T.RowePrice

2024 TCFD Report

Task Force on Climate-Related Financial Disclosures (TCFD) Report for T. Rowe Price Group, Inc.

Issued June 2025

INVEST WITH CONFIDENCE®

About This Report

Our 2024 TCFD Report covers the operations of T. Rowe Price Group, Inc.

T. Rowe Price Group, Inc., is a holding company that directly or indirectly owns the various T. Rowe Price corporate entities, including T. Rowe Price Associates, Inc. (TRPA), T. Rowe Price Investment Management, Inc. (TRPIM), and Oak Hill Advisors L.P. (OHA). The qualitative statements and quantitative metrics within this report are representative of all three entities unless otherwise noted. While OHA is included within the firm's disclosures where material, it operates as a stand-alone business within T. Rowe Price Group, Inc., with autonomy over its investment processes and entity commitments. OHA maintains its own culture and associates, including its own ESG team. OHA's ESG Report provides additional details on related activities.

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 54 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), a subsidiary of TRPA, is in scope and will publish its 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 ended December 31, 2024, 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.

Our Position on Climate Change

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. We advocate for greater transparency for climate-related information and data.
- **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 year-end 2040. 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.

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. With the interests of our corporate stockholders and investment clients being unique and distinct, our governance structure includes separate Boards of Directors to represent the firm and our investment products.

The Board represents a group of leaders, elected by our stockholders annually, with a range of backgrounds, experience, education, and skills. The Board continually evaluates the needs of the firm, assessing and monitoring 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, 56% joined the Board within the last six years; the average independent director tenure is seven 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 Board is composed of well-rounded, experienced leaders with skills and qualifications gained over the course of their careers, complementary to each other and relevant to T. Rowe Price's business. We believe our Board has the appropriate knowledge and experience to oversee any sustainability-related risks and opportunities that are financially material to our firm. The Board historically has valued varying perspectives brought by individuals of differing backgrounds and experiences. Our Board is not just composed of individuals knowledgeable about our business, but is also reflective of our clients, the communities we serve, and our stakeholders. We consider diversity as a factor relevant to any particular nominee and to the overall composition of our Board.

Director Engagement

In 2024, the Board held seven meetings and approved one matter via unanimous written consent. Each director attended at least 75% of the combined total number of Board meetings and Board committee meetings 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 2024. In keeping with our Corporate Governance Guidelines, all directors are expected to attend the annual meeting of stockholders.

Committees of the Board of Directors

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

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.

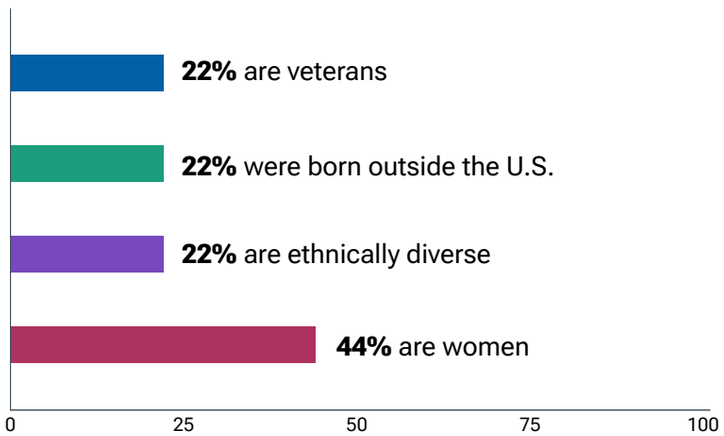
Director Qualifications, Attributes, and Skills (as of December 31, 2024)

The chart below summarizes the specific qualifications, attributes, and skills for each director. 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.

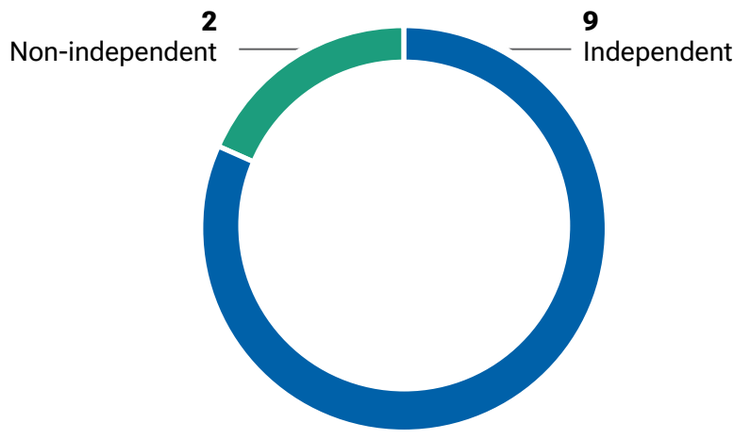
Name	Executive Leadership	Financial Management	Investment Management Industry	International Business Experience	Technology	Strategy Formation/ Execution	Marketing/ Distribution	Government/ Regulatory
Robert W. Sharps	■	■	■	■		■	■	
Glenn R. August	■	■	■	■		■	■	
Mark S. Bartlett	■	■				■		■
William P.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

Independent Directors (as of December 31, 2024)

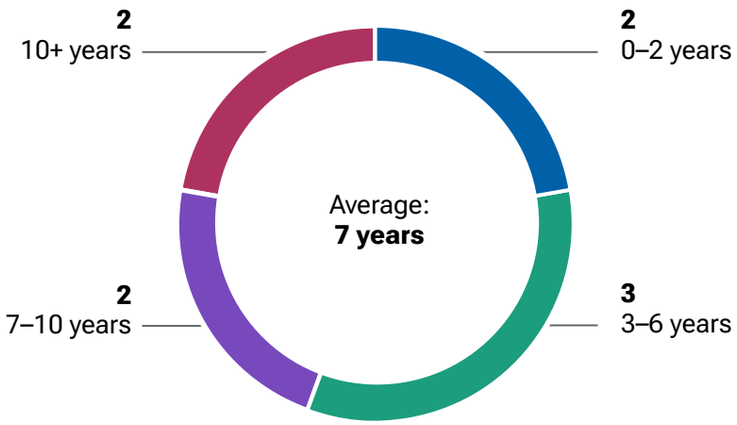
Independent Director Composition



Director Independence



Independent Director Tenure



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, including ESG matters related to both the firm's operations and our investment activities. The NCGC oversees the setting of targets related to climate-related risks and opportunities and monitors progress toward those targets. The firm's Scope 1 and 2 net zero emissions target was approved by the NCGC at its February 2023 meeting. The ESG Enablement team generally briefs the NCGC biannually. Only independent directors serve on the NCGC. Additional details on the NCGC's responsibilities are available in its charter.[1]
- **The Audit Committee** considers ESG matters impacting any disclosures in our financial statements, including climate-related risks. The Audit Committee also receives updates from the firm's chief risk officer (CRO) and regularly discusses legal and regulatory developments with our general counsel. Additional details on the Audit Committee's responsibilities are available in its charter[1].
- **The Executive Compensation and Management Development Committee (ECMDC)** considers how ESG matters may impact management compensation; specifically, the firm's ESG efforts when reviewing and approving general salary and compensation policies for management. The ECMDC's charter[1] provides more details on these responsibilities.

[1] The committee charter is not subject to review by independent certified public accountants.

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

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

Eileen P. Rominger
Former Senior Advisor,
CamberView Partners

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

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

Mark S. Bartlett
Retired Managing Partner,
Ernst & Young

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

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

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

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

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

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

Management's Role‡

The Management Committee strives 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 13 experts with an average tenure of 16 years at the firm, may be found here.[1]

Eric Veiel, head of Global Investments, chief investment officer, and Management Committee member, oversees ESG strategy, risk, investing, and corporate sustainability at T. Rowe Price Associates, Inc. Under his leadership, our ESG Enablement and ESG Investing teams develop and manage TRPA's and TRPIM's sustainability initiatives in their respective areas of focus.

At OHA, the ESG Department reports to Bill Bohnsack, president and senior partner; Adam Kertzer, portfolio manager and senior partner; and Fritz Thomas, head of client coverage and partner. Mr. Bohnsack and Mr. Kertzner work closely with Glenn August, CEO of OHA, all of whom have management responsibility of OHA.

T. Rowe Price's Management Committee oversees risks, including climate-related risks, via the Enterprise Risk Management Committee (ERMC), chaired by the firm's chief risk officer (CRO). OHA maintains its own Risk Committee, and the CRO of T. Rowe Price serves on it.

Recognizing that ESG activities exist across multiple business units, the firm created the ESG Oversight Committee (ESGOC) in 2023. Cochaired by the firm's coheads of ESG Enablement, the ESGOC serves as a central and global body supporting 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.

Additionally, Jeff Cohen, head of ESG and Sustainability at OHA, is a member of the ESGOC. This enables information sharing, while OHA maintains an autonomous structure for ESG governance.

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 the firm's ESG Investing Committees.[2] Senior leaders, portfolio managers, analysts, and ESG specialists, as well as representatives from legal and compliance, serve on these committees.

Further resources 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 and data
- Trade associations
- Sustainability reporting frameworks from organizations such as SASB, TCFD, and the International Sustainability Standards Board (ISSB).

[1] Hyperlinked information is not subject to review by independent certified public accountants.
[2] TRPA and TRPIM only.

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 investing and corporate activities at TRPA.

Investment Management Steering Committee (IMSC)

Enterprise Risk Management Committee (ERMC)

Investment Steering Committees

Management (OHA)*

ESG Oversight Committee (ESGOC)

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

ESG and Sustainability (OHA)

Responsible for the incorporation of ESG matters within the firm's investment processes as well as other sustainability initiatives at OHA.

* OHA is managed as a stand-alone business within T. Rowe Price Group, Inc., pursuant to agreements between OHA's principals and T. Rowe Price. Glenn August, CEO of OHA, has overall management responsibility for OHA and reports to Rob Sharps, CEO of T. Rowe Price Group, Inc.

** RIIM refers to the proprietary Responsible Investing Indicator Models built by TRPA and TRPIM. RIIM rates issuers using a traffic light system measuring their environmental, social, and governance profile and flagging companies with elevated risks. 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[1]

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

Incentive Alignment[1]

At TRPA and TRPIM, an individual's annual performance assessment includes a range of factors, including conduct and collaboration, putting clients first, acting with integrity and accountability, cultivating intellectual curiosity and innovation, embracing inclusion, being disciplined and risk aware, pursuing excellence with passion and humility, compliance with internal policies and procedures (including the Global Code of Conduct), and completion of role-related compliance training courses on an annual basis.

TRPA and TRPIM investment professionals are responsible for incorporating sustainability risk and ESG considerations, including climate-related risks and opportunities, into their investment recommendations and investment decisions, as appropriate for the mandate. As such, this is part of the assessment criteria in year-end performance reviews and compensation.

Compensation of our senior leaders is not tied directly to ESG-related key performance indicators.

OHA maintains its own policy for investment professionals' performance reviews, which also considers ESG integration.

[1] This section is not subject to review by independent certified public accountants.

Strategy

Overview

The firm's climate-related strategy is enabled by our comprehensive approach to identifying and managing risks—including climate change—as a corporate entity and an investment manager. Our enterprise risk management framework is aligned with the three lines of defense model, as discussed in the section Our Risk Management Framework.

As part of our approach, the Enterprise Risk Group (ERG), led by our chief risk officer (CRO), provides expertise and support for the execution of our risk management framework. The ERG works with individuals with functional expertise across the business who are responsible for identifying and addressing potential climate-related risks for their areas of responsibility.

The Enterprise Risk Management Committee (ERMC), chaired by our CRO, and composed of business leadership across the firm, plays an important role in managing climate-related risks and opportunities. The ERMC has oversight of our enterprise risk management framework, which includes managing climate-related risks and opportunities identified that could have a material impact on our firm over short-, medium-, and long-term time horizons.

The ERMC receives regular updates from our ESG Oversight Committee (ESGOC), the ERG, and business leadership on risk issues, responses, and mitigation plans, with the chair of the ERMC reporting into the Management Committee. The CRO is also a member of the ESGOC. This collaboration is integral to consistently monitoring and addressing climate-related risks and opportunities at the highest levels of the firm's management structure.

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.

The 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 to monitor, although components of these risks had been assessed in prior years.

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, 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 ▪ Greater expenses 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-premises. 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 net zero transition and impact investment products. Additionally, the majority of our SICAV range is classified as Article 8.	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.	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).	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 event—such as a cyclone, wildfire, or flood—that impacts the firm's locations or the location of a vendor servicing the firm may affect our day-to-day operations, potentially resulting in increased costs and workforce disruptions.	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 on our facilities and related infrastructure and technologies. Our ERG oversees business continuity and factors extreme weather events into business continuity planning.	▪ Loss of workforce productivity ▪ Disruptions to supplier engagements ▪ Market reaction 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 values 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 are 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 affected 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

Consideration in Investment Products and Strategies‡

Asset managers have 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 Managing Climate Risks section of this report.

We expect that financial markets 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 financed emissions from assets under management can generate significant carbon footprints, most of these assets are managed for clients that have given us a mandate to deliver financial performance. As a result, we have not set a binding net zero target for our assets under management 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 address changing client preferences. In the short and medium terms, we believe the risks and opportunities that could stem from the impact of climate change on client preferences are most material in Europe, the UK, 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.

We believe 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.

As illustrated on the next page, our evaluation of climate-related factors focuses on energy transition and physical risk, but we also believe 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 and/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.

Within both the TRPA and TRPIM RIIM analyses, 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.

TRPA RIIM[1] Example

Not Material | 0.75–1.00 | 0.50–0.74 | 0.00–0.49

Environment	Operations	Supply Chain (Environment)	▪ Scope and quality of supply chain management
		Raw Materials	▪ Raw material procurement standards and statistics
		Energy and Emissions	▪ Scope and quality of energy management systems ▪ Carbon intensity and trend ▪ Scope and quality of net zero targets ▪ Scope of GHG reporting
		Land Use	▪ Biodiversity programs ▪ History of land use incidents
		Water Use	▪ Water intensity and trend
		Waste	▪ Hazardous waste management
		General Operations	▪ History of environmental incidents
	End Products	Environment Product Sustainability	▪ Environmental sustainability of end product
		Products and Services Environmental Incidents	▪ Environmental incidents associated with end product ▪ Environmental impact on local communities
Social	Human Capital	Supply Chain (Social)	
		Employee Safety and Treatment	
		Diversity, Equity, and Inclusion (DEI)	
	Society	Society and Community Relations	
	End Product	Social Product Sustainability	
		Product Impact on Human Health and Society	▪ Contribution to local pollution
		Product Quality and Customer Incidents	
Governance		Business Ethics	
		Bribery and Corruption	
		Lobbying and Public Policy	
		Accounting and Taxation	
		Board and Management Conduct	
		Remuneration	
		ESG Accountability	▪ ESG reporting accountability

Core Evaluation Metrics:

- RIIM environment scores
- GHG footprint
- Net zero status
- Climate solutions alignment[2]

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.

OHA maintains a separate process for factoring in climate risk implications into its investment decisions. These considerations are informed by TCFD and its interconnection with SASB's industry-specific standards. OHA believes an industry-specific approach aligns well with its investment process and allows for the most appropriate risk assessment. Pairing this top-down approach to climate risk assessment with bottom-up company-specific analysis will allow for proper contextualization and time horizon assignment of these risks. Additional information is available in OHA's Climate Policy.[3]

Across all of T. Rowe Price Group's investment advisers, 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.

[1] The implementation and oversight of RIIM for TRPA and TRPIM differ.
[2] TRPA only.
[3] Hyperlinked information is not subject to review by independent certified public accountants.

TRPIM RIIM[1] Example

Not Material | 0.75–1.00 | 0.50–0.74 | 0.00–0.49

Environment	Operations	Supply Chain Environment	▪ Scope and quality of supply chain management
		Raw Materials	▪ Raw material procurement standards and statistics
		Energy and Electricity	▪ Scope and quality of energy management systems
		Emissions	▪ Carbon intensity and trends
		Land Use	▪ Biodiversity programs ▪ History of land use incidents
		Water Use	▪ Water intensity and trend
		Waste	▪ Hazardous waste management
	Environment End Products	Environment Product Sustainability	▪ Environmental sustainability of end product
		Products and Services Environmental Incidents	▪ Environmental incidents associated with end product
Social	Human Capital	Supply Chain Social	
		Employee Safety and Treatment	
		Diversity, Equity, and Inclusion	▪ Diversity statistics and internal initiatives
	Society	Society and Community Relations	
	Societal End Product	Social Product Sustainability	
		Product Impact on Human Health and Society	
		Product Quality and Customer Incidents	
	Ethics	Business Ethics	
		Bribery and Corruption	
		Lobbying and Public Policy	
Governance	Board	Board Quality	
		Board Structure	
	Remuneration	Remuneration	
	Stakeholders	Ownership and Shareholder Rights	
		Stakeholder Governance	
		Auditing and Financial Accounting	▪ ESG reporting accountability

[1] The implementation and oversight of RIIM for TRPA and TRPIM differ.
[2] TRPA only.

A small but growing number of clients have elected to apply various climate-related targets to their investment mandates (such as net zero or GHG reduction targets). These clients have elected to pursue climate-related outcomes as well as financial performance.

Investment Solutions for Clients With Climate-Related Goals‡

TRPA and TRPIM offer 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[2]

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 use engagement and voting to encourage investee companies to follow best practices with regard to net zero disclosure and climate strategy. These mandates apply the T. Rowe Price net zero proxy voting guidelines.

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's Net Zero Investment Framework (PAII NZIF) and leverages our active management capabilities. In addition to customized client solutions for separate account clients, we offer several open-ended funds for investors with net zero objectives, which collectively had USD 1 billion in assets under management as of December 31, 2024.[1]

Setting portfolio-level targets on **greenhouse gas (GHG) reduction** is another approach that can be implemented. While not forward-looking, some asset owners find it helpful to allow them to meet their own financed emissions targets.

Setting targets on capital allocated to **climate solutions** is another approach that can be implemented in isolation or in combination with the other three approaches. This corresponds to aligning with the activities highlighted below.

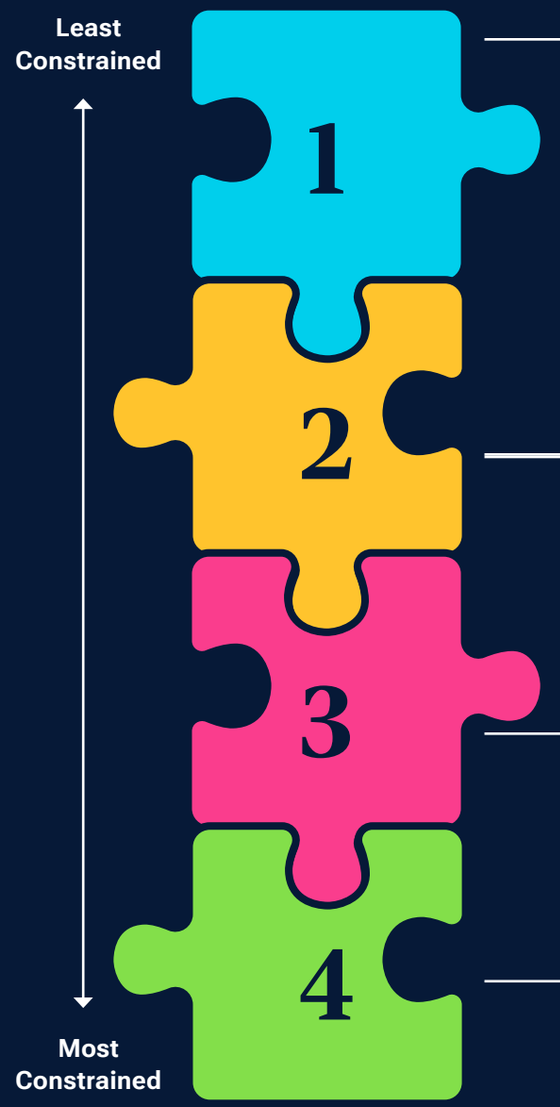
- Increasing energy efficiency
- Decarbonization, carbon capture, and sequestration
- Reducing methane and other GHGs
- Financing sustainable activities

TRPA also offers investment solutions for investors who are interested in pursuing environmental and social goals alongside their financial goals. Impact investors direct capital toward desired environmental and/or social outcomes and utilize engagement with issuers and dedicated proxy voting to help achieve the best results.

In 2024, the firm gained the Sustainability Impact label for its global impact funds under the UK Financial Conduct Authority's Sustainability Disclosure Requirements (SDR) regime. This included one of the first fixed income funds to achieve the SDR Sustainability Impact label. The SDR aims to ensure that financial products marketed as sustainable accurately reflect their impact and have evidence to support those claims.

[1] Products are limited to select jurisdictions where registered. AUM represents assets managed by T. Rowe Price Associates, Inc., and its investment advisory affiliates.

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."

Climate Solutions Alignment With the UN SDGs

Sub-pillars	Sub-pillar Activities	UN SDG Alignment
1. Reducing greenhouse gases (GHGs)	▪ Increasing energy efficiency ▪ Decarbonization, carbon capture, and sequestration ▪ Reducing methane and other GHGs ▪ Financing activities	
2. Promoting healthy ecosystems	▪ Protecting air quality, land use, freshwater, and oceans ▪ Sustainable agriculture ▪ Sustainable aquaculture	
3. Nurturing circular economies	▪ Reducing waste ▪ Recycling ▪ Enabling efficient consumption	

In addition to offering portfolios with net zero and impact goals, T. Rowe Price is developing a global blue bond strategy 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.

While our initial timeline for launching the first T. Rowe Price blue vehicle was delayed in 2024, we plan to launch the offering in 2025.[1]

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

Identifying Opportunities for New Product Offerings‡

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 work includes market analysis, competitive positioning assessment, and investment capability development. 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.

[1] The strategy is not expected to be available to all investors in all jurisdictions.

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 scenario analysis explores a range of plausible climate scenarios that could have a financial impact on the value of our clients' investments over the next several decades. It provides an estimate of the direction and magnitude of the impact of the risk in each scenario. However, this approach is based on available data at a specific point in time and does not consider changes to a company or portfolio holdings during the projection horizon.

Our climate scenario analysis uses climate value at risk (VaR) to assess policy risk, technology opportunity, and physical risk across a range of climate scenarios that may adversely impact the financial value of our investments. Policy risk refers to the costs associated with achieving net zero climate targets such as carbon taxes. Technology opportunity refers to company revenue associated with innovative technology such as low-carbon products. Physical risk refers to the direct and indirect costs of climate change such as damage to physical assets and supply chain disruptions. Acute physical risks include tropical cyclones, flooding, low river flow, and wildfires that occur rapidly, while chronic physical risks include extreme heat/cold, rainfall, snowfall, and wind that manifest slowly over time.

In November 2023, the Network for Greening the Financial System (NGFS), which is a group of central banks and financial regulators that contribute to the development of climate risk management within financial institutions, updated their climate scenarios, which we use, from Phase 3 to Phase 4.

In Phase 4, country-level policy commitments have been updated up to March 2023. The orderly transition scenarios are now more disorderly to reflect the delay in climate policy action. The use of carbon dioxide removal (CDR) technologies has been limited to reflect the current availability of this innovative technology. Physical risks are subdued to reflect the latest policy commitments but are still high. The 1.5°C Disorderly scenario (Divergent Net Zero) has been discontinued as it is unlikely to occur.

This release also incorporates two new scenarios, which include an immediate and effective policy response to limit global warming to below 2°C by the end of the century (Low Demand), as well as delayed and divergent policy responses that result in higher transition and physical risks (Fragmented World).

In the Low Demand scenario, global carbon emissions approach net zero by 2050 with a lower temperature pathway and less progressive carbon prices due to reduced energy demand caused by a shift in consumer consumption preferences toward electrified products, such as electric vehicles. The use of fossil fuels rapidly declines as the use of renewables increases. Countries with a net zero target achieve them before or after 2050. This scenario highlights the policy actions required to meet net zero, which despite the policy challenge, is still possible to achieve, and results in lower economic impact compared with current climate policies.

In the Fragmented World scenario, only currently implemented policies continue until 2030. Thereafter, countries that have set themselves a net zero target only achieve an 80% reduction in their carbon emissions by 2050, while other countries continue with their current policies. This scenario explores the adverse impacts of a failure to implement sufficiently coordinated climate policies, which results in higher transition and physical risks that vary across regions and sectors.

Our climate scenario analysis highlights those sectors that are most exposed to climate-related risks and opportunities. These include energy, industrials, materials, utilities, and real estate.

Corporate Climate VaR by Sector[1, 2]

	Covered Market Value USD	Covered Market Value %	1.5° NGFS Low Demand Agg	1.5° NGFS Orderly Agg	2° NGFS Disorderly Agg	2° NGFS Orderly Agg	3° NGFS NDC Agg	3° NGFS Fragmented World Agg	3° NGFS Current Policies Agg
Communication Services	101,806,692,592	6.6%	-0.1%	-0.2%	-0.1%	-0.1%	-0.2%	-0.2%	-0.2%
Consumer Discretionary	137,089,616,539	8.8%	-0.4%	-0.7%	-0.4%	-0.3%	-0.3%	-0.3%	-0.3%
Consumer Staples	47,896,700,417	3.1%	-0.3%	-0.5%	-0.3%	-0.2%	-0.2%	-0.2%	-0.2%
Energy	50,913,294,388	3.3%	-1.7%	-2.7%	-1.3%	-0.7%	-0.8%	-0.7%	-0.3%
Financials	184,716,031,418	11.9%	-0.3%	-0.5%	-0.4%	-0.3%	-0.4%	-0.4%	-0.5%
Health Care	161,085,766,896	10.4%	-0.3%	-0.5%	-0.3%	-0.3%	-0.4%	-0.4%	-0.4%
Industrials	117,876,991,587	7.6%	-0.6%	-0.9%	-0.6%	-0.4%	-0.5%	-0.5%	-0.3%
Information Technology	335,215,748,628	21.6%	-0.1%	-0.2%	-0.1%	-0.1%	-0.1%	-0.1%	-0.1%
Materials	40,010,303,314	2.6%	-0.7%	-1.0%	-0.6%	-0.4%	-0.5%	-0.4%	-0.2%
Real Estate	30,414,616,358	2.0%	-0.1%	-0.1%	-0.1%	-0.1%	-0.1%	-0.1%	-0.1%
Utilities	28,464,128,752	1.8%	-0.7%	-1.1%	-0.8%	-0.5%	-0.7%	-0.7%	-0.4%
Total	1,235,489,890,890	79.6%	-5.2%	-8.4%	-5.1%	-3.4%	-4.1%	-4.1%	-3.0%

Sovereign Climate VaR

	Covered Market Value %	1.5° NGFS Orderly Agg	2° NGFS Disorderly Agg	2° NGFS Orderly Agg	3° NGFS NDC Agg	3° NGFS Current Policies Agg
Sovereign	5.9%	-2.6%	-1.4%	-0.9%	-0.5%	0.1%

[1] Data as of December 31, 2024. Includes listed equites and corporate bonds; excludes private assets. All data are provided in terms of the contribution of each sector based on the aggregated assets covered. Please see page 36 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. Sum of rows may not equal total due to rounding issues. Source: MSCI ESG Research LLC.
[2] Sector categories are based on Global Industry Classification Standard (GICS).

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.

Consideration in Operational Strategy‡

The firm's climate risk strategy considers acute disruptions by major weather events and chronic implications of climate change. As a commonality with nearly all businesses, our operations are exposed to both physical risks and transition risks derived from climate change. The company actively manages these risks through comprehensive strategies aimed at enhancing operational resilience and ensuring business continuity.

External events, such as severe weather or natural disasters, receive ongoing attention, given their potential impact on business activities, including impacts on 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 an 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.

Reducing and managing our GHG emissions is our primary sustainability priority from a corporate standpoint. This includes a comprehensive assessment of the costs associated with achieving our net zero objectives. To inform our net zero strategy, we work to evaluate the financial implications of continuing to rely on brown power versus investing in the transition to net zero for Scope 1 and 2 emissions by 2040. This evaluation not only helps us understand the long-term benefits of these investments, but also positions us to make informed, strategic decisions that drive meaningful change. Additionally, through our Corporate Real Estate & Workplace Services team, we continuously seek operational improvements throughout our global offices. By optimizing energy use, investing in lower-carbon technologies, and enhancing operational efficiency, we aim to reduce our carbon footprint while ensuring that we are not only sustainable, but also cost-effective.

Fifty-seven percent of our real estate square footage was environmentally certified by year-end 2024, and we aim to have at least 60% certified by year-end 2025.

Progress toward this goal includes:

Completed in 2024

- BREEAM Very Good - London
- 5-Star Green Star - Sydney
- LEED Silver - Singapore

In Progress

- LEED for our new Global Headquarters - Baltimore

Our Locations[1]

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	22.32%
4515 Painters Mill Road Owings Mills, MD 21117	United States of America	LEED Certified	Owned	39.39539738449518, -76.78530798685203	13.74%
4525 Painters Mill Road Owings Mills, MD 21117	United States of America	LEED Certified	Owned	39.394925291878515, -76.78341871938858	10.97%
4545 Painters Mill Road Owings Mills, MD 21117	United States of America	LEED Silver	Owned	39.39608472758382, -76.78433581562524	9.49%
2220 Briargate Parkway Colorado Springs, CO 80920	United States of America	-	Owned	38.96855490264002, -104.7860438580269	8.16%
4555 Painters Mill Road Owings Mills, MD 21117	United States of America	LEED Silver	Owned	39.39641052785798, -76.78532845801622	6.66%
One Vanderbilt 16th Floor New York, NY 10017	United States of America	LEED Gold	Leased	40.75289479607678, -73.97850971534308	3.27%
11550 Cronridge Drive Owings Mills, MD 21117	United States of America	-	Owned	39.44344224764258, -76.77138095986547	2.97%
2260 Briargate Parkway Colorado Springs, CO 80920	United States of America	LEED Silver	Owned	38.968670677427205, -104.78729654638454	1.52%
201 Main Street Suite 1250 Fort Worth, TX 76102	United States of America	-	Leased	32.75643452821222, -97.33201880234695	1.40%
233 Park Avenue, South 2nd Floor New York, NY 10003	United States of America	LEED Certified	Leased	40.73755672011462, -73.98789915585051	0.81%
200 Massachusetts Avenue, NW Washington, DC 20001	United States of America	LEED Silver	Leased	38.899180367682845, -77.01409568686441	0.55%

[1] Interns, fixed terms, and contingent workers are excluded from percentage of workforce.

Street Address	Country	Certification	Ownership	Coordinates	Percentage of Workforce
333 Bush Street Suite 2550 San Francisco, CA 94104	United States of America	LEED Platinum (Building holds certification)	Leased	37.790993083478696, -122.40305656988821	0.36%
12120 State Line Road Leawood, KS 66209	United States of America	-	Leased	38.90801919983562, -94.60863991904388	0.17%
Suite 4240 77 King Street West TD North Tower P.O. Box 87 Toronto, ON M5K 1G8	Canada	LEED Platinum (Building holds certification)	Leased	43.648154072847134, -79.38209058411294	0.17%
1735 Market Street Suite 3020 Philadelphia, PA 19103	United States of America	LEED Certified	Leased	39.953827558117425, -75.16953285800211	0.15%
1251 Avenue of the Americas 35th Floor New York, NY 10020	United States of America	LEED Gold	Leased	40.76026119609277, -73.98173377517483	0.15%
17415 Progress Way Hagerstown, MD 21740	United States of America	-	Owned	39.59544598964031, -77.76535181568273	0.04%
4435 Painters Mill Road Owings Mills, MD 21117	United States of America	LEED Gold	Owned	39.391499594223276, -76.78433381568794	0.02%

EMEA

Street Address	Country	Certification	Ownership	Coordinates	Percentage of Workforce
Warwick Court 5 Paternoster Square London EC4M 7DX	United Kingdom	BREEAM Certified	Leased	51.51486397262379, -0.1000133999956808	10.52%
35, Boulevard Prince Henri 3rd Floor L-1724 Luxembourg Grand Duchy of Luxembourg	Luxembourg	-	Leased	49.610640039978456, 6.124330796243006	0.44%

Street Address	Country	Certification	Ownership	Coordinates	Percentage of Workforce
45 Pall Mall, 4th Floor London, UK SW1Y 5JG	United Kingdom	-	Leased	51.50610727351572, -0.13634481533904347	0.43%
Neue Rothofstrasse 19 60313 Frankfurt Germany	Germany	LEED Gold (Building holds certification)	Leased	50.11397287184947, 8.672841771123787	0.17%
Via San Prospero 1 5th Floor 20121 Milan	Italy	-	Leased	45.466240427372675, 9.186067884476074	0.16%
Talstrasse 65 6th Floor 8001 Zurich	Switzerland	-	Leased	47.37055552668636, 8.535453255696337	0.10%
Torre Europa Paseo da la Castellana 95-14 28046 Madrid, Spain	Spain	LEED Silver	Leased	40.45183025415371, -3.6914523254528264	0.07%
Strawinskylaan 1433 WTC Tower Eight Level 14 1077 XX Amsterdam	Netherlands	BREEAM Certified (Building holds certification)	Leased	52.34045558176207, 4.8754800674946255	0.06%
Dubai International Financial Centre P.O. Box 482023 The Gate, Level 15, Office 24 Dubai, UAE	United Arab Emirates	-	Leased	25.215022031556874, 55.28118076869329	0.05%
Kungsgatan 8 SE-11143 Stockholm	Sweden	-	Leased	59.336365253561226, 18.069669211915034	0.04%
51, Boulevard Grande Duchesse Charlotte L-1331 Luxembourg Grand Duchy of Luxembourg	Luxembourg	-	Leased	49.61038731104659, 6.118667657671541	0.02% of workforce
Gl. Kongevej 60 1850 Frederiksberg C Copenhagen	Denmark	-	Leased	55.675816139262665, 12.565571384656913	0.02% of workforce

APAC					
Street Address	**Country**	**Certification**	**Ownership**	**Coordinates**	**Percentage of Workforce**
6/F, Chater House 8 Connaught Road Central, Hong Kong	China	LEED Gold	Leased	22.28248614391946, 114.15860908583407	1.86%
GranTokyo South Tower 10F 9-2, Marunouchi 1-chome, Chiyoda-ku, Tokyo 100-6610	Japan	LEED Certified	Leased	35.67894531288826, 139.7675247418951	1.13%
501 Orchard Road #10-02 Wheelock Place Singapore 238880	Singapore	LEED Silver	Leased	1.3053115760486456, 103.83077369737198	1.09%
Governor Phillip Tower Level 28 1 Farrer Place Sydney NSW 2000	Australia	5-Star Green Star	Leased	-33.864126688410906, 151.21140328445244	0.77%
Level 30, Collins Place 35 Collins Street Melbourne, VIC 3000	Australia	-	Leased	-37.813852069192706, 144.9730430244129	0.06%
Unit 881, Level 8, International Finance Center Tower 2, No. 8 Century Avenue, Pudong District, Shanghai 200120	China	-	Leased	31.236869058800828, 121.50201097626106	0.05%
Governor Phillip Tower Level 28 1 Farrer Place Sydney NSW 2000	Australia	5-Star Green Star (Located within T. Rowe Price space)	Leased	-33.864126688410906, 151.21140328445244	0.02%
7/F, Chater House 8 Connaught Road, Central Hong Kong	China	LEED Gold (Located within T. Rowe Price space)	Leased	22.28248614391946, 114.15860908583407	0.01%

Risk Management

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 our corporate risks. This includes, but is not limited to, strategic risk, operational risk, investment performance risk, human capital risk, legal and compliance risk, technology risk, environmental and social risk, and financial risk. Climate-related risks are integrated into our risk management framework and include the consideration of extreme weather events, regulatory risk, reputational impact, investment risk, and our product range.

Our risk management framework is aligned with the three lines of defense model, and the scope of operations covered includes all business units and geographies where T. Rowe Price operates. Business units (first line of defense), in collaboration with the ERG, are responsible for identifying risks, assessing emerging and existing risks, evaluating acceptable levels of risk appetite, and implementing actions to mitigate such risks as part of our framework.

The ERG (second line of defense) is responsible for providing oversight, guidance, and reporting with respect to the overall management of the firm's risks. Led by our CRO, the ERG is a global team of seasoned experts specializing in enterprise and operational risk, investment risk, privacy, supplier risk, and business resiliency.

Internal Audit (third line of defense) is responsible for providing independent assurance that established internal controls are operating effectively and that our risks are adequately mitigated.

With the support of the ERMC, our CRO is primarily responsible for establishing the enterprise risk management framework and ensuring that risks are managed relative to the firm's risk appetite and risk profile. The CRO reports to the chief operating officer (COO) and regularly updates the Management Committee and T. Rowe Price Group Board of Directors on the firm's risk profile.

The ERMC is chaired by our CRO and composed of business leadership across the firm responsible for managing risks directly within their operations, including climate risks. The ERMC oversees the firm's enterprise risk management strategy, framework, and other risk programs and is an integral part of our climate-related strategy. Review and prioritization of identified climate-related risks and opportunities is undertaken by the ERMC.

The corporate risk profile informs the ERMC of the key risks the firm faces to help prioritize and oversee risk response and mitigation across the firm. The committee receives information and regular reporting from the ERG and various other committees, programs, and groups, as necessary. The ERMC assesses and reviews risks that our firm faces in the short, medium, and long term with a focus on those risks that can manifest more rapidly and/or with greater adverse outcomes.

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.** – The combination of a change in political leadership and ongoing litigation makes it unlikely that the corporate climate disclosure rules adopted or proposed in the last few years by the Securities and Exchange Commission will take effect. Ongoing litigation is also complicating the implementation timelines for certain state climate disclosure rules, such as those in California. At the same time, a number of states have adopted new laws restricting the consideration of climate, social, and other factors in investments and proxy voting.
- **UK** – The UK is still expected to endorse and adopt the IFRS standards developed by the International Sustainability Standards Board (ISSB) into its regulatory framework, likely applying them to the UK's largest companies.
- **European Union** – The EU has already adopted the Corporate Sustainability Reporting Directive (CSRD) and the Corporate Sustainability Due Diligence Directive (CSDDD); however, both are anticipated to be revised in 2025 as a result of the European Union's focus on the regulatory simplification. We also anticipate the revisions to the Sustainable Finance Disclosure Regulation (SFDR).
- **Australia** – In 2024, Australia adopted mandatory climate reporting by companies and financial institutions.
- **Singapore** – In 2025, the Monetary Authority of Singapore consulted on guidelines for financial institutions on transition planning for a net zero economy.

To help us prepare, our Legislative and 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. Updates are provided to the ESG Oversight Committee (ESGOC) several times per year.

Analyzing Investment Risks‡

TRPA and TRPIM 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[2] contribution
- Exposure to climate solutions
- Land use
- Water use
- Track record on environment
- Accountability and transparency for ESG (including climate change)

[1] Percentage of revenues or use of proceeds aligned to economic activities that are climate solutions (e.g., renewable energy generation, sustainable agriculture, etc.).
[2] See Glossary of Terms for a definition of circular economy.

Climate Stewardship‡

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 not to invest in 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.

One of the more difficult aspects of evaluating climate change risks and opportunities is the lack of disclosure on key environmental metrics, strategy, and accountability. T. Rowe Price recommends companies 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, which embeds core climate concepts from the TCFD and SASB standards.

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, estimation methodologies are still evolving.

Additionally, we understand that smaller issuers may be in the early phases of capturing and reporting emissions data and encourage those issuers to continue advancing these internal capabilities.

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 time. 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.

Process for Managing Climate-Related Risks‡

We identify, assess, prioritize, and monitor climate-related risks as an integrated part of our enterprise risk management framework, which is described in the Our Risk Management Framework section. This approach is consistent with the processes used in the previous reporting period.

To assess the severity and likelihood of our risks, including climate-related risks, we consider both qualitative and quantitative factors. Qualitative factors include input from subject matter experts and stakeholder feedback, while quantitative factors include an evaluation of financial impact and probabilities, which are included as part of the dimensions we use to assess risk. This dual approach ensures a comprehensive understanding of potential risks. For example, we may consider the potential financial impact of a climate-related event on our operations, as well as the likelihood of such an event occurring based on meteorological intelligence and expert analysis.

We evaluate and prioritize climate-related risks alongside other types of risks and their categories based on their potential impact on our strategic objectives, financial performance, and operations. This prioritization process includes evaluating the severity and likelihood of climate-related risks, potential regulatory changes, and risk appetite. This prioritization is integrated into our overall risk management framework and corporate risk profile to ensure that climate-related risks are addressed in a timely and effective manner.

Our climate-related risks are monitored as part of our risk management framework, including regular risk assessments and reporting. The ERG, in collaboration with business unit leaders, risk owners, and subject matter experts, works to promptly address any changes in risk profiles. Regular updates are provided to the T. Rowe Price Group Board of Directors and the Enterprise Risk Management Committee (ERMC), which oversees, monitors, and communicates the firm's risk management structure, processes, and business unit risk management efforts. This ongoing monitoring process helps us anticipate risks, adapt our strategies accordingly, and ensure that our risk management practices are comprehensive and effective.

Metrics and Targets

Our Approach‡

To limit the increase of global temperatures to 1.5˚C, we are committed to reducing GHG emissions associated with our operations. T. Rowe Price Group, Inc., is targeting net zero Scope 1 and 2 emissions by 2040 and has an interim target to achieve a 75% reduction by 2030 compared with our 2021 baseline. Our approach includes, but is not limited to, ongoing efforts in asset optimization to reduce energy consumption and the evaluation of carbon-free energy options to achieve an emissions reduction of 90% or greater by year-end 2040 compared with 2021. Residual emissions that cannot be eliminated will be addressed through the use of carbon credits.

While we do not currently have a Scope 3 target, we are focused on efforts to improve the data quality of Scope 3 emissions and address our Scope 3 emissions through stewardship and partnerships. Our approach is informed by the Science Based Targets initiative (SBTi) methodology. 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.

Measuring the Climate Impact 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 such 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.

Methodological Approach

Asset classes included	Listed equities, corporate bonds, sovereign bonds, securitized bonds, municipal bonds, and bank loans
Asset classes excluded	Private assets, REITs, derivatives, and commodities
Standards	Partnership for Carbon Accounting Financials (PCAF)
Data source	MSCI ESG Research LLC

Financed Emissions

Our data coverage for financed emissions is approximately 86% of the firm's USD 1.6 trillion in AUM, representing USD 1.39 trillion. Where reported carbon emissions data are not available, we use estimates based on the PCAF standards, which are derived by our third-party vendor's proprietary estimation model.

These estimates consider a variety of data sources and approaches to derive emissions based on the available data for each asset type. This includes production activity data as well as sector- and country-level average emissions. Where PCAF does not provide specific methodology guidance, our data vendor leverages existing PCAF approaches to derive emissions. This approach applies to securitized credit and municipal bonds.

We use the equity ownership method recommended by PCAF, which allocates emissions based on the investment amount relative to the Enterprise Value Including Cash (EVIC). It is important to highlight that company data can be severely lagged, which may result in inconsistent time periods across the required input data.

However, as the frequency and availability of company climate disclosures improve, we expect this inconsistency to reduce over time.

Climate Metrics by Sector[1]: Financed Emissions[2]

The PCAF standard suggests using a data quality score, since the calculation of financed emissions relies frequently on 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 weighted data quality score for Scope 1 and 2 financed emissions is 2.6, and for Scope 3 financed emissions it is 2.6.

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

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

Sector	Covered MV$	Covered MV%	Scope 1	Scope 2	Scope 3	Scope 1+2
Communication Services	107,243,685,638	6.9%	109,738	305,218	1,987,958	414,956
Consumer Discretionary	142,817,326,113	9.2%	832,645	813,933	26,299,749	1,646,578
Consumer Staples	48,336,115,998	3.1%	631,633	632,991	16,482,455	1,264,625
Energy	55,306,298,160	3.6%	8,626,301	952,591	112,091,547	9,578,891
Financials	345,619,051,164	22.3%	31,244,068	847,124	36,900,201	32,523,942
Health Care	168,507,720,472	10.9%	307,238	367,216	10,541,208	674,454
Industrials	130,452,020,224	8.4%	3,670,306	838,651	78,055,690	4,508,957
Information Technology	339,061,863,454	21.8%	544,948	832,979	10,103,931	1,377,927
Materials	41,254,170,321	2.7%	9,697,728	2,792,101	33,111,525	12,489,830
Real Estate	30,845,644,577	2.0%	71,507	171,458	2,070,059	242,965
Utilities	32,784,163,937	2.1%	13,831,449	388,900	13,006,895	14,220,348
Total	1,467,875,581,049	94.5%	71,749,118	9,289,006	349,715,902	81,470,874

[1] All data are provided in terms of the contribution of each sector to the aggregated assets covered. Sector categories are based on Global Industry Classification Standard (GICS).
[2] Financed emissions aligned with PCAF Global GHG Accounting and Reporting standards, carbonaccountingfinancials.com/standard.

Weighted Average Carbon Intensity (WACI)

WACI measures the carbon intensity of our investments and includes corporates and sovereigns. The advantage of this approach is that it is simple to calculate and easy to interpret. It relies on readily available input data, such as carbon emissions, company revenue, gross domestic product (GDP), and investment values. Carbon emissions are normalized and then attributed based on the amount invested relative to total portfolio value. WACI is expressed in tons CO_2e/USD million and can also be used to compare investment portfolios across asset classes.

Our data coverage for corporates is above 80% and consists of both reported and estimated data. High-emitting sectors, such as utilities, materials, energy, and industrials, are the largest contributors across Scope 1–3, due to their energy intensity that contributes over 60% of WACI but less than 20% of total assets under management (AUM). Sovereign data coverage is approximately 7% and consists entirely of estimated data due to data availability and to ensure consistency and comparability across countries.

Since last year, our total Scope 1–3 WACI has increased by approximately 4%, which is driven by high-emitting sectors, such as energy and industrials. However, this increase was partially offset by reductions in materials and financials.

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

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

Climate Metrics by Sector[3]: Weighted Average Carbon Intensity

Sector	Covered MV$	Covered MV%	Scope 1 and 2	Scope 3
Communication Services	105,082,756,948	6.8%	1.0	12.0
Consumer Discretionary	139,857,656,605	9.0%	5.1	53.7
Consumer Staples	48,018,619,305	3.1%	1.7	19.4
Energy	54,318,356,695	3.5%	14.2	196.6
Financials	198,457,239,945	12.8%	4.3	41.9
Health Care	161,398,563,070	10.4%	1.8	67.1
Industrials	122,196,971,575	7.9%	8.6	126.7
Information Technology	336,253,573,820	21.7%	5.9	89.6
Materials	40,763,438,936	2.6%	17.5	55.4
Real Estate	31,095,777,143	2.0%	1.6	7.6
Utilities	31,623,691,530	2.0%	44.7	23.7
Total	1,269,072,196,597	81.7%	106.3	693.7

[3] All data are provided in terms of the contribution of each sector to the aggregated assets covered. Sector categories are based on Global Industry Classification Standard (GICS). Sovereign WACI is 283.9 with a coverage ratio of 6.7%.

Carbon Footprint

Carbon footprint is used to measure emissions attributable to investors per USD million invested. This approach applies only to corporate assets and uses available data, such as EVIC, asset values, and Scope 1–3 emissions. It is expressed in tons CO_2e/USD million invested and can be used to compare portfolios and benchmarks but does not account for the emissions intensity of individual companies, unlike WACI.

Our data coverage consists of both reported and estimated data and is above 81%. High-emitting sectors, such as utilities, materials, energy, and industrials, are the largest contributors across Scope 1–3, due to their energy intensity, which contributes over 70% of total carbon footprint but less than 20% of total assets under management (AUM).

Since last year, our total carbon footprint has been reduced by approximately 8%, driven by reductions across a broad range of sectors, such as information technology, real estate, and materials.

Corporate Issuers Carbon Footprint

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

Climate Metrics by Sector[4]: Corporate Carbon Footprint

Sector	Covered MV$	Covered MV%	Scope 1+2	Scope 3
Communication Services	104,439,218,152	6.7%	0.3	2.8
Consumer Discretionary	139,855,639,713	9.0%	1.3	23.2
Consumer Staples	48,016,768,796	3.1%	1.0	10.7
Energy	54,288,801,262	3.5%	7.3	98.5
Financials	198,550,789,554	12.8%	1.8	13.7
Health Care	161,167,229,815	10.4%	0.4	12.4
Industrials	120,321,687,268	7.7%	3.1	50.0
Information Technology	336,241,633,136	21.7%	0.9	10.6
Materials	40,736,765,531	2.6%	8.8	27.7
Real Estate	30,859,104,020	2.0%	0.2	1.3
Utilities	31,318,348,177	2.0%	12.7	6.9
Total	1,265,801,536,452	81.5%	37.7	257.6

[4] All data are provided in terms of the contribution of each sector to the aggregated assets covered. Sector categories are based on Global Industry Classification Standard (GICS).

Implied Temperature Rise (ITR)

ITR is a forward-looking assessment used to evaluate the alignment of a company or portfolio with global climate targets, such as the 2015 Paris Climate Agreement, which aims to limit the global average temperature increase to below 2°C and pursue efforts to reach below 1.5°C by the end of the century. It highlights how much global temperatures could increase over the next several decades, if we assume the global economy follows the same carbon emissions trajectory as a company or portfolio.

The estimation process for an individual company follows four simple steps. First, the global carbon budget is calculated based on a net zero scenario of 1.5°C and allocated to each economic sector and region, followed by individual companies based on their fair share of emissions (e.g., revenue). Next, carbon emissions are projected over the next several decades, considering the current level of emissions, individual decarbonization targets, and credibility assessments. The cumulative estimated emissions from the previous two steps are then used to calculate the relative carbon over/undershoot, which is a measure of how much of the carbon budget has been used over the forecast period, compared with the specific global budget allowance to meet net zero. Finally, the carbon over/undershoot is converted to degrees Celsius using the Transient Climate Response to Cumulative Carbon Emissions (TCRE) factor, which was created by the IPCC to determine the relationship between each additional unit of emissions beyond the 1.5°C carbon budget to degrees of additional warming.

Climate Metrics by Sector[5]: Implied Temperature Rise

Sector	Covered MV$	Covered MV%	Implied Temperature Rise	Contribution in Degrees
Communication Services	104,375,461,063	6.7%	1.6	0.0
Consumer Discretionary	139,791,638,812	9.0%	2.4	0.2
Consumer Staples	47,785,945,531	3.1%	2.3	0.1
Energy	54,144,956,044	3.5%	3.9	0.7
Financials	196,718,810,391	12.7%	2.4	0.5
Health Care	161,069,549,372	10.4%	1.9	0.2
Industrials	120,662,500,040	7.8%	2.7	0.4
Information Technology	336,237,523,122	21.7%	2.1	0.1
Materials	40,741,982,782	2.6%	3.1	0.3
Real Estate	30,856,211,887	2.0%	2.8	0.0
Utilities	31,628,162,510	2.0%	2.4	0.1
Total	1,264,018,292,581	81.4%	2.6	2.6

[5] Asset coverage based on 81% of T. Rowe Price Associates and its investment advisory affiliates AUM. All data are provided in terms of the contribution of each sector to the aggregated assets covered. Sector categories are based on Global Industry Classification Standard (GICS).

However, this approach should not be relied on to make accurate forecasts as it relies on a number of assumptions that impact the final outcome. For example, it does not consider the costs of government policy, such as higher carbon taxes or changes to business models and markets that will be required to transition to a low-carbon economy to meet net zero climate goals. This approach also assumes that projected carbon emissions remain constant beyond a certain date, if a company does not have a climate target beyond that date.

Projected carbon emissions of companies with no climate targets are assumed to grow at 1% each year, which may be unrealistic for some companies.

Since last year, our aggregate portfolio ITR has increased by approximately 11%. Financials, energy, and industrials added to this increase, while communication services, health care, and information technology detracted.

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). Reports may not be available for all funds. 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).

We provide a Scope 1 and 2 emissions view, as well as one including Scope 3 emissions. While improving, Scope 3 emissions remain largely estimated. For this reason, we advocate caution when using these data.

2024 Metrics

Measurement	Unit	Scope	Metrics
Financed emissions	Tons CO_2e	Scope 1	71,749,118
		Scope 2	9,289,006
		Scope 3	349,715,902
Weighted average carbon intensity (WACI)	Tons CO_2e/$Million Revenue	Scope 1 and 2	106.3
		Scope 3	693.7
Carbon footprint	Tons CO_2e/$Million Invested	Scope 1 and 2	37.7
		Scope 3	257.6
Implied temperature rise (ITR)	Celsius	Scope 1 and 2	2.6

Net Zero Alignment Classification System

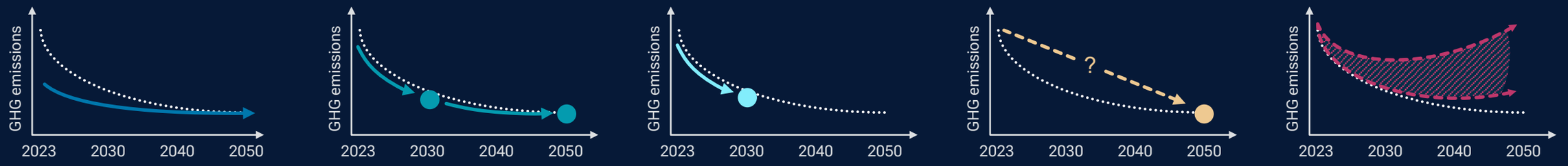
Our net zero alignment or "status" framework helps determine the extent to which corporate issuers have established and are implementing credible, scientifically based net zero transition plans that are compatible with the goal of limiting global temperature increases in this century to 1.5˚C. It is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

We assign corporate issuers to one of five categories, depending on the extent to which they meet certain criteria in relation to transition planning, such as GHG emissions disclosure; short-, medium-, and long-term GHG emissions reduction targets; GHG emissions performance; and alignment of decarbonization strategy with the declared targets, including capital expenditure. The categories are below:

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.

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[6]



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

Our 2024 Emissions by Scope

The reporting period is January 1 to December 31, 2024.

2024 GHG Inventory		MT CO_2e
Total Scope 1 Emissions‡		1,845
	Stationary	691
	Mobile	42
	Fugitive Emissions	1,112
Total Scope 2 Emissions (Location-Based)‡		17,059
Total Scope 2 Emissions (Market-Based)‡		17,219
	Purchased Electricity Location-Based	16,700
	Purchased Electricity Market-Based	16,860
	District Heat	359
Total Scope 3 Emissions (Location-Based)		211,921
Category 3.1	Purchased Goods and Services	113,323
Category 3.2	Capital Goods	58,448
Category 3.3	Fuel- and Energy-Related Activities	4,614
Category 3.5	Solid Waste	260
Category 3.6	Business Travel	21,742
	▪ Air Travel	21,427
	▪ Train Travel	315
Category 3.7	Employee Commuting	13,514
	▪ Commuting to Office	8,802
	▪ Telecommuting	4,712
Category 3.8	Upstream Leased Assets	20
Category 3.15	Investments	See Financed Emissions, page 36
Total GHG Emissions (Location-Based)		230,825

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 (Revised Edition) and the GHG Protocol Scope 2 Guidance. Our selection of this methodology is based on the understanding that it is the commonly used greenhouse gas accounting standard.

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 practical control. This includes owned and leased facilities and data centers, but excludes colocation facilities and serviced offices, which are included in Scope 3.1 (purchased goods and services) and Scope 3.8 (upstream leased assets) emissions, respectively.

For the first time, we have integrated OHA, an alternative credit manager that T. Rowe Price acquired on December 29, 2021, into our GHG inventory.

Per T. Rowe Price's restatement policy, the discovery of a misstatement triggers an assessment to determine materiality. We generally consider a 5% or greater cumulative change in emissions to be material. We convert all emissions to a common GHG metric, CO_2 equivalent, using the latest Intergovernmental Panel on Climate Change's (IPCC) Assessment Report on global warming potentials when possible.

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 is based on location and building use for non-reporting facilities. When refrigerant purchase quantities are available, we collect a list of all refrigerant purchase quantities from the measurement period. Each refrigerant quantity is multiplied by the specific EF for each refrigerant type. ▪ Refrigerant leakage amount is based on rate and building square foot. ▪ Fleet mileage is based on lease maximums. **Emissions Factors** ▪ California Air Resources Board ▪ EPA2024 ▪ IPCC AR6 WG1 Chapter 7 Supplementary Material ▪ UK Government GHG Conversion Factors for Company Reporting 2024 (DEFRA)
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. Estimated heating fuel emissions use building floor area and type, based on data from the Lawrence Berkeley National Lab's Building Performance Database. It applies the median energy use for the building type to estimate monthly electricity use. **Emissions Factors** ▪ Australia National GHG Factors 2023 (data for 2023) ▪ Australia National GHG Factors 2024 (data for 2024) ▪ Canada National Inventory 2024 (data through 2022) ▪ District Heating EF Calculations ▪ ecoinvent 3.10 ▪ EF for clean power purchases ▪ EPA2024 ▪ European Residual Mixes 2022 (data for 2021) ▪ European Residual Mixes 2024 (data for 2023) ▪ Green-e Residuals 2023 (2021 data) ▪ IEA Electricity Emissions Factors 2024 (data through 2022) ▪ UK Government GHG Conversion Factors for Company Reporting 2024 (DEFRA)
Scope 3.1 – Purchased Goods and Services	Annual spend	**Emissions Factors** ▪ Watershed's CEDA v7 and supplier-specific emission factors, when available
Scope 3.2 – Capital Goods	Annual spend	**Emissions Factors** ▪ Watershed's CEDA v7 and supplier-specific emission factors, when available

Scope	Dataset	Calculation Methodology
Scope 3.3 – Fuel- and Energy-Related Activities	Energy-related activity data collected for Scope 1 and 2	**Emissions Factors** ▪ Australia National GHG Factors 2023 (data for 2023) ▪ Australia National GHG Factors 2024 (data for 2024) ▪ Canada National Inventory 2024 (data through 2022) ▪ European Residual Mixes 2022 (data for 2021) ▪ European Residual Mixes 2024 (data for 2023) ▪ Green-e Residuals 2023 (2021 data) ▪ IEA 2024 Well-to-tank and AU NGAF 2024 T&D (data through 2022) ▪ IEA Electricity Emissions Factors 2024 (data through 2022) ▪ IEA Well-to-tank 2024 (data through 2022) ▪ IEA Well-to-tank T&D 2024 (data through 2022) ▪ Renewables WTT ▪ UK Government GHG Conversion Factors for Company Reporting 2024 (DEFRA)
Scope 3.5 – Waste	Waste type	**Assumptions** ▪ Estimates were used for buildings where data could not be obtained. Estimates were made using employee location and on-site presence, applying CalRecycle benchmarks and country-specific emission factors. ▪ Based on head count assigned to the location. **Emissions Factors** ▪ EPA2023 ▪ ecoinvent 3.9.1 ▪ UK Government GHG Conversion Factors for Company Reporting 2022 (DEFRA) ▪ UK Government GHG Conversion Factors for Company Reporting 2023 (DEFRA)
Scope 3.6 – Business Travel	Distance traveled and spend	**Assumptions** ▪ Based on known air and rail travel. Excludes automotive travel and hotel stays. ▪ Approximately 60% of air and rail travel is booked through a travel provider, which provides information on distance traveled. The remainder is captured in our expense system without details on distance traveled. Both data types, distance and spend, were used with aims for full travel coverage and no double-counting. **Emissions Factors** ▪ Air: UK Government GHG Conversion Factors for Company Reporting 2024 (DEFRA) ▪ U.S. Rail: EPA 2024 GHG Emission Factors Hub ▪ International Rail: UK Government GHG Conversion Factors for Company Reporting 2024 (DEFRA) ▪ Travel Spend: Watershed's CEDA v7 and supplier-specific emission factors, when available

Scope	Dataset	Calculation Methodology
Scope 3.7 – Employee Commuting	Distance traveled	**Assumptions** ▪ For TRPA and TRPIM associates, employee badge-in data provided by our physical security system is used to calculate an average for commuting days per week. OHA employees assigned in-office days are counted as their commuting days. ▪ Non-commuting workdays and full-time telecommuter workdays are used to calculate telecommuting data. ▪ Estimated commuting emissions combines employee location and remote status with local commute mode and distance data. Hybrid employees are assumed to commute based on their average commuting days per week, and commute miles are split by local averages for car, transit, walking, and biking. Home office emissions are estimated by combining remote work frequency with regional averages for home size and energy use. It applies local electricity and fuel intensity benchmarks—sourced from the DOE's Building Performance Database (U.S.) or IEA data (international)—and multiplies energy use by the time spent working remotely and local energy emission factors. **Emissions Factors** ▪ Commuting: EPA 2024 GHG Emission Factors Hub and DEFRA 2024 ▪ Telecommuting: multiple sources, including eGRID US 2022, IEA 2022, Australia National GHG Factors 2024, European Residual Mixes 2024, DEFRA 2024
Scope 3.8 – Upstream Leased Assets	Electricity consumption	**Assumptions** ▪ Estimates were used for buildings where data could not be obtained. ▪ The same floor space-based estimation approaches described in scope 1 and scope 2 above were applied here in the absence of data. **Emissions Factors** ▪ Australia National GHG Factors 2023 (data for 2023) ▪ Australia National GHG Factors 2024 (data for 2024) ▪ European Residual Mixes 2024 (data for 2023) ▪ IEA 2024 Well-to-tank and AU NGAF 2024 T&D (data through 2022) ▪ IEA Electricity Emissions Factors 2024 (data through 2022) ▪ IEA Well-to-tank 2024 (data through 2022) ▪ IEA Well-to-tank T&D 2024 (data through 2022)
Scope 3.15 – Investments	Portfolio holdings	See Financed Emissions, page 36

Improving the Measurement of Our Carbon Footprint

We strive to ensure the completeness and accuracy our GHG inventory, using primary data wherever possible and following the Greenhouse Gas Protocol's guidance on the hierarchy of calculation approaches.

Our 2024 GHG inventory reflects a number of improvements in the quality of our data. In addition to including OHA for the first time, we have also begun working with a new vendor for the calculation of our GHG inventory that has access to a more extensive library of emissions factors, including supplier-specific emissions factors, which were utilized for the calculation of emissions from purchased goods and services (Scope 3.1) and business travel (Scope 3.6). Additionally, we used a more complete source of spend data for the calculation of emissions from purchased goods and services (Scope 3.1).

The improvement in data led to notable year-over-year increases in our Scope 1 emissions and select categories of Scope 3 emissions. While methodological differences accounted for a small portion of the increase in our emissions from capital goods (Scope 3.2), which more than doubled between 2023 and 2024, it was primarily driven by the construction associated with building our new

headquarters at Harbor Point in Baltimore. Emissions from construction accounted for 96% of our 58,448 MT of CO_2 emissions from capital goods.

We are reporting emissions from upstream leased assets (Scope 3.8) for the first time, as a review of our lease agreements led us to conclude that a small number of serviced offices, generating only 23 MT of CO_2e emissions in 2024, fall outside of our operational control boundary. We also concluded from further diligence that the locations previously calculated in our downstream leased assets (Scope 3.13) should be included in our Scope 2 emissions. In 2023, these locations generated 682 MT CO_2e emissions and have been incorporated into our Scope 2 calculation for 2024.

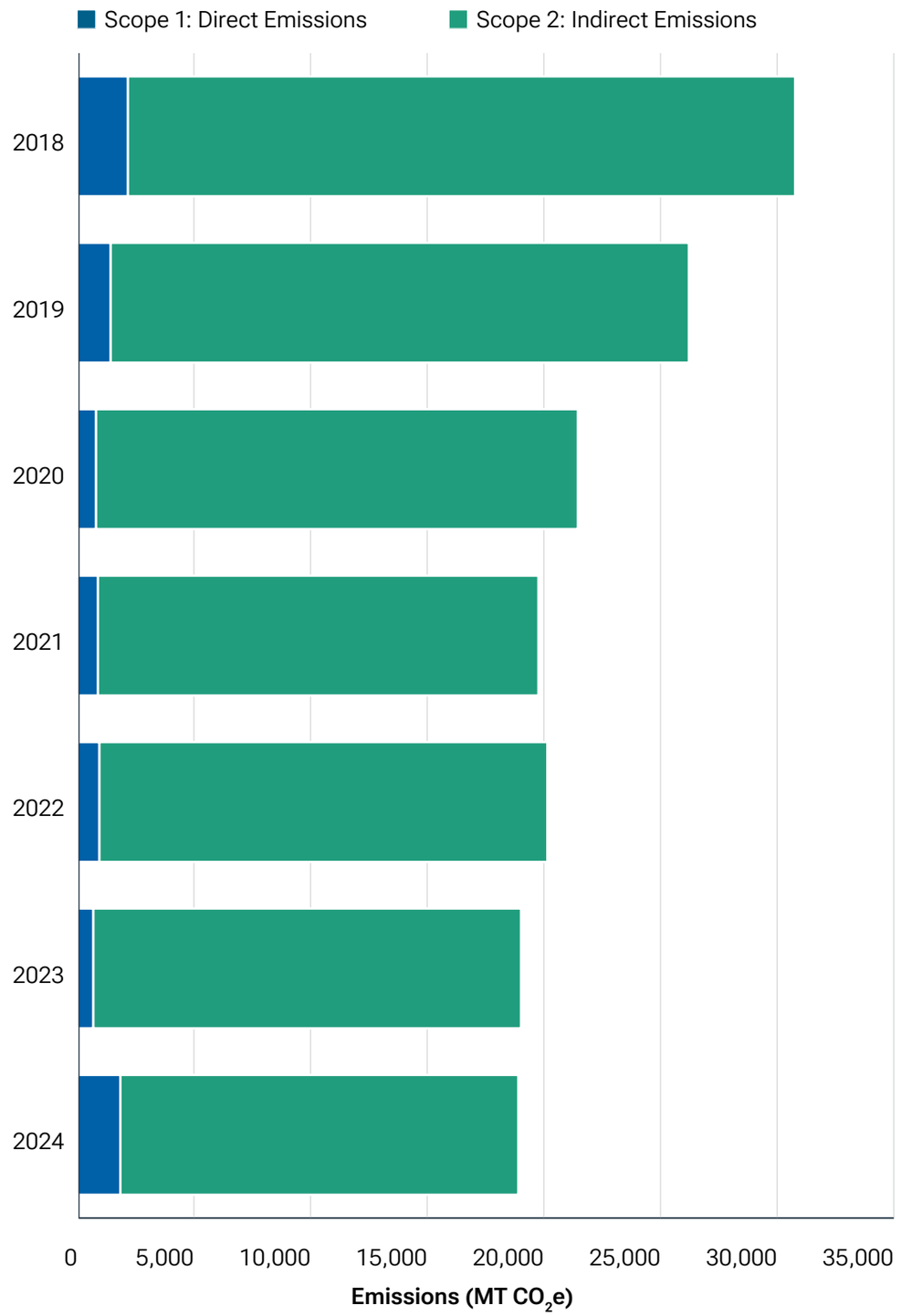
Scope 1 and 2 Emissions Target‡

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 2 emissions.

While we have explored various options to source renewable energy for our owned facilities in Maryland within the Mid-Atlantic region (PJM grid), we have found it difficult to secure favorable pricing and terms. We continue to evaluate the market for potential opportunities. Throughout our review, we have considered the location, timing, and additionality of various market-based instruments, such as renewable energy credits (RECs), prioritizing location, and timing. These considerations, however, must be coupled with an assessment of the feasibility of pricing and contract terms. In the absence of attractive solutions that would satisfy our initial criteria, we have expanded the focus to also explore opportunities to source emissions-free energy supply, including nuclear power.

We recognize that anticipated revisions to the Greenhouse Gas Protocol may address how companies account for energy contracts and RECs, including how location is considered. Our intent is to future-proof any utilization of market-based reduction instruments and ensure the credibility of any reduction.

Scope 1 and 2 Emissions Trends[7]



[7] Periods prior to 2023 were not included in the review of independent certified public accountants. 2023 data included in prior period report of independent certified public accountants.

Concurrently, we have made progress in other locations. In April 2024, we began claiming Renewable Energy Guarantees of Origin (REGOs) for our UK office, which is a leased space we moved into in September 2023.

We continue to strategically evaluate the real estate we occupy and implement energy efficiency projects as old equipment becomes obsolete and opportunities arise. Additionally, our evolving real estate strategy seeks to improve associate experience for our hybrid workforce and pursue opportunities for better utilization of our space. Our Scope 2 location-based emissions decreased in 2024, in part because of our optimization efforts at our Owings Mills and Colorado Springs campuses.

Our Scope 1 emissions increased in 2024 due to a shift in methodology as we transitioned to a new carbon accounting vendor. Previously, Scope 1 refrigerants were calculated by estimating number of units of a specific equipment type based on square footage, and now our calculation estimates a refrigerant capacity per square foot.

In 2024, we purchased carbon removal credits, using biochar, to address our 2023 Scope 1 emissions from fleet vehicles. We see this as an extension of our initiatives to address emissions from business travel (Scope 3.6).

In 2025, we will be evaluating our net zero model to account for the move to our new headquarters in Harbor Point, Baltimore, and our evolving real estate strategy.

Year-Over-Year Scope 1 and 2 Emissions Intensity[8]

Scope	Unit	2018	2019	2020	2021	2022	2023	2024	% Change 2024 vs. 2021 Baseline
Scope 1: Direct Emissions	MT CO_2e	2,162	1,424	796	877	941	681	1,845	110%
Scope 2: Indirect Emissions*	MT CO_2e	28,607	24,791	20,661	18,887	19,210	18,340	17,059	-10%
Total Scope 1 & 2 Emissions*	MT CO_2e	30,769	26,215	21,457	19,764	20,150	19,021	18,904	-4%
Global Square Feet	Thou. Square Feet	2,386	2,392	2,320	2,212	2,246	2,310	2,412	9%
Global Revenue	USD Million	5,373	5,618	6,207	7,672	6,488	6,461	7,094	-8%
Scope 1 & 2 Emissions per Square Foot	MT CO_2e / Thou. SF	12.9	11.0	9.2	8.9	9.0	8.2	7.8	-12%
Scope 1 & 2 Emissions per Revenue	MT CO_2e / MUSD	5.7	4.7	3.5	2.6	3.1	2.9	2.7	4%

* Total based on location-based emissions.

[8] Periods prior to 2023 were not included in the review of independent certified public accountants. 2023 data included in prior period report of independent certified public accountants.

Addressing Operational Waste‡

Last year we announced that, after careful consideration, we were assessing our 2025 goal to achieve zero waste. In 2024, the firm announced that additional changes to the firm's real estate portfolio are on the horizon, driven by an evolving real estate strategy and a move to new headquarters. To assess the full impact of these changes, we are extending the reassessment time frame and will provide an update once available.

Sustainability remains at the forefront of the firm's commitments, and we continue to work toward reducing operational waste and seek opportunities to educate associates on proper waste disposal.

Operational Waste‡[9]

Waste Metric	2024 (tonnes)
Landfill	138
Energy recovery	315
Recycled	352
Composted*	142
Electronics recycling	46
Waste total	993

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

[9] This disclosure covers waste generated in the organization's own activities or within the organization's operational control. Waste metrics include waste that is landfilled, recycled (general and electronics), composted, and energy recovery (from incineration). Metrics are reported in metric tonnes rounded to the nearest whole value. Approximately 95% of operational waste is based on activity data received from waste removal vendors. For remaining sites, landfill waste and recycling is estimated based on assigned head count for each location. Currently, Watershed does not support the disaggregation of additional waste types at the facility level or selective estimation for individual waste streams beyond the two listed above. As a result, some minor data gaps exist in facility-specific waste emissions. However, these gaps are immaterial to the overall footprint due to the relatively low contribution of waste to total emissions. Where necessary, estimates are based on organization-wide waste intensity factors, ensuring consistency and completeness. Future improvements to data granularity will be explored as software capabilities evolve. This metric excludes in-kind donation metrics.

Reducing Plastic Pollution

We have developed a strategy to not only reduce our waste, but to improve its composition by reducing single-use plastics in our facilities. The risks to human health and harm to biodiversity, particularly marine ecosystems, from plastic pollution represents a growing global concern.

Some of the measures we have implemented to reduce plastic pollution include:

- **Compostable serviceware** at our Maryland and Colorado campuses (U.S.)
- **Reusable dishware** in our new London headquarters and in Frankfurt (Europe)
- In retail areas, we provide **fountain beverages** and have transitioned to **aluminum and glass** alternatives, incorporate **bulk snack items**, and snacks in **recyclable or compostable packaging** wherever possible

Working With Our Supply Chain‡

Our Supplier Code of Conduct emphasizes environmental requirements, including the implementation of operational practices aimed at minimizing environmental impact and preventing or mitigating any harm. We expect our supply chain to adhere to the code by monitoring their performance, reporting on environmental improvements, and establishing targets and commitments to reduce their environmental footprints.

Business Travel and Commuting‡

Due primarily to the utilization of a different set of emissions factors, our business travel emissions (Scope 3.6) more than doubled between 2023 and 2024. We began using Watershed's Comprehensive Environmental Data Archive (CEDA) for travel spend and DEFRA GHG Conversion Factors for Company Reporting 2024 for air travel. When these emissions factors are applied to our 2023 footprint, our emissions rise from the previously communicated 8,504 MT CO_2 to 13,699 MT CO_2.

In addition, we observed a 20% increase in year-over-year business travel, and the inclusion of OHA also contributed to higher business travel emissions in 2024. Similar to our approach in 2023, the majority of our emissions from travel are calculated using the distance-based method, with approximately one-third calculated using the spend-based method.

We aim to reduce emissions from business travel in ways that do not limit the effectiveness of our global operations. T. Rowe Price Associates maintains a Travel Policy, which 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.

For the third consecutive year, we have partnered with Climate Vault to invest in climate solutions that address our emissions from business travel. Climate Vault is an award-winning nonprofit founded at the University of Chicago. 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 ton of CO_2), provides price transparency, and is rigorously verifiable. Climate Vault intends to eventually 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 undergoes procedures over carbon allowances from independent accountants.[10]

Since we began addressing our business travel emissions, cost per metric ton of carbon permits has increased notably. We were pleased to continue to make a donation to Climate Vault to purchase carbon allowances for 11,500 metric tons of CO_2 emissions and are planning to make another donation to cover the remaining 370 MT CO_2 emissions. Our donations will cover emissions that were calculated using the distance-based calculation methodology, which we believe provides a more accurate metric, and will exclude emissions from OHA's business travel, as it maintains a separate approach to address emissions from their operations.

Our emissions from employee commuting decreased slightly from 16,813 MT CO_2 in 2023 to 13,514 MT CO_2 in 2024. The majority of this (8,801 MT CO_2) was generated from commuting into the office while a smaller amount (4,614 MT CO_2) is from telecommuting. To encourage the use of electric cars, we provide free charging stations at most of our global facilities, providing access to 77% of our global workforce as of December 31, 2024.

[10] Climate Vault's purchase of carbon allowances and the effectiveness of such carbon allowances is not subject to review by independent certified public accountants.

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 assumes 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 alternative 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 esgidp.org/ for more information.

Exposure to Climate Solutions: Percentage of revenues or use of proceeds aligned to economic activities that are climate solutions (e.g., 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 (percent of 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 (percent of 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 financials 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 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 its 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 attributed by their equity ownership. Emissions are apportioned based on equity ownership (percent of 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.

Report of Independent Certified Public Accountants

GRANT THORNTON LLP
1000 Wilson Blvd., Suite 1500
Arlington, VA 22209

D +1 703 847 7500
F +1 703 848 9580

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 T. Rowe Price Group, Inc. Task Force on Climate-Related Financial Disclosures ("TCFD"), Scope 1 greenhouse gas ("GHG") emissions, Scope 2 GHG (location and market-based) emissions, and Operational Waste information (collectively, the "Subject Matter") of T. Rowe Price Group, Inc. as specified in Note 1 below as of and for the year ended December 31, 2024. The T. Rowe Price Group, Inc.'s management is responsible for preparing and 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 (AICPA). 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 presented in accordance with 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 presented in accordance with 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 T. Rowe Price Group, Inc.'s personnel reviewing internal or external documents,

- Observation of T. Rowe Price Group, Inc.'s personnel obtaining relevant information from internal or external sources, and
- Performing analytical procedures.

In addition, we obtained an understanding of T. Rowe Price Group, Inc.'s business processes relevant to the review in order to design appropriate procedures.

The preparation of information supporting the Subject Matter, including the T. Rowe Price Group, Inc.'s incorporation of ESG factors into its investment processes and strategies and the T. Rowe Price Group, Inc.'s future goals, targets, and commitments, requires management to determine materiality for sustainability-related issues, identify sustainability-related issues affecting the T. Rowe Price Group, Inc.'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 T. Rowe Price Group, Inc.'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 T. Rowe Price Group, Inc.'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 T. Rowe Price Group, Inc.'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, 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 2024 TCFD 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 2024 TCFD 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, 2024, in order for it to be presented based on the criteria set forth in Note 1.

Grant Thornton LLP

Arlington, Virginia
June 11, 2025

Grant Thornton

Note 1

Metrics included in the Subject Matter and the Criteria presented based on the following:

Subject Matter		Criteria
Committees with ESG Oversight Disclosures	Page 08	Global Reporting Initiative (“GRI”) 1: Foundation 2021, Section 4: Reporting Principles
Management’s Role Disclosures	Page 10	
Accountability Chart	Page 11	
Climate-Related Risks and Mitigation Strategies Disclosures	Pages 15 - 17	
Consideration in Investment Products and Strategies Disclosures	Pages 18 - 20	
Investment Solutions for Clients with Climate-related Goals Disclosures	Pages 20 - 22	
Identifying Opportunities for New Product Offering Disclosures	Pages 22 - 23	
Consideration in Operational Strategy Disclosures	Pages 25 - 29	
Our Risk Management Framework Disclosures	Page 31	
Implications of Increasing Global Regulation Disclosures	Page 32	
Analyzing Investment Risks Disclosures	Page 32	
Climate Stewardship Disclosures	Page 33	
Process for Managing Climate-Related Risks Disclosures	Pages 33 - 34	
Our Approach Disclosures	Page 36	

Subject Matter		Criteria
Measuring the Climate Impacts of Our Operations Disclosures	Page 43	
Scope 1 and 2 Emissions Target Disclosures	Pages 47 - 48	
Addressing Operational Waste Disclosures (exclusive of Operational Waste table)	Page 49	
Working with our Supply Chain Disclosures	Page 50	
Business Travel and Commuting Disclosures	Page 50	
Operational Waste table and Disclosures	Page 49	Developed by management – the metrics measure waste expressed as an absolute measurement of the identified activity to the stated benchmark
2024 Total Scope 1 Emissions:	1,845 MT CO2e	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
2024 Total Scope 2 Emissions (Location-Based):	17,059 MT CO2e	
2024 Total Scope 2 Emissions (Market-Based):	17,219 MT CO2e	
Purchased Electricity Location-Based	16,700 MT CO2e	
Purchased Electricity Market-Based	16,860 MT CO2e	
District Heat	359 MT CO2e	
Inventory Boundary and Methodology disclosures regarding Scope 1 and Scope 2 Emissions (including table)	Pages 43 - 46	

IMPORTANT INFORMATION

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