-adjusted returns. We consider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

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 us understand how they may perform in a tightening regulatory environment. As such, our RIIM frameworks include a range of inputs; a few examples are highlighted in the illustration of TRPA's corporate RIIM framework. Green scores of <0.5 reflect positive ESG characteristics or low ESG risks. Orange scores of between 0.5 and 0.75 reflect elevated levels of ESG risks. Red scores between 0.75 and 1 reflect high ESG risks.

TRPA RIIM[3] Example



[3] The implementation and oversight of RIIM for TRPA and TRPIM differ.



Within both the TRPA and TRPIM RIIM analysis, consideration of environmental factors is driven by materiality, and the weight applied to each factor will vary based on industry or asset class.

When it comes to considering climate-related risks and opportunities at a broader level (e.g., portfolio or investment universe level), we generally center on our core evaluation metrics listed below, as well as engagement.

Core Evaluation Metrics:

- RIIM environment scores
- GHG footprint
- Net zero status
- Climate solutions alignment[4]

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 the GHG footprint to be a decision-useful metric. Instead, that strategy may place a greater focus on RIIM environment 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.

Management of climate-related risks for a particular investment product is dependent upon the mandate given 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.

[4] TRPA only.

Products and Mandates: Net Zero Solutions‡

In 2023, we started offering practical solutions for asset owners interested in aligning their investments to net zero by 2050. These typically incorporate one or a combination of the following four commitments:

1. Net zero stewardship
2. T. Rowe Price Net Zero Transition Framework
3. GHG emissions reduction
4. Climate solutions alignment[5]

Because these commitments constrain the investment universe to varying degrees, they need to be considered carefully alongside the financial objectives of a client's specific mandate.

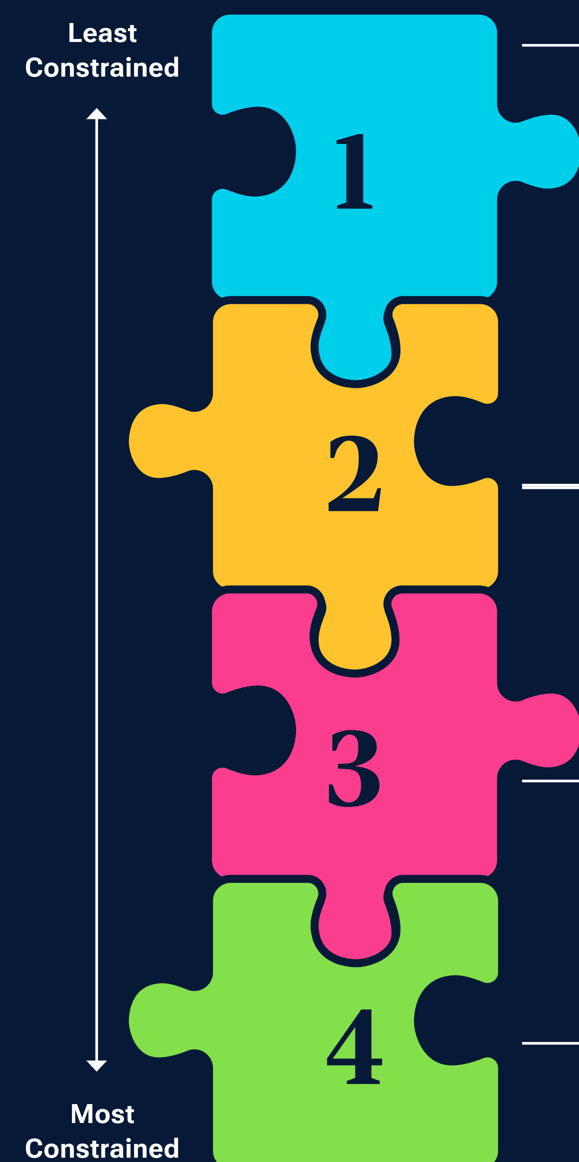
Mandates electing a **net zero stewardship** approach uses engagement and voting to encourage investee companies to follow best practices with regards to net zero disclosure and climate strategy. These mandates apply the T. Rowe Price net zero proxy voting guidelines created in 2023.

Mandates electing a **Net Zero Transition Framework** approach apply portfolio-level targets for the distribution of net zero status among the underlying holdings, in addition to utilizing net zero stewardship. This framework seeks to gradually increase net zero alignment at the portfolio level by setting binding net zero alignment targets for 2030, 2040, and 2050. In keeping with our efforts to promote best practices, the framework is anchored to an existing industry standard, the Paris Aligned Investment Initiative Net Zero Investment Framework (PAII NZIF) and leverages our active management capabilities.

Setting portfolio-level targets on **greenhouse gas (GHG) reduction** is another approach that can be implemented. While this is a backward-looking approach, some asset owners find it helpful to allow them to meet their own financed emissions targets.

[5] TRPA only.

Aligning net zero goals with portfolio-level targets



Net Zero Stewardship

Portfolio utilizes stewardship to pursue net zero objective. Internal target is for 70% of the portfolio's financed emissions to be either aligned to a net zero pathway or the subject of engagement.* For equity portfolios, a net zero voting policy is applied.

Net Zero Transition Framework

Portfolio sets net zero status targets that align with a 1.5°C scenario and net zero stewardship policy.

GHG Reduction Target

Portfolio sets a greenhouse gas reduction target that aligns with a 1.5°C scenario and seeks year over year reductions.

Climate Solutions Target

Portfolio sets a target for portfolio alignment to climate solutions.

* Target is to engage with holdings that have not reached "Achieving" or "Aligned" net zero status covering at least 70% of financed emissions. Engagement target will rise to 90% by 2030. Please note that this is an internal aim and not an objective. It is not possible to guarantee the portfolio will maintain the 70% at all times due to the variability of portfolio composition driven by active investment decisions. See Glossary of Terms for further information and definitions of "Achieving" and "Aligned."

Setting targets on capital allocated to **climate solutions** is another approach that can be implemented in isolation or in combination with the other three. At T. Rowe Price, this corresponds to the Reducing Greenhouse Gas sub-pillar of our impact strategies and includes activities such as:

- Increasing energy efficiency
- Decarbonization, carbon capture, and sequestration
- Reducing methane and other GHGs
- Financing sustainable activities

For clients with access to SICAV offerings, we launched the T. Rowe Price Global Growth Equity Net Zero Transition Fund in 2023, which uses the Net Zero Transition Framework.

Products and Mandates: Blue Bond Capability‡

T. Rowe Price has partnered with the International Finance Corporation (IFC),[6] a member of the World Bank Group, to deliver a pioneering global blue bond venture designed to stimulate the growth of the blue economy. Blue investments seek to support the health, productivity, and resilience of the world's oceans and water resources.

Blue bonds are becoming an innovative means to urgently address the funding gap for marine and water resource management projects. We believe they could help accelerate the growth of the sustainable bond market, helping investors direct capital toward projects aligned with SDG6 (clean water and sanitation) and SDG14 (life below water).

The venture leverages the strengths of our existing impact investing and emerging markets capabilities and seeks to:

- Consolidate standards for the nascent blue bond market
- Mobilize investor funding toward innovative, sustainable blue economy projects within emerging markets

We plan to launch the first T. Rowe Price blue vehicle in 2024.

Identifying Opportunities for New Product Offering‡

We are always looking to evolve and expand our product offerings to help clients navigate varying markets and meet their investment needs.

The ESG Enablement team is responsible for our ESG-related product strategy and execution. Their analysis includes market analysis, competitive positioning, and investment capability. The Product Strategy Committee is responsible for approving new product ideas and consists of members of senior management, most of whom are members of the firm's Management Committee.

We manage the product life cycle from idea capture and initial assessment through a build, launch, and go-to-market process, followed by post-launch evaluation.

Above all, we feel it is our responsibility to manage product development in a disciplined and strategic manner. Our goal is to maintain the integrity of our existing investment strategies and existing shareholders' returns while also responding to the demands of a complex and ever-changing investment environment.

Climate Scenario Analysis

Climate value at risk (VaR) is used by institutional investors to identify and assess the climate-related risks associated with global climate change across a range of different scenarios. These scenarios are not intended to be forecasts but are used to evaluate the financial impact on investment returns caused by transition and physical risks over a 15-year period. A limitation of this metric is that it does not take into account changes in investment holdings over time or updates to climate targets of investee companies.

At T. Rowe Price, we conduct climate scenario analysis using a range of scenarios. These scenarios are designed and developed by the Network for Greening the Financial System (NGFS) and include 1.5°C, 2°C (Orderly and Disorderly), as well as Nationally Determined Contributions (NDC). They are not intended to be forecasts but instead are used to explore a range of plausible outcomes over the next several

[6] T. Rowe Price and IFC are not affiliated companies. This material is provided for informational purposes only and is not intended to be investment advice or a recommendation to take any particular investment action.

decades. We assess our aggregated investment portfolios' climate-related risks and opportunities using climate VaR, a forward-looking, return-based assessment of financial impact over a 15-year horizon. Climate VaR measures the present value of future company profitability, taking into account potential climate-related costs and revenues.

Climate Risk Exposure by Sector

Sector[7,8]	% of AUM Covered[9]	1.5°C Disorderly	1.5°C Orderly	2°C Disorderly	2°C Orderly	3°C NDC
Communication Services	6.4%	-0.3%	-0.2%	-0.2%	-0.2%	-0.3%
Consumer Discretionary	8.8%	-1.0%	-0.7%	-0.6%	-0.4%	-0.4%
Consumer Staples	3.4%	-0.6%	-0.4%	-0.4%	-0.2%	-0.3%
Energy	3.6%	-2.8%	-2.4%	-2.0%	-0.9%	-0.9%
Financials	12.4%	-0.9%	-0.7%	-0.7%	-0.6%	-0.9%
Health Care	12.6%	-0.6%	-0.4%	-0.4%	-0.3%	-0.4%
Industrials	8.2%	-1.1%	-0.8%	-0.7%	-0.4%	-0.5%
Information Technology	20.4%	-0.4%	-0.3%	-0.3%	-0.2%	-0.3%
Materials	3.1%	-1.0%	-0.9%	-0.8%	-0.5%	-0.5%
Real Estate	2.1%	-0.2%	-0.2%	-0.2%	-0.1%	-0.2%
Utilities	1.8%	-1.5%	-1.1%	-1.1%	-0.5%	-0.7%

Overall Climate Risk Exposure

Sector[7]	% of AUM Covered	1.5°C Disorderly	1.5°C Orderly	2°C Disorderly	2°C Orderly	3°C NDC
Total climate VaR	82.9%	-10.6%	-8.1%	-7.4%	-4.5%	-5.3%

The three main pillars of climate VaR are Policy, Technology, and Physical risks. For instance, Policy risk refers to the regulatory costs of achieving net zero climate targets such as higher carbon taxes. Technology opportunity refers to potential future revenues associated with the transition to a low-carbon technology such as renewable energy. Physical risks refer to the direct and indirect costs of climate-related risk, such as damage to assets and supply chain disruptions, respectively.

Physical risks also encompass acute risks such as extreme weather events and chronic risks that manifest slowly over time. Examples of acute risks include tropical cyclones, flooding, low river flow, and wildfire whereas chronic risks comprise extreme heat/cold, precipitation, snowfall, and wind. In total, we assess 10 different weather hazards at both the 50th and 95th percentiles of their cost distributions.

We model chronic risks using statistical extrapolation of historical data whereas for acute risks we use physical climate models that incorporate the latest climate science. In general, a lower temperature scenario (e.g., less than 2°C) is likely to represent greater transition risk while a higher temperature scenario (e.g., greater than 3°C) is likely to represent greater physical risk. Our assessment based on a possible 2°C climate scenario indicates that sectoral risks would become elevated across high-emitting sectors such as energy, materials, utilities, and industrials.

At T. Rowe Price, we assess climate-related risks and opportunities of our aggregated investment portfolios over short-, medium-, and long-term time horizons. These include transition risks such as changes in government policy and regulation as well as physical risks such as flooding and extreme heat/cold. Together, they form part of our enterprise risk management framework, which aims to identify and assess such risks over the investment horizon.

[7] This information excludes Oak Hill Advisors, L.P. (OHA), an alternative credit manager that T. Rowe Price Group, Inc., acquired on December 29, 2021. Data as of December 31, 2023. All data are provided in terms of the contribution of each sector based on the aggregated assets covered. Please see page 54 for further definition. The climate scenarios are designed and developed by Network for Greening the Financial System (NGFS). Climate value at risk is based on a weighted average market value approach and represents the estimated percent change in portfolio value under each scenario. Source: MSCI ESG Research LLC.
[8] Sectors categories are based on Global Industry Classification Standard (GICS).
[9] Total may differ due to rounding.

The materialization of climate-related risks could lead to lower asset valuations and increased market volatility, but the range of possible outcomes is highly uncertain and subject to change. Moreover, our assessment of climate-related risks is not exhaustive but aims to highlight the most significant risks, as well as their potential impact on the investments we manage on behalf of our clients.

Climate-related risks and opportunities related to the investments we manage

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

Description	Impact on Investee Companies	Risks and Opportunities for T. Rowe Price Investments[10]
Transition Risks		
Regulation S M L Changes in government policy to meet country-specific climate targets	Dedicated resources to monitor and review global ESG/climate regulatory proposals (pre-implementation stage) and determine impact to T. Rowe Price holdings. Project management and business resources are engaged to ensure final regulatory requirements are met and implemented in a timely manner	**Risks:** Greater investment performance variability due to changes in asset valuations; changes in asset allocation to avoid stranded assets and manage idiosyncratic risks **Opportunities:** Strong evaluation of environmental factors will highlight companies for investment that have better potential to strive under new regulations generating above-average returns
Technology M L Increase in intellectual property and product innovation	Reduced carbon emissions due to adoption of affordable low-carbon technology and renewable energy; higher revenue projections and profitability due to increased product demand and market share; increased capital expenditure and operational costs to incorporate new technologies into business operations	**Risks:** Greater investment performance variability due to adoption costs and opportunities of investee companies; changes in asset allocation to incorporate investment opportunities and manage idiosyncratic risks **Opportunities:** Potential for improved investment performance of innovative investee companies
Market M L Changes in market volatility and asset valuations	Lower profitability and higher costs due to idiosyncratic risks and negative market sentiment	**Risks:** Greater investment performance variability due to changes in asset valuations; changes in asset allocation to avoid stranded assets and manage idiosyncratic risks **Opportunities:** Strong evaluation of environmental factors will identify sectors and individual companies effectively managing risks and potentially produce above-average performance

[10] Other factors could have a material impact on performance.

Description	Impact on Investee Companies	Risks and Opportunities for T. Rowe Price Investments[10]
Transition Risks		
Reputational M L Loss of confidence due to perceived greenwashing or lack of competitiveness	Lower revenue projections and profitability due to loss of confidence and trust; failure to attract and retain talent to maintain competitiveness	**Risks:** Greater investment performance variability due to changes in asset valuations; changes in asset allocation to manage idiosyncratic risks **Opportunities:** Ability to effectively evaluate companies on environmental and social dimensions will allow us to gear investments toward companies that will maintain a strong reputation in the market

Description	Impact on Investee Companies	Risks and Opportunities for T. Rowe Price Investments[11]
Physical Risks		
Acute S M L Extreme short-term weather events	Lower revenue projections and profitability due to business disruption and increased costs	**Risks:** Greater investment performance variability due to changes in asset valuations; changes in asset allocation to manage idiosyncratic risks **Opportunities:** Identifying acute risks and working with companies to understand mitigation strategies to help protect investments and potentially improve returns
Chronic S M L Long-term shifts in weather patterns	Lower revenue projections and profitability due to changes in climate conditions that affect supply and demand	**Risks:** Greater investment performance variability due to changes in asset valuations; changes in asset allocation to manage idiosyncratic risks **Opportunities:** Staying abreast of broad environmental changes and impact to businesses will highlight those companies quickly adapting through technology and strong management, which will create above-average investment opportunities

[11] Other factors could have a material impact on performance.

Consideration in Operational Strategy‡

Reducing and managing our GHG emissions is our primary sustainability priority from a corporate standpoint. This includes an assessment of costs to achieve our objectives. We analyzed the cost of 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 & Workplace Services team, we continuously seek energy efficiency measures to implement throughout our global offices.

Forty-eight percent of our real estate square footage was environmentally certified by year-end 2023, and we aim to have at least 60% 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. Our new London office achieved an Excellent standard by Building Research Establishment Environmental Assessment Methodology (BREEAM) for its design phase, and we are currently pursuing certification for post-construction.

Our locations[12]

Americas					
Street Address	**Country**	**Certification**	**Ownership**	**Coordinates**	**Percentage of Workforce**
100 East Pratt Street Baltimore, MD 21202	United States of America	LEED Certified - Partial	Leased	39.28710981313251, -76.6127409035248	20.0%
2260 Briargate Parkway Colorado Springs, CO 80920	United States of America	LEED Silver	Owned	38.968670677427205, -104.78729654638454	1.6%
2220 Briargate Parkway Colorado Springs, CO 80920	United States of America	-	Owned	38.96855490264002, -104.7860438580269	7.3%
17415 Progress Way Hagerstown, MD 21740	United States of America	-	Owned	39.59544598964031, -77.76535181568273	0.2%
709 Digital Drive Linthicum, MD 21090	United States of America	-	Leased	39.2187401487003, -76.67274264452794	0.1%
1251 Avenue of the Americas, 35th Floor New York, NY 10020	United States of America	LEED Gold	Leased	40.76026119609277, -73.98173377517483	0.1%
233 Park Avenue, South, Concourse and 2nd Floors New York, NY 10003	United States of America	LEED Certified	Leased	40.73755672011462, -73.98789915585051	0.7%

[12] OHA and Retiree, Inc. facilities are excluded. Interns, fixed terms, contingent workers, and OHA employees are excluded from percentage of workforce.

Street Address	Country	Certification	Ownership	Coordinates	Percentage of Workforce
4555 Painters Mill Rd Owings Mills, MD 21117	United States of America	LEED Silver	Owned	39.39641052785798, -76.78532845801622	8.9%
4545 Painters Mill Rd Owings Mills, MD 21117	United States of America	LEED Silver	Owned	39.39608472758382, -76.78433581562524	6.0%
4515 Painters Mill Rd Owings Mills, MD 21117	United States of America	LEED Certified	Owned	39.39539738449518, -76.78530798685203	16.3%
4525 Painters Mill Rd Owings Mills, MD 21117	United States of America	LEED Certified	Owned	39.394925291878515, -76.78341871938858	11.6%
4405 Painters Mill Rd Owings Mills, MD 21117	United States of America	LEED Gold	Owned	39.392264610625574, -76.785528700283	3.2%
4435 Painters Mill Rd Owings Mills, MD 21117	United States of America	LEED Gold	Owned	39.391499594223276, -76.78433381568794	3.2%
11550 Cronridge Drive Owings Mills, MD 21117	United States of America	-	Owned	39.44344224764258, -76.77138095986547	3.2%
BNY Mellon Center 1735 Market St, Suite 3020 Philadelphia, PA 19103	United States of America	LEED Certified	Leased	39.953827558117425, -75.16953285800211	0.2%
333 Bush St., Suite 2550 San Francisco, CA 94104	United States of America	LEED Platinum (Building holds certification)	Leased	37.790993083478696, -122.40305656988821	0.4%
200 Massachusetts Avenue Washington, D.C. 20001	United States of America	LEED Silver	Leased	38.899180367682845, -77.01409568686441	0.5%
Toronto Dominion Centre 77 King Street West Suite 4240 Toronto, ON Canada MSK 1A2	Canada	-	Leased	43.648154072847134, -79.38209058411294	0.1%

EMEA					
Street Address	**Country**	**Certification**	**Ownership**	**Coordinates**	**Percentage of Workforce**
Axel Towers 2F, 7th Floor Tower D 1609 Copenhagen V Denmark	Denmark	-	Leased	55.67565276956809, 12.565667942471766	< 0.1%
Neue Rothofstraße 19, 6th Floor Frankfurt Germany 60313	Germany	LEED Gold (Building holds certification)	Leased	50.11397287184947, 8.672841771123787	0.1%
Via San Prospero 1, 5th Floor 20121 Milan Italy	Italy	-	Leased	45.466240427372675, 9.186067884476074	0.1%
35 Boulevard Du Prince Henri L-1724 Luxembourg Grand Duchy of Luxembourg	Luxembourg	-	Leased	49.610640039978456, 6.124330796243006	0.4%
World Trade Centre, Strawinskylaan 1433, Tower Eight Level 14 1077 XX Amsterdam The Netherlands	Netherlands	BREEAM Certified (Building holds certification)	Leased	52.34045558176207, 4.8754800674946255	0.1%
Torre Europa, Paseo De La Castellana, 95-15 Madrid, Spain 28046	Spain	LEED Silver (Building holds certification)	Leased	40.45183025415371, -3.6914523254528264	0.1%
Kungsgatan 8 SE-11143 Stockholm Sweden	Sweden	-	Leased	59.336365253561226, 18.069669211915034	< 0.1%
65 Talstrasse, 6th Floor 8001 Zurich Switzerland	Switzerland	-	Leased	47.37055552668636, 8.535453255696337	0.1%
Difc Gate Building, Level 15, Office #24 Dubai United Arab Emirates	United Arab Emirates	-	Leased	25.215022031556874, 55.28118076869329	< 0.1%
Paternoster Square London, EC4M 7DX	United Kingdom	-	Leased	51.51486397262379, -0.1000133999956808	10.2%

APAC					
Street Address	**Country**	**Certification**	**Ownership**	**Coordinates**	**Percentage of Workforce**
Servcorp, 101 Collins St, Level 27 Suite 2725 & 2726 Melbourne VIC 3000 Australia	Australia	-	Leased	-37.81437215939782, 144.9705028538828	0.1%
Governor Phillip Tower, 1 Farrer Place, Suite 28 01-04 Sydney NSW 2000 Australia	Australia	-	Leased	-33.864126688410906, 151.21140328445244	0.7%
Chater House, 8 Connaught Road, 6th & 7th Floor Central Hong Kong	China	LEED Gold	Leased	22.28248614391946, 114.15860908583407	2.5%
The Executive Centre Suite 838-839 and 835 8 Century Avenue, Pudong District, Shanghai 200120 China	China	-	Leased	31.236869058800828, 121.50201097626106	< 0.1%
9-2, 1-Chome, Marunouchi, Chiyoda-Ku, 10F Tokyo Japan 100-6610	Japan	LEED Certified	Leased	35.67894531288826, 139.7675247418951	1.0%
501 Orchard Road #10-02 Wheelock Place Singapore 238880 Republic of Singapore	Singapore	-	Leased	1.3053115760486456, 103.83077369737198	0.9%

Risks

Our Risk Management 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 Enterprise Risk Management Committee (ERMC), for anticipating and addressing new risks, as well as ensuring that risks are managed relative to the firm's tolerances. 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. The firm's risk management framework is used to monitor climate risks. As part of that framework, the ERG works with subject matter experts to ensure that ownership of these risks aligns with the appropriate business leaders.

The ERMC assesses risks that our firm faces in the short, medium, and long terms with more detailed focus on those risks that can manifest more rapidly and/or with greater adverse outcomes. 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 Human Resources, 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 is designed to promote quick identification and response to risks and opportunities, reducing the impact on the firm and its clients.

Implications of Increasing Global Regulation‡

The volume and pace of sustainability-related regulation, much of which has implications for climate-related activities, is unprecedented, putting significant pressures on implementation teams and adding compliance costs. Divergence in local standards also presents a challenge, and we encourage global regulatory coordination through our advocacy efforts.

As a global organization, we may become (and already are) subject to new and evolving sustainability-related rules and regulations in a number of jurisdictions and regions at about the same time:

- U.S. – In 2024, new rules on corporate climate reporting from the Securities and Exchange Commission (SEC) were issued and possibly new state laws requiring climate reporting, such as in California. This is in addition to new SEC rules for ESG product disclosure for mutual funds.
- UK – The UK government recently consulted on whether to adopt the standards developed by the International Sustainability Standards Board (ISSB), and the Financial Conduct Authority recently finalized the Sustainability Disclosure Requirements and investment labels framework.
- European Union – The EU adopted the Corporate Sustainability Reporting Directive (CSRD), it is nearing the adoption of the Corporate Sustainability Due Diligence Directive (CSDDD), and it continues to amend its sustainable finance framework, including the Sustainable Finance Disclosure Regulation (SFDR).

- Australia – Australia is rolling out its sustainable finance strategy, including its plans for mandatory climate reporting by companies and financial institutions.
- Singapore – The Monetary Authority of Singapore recently consulted on guidelines for financial institutions on transition planning for a net zero economy.

To help us prepare, our Legislative & Regulatory Affairs (LRA) team monitors developments in key jurisdictions to ensure we can develop and coordinate a timely compliance strategy across the firm in the most efficient manner. The LRA team distributes internal communications with regulatory development updates and provides regular briefings to key internal stakeholders. Quarterly updates are provided to the ESG Oversight Committee (ESGOC).

Analyzing Investment Risks‡

We use our proprietary RIIM analyses, net zero status, GHG footprint, and climate solutions alignment[1] analysis to identify and assess climate-related risks. Within the RIIM assessments, 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. At the 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 help 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 investee companies across portfolios may look meaningfully different from peers—particularly passive peers. That is why engagements on specific ESG issues such as 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 the Sustainability Accounting Standards Board (SASB) and the Task Force on Climate-Related Financial Disclosures (TCFD)—both globally recognized frameworks that emphasize financial materiality. As the newly established International Sustainability Standards Board (ISSB) comes into effect, we will recommend this disclosure as best practice.

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.

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

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 to 24 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 that 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.

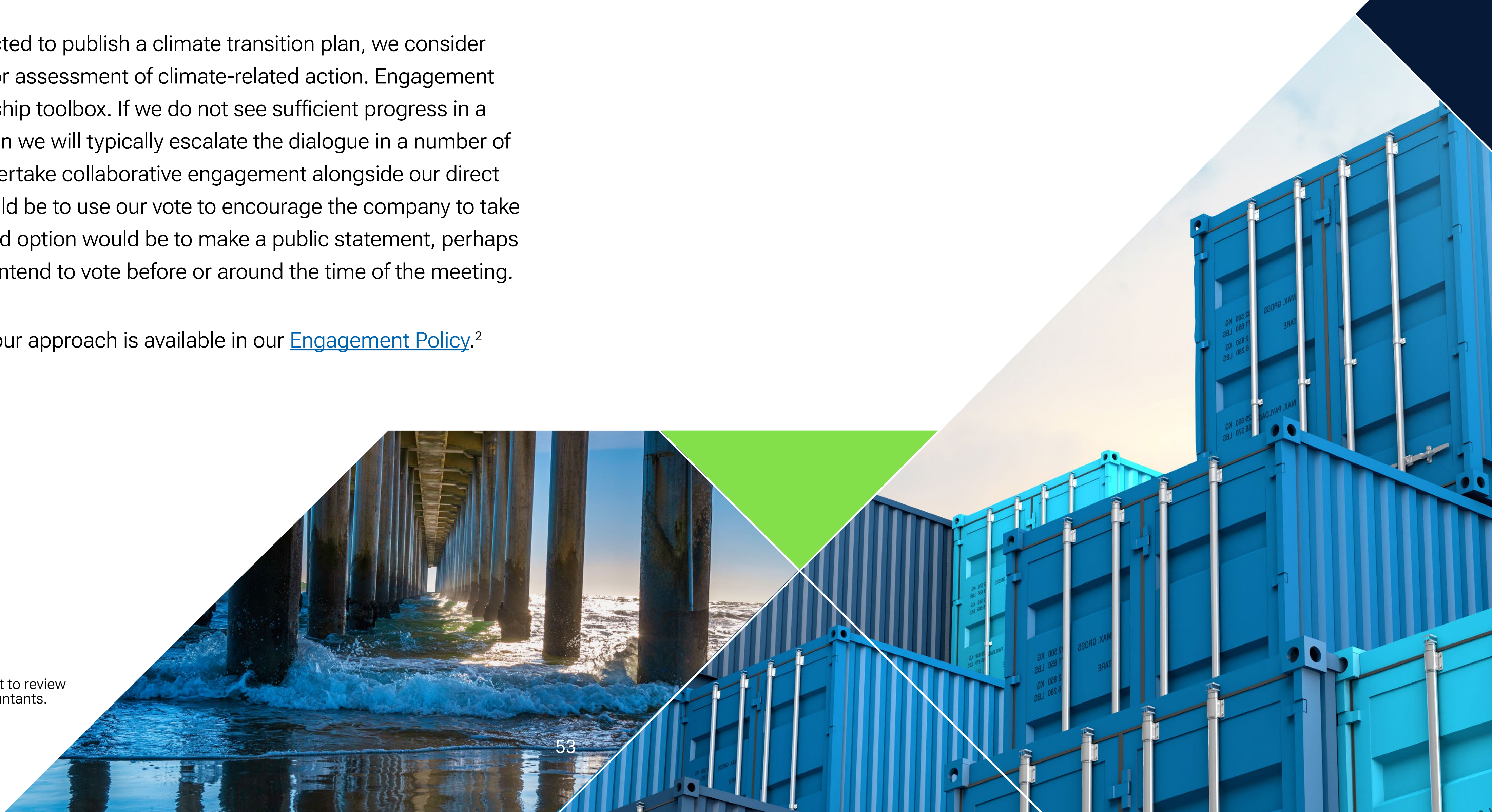
Where a company has elected to publish a climate transition plan, we consider it against our framework for assessment of climate-related action. Engagement is only part of the stewardship toolbox. If we do not see sufficient progress in a reasonable time frame, then we will typically escalate the dialogue 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.

Additional information on our approach is available in our Engagement Policy.[2]

Process for Managing Climate-Related Risk[‡]

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 Enterprise Risk Management Committee (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. It 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 regularly and is composed of senior business leaders from across the organization.



[2] Hyperlinked information is not subject to review by independent certified public accountants.

Metrics and Targets

Our Approach‡

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 targeting net zero Scope 1 and 2 emissions by 2040 and have an interim target to achieve a 75% reduction by 2030 compared with our 2021 baseline. This includes, but is not limited to, pursuing renewable electric supply and energy efficiency improvements in our operations.

While we do not currently have a Scope 3 target, we are focused on efforts to expand our disclosure of Scope 3 emissions categories and reduce our Scope 3 emissions through stewardship and partnerships. Our approach is informed by the Science Based Targets initiative (SBTi) methodology. However, since the majority of our clients have given us a mandate to pursue financial performance for their portfolios, we do not believe that setting a binding Scope 3 target and pursuing validation of our target by the SBTi would be consistent with our fiduciary duty, as this would require us to divest from select high-emitting securities. Our commitment to NZAM is made with the understanding that the aim to achieve net zero is consistent with maximizing financial returns and does not conflict with our fiduciary duty to our clients.

Measuring the Climate Impacts of Our Investments

Carbon emissions datasets are made up of a combination of reported and estimated data, due to a variance in disclosure levels by companies. Because of this, there can be variations between vendors, who take different approaches depending on the industry and the information available. The goal of any estimate is a figure in the right order of magnitude, since total accuracy can only be achieved if a company is actually reporting carbon data. We rely on our vendor to supply both the data and analysis. We do not guarantee its accuracy. The limited and unstandardized nature of Scope 3 emissions disclosure requires the use of datasets consisting entirely of estimated GHG emissions. For this reason, we see limitations in data quality and advocate caution when using these data. We expect data quality to improve over time. In line with TCFD recommendations, we use the following metrics to monitor and report our Scope 3.15 (Investments) emissions.

Methodology

Asset classes included	Listed equities, corporate bonds, sovereign bonds,[1] securitized bonds,[2] municipal bonds,[2] and bank loans[2]
Asset classes excluded	REITs, derivatives, and commodities
Percentage of T. Rowe Price Associates and its investment advisory affiliates AUM included	80%–90%, depending on the metric
Standards	Partnership for Carbon Accounting Financials (PCAF)
Date	Holdings as of December 31, 2023
Data source	MSCI ESG Research LLC

[1] Sovereign bonds are only used in financed emissions and weighted average carbon intensity.
[2] Based on estimates only and accounts for approximately 4% of T. Rowe Price Associates and its investment advisory affiliates AUM.

Financed Emissions

We have adopted the equity ownership approach when attributing carbon emissions to our investment portfolios. This methodology allocates emissions to an investor based on levels of capital invested in a company and is aligned with the PCAF standards. Scope 1 emissions are direct emissions from owned or controlled sources. Scope 2 emissions are indirect emissions from the generation of purchased electricity, steam, or cooling. Scope 3 emissions are all other indirect emissions, attributable to the supply chain over a product's life cycle. These consist of upstream emissions (up to point of sale) and downstream emissions (post-point of sale).

Our Scope 1 and 2 financed carbon emissions as of year-end 2023 include both reported and estimated data with approximately 56% coming from 2022 and 30% coming from 2021 issuer emissions. Enhancements to the existing data collection process are expected to improve the timeliness of data availability from 2025 onward. Additionally, 83% of the MSCI ACWI universe and 63% of the MSCI ACWI IMI universe have Scope 1 and 2 carbon emissions data available for 2022. This includes 95% of Top 20 emitters and 85% of Climate Action 100+ companies (that are within the MSCI Climate universe).

The PCAF standard suggests using a data-quality score, since the calculation of financed emissions relies on frequently unaudited and estimated emissions data from investees. This scale ranges from 1 (highest-quality, verified data) to 5 (low-quality, estimation based on asset turnover). The aggregate quality score for T. Rowe Price Associates and its investment advisory affiliates' Scope 1 and 2 financed emissions is 2.23 and Scope 3 is 2.74.

Listed and Private Company Total Financed Greenhouse Gas Emissions

$$\sum_{n}^{i}\left(\frac{\textit{current value of investment}_i}{\textit{issuer's EVIC or total equity + debt}_i} \times \textit{issuer's Scope 1, 2, 3 GHG emissions}_i\right)$$

Sovereign Financed Greenhouse Gas Emissions

$$\sum_{n}^{i}\left(\frac{\textit{current value of investment}_i}{\textit{PPP - GDP}_i} \times \textit{sovereign issuer's GHG emissions}_i\right)$$

Weighted Average Carbon Intensity (WACI)

WACI measures a portfolio's exposure to carbon-intensive companies. We use a weighted average approach expressed in tons CO_2e/USD million revenue to normalize carbon emissions by company sales and attribute them to our investment portfolios. This metric does not rely on equity ownership in a company, and it can be applied to both equity and credit portfolios.

Corporate Issuers

$$\sum_{n}^{i}\left(\frac{\textit{current value of investment}_i}{\textit{current portfolio value}} \times \frac{\textit{issuer's Scope 1 and Scope 2 GHG emissions}_i}{\textit{issuer's \$M revenue}_i}\right)$$

Sovereign Issuers

$$\sum_{n}^{i}\left(\frac{\textit{current value of investment}_i}{\textit{current portfolio value}} \times \frac{\textit{sovereign issuer's GHG emissions}_i}{\textit{sovereign issuer's \$M GDP}_i}\right)$$

Carbon Footprint

Carbon footprint measures the amount of carbon emissions that are attributable to an investor per USD million invested (expressed in tCO_2e/$M invested). This metric is useful for comparing portfolios and benchmarks.

For carbon footprint, our asset class coverage primarily consists of equity and corporate bond holdings. Assets not covered include derivatives, securitized credit, and sovereign bonds, where there is insufficient data quality or a lack of methodology. Data reliability remains a key challenge for industry participants, due to a lack of harmonized company disclosure standards and reporting across jurisdictions.

Where data are lacking, carbon emissions for individual companies are either estimated by our third-party data provider or excluded. In general, data quality scores of 1–2 indicate reported emissions, whereas scores of 3–5 indicate estimated emissions. Scope 3 emissions are mostly estimated due to poor quality data.

Corporate Issuers Carbon Footprint

$$\frac{\sum_{n}^{i}\left(\frac{\textit{current value of investment}_i}{\textit{issuer's EVIC}_i} \times \textit{issuer's Scope 1 and Scope 2 GHG emissions}_i\right)}{\textit{current portfolio value (\$M)}}$$

Implied Temperature Rise

The implied temperature rise (ITR) metric provides an indication of how aligned a company or investment portfolio is with global climate targets, such as the Paris Climate Agreement. It provides an indication of how much we can expect global temperatures to increase (expressed in degrees Celsius) over the next several decades based on how much of the global carbon budget is used, assuming the whole economy utilizes the same proportion of carbon budget as an individual company or portfolio.

2023 Metrics[3]

Measurement	Unit	Scope	Metrics
Financed emissions	Tons CO_2e	Scope 1 and 2	77,147,174
		Scope 3	365,198,867
Carbon footprint	Tons CO_2e/$Million Invested	Scope 1 and 2	42.9
		Scope 3	277.23
Weighted average carbon intensity (WACI)	Tons CO_2e/$Million Revenue	Scope 1 and 2	119.3
		Scope 3	653.73
Implied temperature rise	Celsius	Scope 1 and 2	2.4

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

Climate Metrics by Sector[4]

Sector[5]	Financed Carbon Emissions Scope 1+2 tCO_2e	Financed Carbon Emissions Scope 3 tCO_2e	Weighted Data Quality Score Scope 1+2	Weighted Data Quality Score Scope 3
Communication Services	416,691	2,338,616	2	3
Consumer Discretionary	1,758,040	28,345,796	2	3
Consumer Staples	1,360,987	20,066,041	2	3
Energy	9,023,468	99,129,712	2	3
Financials	32,191,747	10,207,258	3	3
Health Care	619,772	9,516,964	2	3
Industrials	3,731,592	136,011,695	3	3
Information Technology	1,187,263	8,194,530	2	2
Materials	11,453,673	32,044,260	2	3
Real Estate	192,271	2,375,347	2	3
Utilities	14,688,175	14,693,331	2	3

Sector	WACI Scope 1+2 (tCO_2e/$M Revenue)	WACI Scope 3 (tCO_2e/$M Revenue)
Communication Services	0.93	11.05
Consumer Discretionary	6.64	60.01
Consumer Staples	2.10	21.75
Energy	15.61	154.20
Financials	4.45	67.75
Health Care	2.43	48.33
Industrials	10.19	112.42
Information Technology	5.56	84.96
Materials	20.76	65.74
Real Estate	1.52	8.77
Utilities	49.13	18.74

Sovereign WACI is approximately 323 (expressed in tCO_2e/USD M GDP nominal). The coverage ratio is approximately 7%.

Sector	Carbon Footprint Scope 1+2 (tCO_2e/$M Invested)	Carbon Footprint Scope 3 (tCO_2e/$M Invested)
Communication Services	0.31	3.44
Consumer Discretionary	1.51	26.07
Consumer Staples	1.11	11.67
Energy	7.55	90.68
Financials	1.47	12.14
Health Care	0.53	14.14
Industrials	3.35	58.91
Information Technology	1.32	16.22
Materials	10.99	36.02
Real Estate	0.19	1.92
Utilities	14.56	6.03

[4] This information excludes Oak Hill Advisors, L.P. (OHA), an alternative credit manager that T. Rowe Price Group, Inc., acquired on December 29, 2021. Asset coverage based on 80% of T. Rowe Price Associates AUM. All data are provided in terms of the contribution of each sector to the aggregated assets covered. Sectors categories are based on Global Industry Classification Standard (GICS).
[5] Financed emissions aligned with PCAF Global GHG Accounting and Reporting standards, carbonaccountingfinancials.com/standard

Net Zero Asset Managers Initiative

T. Rowe Price joined the Net Zero Asset Managers initiative (NZAM) in 2022 and made its initial disclosure under the initiative in 2023.

One of our key rationales for joining NZAM was to help support the establishment of robust and standardized methodologies for evaluating investment pathways to net zero. NZAM objectives also align with our belief that a smooth climate transition should 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.

Importantly, our membership rested on NZAM's pragmatism and acknowledgment that asset managers like T. Rowe Price are fiduciaries, whose success in reaching net zero largely depends on governments following through on their respective commitments to achieve the goals of the Paris Climate Agreement.

Finally, the commitments made under NZAM align with T. Rowe Price's existing business practices and our approach to sustainability. Consideration of climate transition is fully integrated into our fundamental research and portfolio construction processes and has formed part of our proprietary ESG analysis for several years. Furthermore, we engage constructively with companies to encourage a thoughtful approach to decarbonization and advocate for greater transparency of climate-related information and data.

In April 2024, we committed 61% of our total AUM as of December 31, 2023, to net zero.[6] To determine this commitment, we adopted a methodology rooted in process, alignment with investment styles, data quality, and measurements. The strategies not committed fall into four categories:

- Strategies invested in corporate securities that lack adequate GHG emissions data (min. 75%) to make an informed net zero assessment,
- Strategies that predominantly invest in emerging markets or specific sectors lacking realistic pathways to achieve net zero by 2050,
- Strategies that predominantly invest in asset classes lacking a net zero methodology (sovereign, securitized, and municipal bonds), and
- Strategies with short-term investment styles (cash funds and short, ultrashort, and low duration strategies) or strategies that do not have net zero as a consideration within their investment process (quantitative and index funds).

At the same time, we set interim targets in 2030 and 2040 for the portion of committed assets under management to be managed in line with the attainment of net zero emissions by 2050 or sooner. We elected to use what NZAM defines as the Portfolio Coverage Target because this is a forward-looking indicator that does not force divestment and emphasizes the credibility of issuers' short-, medium-, and long-term climate transition plans. With this approach, we target to gradually increase the percentage of committed AUM that is at least aligned with net zero.

Consistent with our portfolio coverage approach, we assess each issuer's respective net zero targets, their credibility, and the progress made toward achieving them. We check that the chosen pathways align with limiting warming to 1.5˚C.

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

Net Zero Alignment Classification System

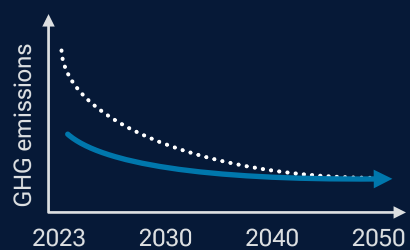
Our net zero alignment or "status" framework helps determine the extent to which corporate issuers have established and are implementing credible, scientifically based net zero transition plans that are compatible with the goal of limiting global temperature increases in this century to 1.5˚C.

It is based on the PAII NZIF.

We assign corporate issuers to one of five categories, depending on the extent to which they have certain aspects of transition planning in place, including ambition, targets, emission performance, disclosure, decarbonization strategy, and capital allocation alignment. The categories are below:

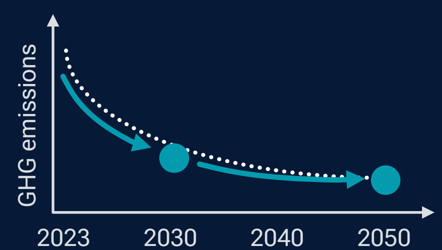
Proprietary Assessment of Issuers' Net Zero Alignment

Each security is assigned a net zero status based on the Paris Aligned Investment Initiative (PAII) Net Zero Investment Framework[7]



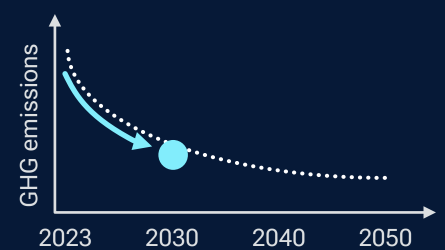
Achieving

- Current GHG emissions are close to or have already achieved net zero
- Capital allocation plan supports achievement of net zero
- Adequate disclosure of GHG emissions



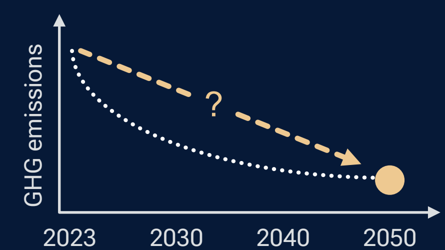
Aligned

- Net zero target that meets regional/sectoral 1.5°C pathway
- Short- and medium-term targets aligned to regional/sectoral 1.5°C pathway
- Adequate GHG emissions disclosure
- Credible decarbonization plan supported by adequate capital allocation
- GHG emissions performance should already be in line with regional/sectoral 1.5°C pathway



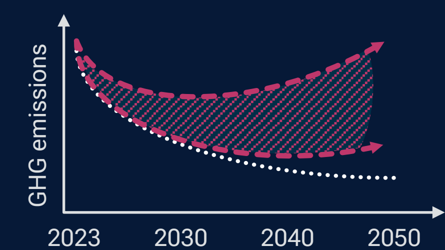
Aligning

- Short- and medium-term targets aligned to regional/sectoral 1.5°C pathway
- Adequate GHG emissions disclosure
- Credible decarbonization plan supported by adequate capital allocation



Committed

- Net zero target that meets regional/sectoral 1.5°C pathway is in place



Not Aligned

- No net zero target
- Net zero target does not meet 1.5°C pathway

For illustrative purposes only.
The dotted white line represents emission reductions aligned with a 1.5°C pathway.

[7] Source: Institutional Investors Group on Climate Change (IIGCC). See Glossary of Terms for further information.

Aggregating the net zero alignment or the status of individual issuers using the percentage weight of each holding provides a net zero portfolio coverage view. Measuring the percentage of a portfolio's value classified as Achieving and Aligned to net zero helps us to track its transition to net zero.

Fund Carbon Footprint Reporting

On a quarterly basis, we assess and report to our clients on the carbon profile of our equity and credit funds (for portfolios where we have more than 75% data coverage, either reported or estimated). The report includes data on:

- Total emissions (total emissions owned),
- Carbon footprint (total emissions expressed as USD 1 million invested), and
- Weighted average carbon intensity (the weighted average, by portfolio weight, of the total carbon emissions per USD 1 million of revenues for each of the portfolio's holdings).

Since 2022, we provide a Scope 1 and 2 emissions view, as well as one including Scope 3 emissions. The limited and unstandardized nature of Scope 3 emissions disclosure requires the use of datasets consisting entirely of estimated GHG emissions. For this reason, we advocate caution when using these data.

Measuring the Climate Impacts of Our Operations‡

T. Rowe Price's GHG emissions are calculated according to the methodology set forth by the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard.

2023 Emissions by Scope

The reporting period is January 1 to December 31, 2023.

2023 GHG Iventory[8]		MT CO_2e
Total Scope 1 Emissions‡		**681**
	On-Site Fuel Use	402
	Fleet Fuel Use	35
	Refrigerants	244
Total Scope 2 Emissions (Location-Based)‡		**18,340**
Total Scope 2 Emissions (Market-Based)‡		**18,649**
	Purchased Electricity Location-Based	17,894
	Purchased Electricity Market-Based	18,203
	Purchased Steam	446
Total Scope 3 Emissions		**130,124**
Category 3.1	Purchased Goods and Services	78,553
Category 3.2	Capital Goods	21,328
Category 3.3	Fuel- and Energy-Related Activities	3,866
Category 3.5	Solid Waste	277
Category 3.6	Business Travel	8,504
	Air Travel	8,374
	Train Travel	130
Category 3.7	Employee Commuting	16,914
	Commuting to Office	13,252
	Telecommuting	3,662
Category 3.13	Downstream Leased Assets	682
Category 3.15	Investments	See page 56
Total GHG Emissions (Location-Based)		**149,145**
Total GHG Emissions (Market-Based)		**149,454**

[8] Unless otherwise noted, the information provided in this report and related materials do 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.

Inventory Boundary and Methodology‡

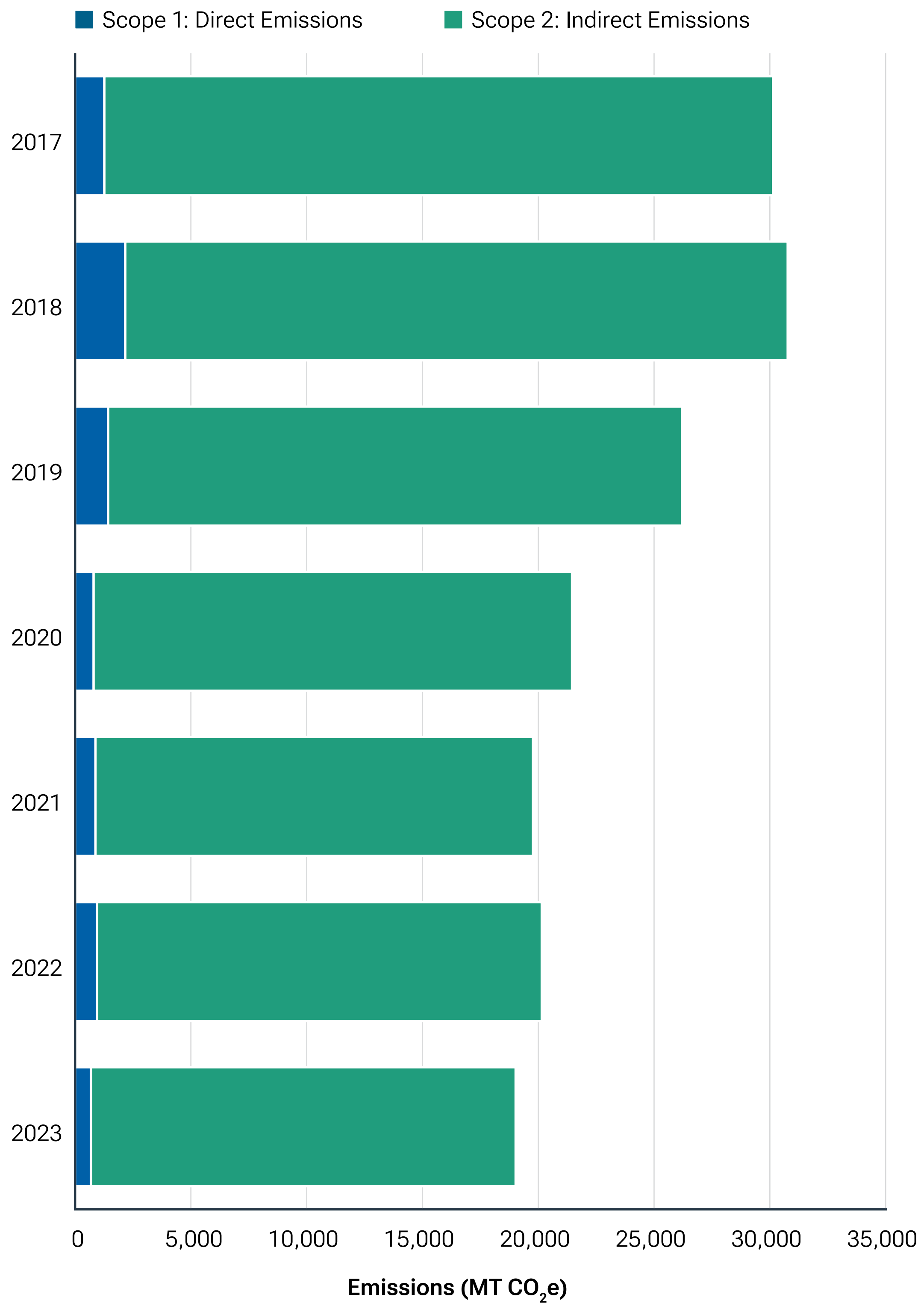
T. Rowe Price uses an operational control approach, which accounts for all the GHG emissions from operations over which we have control. This includes owned and leased facilities and data centers, but excludes co-location facilities, which are included in Scope 3.1 (Purchased Goods and Services) emissions. Exclusions to the operational control approach are the GHG emissions generated by the operations of OHA and Retiree Inc.'s facility. T. Rowe Price will generally restate GHG emissions if any changes result in a 5% or greater cumulative change in emissions. We convert all emissions to a common GHG metric, CO_2 equivalent.

The following table details our methodologies used to calculate emissions and lists the categories of Scope 3 emissions relevant for T. Rowe Price:

Scope	Dataset	Calculation Methodology
Scope 1‡	Fuel consumption	**Assumptions** ▪ Estimated refrigerant type (78%) is based on location and building use for non-reporting facilities. ▪ Refrigerant leakage amount is based on rate and building square foot. ▪ Fleet mileage is based on lease maximums and 2022 data. **Emissions Factors** ▪ IPCC 2006 Guidelines, Volume 2: Energy: Chapter 2: Stationary Combustion, Table 2.4 and Chapter 3: Mobile Combustion, Table 3.2.1 ▪ EPA Emission Factors for Greenhouse Gas Inventories, Table 3
Scope 2‡	Electricity and steam consumption	**Assumptions** ▪ Utility invoices were utilized for owned properties and leased properties with submeters. When data were received for whole-building consumption, they were prorated on a square foot basis. ▪ Estimates were used for buildings where we have partial tenants or data could not be obtained. **Emissions Factors** ▪ U.S. – EPA's Emissions & Generation Resource Integrated Database (eGrid) 2022 ▪ Canada – Canada 2022 National Inventory Report, UNFCCC ▪ All other International – International Energy Agency (IEA) 2023 ▪ EPA Emission Factors for Greenhouse Gas Inventories, Table 7
Scope 3.1 – Purchased Goods and Services	Annual spend	**Emissions Factors** ▪ U.S. EPA Supply Chain Greenhouse Gas Emission Factors v1.2 by NAICS-6
Scope 3.2 – Capital Goods	Annual spend	**Emissions Factors** ▪ U.S. EPA Supply Chain Greenhouse Gas Emission Factors v1.2 by NAICS-6
Scope 3.3 – Fuel- and Energy-Related Activities	Energy-related activity data collected for Scope 1 and 2	**Emissions Factors** ▪ GREET 1 2023 Model ▪ UK – DEFRA: 2023 Conversion Factors – Well to Tank (WTT) ▪ U.S. – EPA's Emissions & Generation Resource Integrated Database (eGrid) 2022 ▪ Canada – Canada 2022 National Inventory Report, UNFCCC ▪ All other International – International Energy Agency (IEA) 2023 ▪ EPA Emission Factors for Greenhouse Gas Inventories, Table 7

Scope	Dataset	Calculation Methodology
Scope 3.5 – Waste	Waste type	**Assumptions** ▪ Estimates were used for buildings where data could not be obtained. ▪ When data were received for whole-building waste, they were prorated on a square foot basis. **Emissions Factors** ▪ EPA Emission Factors for Greenhouse Gas Inventories, Table 9
Scope 3.6 – Business Travel	Distance traveled and spend	**Assumptions** ▪ Based on known air and rail travel. Excludes automotive travel and hotel stays. ▪ Approximately 80% of air and rail travel booked through our travel provider, which includes information on distance traveled. The remainder is captured in our expense system without details on distance traveled. ▪ Spend data collected by our travel provider were scaled to capture travel documented in our expense system, where data on distance traveled are absent. **Emissions Factors** ▪ Air: Follows the guidance from the EPA Emission Factors for Greenhouse Gas Inventories, Table 10, and utilizes DEFRA GHG Conversion Factors 2022 ▪ U.S. Rail: EPA Emission Factors for Greenhouse Gas Inventories, Table 10 ▪ International Rail: DEFRA GHG Conversion Factors 2023
Scope 3.7 – Employee Commuting	Distance traveled	**Assumptions** ▪ Utilized employee survey results on 2022 commuting patterns to scale emissions based the number of hybrid employees as of December 31, 2023. ▪ Assumes employees work 42 weeks per year, accounting for global holidays and paid leave. ▪ Teleworkers' full-time workweek is applied to telecommuting calculation. **Emissions Factors** ▪ Commuting: Federal Highway Administration; AFLEET ▪ Telecommuting: Energy Statistics Data Browser – Data Tools – IEA
Scope 3.13 – Downstream Leased Assets	Fuel and electricity consumption	**Assumptions** ▪ Includes purchased electricity and natural gas and gas diesel oil consumption from facilities leased by T. Rowe Price (the lessor) to a third party (the lessee). Emissions included in this category are the lessee's Scope 1 and 2 emissions. **Emissions Factors** ▪ IPCC 2006 Guidelines, Volume 2: Energy: Chapter 2: Stationary Combustion, Table 2.4 ▪ U.S. – EPA's Emissions & Generation Resource Integrated Database (eGrid) 2022 ▪ All other International – International Energy Agency (IEA) 2023
Scope 3.15 – Investments	Portfolio holdings	See page 54

Scope 1 and 2 Emissions Trends



Scope 1 and 2 Emissions Target‡

Our road map for achieving net zero Scope 1 and 2 emissions by 2040 is based on materiality, as we seek to address our largest sources of emissions first. Our Maryland-based utilities generate the largest portion of our Scope 1 and 2 emissions. Consequently, switching to renewable energy in our Maryland-based facilities represents the most significant step toward reducing our greenhouse gas emissions and is, therefore, our highest priority.

Our contract with our energy supplier in Maryland expires at the end of 2024, and we are currently reviewing supplier bids to procure off-site renewable energy. While we do not expect to fully transition our Maryland locations to renewable energy by the contract expiration in 2024, we anticipate that by year-end 2030, all the electricity in our owned Maryland offices will be provided by renewable sources.

To address our remaining Scope 2 emissions, we have developed a timeline to convert our global offices to green power from brown power where available. The most recent example of this is our office move in London to Warwick Court, which opened in September 2023. The building is powered by 100% renewable electricity from high-quality contracts that meet UK Green Building Council requirements for net zero carbon and RE100 requirements.

We have offices in select global locations that currently do not offer renewable energy. We are hopeful that renewable energy options will become available in advance of our 2040 goal.

Furthermore, we have multiple opportunities to reduce Scope 1 and 2 emissions at our leased sites before 2040, and we plan to work closely with our landlords to procure green energy where available. As older equipment becomes obsolete, we will install more efficient replacements, selected to specifically support our net zero strategy.

Year-Over-Year Scope 1 and 2 Emissions Intensity

Scope	Unit	2017	2018	2019	2020	2021	2022	2023	% Change 2023 vs. 2021 baseline
Scope 1: Direct Emissions	MT CO_2e	1,259	2,162	1,424	796	877	941	681[9]	-22%
Scope 2: Indirect Emissions*	MT CO_2e	28,877	28,607	24,791	20,661	18,887	19,210	18,340	-3%
Total Scope 1 and 2 Emissions*	MT CO_2e	30,135	30,769	26,215	21,457	19,764	20,150	19,021	-4%
Global Square Feet	Thou. Square Feet	2,356	2,386	2,392	2,320	2,212	2,246	2,310	4%
Global Revenue	USD Million	4,793	5,373	5,618	6,207	7,672	6,488	6,461	-16%
Scope 1 and 2 Emissions per Square Foot	MT CO_2e/Thou. SF	12.8	12.9	11.0	9.2	8.9	9.0	8.2	-8%
Scope 1 and 2 Emissions per Revenue	MT CO_2e/MUSD	6.3	5.7	4.7	3.5	2.6	3.1	2.9	14%

* Total based on location-based emissions.

Reducing Operational Waste‡

After careful consideration, we have decided to reassess our 2025 goal to achieve zero waste at our facilities. This strategic decision considers the limited options for sourcing recyclable and compostable materials essential to our operations, as upstream providers fall short of their commitments to utilize environmentally friendly materials and packaging by 2025. Additionally, downstream providers are now rejecting compostable plastics and vending materials in select locations.

As we reassess our goal, sustainability remains at the forefront of the firm's commitments, and we continue to work toward reducing our operational waste. We have engaged a third-party vendor to help us reassess our waste reduction road map, recognizing the evolving landscape. This work will help inform our path forward, which we will communicate in future reporting.

Operational Waste Management‡[10]

Waste Metric	2023 (Tons)
Landfill	191
Energy recovery	308
Recycled	332
Composted*	84
Electronics recycling	69
Waste total	984

* Includes a minor portion of waste that was disposed via wet anaerobic digestion.

[9] Decrease in Scope 1 emissions in 2023 is attributed to a combination of data collection enhancements, improved energy efficiency and utilizing a greater proportion of reported data instead of estimates.
[10] This disclosure covers waste generated in the organization's own activities or within the organization's operational control. Exclusions include waste generated from OHA and Retiree, Inc. facilities. Waste metrics include waste that is landfilled, recycled (general and electronics), composted, and energy recovery (from incineration). Metrics are reported in short tons. Approximately 84% of operational waste is based on activity data received from waste removal vendors. For remaining sites, waste is estimated based on volumes from sites where activity data is available for similar activities and headcount of the estimated locations

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 2023, we observed an increase in our business travel emissions (Scope 3.6) from 2022. This increase can be attributed to two factors: increased business travel operations and improved data collection. In the aftermath of the global pandemic, we continue to see travel increasing to levels previously seen in 2018. More business travel accounted for a 32% increase in our air and rail emissions compared with 2022. Additionally, for our 2023 GHG Inventory, we improved our data collection processes to capture air and rail trips that were booked outside of the firm's corporate travel management company. This accounted for a 26% increase from the calculated 2023 business travel emissions booked through the firm's travel management company and resulted in a 67% total increase from 2022 business travel emissions.

Our Travel Policy encourages associates to consider travel options with lower emissions, such as direct flights and traveling by rail instead of air when possible. Our travel provider shows projected emissions associated with employees' travel options to help inform their selection.

We have continued our partnership with Climate Vault, which began in 2022, to invest in climate solutions that address our emissions from travel each year. We will make a donation to Climate Vault to purchase carbon allowances for 8,504 metric tons of CO_2 emissions.[11] This amount approximates total emissions generated from our business travel during 2023. 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 SBTi-accredited service provider. It purchases and "vaults" 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 the CO_2 already in our atmosphere. In addition to annual financial audits, Climate Vault voluntarily requests allowance audits by Baker Tilly US, LLP, which verify that all donations made toward carbon metric tons are purchased in the respective compliance market.[12]

In 2023, T. Rowe Price was the recipient of Climate Vault's Carbon Champion Game Changer award, which celebrates an organization that leads the charge against climate change by making a tangible difference in its own carbon footprint, as well as implementing diverse and creative solutions to deepen its impact. More information is available on Climate Vault's website.[13]

In 2023, we surveyed our associates to understand and report the emissions generated from their commuting. We learned that even with a hybrid work schedule, commuting into work generated 13,252 MT CO_2 coming from our associates' commutes. To encourage the use of electric cars, we provide free charging stations at most of our global facilities, providing access to 82% of our global workforce as of December 31, 2023. For the first time, we have calculated emissions from telework and learned that remote work contributed 3,663 MT CO_2 to our total Employee Commuting (Scope 3.7) emissions.

[11] Climate Vault's purchase of carbon allowances and the effectiveness of such carbon allowances is not subject to review by independent certified public accountants.
[12] Climate Vault does not participate in the Voluntary Carbon Market. Instead, it participates in government-regulated compliance markets and is exempt under California AB 1305.
[13] Hyperlinked information is not subject to review by independent certified public accountants.

Social

5 GENDER EQUALITY

10 REDUCED INEQUALITIES

Human Capital

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.

Diversity in Our Workforce

Associate Promotions

46%
women

21%
underrepresented minorities[1]

Senior-Level Promotions

37%
women

4%
underrepresented minorities[1]

External Hires

41%
ethnically diverse

43%
women

21%
underrepresented minorities[1]

Exits

51%
women

30%
underrepresented minorities[1]

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

Supporting Diversity in Our Workforce‡

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

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 resolve related challenges and concerns.

We have continued to look across our entire organization for ways to further diversify our firm, work toward racial and gender equity, and strengthen a sense of belonging. Our Diversity, Equity, and Inclusion (DEI) programs and expectations are consistently woven throughout our practices and policies on talent acquisition and retention; compensation and benefits; professional development and training; promotions; transfers; associate engagement, outreach, and advocacy; layoffs and terminations; and the ongoing development of an inclusive work environment that allows associates to bring their best selves to work every day. Additional details are available to associates in our Diversity, Equity, and Inclusion Policy.

Total U.S. Workforce[2]

	Male							Female						
EEO Classification	Hispanic or Latinx	White	Black or African American	Native Hawaiian or Other Pacific Islander	Asian	American Indian or Alaska Native	Two or More Races	Hispanic or Latinx	White	Black or African American	Native Hawaiian or Other Pacific Islander	Asian	American Indian or Alaska Native	Two or More Races
Executive management	0.71%	54.61%	4.96%	-	4.96%	-	0.71%	0.71%	28.37%	2.13%	-	2.84%	-	-
Non-executive management	1.50%	45.04%	2.54%	0.06%	9.98%	0.12%	1.04%	1.04%	31.08%	3.23%	-	3.34%	0.12%	0.92%
Professional	2.53%	38.29%	5.13%	0.13%	10.13%	0.13%	1.38%	2.07%	27.63%	5.20%	0.13%	5.79%	-	1.45%
All other employees	3.32%	32.97%	8.03%	0.06%	2.23%	0.12%	1.51%	3.44%	27.05%	16.55%	0.12%	2.48%	0.06%	2.05%
Grand Total	**2.42%**	**39.08%**	**5.17%**	**0.09%**	**7.99%**	**0.12%**	**1.31%**	**2.12%**	**28.41%**	**7.47%**	**0.09%**	**4.25%**	**0.05%**	**1.43%**

[2] To ensure consistency across our reporting and minimize operational burden, we align our disclosure with our EEO-1 data, which does not include an "undisclosed" category. Definitions are based on the U.S. Equal Employment Opportunity Commission's EEO-1 Survey. As of December 31, 2023, our U.S. associate population (regular associate population, excluding interns, fixed terms, and contingent workers) represents 83% of our global workforce. This information includes Oak Hill Advisors, L.P. (OHA), an alternative credit manager that T. Rowe Price Group, Inc., acquired on December 29, 2021.

Diversity by Department

We are proud to continue sharing our progress. This is the fourth time that, in addition to the EEO-1 data, 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, 2023, and exclude interns, fixed-term, and OHA employees.

Investments Group Diversity Breakdown[3]

Gender Representation—Global Population

	Women	Men
Total:* 968	**28%**	**72%**
Portfolio Managers: 171	14%	86%
Analysts: 361	30%	70%
Traders: 97	26%	74%
All Other Roles: 339	34%	66%

Ethnically Diverse—U.S. Population Only

	Ethnically Diverse	Non-ethnically Diverse
Total:* 683	**24%**	**76%**
Portfolio Managers: 126	15%	85%
Analysts: 247	37%	63%
Traders: 66	21%	79%
All Other Roles: 244	16%	84%

Global Distribution and Global Product Group Diversity Breakdown

Gender Representation—Global Population

	Women	Men
Total: 2,927	**48%**	**52%**
Senior Level:** 537	35%	65%
All Others: 2,390	51%	48%

Ethnically Diverse—U.S. Population Only

	Ethnically Diverse	Non-ethnically Diverse
Total: 2,636	**30%**	**70%**
Senior Level:** 438	16%	84%
All Others: 2,198	32%	68%

Corporate Functions Group Diversity Breakdown

Gender Representation—Global Population

	Women	Men
Total: 3,590	**45%**	**55%**
Senior Level:** 462	43%	57%
All Others: 3,128	45%	55%

Ethnically Diverse—U.S. Population Only

	Ethnically Diverse	Non-ethnically Diverse
Total: 2,865	**35%**	**65%**
Senior Level:** 358	20%	80%
All Others: 2,507	37%	63%

*Investments Group consists of Fixed Income, Global Equity, and Multi-Asset business units, which are composed of investment professionals and non-investment professionals.
**Senior level is defined as people leaders and individual contributors with significant business or functional responsibility. Firmwide administrative support staff is included in all others.
[3] Portfolio managers include portfolio manager, regional portfolio manager, sector portfolio manager, and associate portfolio manager.

Attracting and Retaining Diverse Talent

Attracting, retaining, and developing diverse talent positions us to create greater value for our clients through the delivery of an inclusive associate experience.

In 2020, we set aspirational success measures to increase the representation of women globally and underrepresented talent in the U.S.—specifically Black/African American, Hispanic/Latinx, and/or Native American talent—within our workforce and in senior roles by 2025. Our strategy, programs, and investments continue to enable us to make progress against our plan.

In 2022, we met our goal to increase the U.S. percentage of underrepresented talent to 19% three years ahead of our 2025 goal. However, as hiring slowed in 2023, we fell below our goal to 17.5% underrepresented talent in the U.S. We recognize that increasing the diversity of our workforce is a long-term journey—one that we remain steadfastly committed to—and that the pace of progress will fluctuate and sometimes reverse. We believe our 2025 ambition remains achievable, and we continue to prioritize our work to remain an employer of choice.

Developing an Inclusive Culture

Business resource groups (BRGs) provide important perspectives that help shape our company culture, especially in recruitment, talent acquisition, and retention. At the end of 2023, more than 50% of associates were members of at least one BRG, compared with 44% in 2022.

BRGs are open to all associates. These associate-led groups contribute valuable information and insights toward programs to reinforce our inclusive culture, support career development, strengthen our brand in the community, and deliver our services in the marketplace. T. Rowe Price also hosts Diversity Dialogues and listening sessions to advocate for our associates and promote allyship in the workplace.

Our Black Leadership Council, an advisory council to the firm's Management Committee focused on supporting the attraction, development, and retention of talent, hosted the firm's inaugural Black Leadership Summit in partnership with Amplify Voices, an advisory committee providing guidance, cultural insight, and perspective to cultivate inclusivity and career equity. This curated, one-day experience for 140 mid- to senior-level global Black leaders was designed to focus on career growth, professional development, and promoting connectivity and networking among attendees, while strengthening retention and engagement.

Our BRGs Include:

MOSAIC
@ T. Rowe Price

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.

wave
@ T. Rowe Price

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.

PRIDE
@ T. Rowe Price

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

THRIVE
@ T. Rowe Price

As T. Rowe Price's newest BRG, THRIVE promotes awareness, education, and acceptance of the broad spectrum of conditions affecting our associates to create an inclusive, supportive working environment, which fosters a sense of belonging and appreciation of our differences.

VALOR
@ T. Rowe Price

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.

Community Partnerships

To increase and expand the pipeline of diverse candidates, we partner with colleges and universities in the United States, where we focus on deepening recruitment plans for Black/African American and Hispanic/Latinx candidates. Other global initiatives connect with prospective and future underrepresented talent and female candidates from high school, through college, and into graduate school.

We host on-site and virtual mentoring and recruitment initiatives to encourage underrepresented candidates to consider careers in asset management. Our signature programs, including Launching Your Legacy and the Women's Stock Pitch workshop, are a few of the ways in which we strive to introduce early-career diverse talent to our industry and create opportunities for them to bring their perspectives and insight to the firm.

We are proud to have achieved Plan Approved status with the Management Leadership for Tomorrow (MLT) Black and Hispanic Equity at Work Certification. This represents an important milestone as we continue to advance our underrepresented talent strategy and strengthen inclusion broadly. MLT is a national nonprofit organization that supports employers in their DEI journeys.

T. Rowe Price entered the Black Equity at Work certification program in early 2022. Later that year, we announced our participation in the inaugural Hispanic Equity at Work certification program.

Throughout 2023, our DEI team worked with MLT to identify our top priorities. These include:

- Strengthening representation and inclusion for Black and Hispanic talent,
- Growing philanthropic giving that supports Black and Hispanic communities,
- Expanding access and opportunity for diverse suppliers annually, and
- Increasing Black and Hispanic representation in both senior roles and among our Board members over time.

This thorough analysis has enabled the delivery of a solid, actionable strategy that we will execute over the coming months and years.

For the last 17 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 M.B.A. Day hosted in 2023 was no exception, as we welcomed our largest group of students to date. During this three-day signature program, attendee makeup was 47% female, 78% ethnically diverse, and 27% underrepresented talent.

In addition, we have partnered with multiple national organizations, such as National Black MBA Association, the Association of Latino Professionals for America (ALPFA), Grace Hopper, AFROTECH, and others, to create access to diverse talent and to assist us in learning and maintaining best practices.

We continue to incorporate many best practices to cultivate inclusion for veterans, with particular focus on recruitment and retention.

Fostering Inclusive Hiring

Our Diversity Talent Acquisition team, supported by the Global Technology leadership, extended 35 on-site job offers at Grace Hopper, AFROTECH, and the Society of Hispanic Professional Engineers (SHPE). We also expanded our framework to include our corporate business units and extended offers at ALPFA. Going beyond industry norms, we invested in Level Up Labs, Knowledge Share Sessions, and networking events, significantly expanding our diverse talent pool.

Building on this success, the Diversity Talent Acquisition team is now equipping leaders with inclusive hiring practices to embed diversity into our corporate culture. This reflects our commitment to creating a workplace that values and celebrates diverse perspectives.

Annual Employee Turnover[4,5]

Year	Percentage
2023	9%
2022	13%
2021	12%

Global Career Framework

Our Global Career Framework (GCF) is a structure based on tracks and levels that organizes roles across the firm to create clarity around responsibilities and expectations. With standardized descriptions and titles, the framework provides a tool for career development and alignment firmwide. Our learning experience platform, Degreed, is a digital portal for learning, skill building, and career planning. Degreed supports our GCF structure by auto-populating role-based skills for development into an associate's profile. Our GCF and Degreed skill pathways support role clarity and career progression, providing transparency around potential opportunities in other areas of the firm that might align with an associate's current skill set and interests.

Learning and Development

We encourage associates to own their career and partner with their manager to discuss their goals. In addition to formal performance reviews, associates and managers engage in regular development conversations throughout the year. We foster continuous learning by providing associates access to hundreds of live and self-paced training programs, more than 20 certifications, hundreds of Continuing Professional Education and Professional Development Unit credits, and a tuition assistance program.

In addition, Degreed presents learning opportunities customized to associates based on their roles and the focus skills they select. Degreed brings together education, exposure, and experiential opportunities from a variety of firm-endorsed providers such as Udemy, getAbstract, and Amazon Web Services.

[4] This information includes Oak Hill Advisors, L.P. (OHA), an alternative credit manager that T. Rowe Price Group, Inc., acquired on December 29, 2021.
[5] Excludes reductions in force (RIF). This methodology differs from previous years' reporting, which included any RIFs. We believe the current methodology more accurately reflects associates' willingness to pursue careers at T. Rowe Price.

The Career Journey website highlights resources for associates to define, develop, and attain their career goals. Sponsorship, mentorship, and role clarity and transparency support internal mobility and growth. We fill approximately one-third of our open positions with internal applicants, and almost all our portfolio managers have been internal promotions.[6]

Annual Employee Training Hours

Year	Total Hours	Average Hours per Associate	% Associates Completing Optional Training
2023	88K	11.6	90%
2022	205K	27	76%
2021	200K	21	85%
2020	140K	18	89%
2019	190K	26	77%

Mentorship and Sponsorship

T. Rowe Price is committed to the growth and retention of our associates and believes mentoring is one of the most powerful and effective strategies for career development. In 2022, we launched a firmwide mentorship program using MentorcliQ, a full-service mentor matching platform, to increase access to leaders across business units and support associates' development throughout their career journeys. Firmwide enrollment increased from 15% to 18% year on year in 2023 with an overall satisfaction score of 4.3, which exceeds MentorcliQ's average 4.0 out of 5.0 satisfaction score. Our associates have invested 5,630 hours in the program, showing an increase of 32% compared with 2022.

The program enables a 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). Our approach allows us to develop talent and facilitate a culture of inclusive learning across regions and business areas.

T. Rowe Price leverages sponsorship to accelerate the development and advancement of our most talented associates. Our executive-level sponsors serve as career-advancing advocates that take joint ownership of the development and progression of their protégés.

In 2023, we partnered with an external leader in sponsorship to further build the individual and collective sponsorship capability of our senior leaders in the top two levels of the firm. We hosted sessions focused on building executive sponsor capabilities, sharing best practices, and illustrating how our senior leaders can further develop and distinguish their protégés to drive effective outcomes. Sponsorship was also a key component of our Accelerated Leadership Development Experience, a nine-month program for high potential ethnically diverse leaders focused on building executive, global, and business leadership skills and capabilities to strengthen their readiness for future leadership roles.

Leadership Development at Every Level

At T. Rowe Price, all associates are leaders and are expected to maximize potential, drive client value, and activate our culture. We balance business credibility and leadership capability to deliver our strategy, live our values, and generate results for clients. We offer leadership development across four levels of proficiency according to managerial scope and business impact. We align the prioritized leadership skills with our Global Career Framework to provide associates with role transparency, opportunities for career mapping, and internal mobility. In addition, through the provision of corresponding development opportunities, we empower associates to design their personal and professional development path, strengthen their workplace relationships, and, ultimately, accelerate their career progression.

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

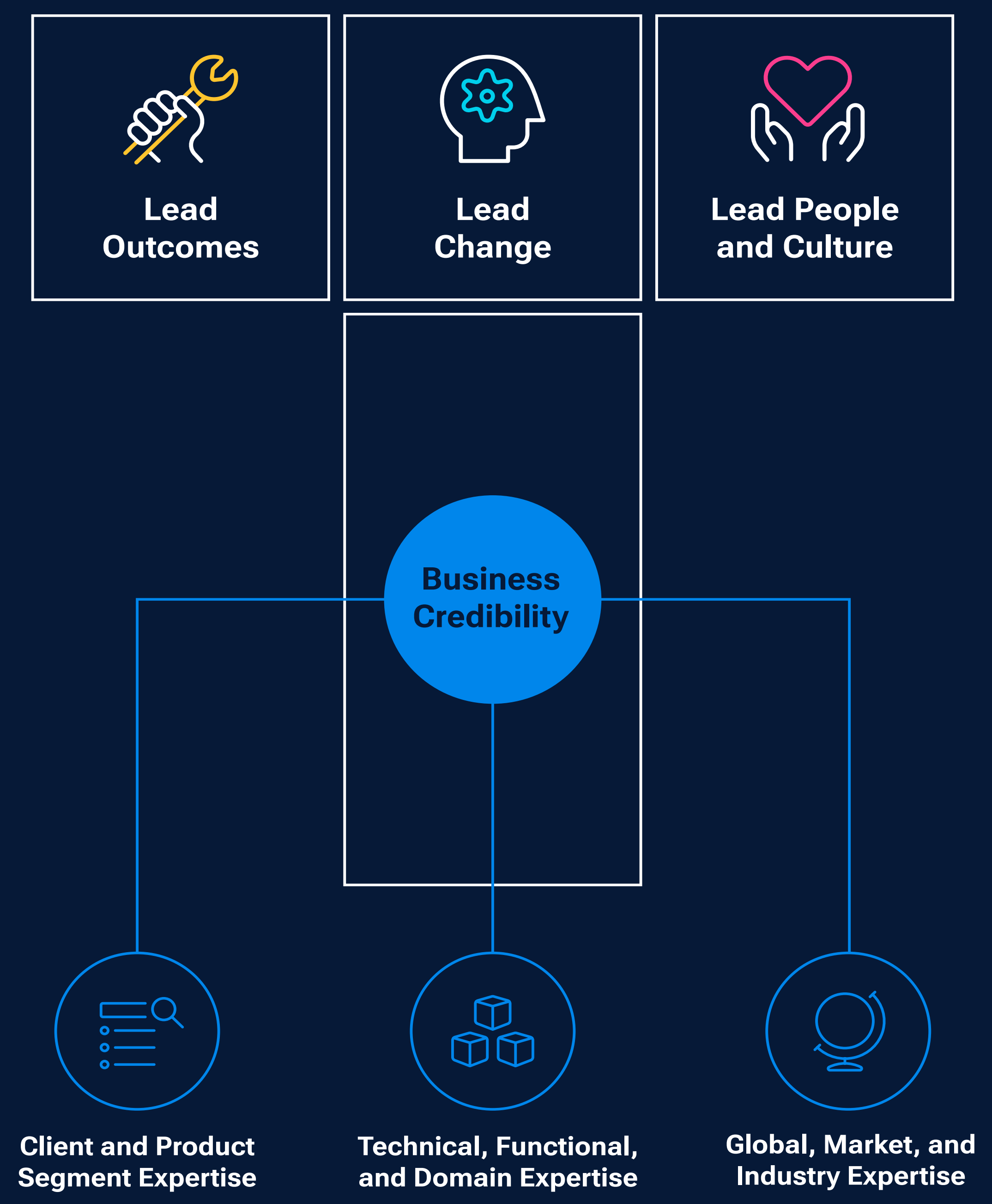
Leadership Training

Fostering strong leadership requires intentional focus. We encourage all associates to align at least one development goal to a leadership capability in our Leadership Framework. We provide learning and development opportunities to all associates to enable strong leadership and performance across the organization.

Cohort and open enrollment programs are available to support both career and leadership development. Additionally, we provide tailored opportunities for target audiences (managers, high-potential talent, and underrepresented talent) to ensure growth for all associates.

We all share responsibility for strengthening our culture of inclusion. Each associate receives a Diversity, Equity, and Inclusion (DEI) performance objective that is cascaded from our CEO and outlines the expectation and accountability we share for achieving our DEI goals.

We intentionally ensure that inclusive practices are woven into our core programs and offer several learning opportunities to better support inclusion and allyship. We make our inclusion programs available to all associates and people leaders. As of year-end, 92% of our people leaders have completed training on managing inclusion, which has set the foundation for continued learning in this space. We design our DEI training to give associates a better understanding of how leaders can achieve a multiplier effect by contributing effectively and strategically through others. Our learning pathways empower associates to design their personal and professional development path.



Ensuring Associates' Voices Are Heard: 2024 Associate Survey Highlights

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

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

79% feel they can get the support they need from their managers.

75% would recommend T. Rowe Price as a great place to work.

71% feel T. Rowe Price has a great culture.

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.

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 associate benefit solutions, including both health care and retirement benefits (where applicable), fitness club reimbursement, life insurance, and an employee assistance program. In the U.S., we provide additional well-being support with access to on-site counselors and personalized assistance and education in all areas of financial planning to support associates' financial well-being. We assess benefit competitiveness and design within the relevant market for a given country and align offerings with our global principles and local market practice. For example, we design retirement programs 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, in the U.S., 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 U.S. 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. The plan also covers eligible travel and lodging expenses should a covered medical service not be available from an in-network provider within a certain distance of an associate's 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, since 2020, the firm also provides wellness days, in recognition of the importance of disconnecting from work and encouraging self-care.

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 sick, personal, sabbatical, military, and organ donor leave, in addition to providing all leave time required by federal and state law, including the Family Medical Leave Act and disability. Our paid time off offerings are available to all full- and part-time associates who work at least 20 hours per week.

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 per week for most of our associates—notable exceptions are in Investments, 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.

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 2023 report can be found here.

Spotlight on Human Rights

We consider the most material human rights issues for operations to encompass:

Nondiscrimination with respect to employment

Gender equality

Working conditions

Safe and healthy working environment

Digital security/privacy

Because our highly skilled office-based workforce operates in countries with lower prevalence of modern slavery and human trafficking according to the Global Slavery Index,[7] we consider the overall risk that our business has directly caused or contributed to these issues to be low.

Our global human resources policies and procedures ensure compliance in all the regions in which we operate. Additional information is available in our Human Rights Policy.

For information on how human rights are considered in our investment decisions, please refer to our Investment Policy on Human Rights.

[7] The Global Slavery Index is a global study of modern slavery, published by the Minderoo Foundation's Walk Free initiative, providing national estimates of modern slavery's prevalence in 160 countries.

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, including 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. We are committed to providing timely notifications of privacy incidents to impacted individuals as appropriate and in compliance with applicable laws.

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 Risk Management and Strategy

T. Rowe Price has a holistic firmwide approach to risk management, including material risks from cybersecurity threats. The firm's overall risk management framework is designed to identify, assess, report, and manage risks that could affect the firm's ability to achieve its objectives and goals. It operates across business lines and includes operational resiliency and technology-related risks, such as cybersecurity threats.

Management is responsible for the firm's day-to-day cybersecurity operations, including identifying key risks from cybersecurity threats specific to our environment, estimating their significance, assessing the likelihood of their occurrence, establishing acceptable risk tolerance levels, and implementing appropriate measures to monitor those risks. Management is also responsible for identifying inadequate controls and developing action plans to address these.

The Board of Directors (Board) oversees the firm's cybersecurity program. The Board does not delegate this responsibility to a Board committee, nor does the Board engage an external cybersecurity expert to make recommendations or provide advice. Instead, many of our directors have significant technology expertise gained over years of experience, and their insight and practical guidance informs both their oversight as well as the continuing investment in and development of our cybersecurity program.

Our chief executive officer (CEO) and president has ultimate responsibility for developing strategy and overseeing execution to meet the firm's objectives. The CEO has delegated to our chief operating officer (COO) oversight of this operational execution. Executive leaders within the COO organization develop and oversee the firm's risk management, technology, and information security practices and play a critical role in cybersecurity risk management and strategy.

The firm's chief risk officer (CRO) leads the Enterprise Risk program, providing the framework and tools used by all business teams across the firm, including technology, to identify, assess, and manage risks from cybersecurity threats. Enterprise Risk provides guidance and support in identifying, assessing, and monitoring all aspects of risks from cybersecurity threats. The Enterprise Risk function conducts risk assessments for technology and cybersecurity and coordinates with Internal Audit and firmwide Compliance to provide risk assurance activities.

Enterprise Risk is primarily responsible for reporting risks from cybersecurity threats to executive leadership and our Enterprise Risk Management Committee (ERMC). The ERMC supports the efforts of the CRO in providing corporatewide oversight of our firm's risk management efforts and provides a path for risk escalation. This committee monitors risk management activities and provides periodic reporting to our Board of Directors and Audit Committee.

T. Rowe Price has documented enterprise incident management and reporting policies and procedures, outlining responsibilities and requirements for escalation of various types of incidents, including those relating to cybersecurity to internal or external parties, as applicable. Our process is designed to investigate incidents efficiently, identify the root cause, communicate with the affected parties as appropriate, spot trends, and recommend improvements to mitigate risk. The escalation protocols are based on defined risk likelihood and impact measures. These procedures incorporate incident materiality determination within senior executive levels and operate firmwide.

Technology and business unit management are also responsible for implementing internal controls to manage risks from cybersecurity threats to an appropriate level in line with the firm's risk appetite. Cybersecurity risks are managed across all lines of business, requiring support and participation across all levels in the organization.

Within Technology, 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 controls, enforce them, and monitor their adherence on an ongoing basis. Enterprise Security also manages annual training for all associates that is focused on raising awareness and highlighting the important role our associates play in protecting the firm from cybersecurity threats. This training is bolstered by regular phishing tests.

Business Continuity and Disaster Recovery programs execute regular testing across business and technology teams to demonstrate resilience. The chief information security officer regularly reviews the cybersecurity program and strategy with various risk committees, including the ERMC, the Management Committee, and the Audit Committee. This ensures risks from cybersecurity threats are properly managed and our enterprisewide cybersecurity program is aligned with the business needs and defined risk tolerances or risk appetite.

We regularly assess the effectiveness of the firm's risk mitigation strategies. This includes third-party validation to help ensure our internal controls and safeguards adhere to security and compliance standards. We undergo external examinations such as Sarbanes-Oxley relating to financial reporting and SOC 1 and/or SOC 2 for key operational business units on an annual basis. In addition, we periodically engage with third-party partners to perform an independent evaluation of our cybersecurity program, as well as external network penetration testing. This complements our internal assessments, such as application security testing, vulnerability management, and penetration testing. The firm participates in various industry threat intelligence information-sharing forums to stay current on evolving cyber risks and threats.

The firm has established hiring practices, together with ongoing training, development, and performance management processes, to ensure associates have the appropriate experience and expertise for their roles. Committees with oversight responsibilities draw on the experience and expertise of their members to carry out their duties.

Within the firm's Procurement Department, our established governance processes include a formal Supplier Risk Management program to oversee third-party relationships based on documented risk thresholds. The Supplier Risk Management program performs regular assessments, including information security reviews. We perform ongoing monitoring through our centralized risk function as well as through business line supplier managers to identify new threats or weaknesses associated with a third-party service. In accordance with our own Enterprise Incident Management Policy, any third-party cybersecurity incident is reported and evaluated for further review and impact analysis.

Cybersecurity risk management practices operate enterprisewide across T. Rowe Price legal entities, including Oak Hill Advisors (OHA). In addition, OHA has established an independent risk committee, which includes responsibilities for prompt escalation of key risks and incidents such as cybersecurity to the T. Rowe Price CRO.

Supply Chain

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. This is accessible to suppliers via the Supplier Resource Portal site. 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

Our supplier diversity program promotes relationships with small and diverse business owners, including women, ethnic minorities, veterans, service-disabled veterans, disabled, LGBTQ+, and small disadvantaged-owned business enterprises. We have a three-year strategy to increase our engagement with these businesses, execute initiatives to improve program visibility, and invest in the development of suppliers in the diverse and small business community.

In 2023, we focused on growth and development initiatives. We created a Supplier Development and Learning event called Supplier Learning Day to encourage a two-way knowledge exchange between T. Rowe Price and small and diverse-owned businesses. The workshop marked the first supplier-focused event hosted by T. Rowe Price, featuring 15 current and potential suppliers seeking opportunities to grow their current footprint at T. Rowe Price or join our supply chain. The goal is to educate entrepreneurs on critical subjects that will equip them to navigate the constantly evolving procurement process with confidence. We also executed additional development initiatives to create greater opportunities for contract engagement, such as Tier 2 (Subcontracting) partnerships in key contracting categories, to increase opportunities for including diverse and small businesses in targeted contracting categories.

With these program adjustments, we achieved our aspirational goal to spend USD 50 million annually with diverse-owned and disadvantaged-owned small businesses in the U.S., with a total spend of USD 50.5 million, representing 3.7% of our total corporate addressable spend.

Furthermore, we increased our advocacy and activity with national and regional organizations supporting small and diverse business owners to amplify our supplier diversity programming in the community. T. Rowe Price sponsored and took part in the 2023 National Minority Supplier Development Council (NMSDC) Annual Conference and Business Exchange held in the City of Baltimore, which attracted over 5,000 corporate CEOs, procurement executives, supplier diversity professionals, and leading minority business owners nationwide. Thousands of minority-owned and small local businesses attended the Business Exchange fair to network and connect with corporations and government agencies, including T. Rowe Price, who supplied information about our Supplier Diversity program, our commitment, and how to engage.

We plan to stand on our established foundational practices, adopting a data-driven program focused on developing, cultivating, and integrating diverse, small businesses into our supply base. We will work to sustain and build on our progress by solidifying and maintaining relationships with diverse third-party certified businesses.

Community Investment

Opportunity for all: We pride ourselves on making an impact far beyond our walls, supporting positive change in the communities where we live and work. We leverage the skills, resources, and expertise of our associates and philanthropic arm—the T. Rowe Price Foundation—to harness our collective power to invest in opportunities that enrich lives and enable equitable solutions.

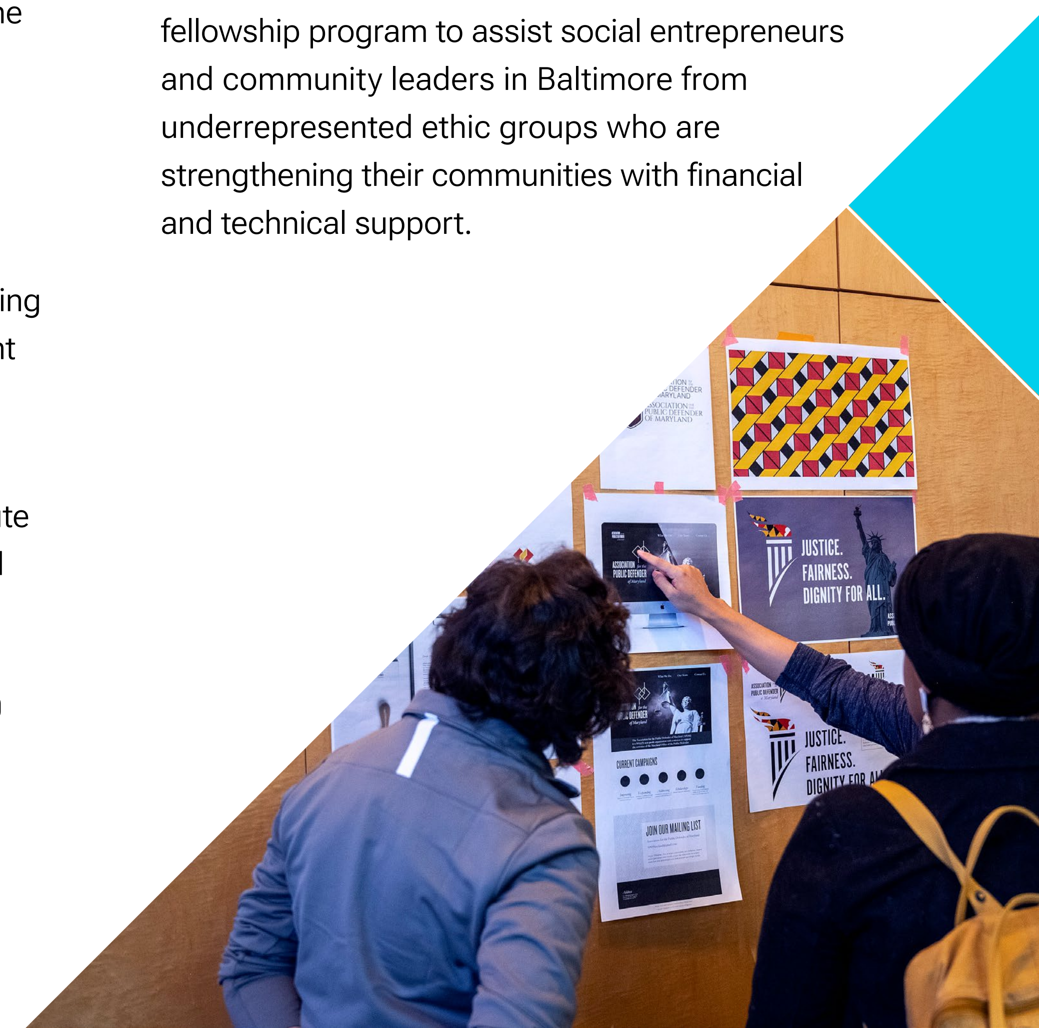
We expand opportunities in our communities by breaking down barriers to advance growth and learning. Our efforts come to life through deep relationships that include pro bono and volunteer opportunities and experiences, grantmaking, associate giving, community partnerships, and signature programming.

T. Rowe Price Foundation

The firm's philanthropic Foundation was founded in 1981 and has been steadfastly committed to its mission of pursuing the long-term success of communities where T. Rowe Price associates live and work. The Foundation aims to help advance community goals and build strong nonprofit leaders and organizations. Through grantmaking, we support organizations that are making a difference in areas such as youth empowerment, racial equity, creativity and innovation, and financial well-being.

Since its inception and through December 2023, the T. Rowe Price Foundation has provided USD 182.3 million in direct grants and matching gifts. Total direct grant giving in 2023 was USD 5.5 million. Since 2016, the firm's nonprofit capacity-building program has served more than 830 nonprofits and more than 8,681 participants, aimed at strengthening organizational health and professional development opportunities for the nonprofit community. A few recent initiatives include:

- **DesignFest**, in partnership with Maryland Institute College of Art, connects pro bono designers and marketers from all over the U.S. with nonprofits seeking marketing and branding support in an energetic one-day design-a-thon. More than 100 organizations have received nearly 1 million in in-kind support through this program.
- **One Book Baltimore** promotes citywide dialogue of peace and nonviolence for students and families, all by reading the same book. Since 2018, One Book Baltimore has engaged nearly 11,000 students annually in reading and dialogue, led by the Enoch Pratt Free Library.
- As a lead funder of the **Baltimore Arts Education Initiative**, spearheaded by Arts Every Day, this program aims to ensure that all Baltimore City public school students have access to high-quality, sequential arts education in grades K–12.
- T. Rowe Price co-created the ***Elevation Awards*** fellowship program to assist social entrepreneurs and community leaders in Baltimore from underrepresented ethic groups who are strengthening their communities with financial and technical support.



Humanitarian Response

We leverage our global partnerships with organizations such as the Center for Disaster Philanthropy to identify areas of humanitarian response and relief opportunities through direct donations, associate giving, and the firm's matching gifts programs. Last year, the firm donated more than $500,000 to support organizations around the world to lift communities and people experiencing hardships because of disasters.

Supporting Communities Through Service and Donations

The firm's associates bring a spirit of generosity of spirit to everything they do, volunteering countless hours assisting and leading nonprofits and donating their time, talents, and resources to support communities around the world. Associates actively engage in workplace giving and individual and team volunteer opportunities, board leadership and service, and the firm's matching gifts program. 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

The firm hosts year-round volunteer events that represent associates' interests and skills. To support pro bono volunteer opportunities, T. Rowe Price partners with Business Volunteers Maryland to facilitate nonprofit consulting projects through scope-athon style events called skillCONNECT. Teams of T. Rowe Price volunteers offer their expertise and consultative skills to assist the nonprofits in navigating business challenges related to strategic planning, finance, fundraising, human resources, marketing, and more. In 2023, we provided 75 hours in pro bono consulting services through skillCONNECT.

Expanding Access to Capital

In June 2023, we committed to a $50 million investment in CNote, a women-led social enterprise that helps to create jobs and invest in financially underserved communities in the U.S. CNote serves as a single point of investment for cash deposits into financial institutions that provide small business loans to diverse and women entrepreneurs. Our social impact investment in CNote is being allocated across more than 3,000 certified community financial institutions in the U.S. based on criteria we selected to help address the racial wealth gap. These include:

- Supporting affordable housing and mortgages,
- Access to banking and financial health,
- Business investment, and
- Diverse workforce training and development.

2023 Giving by the Numbers

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 2023 community investments included:

USD 6.5M in matching gifts

USD 15.6M in associate giving[1]

32,000+ volunteer hours

368 associates serving on **440** nonprofit boards

[1] Includes donations matched within and external to the firm's giving platform.

To Learn 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.

ESG Investment Approach >

Leadership >

Policies >

Diversity, Equity, and Inclusion >

Glossary of Terms

Acute Risks – Events/Disruptions: Event-driven physical risks emanating from climate change, including increased severity of extreme weather events, such as cyclones, hurricanes, or floods.

Biodiversity: The variety of plant and animal species on Earth, their habitats, and the ecological processes that sustain them.

Bloomberg Industry Classification Standard: The Bloomberg Industry Classification Standard (BICS) classifies companies by tracking their primary business as measured first by source of revenue and second by operating income, assets, and market perception.

Carbon Footprint: Carbon footprint is the total amount of greenhouse gas (GHG) emissions, usually measured in carbon dioxide equivalents (CO_2e), caused by an individual, organization, product, or activity.

Chronic Physical Risks – Events/Implications: Physical risks emanating from climate change that are long term in nature, such as longer-term shifts in precipitation and temperature and increased variability in weather patterns (e.g., sea level rise).

Circular Economy: An economic model that aims to minimize waste and maximize resource efficiency by promoting the recycling, reuse, and regeneration of materials.

Climate Scenario Analysis: Climate scenario analysis (CSA) is the process of assessing the potential impacts of different climate change scenarios on an organization's operations, financials, and strategies. It helps identify risks and opportunities related to climate change.

Climate Value at Risk: Climate value at risk (VaR) is an output of climate scenario analysis. It is designed to provide a forward-looking and return-based valuation assessment to measure climate-related risks and opportunities in an investment portfolio. It offers insights into how climate change could affect company valuations.

Disorderly Transition: A disorderly transition refers to a particular climate scenario. The representative scenario for a disorderly transition shows a much more challenging pathway to meeting the Paris Climate Agreement targets.

Energy Transition: The shift away from the current energy system to one that emits low to zero GHG emissions. This is achieved through the use of energy efficiency measures and the shift to cleaner and more sustainable energy sources, such as renewable energy (solar, wind, hydropower).

Enterprise Value Including Cash: Enterprise value including cash (EVIC) is an alternate measure to enterprise value (EV) to estimate the value of a company by adding back cash and cash equivalents to EV. The underlying data used for EVIC calculation are sourced from a company's accounting year-end annual filings. EVIC is updated and reflected once a year as the data are sourced annually.

ESG Integrated Disclosure Project: Please refer to www.esgidp.org/ for more information.

Exposure to Climate Solutions: Percentage of revenues or use of proceeds aligned to economic activities that are climate solutions (i.e., renewable energy generation, sustainable agriculture, etc.).

Financed Carbon Emissions (tons CO_2e/USD million invested): Allocated emissions to all financiers (EVIC) normalized by USD million invested. Measures the carbon emissions, for which an investor is responsible, per USD million invested, by their equity ownership. Emissions are apportioned based on equity ownership (% market capitalization).

Financed Carbon Intensity (tons CO_2e/USD million revenue): Allocated emissions per allocated revenue. Measures the carbon efficiency of a portfolio, defined as the ratio of carbon emissions for which an investor is responsible to the revenue for which an investor has a claim by their equity ownership. Emissions and revenue are apportioned based on equity ownership (% market capitalization).

Financed Emissions: Financed emissions are those generated as a result of financial services, investments, and lending by investors and companies that provide financial services.

Global Industry Classification Standard: The Global Industry Classification Standard (GICS®) classifies companies in the subindustry that most closely describe the business activities that generate the majority of the company's revenues.

Implied Temperature Rise: The Implied Temperature Rise metric provides an indication of how companies and investment portfolios align to global climate targets. Expressed in degrees Celsius (°C), it estimates the global implied temperature rise (in the year 2100 or later) if the whole economy had the same carbon budget over-/undershoot level as the company (or portfolio) in question.

Nationally Determined Contribution: The nationally determined contribution (NDC) is where countries set targets for mitigating the greenhouse gas emissions that cause climate change and for adapting to climate impacts through a climate action plan that is updated every five years. The plans define how to reach the targets, as well as elaborate systems to monitor and verify progress so it stays on track.

Network for Greening the Financial System: The Network of Central Banks and Supervisors for Greening the Financial System (NGFS) is a group of central banks and supervisors willing, on a voluntary basis, to exchange experiences, share best practices, contribute to the development of environment and climate risk management in the financial sector, and mobilize mainstream finance to support the transition toward a sustainable economy. Its purpose is to define and promote best practices to be implemented within and outside of the Membership of the NGFS and to conduct or commission analytical work on green finance.

Net Zero Asset Managers initiative (NZAM): Please refer to https://www.netzeroassetmanagers.org/ for more information.

Net Zero Status: Net zero status indicates the level of alignment a company has with a 1.5°C warming scenario. The net zero status alignment scale includes:

- **Achieving:** Company is already achieving the emissions intensity required by the sector and regional pathway to stay within a 1.5°C warming scenario and whose ongoing investment plan or business model is expected to maintain this performance
- **Aligned:** Company has a 2050 net zero target that is supported by 1.5°C-aligned short- and medium-term targets, exhibits GHG emissions intensity performance in line with its targets, and has a credible decarbonization plan and capex alignment
- **Aligning:** Company has 1.5°C-aligned short- and medium-term targets and has a credible decarbonization plan
- **Committed:** Company has a 2050 net zero target
- **Not Aligned:** Company does not have adequate GHG reduction targets, disclosure, or performance to qualify for Achieving, Aligned, Aligning, or Committed status
- **Out of Scope:** Asset class is not yet covered by Paris Aligned Investment Initiative (PAII) Net Zero Investment Framework

Orderly Transition: An orderly transition refers to a particular climate scenario. The representative scenario for an orderly transition assumes immediate action is taken to reduce emissions consistent with the Paris Climate Agreement.

Paris Aligned Investor Investment (PAII) Net Zero Investment Framework: Please refer to parisalignedassetowners.org/media/2021/03/PAII-Net-Zero-Investment-Framework_Implementation-Guide.pdf for more information.

Responsible Investing: Responsible investing includes a variety of activities, such as ESG integration, stewardship, management of exclusion lists, security- or industry-level research, and thematic research.

Science Based Targets initiative: Please refer to sciencebasedtargets.org/ for more information.

Scope 1, 2, and 3 Greenhouse Gas Emissions: Corporate greenhouse gas emissions are broken down into Scope 1, 2, and 3, where Scope 1 and 2 emissions represent those under the company's direct control and Scope 3 emissions represent those in a company's upstream and downstream value chain.

- Scope 1–refers to all direct emissions
- Scope 2–refers to indirect emissions from consumption of purchased electricity, heat, or steam
- Scope 3–refers to other indirect emissions not covered in Scope 1 and 2 that occur in the value chain of the reporting company, including both upstream and downstream emissions. Scope 3 emissions could include the extraction and production of purchased materials and fuels, transport-related activities in vehicles not owned or controlled by the reporting entity, electricity-related activities, e.g., transmission and distribution losses, outsourced activities, and waste disposal.

Sustainability Accounting Standards Board (SASB): Please refer to sasb.org/ for more information.

Task Force on Climate-Related Financial Disclosures (TCFD): Please refer to fsb-tcfd.org/ for more information.

Total Financed Carbon Emissions (tons CO_2e): Allocated emissions to all financiers/enterprise value including cash (EVIC). Measures the total carbon emissions for which an investor is responsible by their equity ownership. Emissions are apportioned based on equity ownership (% market capitalization).

Transition Plan: Refers to an aspect of an organization's overall business strategy that lays out a set of targets and actions supporting its transition toward a low-carbon economy, including actions such as reducing its GHG emissions.

Appendix

Task Force on Climate-Related Financial Disclosures (TCFD) Disclosure Index

Metrics not included were deemed not applicable or immaterial.

Recommended Disclosure	Sections
Governance	
A. Describe the board's oversight of climate-related risks and opportunities	▪ Committees With ESG Oversight, page 12
B. Describe management's role in assessing and managing risks and opportunities	▪ Management's Role, page 14
Strategy	
A. Describe the climate-related risks and opportunities the organization has identified over the short, medium, and longer terms	▪ Climate-Related Risks and Mitigation Strategies, page 37
B. Describe the impact of the climate-related risks and opportunities on the organization's business, strategy, and financial planning	▪ Climate-Related Risks and Mitigation Strategies, page 37 ▪ Consideration in Investment Products and Strategies, page 40 ▪ Consideration in Operational Strategy, page 47
C. Describe the resilience of the organization's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario	▪ Climate Scenario Analysis, page 43

Risk Management

A. Describe the organization's processes for identifying and assessing climate-related risks	▪ Our Risk Management Framework, page 51 ▪ Implications of Increasing Global Regulation, page 51 ▪ Analyzing Investment Risks, page 52 ▪ Climate Stewardship, page 52
B. Describe the organization's processes for managing climate-related risks	▪ Our Risk Management Framework, page 51 ▪ Implications of Increasing Global Regulation, page 51 ▪ Analyzing Investment Risks, page 52 ▪ Climate Stewardship, page 52 ▪ Process for Managing Climate-Related Risks, page 53
C. Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management	▪ Our Risk Management Framework, page 51 ▪ Process for Managing Climate-Related Risks, page 53

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	▪ Our Approach, page 54 ▪ Measuring the Climate Impacts of Our Investments, page 54 ▪ Measuring the Climate Impacts of Our Operations, page 60
B. Disclose Scope 1 and 2 and, if appropriate, Scope 3 greenhouse gas (GHG) emissions and related risks	▪ Measuring the Climate Impacts of Our Investments, page 54 ▪ Measuring the Climate Impacts of Our Operations, page 60
C. Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets	▪ Measuring the Climate Impacts of Our Investments, page 54 ▪ Measuring the Climate Impacts of Our Operations, page 60

Investor Climate Action Plan Index

Topic	Section
Investment	
Strategy	▪ Responsible Investing, page 21 ▪ Investment Products With ESG Mandates, page 25
Risk management	▪ Climate-Related Risks and Mitigation Strategies, page 37 ▪ Consideration in Investment Products and Strategies, page 40 ▪ Climate Scenario Analysis, page 43
Asset allocation	▪ Investments and Products, page 35
Additional target setting	▪ Consideration in Investment Products and Strategies, page 40 ▪ Climate Scenario Analysis, page 43 ▪ Measuring the Climate Impacts of Our Investments, page 54 ▪ Measuring the Climate Impacts of Our Operations, page 60
Corporate Engagement	
Collective/collaborative engagement	▪ Policy and Engagement, page 29
Bilateral engagement	▪ Proxy Voting, page 26 ▪ Climate Stewardship, page 52
Corporate escalation and shareholder engagement	▪ Proxy Voting, page 26

Policy Advocacy

Investor statements	▪ Policy and Engagement, page 29
Lobbying	▪ Policy and Engagement, page 29
Advocacy	▪ Policy and Engagement, page 29

Investor Disclosure

Commitments, objectives, and targets	▪ Strategy, page 33
Carbon emissions	▪ Our Approach, page 54; ▪ Measuring the Climate Impacts of Our Investments, page 54 ▪ Measuring the Climate Impacts of Our Operations, page 60
Portfolio assessment	▪ Climate Scenario Analysis, page 43
TCFD alignment	▪ About This Report, page 3 ▪ TCFD Disclosure Index, page 89
Assessment of disclosures	▪ About This Report, page 3

Governance

Policy	▪ Responsible Investing, page 21 ▪ Proxy Voting, page 26
Accountability	▪ Committees With ESG Oversight, page 12 ▪ Management's Role, page 14
Planning and evaluation	▪ Our Approach, page 54 ▪ Measuring the Climate Impacts of Our Investments, page 54 ▪ Measuring the Climate Impacts of Our Operations, page 60
Board reporting	▪ Committees With ESG Oversight, page 12 ▪ Management's Role, page 14
Skills assessment	▪ Training on ESG Topics, page 17

Sustainability Accounting Standards Board (SASB) Disclosure Index

Metrics not included were deemed not applicable or immaterial.

Disclosure topic	Code	Accounting metrics	Response
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	As of December 31, 2023, out of 1,304 covered employees,[1] 15 of our registered representatives had disclosures of investment-related investigations, client-initiated complaints, private civil litigations, or other regulatory proceedings.[2] This represents 1% of our total "covered employee" population as of year-end. Registered representatives are subject to providing accurate information at the time of employment, during the Annual Compliance Certification, and on their Form U4 and Form U5, which are filed with the Central Registration Depository of the Financial Industry Regulatory Authority (FINRA). The Legal Registration Group (LRG) assists all T. Rowe Price registered representatives with the maintenance of these forms. Registered representatives are also required to complete an annual training that details disclosure requirements and timelines. Email reminders detailing the types of disclosable events and the 30-day requirement are sent to all registered representatives on a monthly basis, and responses are monitored by the LRG. On a monthly basis, the LRG reviews self-reported disclosures from the previous month to ensure disclosure on FINRA Form U4 as applicable.
	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, 2023, T. Rowe Price did not sustain any monetary losses due to 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	▪ Responsible Marketing, page 19

[1] "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).
[2] 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.

Disclosure topic	Code	Accounting metrics	Response
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	▪ Supporting Diversity in Our Workforce, page 68
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	▪ Investment Products With ESG Mandates, page 25
	FN – AC – 410 A.2	Description of approach to incorporation of ESG factors in investment and/or wealth management processes and strategies	▪ Responsible Investing, page 21 ▪ Accountability, page 15
	FN – AC – 410 A.3	Description of proxy voting and investee engagement policies and procedures	▪ Proxy Voting, page 26
Business ethics	FN – AC – 510 A.1	Total amount of 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 regulation	For the year ended December 31, 2023, T. Rowe Price did not sustain any monetary losses due to 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	▪ Whistleblower Policies and Procedures, page 20
Activity metrics[3,4,5]	FN – AC – 000.A	Total registered assets under management (AUM) as of December 31, 2023	USD 1,231.7 billion
		Total unregistered AUM as of December 31, 2023	USD 212.8 billion
	FN – AC – 000.B	Total assets under custody and supervision as of December 31, 2023	We do not believe this is an applicable metric. However, total AUM is applicable, which as of December 31, 2023 was USD 1,444.5 billion

[3] Includes Oak Hill Advisors, L.P. (OHA), an alternative credit manager that T. Rowe Price Group, Inc., acquired on December 29, 2021.
[4] 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.
[5] 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 the accounts that are classified as unregistered AUM are third-party accounts and 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.

Report of Independent Certified Public Accountants

GrantThornton

GRANT THORNTON LLP
1000 Wilson Blvd., Suite 1600
Arlington, VA 22209

D +1 202 521 1535

REPORT OF INDEPENDENT CERTIFIED PUBLIC ACCOUNTANTS

To the Nominating and Corporate Governance Committee of the Board of Directors
T. Rowe Price Group, Inc.

We have reviewed the accompanying Task Force on Climate-Related Financial Disclosures ("TCFD"), Sustainability Accounting Standards Board ("SASB") disclosures, Scope 1 greenhouse gas ("GHG") emissions, Scope 2 GHG (location-based and market-based) emissions and Operational Waste information (collectively, the "Subject Matter") of T. Rowe Price Group, Inc. (the "Company") as specified in Note 1 below as of and for the year ended December 31, 2023. The Company's management is responsible for presenting the Subject Matter based on the criteria as described in Note 1 below (the "Criteria"). Our responsibility is to express a conclusion on the Subject Matter based on our review.

Our review was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. Those standards require that we plan and perform the review to obtain limited assurance about whether any material modifications should be made to the Subject Matter in order for it to be based on the criteria. The procedures performed in a review vary in nature and timing from, and are substantially less in extent than, an examination, the objective of which is to obtain reasonable assurance about whether the Subject Matter is based on the criteria, in all material respects, in order to express an opinion. Accordingly, we do not express such an opinion. Because of the limited nature of the engagement, the level of assurance obtained in a review is substantially lower than the assurance that would have been obtained had an examination been performed. We believe that the review evidence obtained is sufficient and appropriate to provide a reasonable basis for our conclusion.

We are required to be independent and to meet our other ethical responsibilities in accordance with relevant ethical requirements related to the engagement.

The procedures we performed were based on our professional judgment and consisted primarily of:

- Inquiries of management,
- Inspection of selected internal and external documents or inspection of evidence of Company personnel reviewing internal or external documents,
- Observation of Company personnel obtaining relevant information from internal or external sources
- Performing analytical procedures

GrantThornton

In addition, we obtained an understanding of the Company's business processes relevant to the review in order to design appropriate procedures.

The preparation of information supporting the Subject Matter, including the Company's incorporation of ESG factors into its investment processes and strategies and the Company's future goals, targets, and commitments, requires management to determine materiality for sustainability-related issues, identify sustainability-related issues affecting the Company's current operations and financial position or that may affect its future operations or financial position, establish the criteria for measurement of metrics, make determinations about the relevancy of information to be included, and make estimates and assumptions that affect the reported information. Different entities may make different but acceptable interpretations, determinations, and estimates. The sustainability-related financial disclosures include information regarding the potential future financial impact on the Company's operations, including revenues, expenditures, assets and liabilities, and capital and financing. Actual results in the future may differ materially from management's present assessment of this information because possible future events and circumstances, if they should occur, may not occur in the manner described or in the specified timeframe. Specific to incorporation of ESG factors into the Company's investment processes and strategies, the actual achievement of the related sustainability objectives may differ materially from the intended objective or may not occur in the manner described or in the specified timeframe. Further, disclosures related to future goals, targets and commitments include discussion of the Company's current strategy, policies, processes, and future performance objectives for a variety of sustainability topics. The actual achievement of the related sustainability objectives may differ materially from the intended objective or may not occur in the manner described or in the specified timeframe.

Our report relates to the specific TCFD information, SASB disclosures, greenhouse gas emissions information, and waste metrics identified in Note 1 below. We were not engaged to, and did not, review any other data, disclosures, or elements of the T. Rowe Price 2023 Sustainability Report. Accordingly, we do not express a conclusion or any other form of assurance on any amounts or disclosures included within the T. Rowe Price 2023 Sustainability report other than those specified in Note 1 below.

Based on our review, we are not aware of any material modifications that should be made to the Subject Matter as of and for the year ended December 31, 2023, in order for it to be based on the Criteria set forth in Note 1.

Grant Thornton LLP

Arlington, Virginia
May 23, 2024

GrantThornton

Note 1

Subject Matter		Criteria
Committees with ESG Oversight disclosures	Page 12	Global Reporting Initiative ("GRI") 1: Foundation 2021, Section 4: Reporting Principles
Management's Role disclosures	Page 14	
Accountability chart	Page 15	
Climate-Related Risks and Mitigation Strategies disclosures	Pages 37 - 40	
Consideration in Investment Products and Strategies disclosures	Pages 40 - 41	
Product & Mandates: Net Zero Solutions disclosures	Pages 42 - 43	
Products & Mandates: Blue Bond Capability disclosures	Page 43	
Identifying Opportunities for New Product Offering disclosures	Page 43	
Consideration in Operational Strategy disclosures	Pages 47 - 50	
Our Risk Management Framework disclosures	Page 51	
Implications of Increasing Global Regulation disclosure	Pages 51 - 52	
Analyzing Investment Risks disclosures	Page 52	
Climate Stewardship disclosures	Pages 52 - 53	
Process for Managing Climate Related Risk disclosures	Page 53	
Our Approach disclosures	Page 54	
Measuring the Climate Impacts of Our Operations disclosures	Page 60	
Scope 1 and 2 Emissions Target disclosures	Pages 63 - 64	
Reducing Operational Waste disclosures (exclusive of Operational Waste Management table)	Page 64	
Working with Our Supply Chain Disclosures	Page 65	
Business Travel and Commuting disclosures	Page 65	

Grant Thornton

Operational Waste Management table and disclosures	Page 64	Developed by management – the metrics measure waste expressed as an absolute measurement of the identified activity to the stated benchmark)
2023 Total Scope 1 Emissions:	681 MT CO_2e	World Resources Institute and World Business Council for Sustainability Development Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition) and the GHG Protocol Scope 2 Guidance
2023 Total Scope 2 Emissions (Location-Based)	18,340 MT CO_2e	
2023 Total Scope 2 Emissions (Market-Based)	18,649 MT CO_2e	
Purchased Electricity Location-Based	17,894 MT CO_2e	
Purchased Electricity Market-Based	18,203 MT CO_2e	
Purchased Steam	446 MT CO_2e	
Inventory Boundary and Methodology disclosures regarding Scope 1 and Scope 2 emissions (including table)	Pages 61 - 62	
SASB disclosure Code FN-AC-270A.1	Page 94	IFRS SASB Standards "Asset Management & Custody Activities Sustainability Accounting Standard" October 2018, revised December 2021
SASB disclosure Code FN-AC-270A.2	Page 94	
SASB disclosure Code FN-AC-270A.3 (inclusive of all Responsible Marketing disclosures)	Pages 19 - 20	
SASB disclosure Code FN-AC-330A.1 (inclusive of all Supporting Diversity in our Workforce disclosures and Total U.S. Workforce table)	Page 68	
FN-AC-410A.2 (inclusive of all Responsible Investing disclosures, RIIM Frameworks Across Asset Classes disclosures, Asset Class Considerations tables and disclosures)	Pages 21 - 24	
FN-AC-410A.3 (inclusive of all Proxy Voting disclosures and tables)	Pages 26 - 28	
FN-AC-510A.1	Page 95	
FN-AC-510A.2 (inclusive of all Whistleblower Policies and Procedures disclosures)	Page 20	
FN-AC-000.A	Page 95	
FN-AC-000.B	Page 95	

IMPORTANT INFORMATION

The Global Industry Classification Standard ("GICS") was developed by and is the exclusive property and a service mark of Morgan Stanley Capital International Inc. ("MSCI") and Standard & Poor's, a division of The McGraw-Hill Companies, Inc. ("S&P") and is licensed for use by T. Rowe Price. Neither MSCI, S&P nor any third party involved in making or compiling the GICS or any GICS classifications makes any express or implied warranties or representations with respect to such standard or classification (or the results to be obtained by the use thereof), and all such parties hereby expressly disclaim all warranties of originality, accuracy, completeness, merchantability and fitness for a particular purpose with respect to any of such standard or classification. Without limiting any of the foregoing, in no event shall MSCI, S&P, any of their affiliates or any third party involved in making or compiling the GICS or any GICS classifications have any liability for any direct, indirect, special, punitive, consequential or any other damages (including lost profits) even if notified of the possibility of such damages.

This report contains certain information (the "Information") sourced from and/or ©MSCI ESG Research LLC, or its affiliates or information providers (the "ESG Parties") and may have been used to calculate scores, ratings or other indicators. The Information may only be used for your internal use, may not be reproduced or redisseminated in any form and may not be used as a basis for or a component of any financial instruments or products or indices. Although they obtain information from sources they consider reliable, none of the ESG Parties warrants or guarantees the originality, accuracy and/or completeness, of any data herein and expressly disclaim all express or implied warranties, including those of merchantability and fitness for a particular purpose. None of the Information is intended to constitute investment advice or a recommendation to make (or refrain from making) any kind of investment decision and may not be relied on as such, nor should it be taken as an indication or guarantee of any future performance, analysis, forecast or prediction. None of the ESG Parties shall have any liability for any errors or omissions in connection with any data or Information herein, or any liability for any direct, indirect, special, punitive, consequential or any other damages (including lost profits) even if notified of the possibility of such damages.

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

202404-3491729