T. Rowe Price

2023 TCFD Report

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

INVEST WITH CONFIDENCE®

About This Report

Our 2023 TCFD Report covers the operations of T. Rowe Price Group, Inc.

The information included in this report is representative of all T. Rowe Price investment advisory entities except Oak Hill Advisors, L.P. (OHA), unless otherwise noted. OHA is an alternative credit manager that T. Rowe Price Group, Inc., acquired on December 29, 2021. Information on OHA's approach to environmental, social, and governance (ESG) can be found on its website.

The disclosures appearing under headings or subheadings with the symbol ‡ are included in the report of independent certified public accountants. Refer to Report of Independent Certified Public Accountants on page 51 for additional details.

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

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

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

Forward-Looking Statements

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

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

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

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

Leadership Message

At T. Rowe Price, we believe in active management of climate risks and opportunities. A global energy transition is underway, while the business and economic impacts from a changing climate become more frequent and disruptive. We believe it is our fiduciary duty to consider these shifts in order to maximize financial performance for our clients. In the instances when our clients have given us a mandate to pursue sustainability goals for their portfolios, these considerations drive security selections.

Our support of the TCFD demonstrates our advocacy for improved disclosures across capital markets. It is helpful that voluntary reporting frameworks focused on financial materiality, such as the TCFD and the new IFRS Sustainability Disclosure Standards, have become the basis for mandatory disclosure requirements in many jurisdictions. We believe their adoption can improve the availability and comparability of decision-useful information for investors.

Understanding an issuer's climate-related risks and opportunities will be key for investors. As an issuer ourselves, this year's disclosure highlights a few areas of opportunity, including:

- We have expanded our product offering to meet the needs of clients interested in aligning their investments to net zero by 2050, with the development and launch of our Net Zero Transition Framework for global equities and corporate bonds.
- We announced plans to collaborate with the International Finance Corporation (IFC),[1] part of the World Bank Group, on a pioneering global blue bond venture. Recognizing the important role that oceans will play in addressing climate change, as they absorb 25% of all carbon dioxide emissions and capture 90% of excess heat generated from these emissions,[2] the new venture seeks to increase access to finance blue projects in emerging markets.

In the same way that we encourage our portfolio companies to adopt industry best practice disclosure standards, we continue to enhance our own reporting. Key advancements include:

- For the first time, we have published climate metrics for T. Rowe Price Group's assets under management, including financed emissions.
- We published our first Investor Climate Action plan and made our initial disclosure as a signatory of the Net Zero Asset Managers initiative.

Within our operations, we continue to work toward net zero Scope 1 and 2 emissions by 2040, as announced last year. We're pleased to report a 4% decrease since our 2021 baseline, despite increased energy needs with our workforce's return to office during that time.

Decarbonization will be a decades-long process, and we look forward to reporting on our progress annually.

Eric Veiel
Head of Global Investments and CIO

[1] T. Rowe Price and IFC are not affiliated companies
[2] Source: United Nations https://www.un.org/en/climatechange/science/climate-issues/ocean

Governance

Board Oversight

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

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

Of the independent directors, 50% joined the Board within the last five years; the average non-executive director tenure is six years. The Board's thoughtful approach to its composition ensures a proper balance between new directors, who bring fresh and diverse perspectives, and the stability of the Board overall.

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

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

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

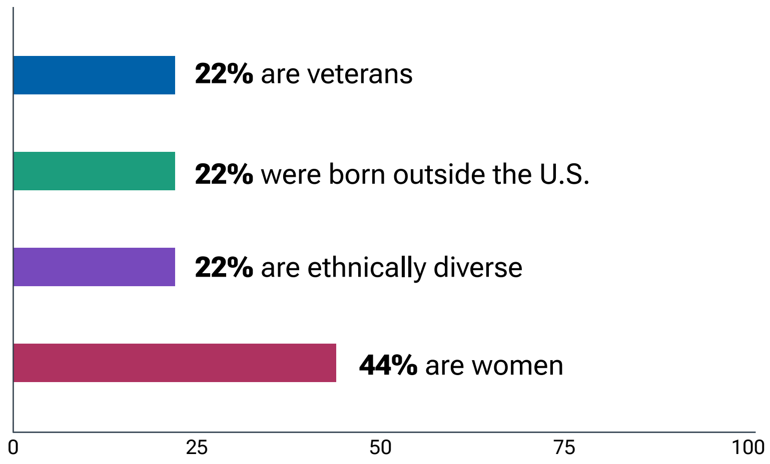
Name	Executive Leadership	Financial Management	Investment Management Industry	International Business Experience	Technology	Strategy Formation/ Execution	Marketing/ Distribution	Government/ Regulatory	Diversity
Robert W. Sharps	■	■	■	■		■	■		
Glenn R. August	■	■	■	■		■	■		
Mark S. Bartlett	■	■				■		■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

Board Diversity Matrix (As of March 1, 2024)

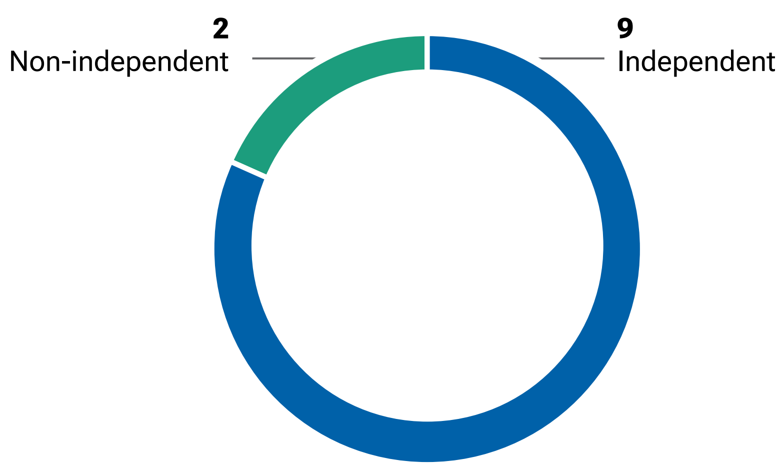
	Female	Male	Nonbinary	Did Not Disclose Gender
Directors	4	9	0	0
Number of Directors Who Identify in Any of the Categories Below				
African American or Black	1	1	0	0
Alaskan Native or Native American	0	0	0	0
Asian	0	1	0	0
Hispanic or Latinx	1	0	0	0
Native Hawaiian or Pacific Islander	0	0	0	0
White	3	8	0	0
Two or More Races or Ethnicities	1	0	0	0
LGBTQ+	0	0	0	0
Did Not Disclose Demographic Background	0	0	0	0

Independent Directors (As of May 10, 2024)

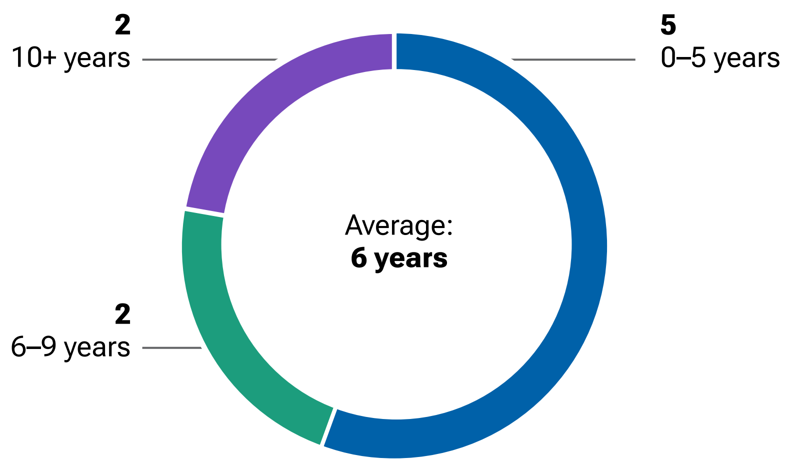
Independent Director Composition



Director Independence



Independent Director Tenure



Director Engagement

In 2023, the Board held six meetings and approved one matter via unanimous written consent. Each director attended at least 75% of the combined total number of Board meetings and Board committees of which he or she was a member. Consistent with the firm's Corporate Governance Guidelines, the independent directors met in an executive session at each of the Board's regular meetings in 2023. Our Corporate Governance Guidelines provide that all directors are expected to attend the annual meeting of stockholders. All nominees for director submitted to the stockholders for approval at last year's annual meeting on May 9, 2023, attended that meeting.

Committees of the Board of Directors

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

Committee Charters

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

Committees With ESG Oversight‡

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

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

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

Eileen P. Rominger
Former Senior Advisor, CamberView Partners

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

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

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

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

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

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

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

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

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

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

Mark S. Bartlett
Retired Managing Partner, Ernst & Young

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

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

Management's Roles‡

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

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

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

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

The ESGOC is responsible for:

- Developing and driving T. Rowe Price's overarching ESG strategy
- Approving ESG-related memberships, disclosures, and corporate sustainability policies
- Ensuring coordinated, consistent, and prioritized execution of ESG initiatives and management of ESG risks
- Fostering ESG collaboration across the organization
- Embedding operational support for ESG across the organization at scale
- Monitoring performance against goals and targets.

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

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

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

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

Accountability‡*

The following chart illustrates the firm's ESG accountability framework

Boards and Committees

The ESG Enablement team provides regular updates to the Nominating and Corporate Governance Committee, and Risk provides regular updates to the Audit Committee.

T. Rowe Price Group Board of Directors

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

T. Rowe Price Funds/Trusts Board of Directors

Management Companies/Investment Advisers

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

T. Rowe Price Management Committee

Oversees corporate strategy and implementation.

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

Investment Management Steering Committee (IMSC)

Enterprise Risk Management Committee (ERMC)

Investment Steering Committees

ESG Oversight Committee (ESGOC)

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

ESG Investing Committees (TRPA and TRPIM)

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

Implementation Teams

ESG Enablement

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

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

Risk

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

Investment Platforms (TRPA and TRPIM)

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

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

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

* As of January 1, 2024. The information provided in this report and related materials does not include content relating to Oak Hill Advisors, L.P. (OHA), an alternative credit manager that T. Rowe Price Group, Inc., acquired on December 29, 2021, unless otherwise noted.

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

Steering Committees[3]

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

Incentive Alignment[3]

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

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

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

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

Strategy

Our Position on Climate Change

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

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

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

Overview

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

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

1. Impact on investment performance,

2. Impact on client preferences for investment products,

3. Regulatory impact,

4. Impact on the firm's reputation, and

5. Impact of acute disruptions to our operations brought on by major weather events as well as chronic implications of climate change.

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

Investments and Products

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

We expect that financial market performance will experience more volatility in the event of a delayed and/or disorderly transition, as the likelihood of physical climate risk will be greater and the regulatory impact may be more severe. While climate change risks and opportunities are present across all geographies and sectors, they will likely be more pronounced for issuers in regions taking limited action to address climate risk from a regulatory standpoint, those more likely to experience greater physical impacts, and in high-emitting sectors.

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

1. Considering climate and other environmental factors within investment analysis (for the purpose of maximizing risk-adjusted returns) and

2. Offering select investment products that have environmental mandates.

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

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

Operations

The firm's climate risk strategy considers acute disruptions brought on by major weather events and chronic implications of climate change. Our operations are exposed to physical risks and transition risks derived from climate change.

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

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

To help mitigate risks associated with the prospect of increased energy costs and regulatory penalties for carbon emissions, we are seeking a long-term energy contract for our largest facilities in Maryland, U.S.

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

	As an Asset Manager			As a Corporate Entity		
Approach and Capabilities	**ESG Integration** Central, dedicated ESG teams. Proprietary ESG analytics and ratings, which include GHG analysis and net zero status. ESG analysis conducted at the security and portfolio levels.	**Stewardship** Advocate for industry standards regarding climate disclosures. Active stewardship program that incorporates climate issues. Publish our engagement and proxy voting statistics.	**Products and Mandates** *Scope 3, Category 15* Suite of impact products. Specific offerings for clients with overriding climate or other environmental goals.	**Corporate Net Zero Strategy** *Scope 1 and 2* Net zero operations by year-end 2040 (Scope 1 and 2). Interim targets to reduce GHG emissions by 75% by year-end 2030 and 80% by year-end 2035 compared with our 2021 base year.	**Waste Management** *Scope 3, Category 5* Committed to reducing operational waste and phasing out single-use plastics in our global facilities where market alternatives exist. Reassessing the feasibility and timeline of a waste target for our facilities.	**Emissions From Business Travel** *Scope 3, Category 6* Partnered with Climate Vault to address emissions from rail and air travel, purchasing carbon allowances, and investing in long-term carbon removal solutions.
Transparency and Accountability	**Fund- and Mandate-Level Reporting**			**TCFD and SASB Reports**		
	ESG Investing Report			**Sustainability Report**		
	Investment Policy on Climate Change			**Environmental Policy**		

Climate-Related Risks and Mitigation Strategies‡

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

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

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

Description	Mitigation	Monitoring Process	Potential Impact
Transition Risks			
Market (Product Related) X S M L Climate change may influence client preferences by increasing the demand for investment products oriented toward climate change mitigation. Clients may request more customization on their separate accounts and/or pooled vehicles in order to align with their individual climate goals. Conversely, a climate backlash could negatively impact demand for climate- or transition-related products.	We have a range of Article 8 and impact products. In addition, we offer clients bespoke solutions to meet their needs. Our ESG commercialization strategy is expanding our client offer to include Net Zero Transition investment options and thematic strategies.	The ESG Enablement team is responsible for working in partnership with the Product team to execute our strategy for investment product offerings with environmental and/or social mandates.	▪ Lower market share if product suite does not align with client preferences ▪ Increased costs associated with providing more customized products ▪ Increased costs for ESG data ▪ Reduced assets under management
Operations M L Regulatory environmental standards may require participation in energy reduction initiatives, energy efficiency programs, or renewable energy programs.	We are targeting net zero Scope 1 and 2 emissions by year-end 2040 and a 75% reduction by year-end 2030 compared with our 2021 baseline. Our strategy may consider evaluation of energy contracts and energy efficiency improvements in our operations, among other initiatives. Our net zero strategy may help reduce long-term utility costs and avoid expected carbon penalties that would be imposed on our Colorado operations (via the Energy Performance for Buildings HB21-1286 statute) beginning in 2026, and operations in Maryland (via the Maryland Building Energy Performance Standards as required by the Climate Solutions Now Act of 2022). Timing for Maryland penalties is unknown as the performance standards are still under review.	These considerations are reflected in the firm's environmental management planning strategy, managed by our Corporate Real Estate & Workplace Services team.	▪ Increased costs from carbon taxes or other environmental levies
Reputation X S M L If we are perceived to fall short of our own corporate commitments or stakeholder expectations on climate and sustainability, particularly in regard to our fiduciary duty to clients, this may impact our brand, influence clients' willingness to do business with us, and affect our workforce's willingness to remain. It also exposes us to potential litigation risk.	We have corporate sustainability goals related to GHG emissions reduction and our facilities. Our commitments are articulated in our public disclosures (e.g., TCFD, SASB, website, Stewardship Report). Furthermore, we believe that the work that we have done to strengthen our climate analysis since becoming a signatory of NZAM will benefit clients over the long term and enable us to deliver our fiduciary duty by helping portfolio managers make more informed investment decisions.	T. Rowe Price has a comprehensive risk management program in place that is designed to help reduce any impact on clients or the firm. This multilayered, cross-functional approach ensures that the firm routinely tracks shifts in client preferences, associate feedback, and stockholder ratings and assessments.	▪ Drop in stock price due to negative stakeholder feedback ▪ Negative impact on workforce management (i.e., employee attraction and retention) ▪ Reduced assets under management due to negative client feedback

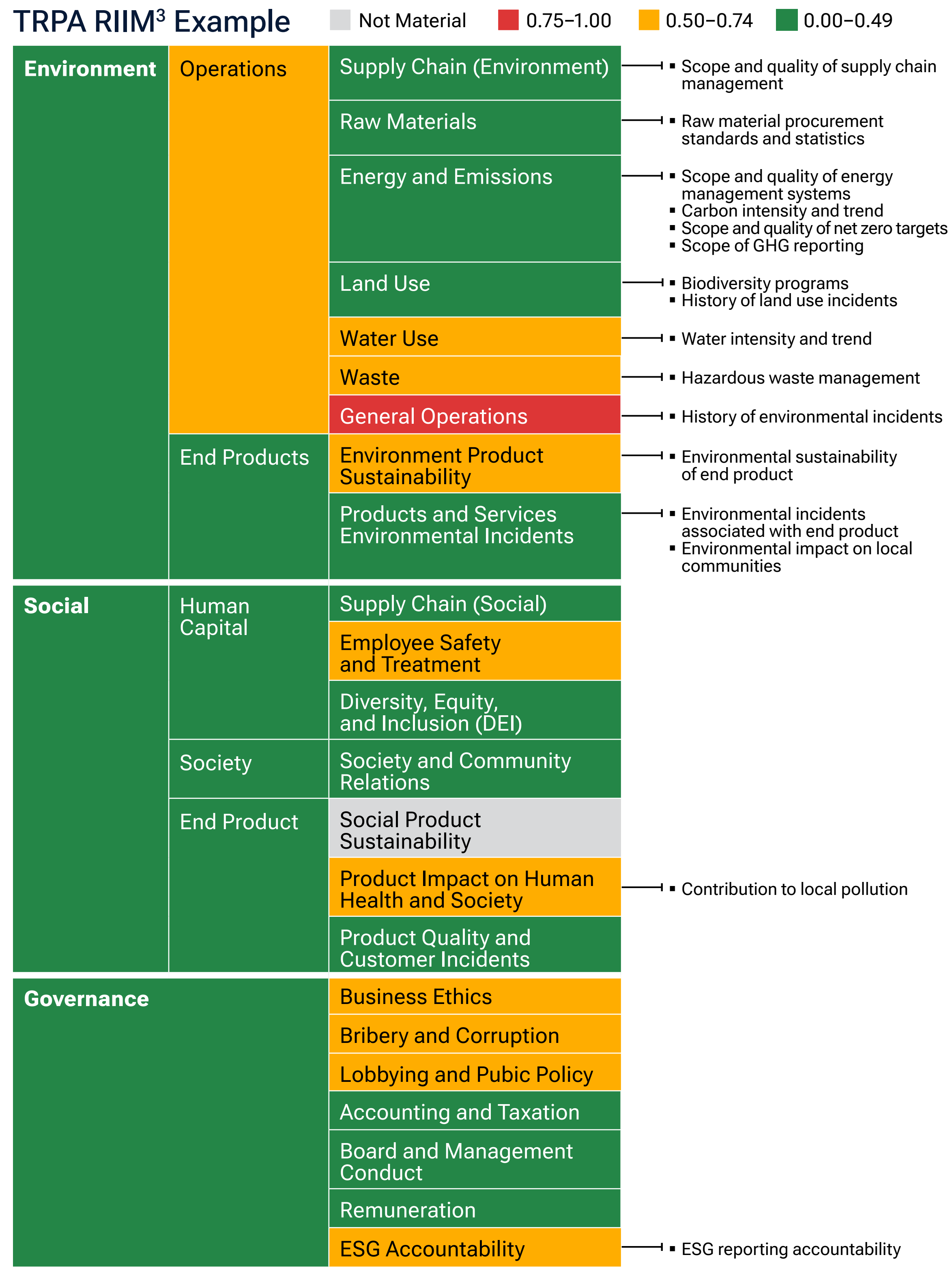
Description	Mitigation	Monitoring Process	Potential Impact
Physical Risks			
Acute X S M L An extreme weather even—such as a cyclone, wildfire, or flood—that impacts the firm's locations or the location of a vendor servicing the firm may affect our day-to-day operations, potentially resulting in increased costs and workforce disruptions.	The firm has local crisis management plans that ensure business continuity by mobilizing resources—employees and facilities—to address the fallout of an acute event in order to sustain service levels for clients. The Corporate Real Estate & Workplace Services team will be developing a future leasing strategy that will formally assess and consider the impact of physical climate risks on our facilities.	External events, such as severe weather or natural disasters, receive ongoing attention, given their potential impact on business activities, including impacts to our facilities and related infrastructure and technologies. Our ERG oversees business continuity and factors extreme weather events in business continuity planning.	▪ Loss of workforce productivity ▪ Disruptions to supplier engagements ▪ Negative impact to valuations could result in declines in asset values and potential loss of revenue ▪ Increased operating and capital costs to manage the impact of the event
Chronic (Investment Performance Related) S M L Within our investment portfolios, changes in weather patterns around the world can impact companies in which the firm invests on behalf of our clients. Weather pattern changes may cause our investment professionals to reevaluate investments in affected companies. Valuations may be impacted, resulting in declines in asset values and potential loss of revenue.	We incorporate climate-related investment analysis into our investment process to mitigate the potential impact on our portfolios.	Analysts and portfolio managers are accountable for considering climate-related factors within their investment process as part of ESG integration. This is included as part of their year-end evaluation and compensation. Additionally, the firm's active stewardship program helps mitigate climate risks within investment portfolios.	▪ Negative impact to asset valuations could result in declines in assets under management and potential loss of revenue.
Chronic (Operations Related) M L Rising sea levels may increase the risk of flooding to our Baltimore office, and increasing wildfires could impact our operations in various locations. Additionally, because of extreme variability in weather patterns, we may experience increased costs related to more frequent cooling and heating needs inside our buildings.	Corporate Real Estate & Workplace Services plans to embed physical risk considerations into a future leasing strategy, working with the Business Continuity team to ensure that there is sufficient considerations in business continuity planning.	Our headquarters is our largest waterfront location. The National Oceanic and Atmospheric Administration's Sea Level Rise Map shows that our new headquarters at Harbor Point will not be effected by sea level rises of seven feet. However, surrounding roadways and infrastructure may be impacted by sea level rises of three feet or more. Our remote work capabilities enable associates to work from home if roadways and infrastructure used to commute are compromised. Our Business Continuity team is developing a long-term plan that seeks to assess and mitigate specific impacts to all locations over 10 to 30 years.	▪ Increased operating and capital costs ▪ Increased insurance premiums and potential for reduced availability of insurance ▪ Reduced ability to attract talent

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

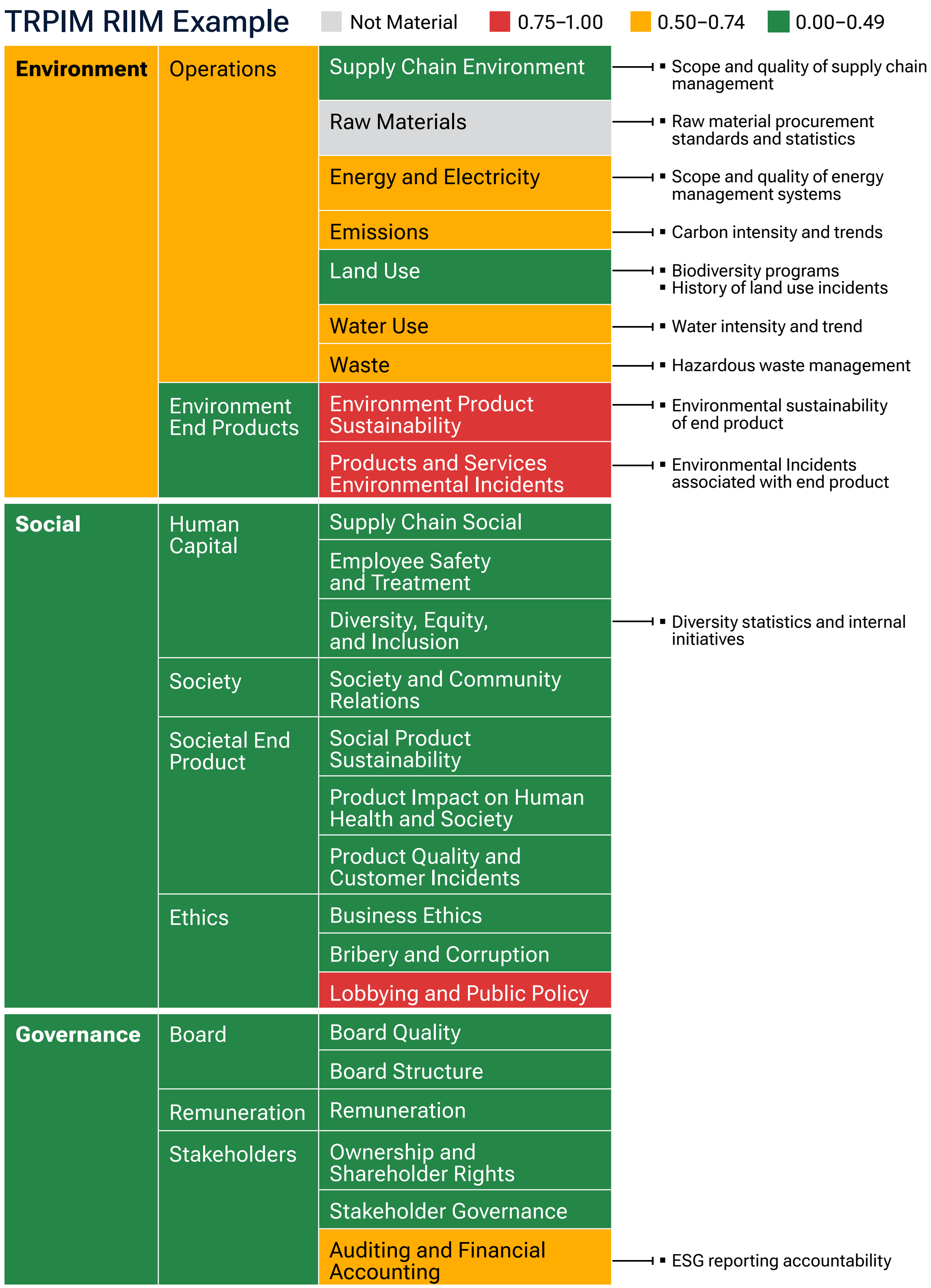
Consideration in Investment Products and Strategies‡

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

Our evaluation of climate-related factors focuses on energy transition and physical risk, but we also believe that an issuer's environmental footprint and track record are important indicators that can help us understand how they may perform in a tightening regulatory environment. As such, our RIIM frameworks include a range of inputs; a few examples are highlighted in the illustration of TRPA's corporate RIIM framework. Green scores of <0.5 reflect positive ESG characteristics or low ESG risks. Orange scores of between 0.5 and 0.75 reflect elevated levels of ESG risks. Red scores between 0.75 and 1 reflect high ESG risks.



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



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

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

Core Evaluation Metrics:

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

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

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

A small but growing number of clients have elected to apply various net zero or GHG reduction targets to their investment portfolios. These clients have directed a dual mandate to deliver on climate-related outcomes as well as financial performance.

[4] TRPA only.

Products and Mandates: Net Zero Solutions‡

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

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

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

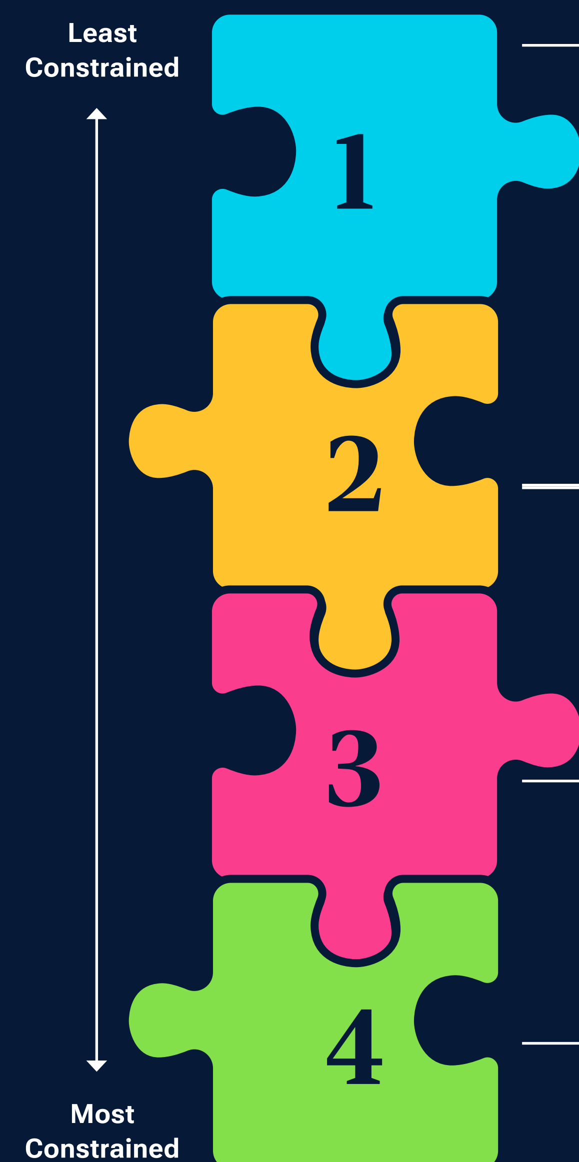
Mandates electing a **net zero stewardship** approach uses engagement and voting to encourage investee companies to follow best practices with regards to net zero disclosure and climate strategy. These mandates apply the T. Rowe Price net zero proxy voting guidelines created in 2023.

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

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

[5] TRPA only.

Aligning net zero goals with portfolio-level targets



Net Zero Stewardship

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

Net Zero Transition Framework

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

GHG Reduction Target

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

Climate Solutions Target

Portfolio sets a target for portfolio alignment to climate solutions.

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

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

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

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

Products and Mandates: Blue Bond Capability‡

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

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

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

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

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

Identifying Opportunities for New Product Offering‡

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

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

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

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

Climate Scenario Analysis

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

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

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

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

Climate Risk Exposure by Sector

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

Overall Climate Risk Exposure

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

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

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

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

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

[7] This information excludes Oak Hill Advisors, L.P. (OHA), an alternative credit manager that T. Rowe Price Group, Inc., acquired on December 29, 2021. Data as of December 31, 2023. All data are provided in terms of the contribution of each sector based on the aggregated assets covered. Please see page 37 for further definition. The climate scenarios are designed and developed by Network for Greening the Financial System (NGFS). Climate value at risk is based on a weighted average market value approach and represents the estimated percent change in portfolio value under each scenario. Source: MSCI ESG Research LLC.
[8] Sectors categories are based on Global Industry Classification Standard (GICS).
[9] Total may differ due to rounding.

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

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

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

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

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

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

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

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

Consideration in Operational Strategy‡

Reducing and managing our GHG emissions is our primary sustainability priority from a corporate standpoint. This includes an assessment of costs to achieve our objectives. We analyzed the cost of continuing to use brown power compared with working toward net zero in Scope 1 and 2 by year-end 2040. Additionally, through our Corporate Real Estate & Workplace Services team, we continuously seek energy efficiency measures to implement throughout our global offices.

Forty-eight percent of our real estate square footage was environmentally certified by year-end 2023, and we aim to have at least 60% certified by year-end 2025. Our new global headquarters will aim for excellence in terms of environmental sustainability and energy efficiency, with our Baltimore offices striving for LEED Platinum status for commercial interiors from the U.S. Green Building Council. Our new London office achieved an Excellent standard by Building Research Establishment Environmental Assessment Methodology (BREEAM) for its design phase, and we are currently pursuing certification for post-construction.

Our locations[12]

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

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

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

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

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

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 reputational risk, strategic risk, operational risk, business continuity risk, human capital risk, compliance risk, and financial risk. Identifying climate-related risks includes the consideration of extreme weather events, uncertainty surrounding regulation, reputational impacts, investment risk, and our product range.

As head of the Enterprise Risk Group (ERG), our chief risk officer (CRO) is primarily responsible, with support from the Enterprise Risk Management Committee (ERMC), for anticipating and addressing new risks, as well as ensuring that risks are managed relative to the firm's tolerances. The CRO reports to the firm's chief operating officer (COO) and regularly updates the T. Rowe Price Group Board of Directors. The ERG is an independent, global team with seasoned experts specializing in enterprise and operational risk, investment risk, privacy, and business resiliency. The firm's risk management framework is used to monitor climate risks. As part of that framework, the ERG works with subject matter experts to ensure that ownership of these risks aligns with the appropriate business leaders.

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

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

Implications of Increasing Global Regulation‡

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

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

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

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

Analyzing Investment Risks‡

We use our proprietary RIIM analyses, net zero status, GHG footprint, and climate solutions alignment[1] analysis to identify and assess climate-related risks. Within the RIIM assessments, investments' environmental characteristics are considered holistically. At the issuer level, each area of focus is weighted in accordance with its materiality to the industry or subindustry. At the portfolio level, assessments can also include a comparison with the benchmark. Key areas of focus include:

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

Climate Stewardship‡

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

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

One of the more difficult aspects of evaluating climate change risks and opportunities in corporate securities is the lack of disclosure on key environmental metrics, strategy, and accountability. T. Rowe Price expects companies to adopt industry best practice disclosure standards. To this end, we advocate for disclosures aligned to the Sustainability Accounting Standards Board (SASB) and the Task Force on Climate-Related Financial Disclosures (TCFD)—both globally recognized frameworks that emphasize financial materiality. As the newly established International Sustainability Standards Board (ISSB) comes into effect, we will recommend this disclosure as best practice.

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

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

We strongly encourage all issuers to report their Scope 1–3 GHG emissions. However, we recognize that reporting Scope 3 emissions adds much more complication than reporting Scope 1 and 2 emissions and that, for some industries, estimating methodologies are still evolving. Given these issues, we do not think it is appropriate for us to unilaterally expect all issuers to report a full suite of Scope 3 emissions; however, we do expect that the landscape and our expectations will evolve over the next 12 to 24 months. In the interim, we strongly encourage issuers to report the Scope 3 emissions categories most material to their business. For high-emitting companies, our minimum expectation is that they disclose absolute Scope 1 and 2 GHG emissions on an annual basis. Failure by companies in these industries to disclose these data leaves investors unable to properly analyze their exposure to climate change risk. For this transparency gap, we will generally oppose the reelections of all non-executive incumbent directors at the next shareholder meeting.

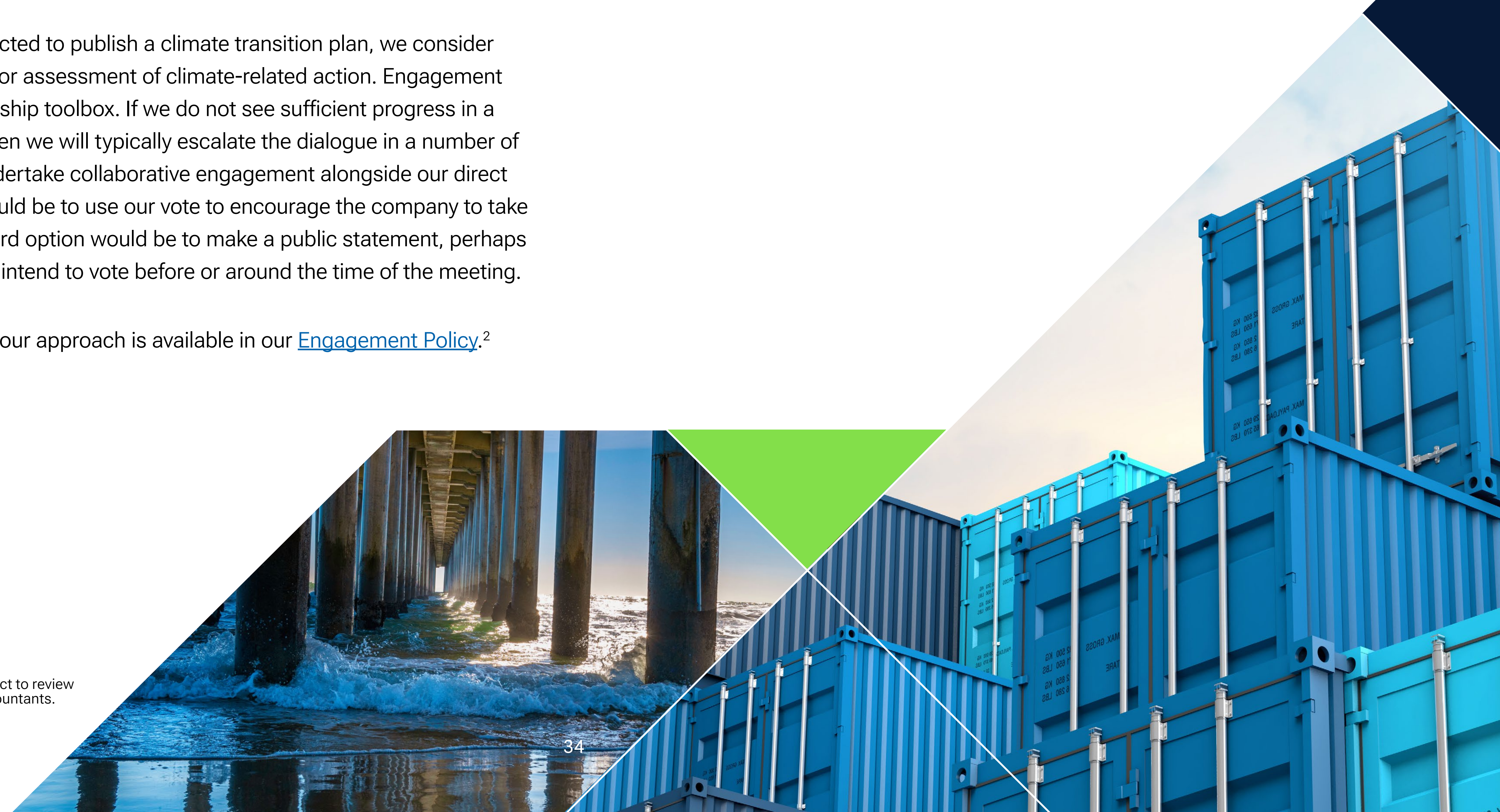
Where a company has elected to publish a climate transition plan, we consider it against our framework for assessment of climate-related action. Engagement is only part of the stewardship toolbox. If we do not see sufficient progress in a reasonable time frame, then we will typically escalate the dialogue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

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

Process for Managing Climate-Related Risk[‡]

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

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



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

Metrics and Targets

Our Approach‡

To support the goals of the Paris Climate Agreement to limit the increase of global temperatures to 1.5˚C, we are committed to reducing GHG emissions associated with our operations. We are targeting net zero Scope 1 and 2 emissions by 2040 and have an interim target to achieve a 75% reduction by 2030 compared with our 2021 baseline. This includes, but is not limited to, pursuing renewable electric supply and energy efficiency improvements in our operations.

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

Measuring the Climate Impacts of Our Investments

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

Methodology

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

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

Financed Emissions

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

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

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

Listed and Private Company Total Financed Greenhouse Gas Emissions

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

Sovereign Financed Greenhouse Gas Emissions

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

Weighted Average Carbon Intensity (WACI)

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

Corporate Issuers

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

Sovereign Issuers

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

Carbon Footprint

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

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

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

Corporate Issuers Carbon Footprint

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

Implied Temperature Rise

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

2023 Metrics[3]

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

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

Climate Metrics by Sector[4]

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

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

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

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

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

Net Zero Asset Managers Initiative

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

One of our key rationales for joining NZAM was to help support the establishment of robust and standardized methodologies for evaluating investment pathways to net zero. NZAM objectives also align with our belief that a smooth climate transition should create a more stable economic environment, reduce uncertainty, and enable business investment. This should result in better long-term financial outcomes for the companies and other securities in which we invest on behalf of our clients.

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

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

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

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

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

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

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

Net Zero Alignment Classification System

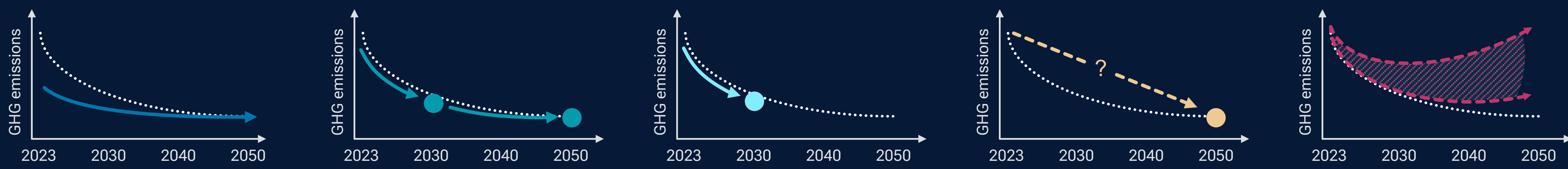
Our net zero alignment or “status” framework helps determine the extent to which corporate issuers have established and are implementing credible, scientifically based net zero transition plans that are compatible with the goal of limiting global temperature increases in this century to 1.5˚C.

It is based on the PAII NZIF.

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

Proprietary Assessment of Issuers’ Net Zero Alignment

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



Achieving

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

Aligned

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

Aligning

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

Committed

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

Not Aligned

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

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

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

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

Fund Carbon Footprint Reporting

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

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

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

Measuring the Climate Impacts of Our Operations‡

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

2023 Emissions by Scope

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

2023 GHG Iventory[8]		MT CO_2e
Total Scope 1 Emissions‡		**681**
	On-Site Fuel Use	402
	Fleet Fuel Use	35
	Refrigerants	244
Total Scope 2 Emissions (Location-Based)‡		**18,340**
Total Scope 2 Emissions (Market-Based)‡		**18,649**
	Purchased Electricity Location-Based	17,894
	Purchased Electricity Market-Based	18,203
	Purchased Steam	446
Total Scope 3 Emissions		**130,124**
Category 3.1	Purchased Goods and Services	78,553
Category 3.2	Capital Goods	21,328
Category 3.3	Fuel- and Energy-Related Activities	3,866
Category 3.5	Solid Waste	277
Category 3.6	Business Travel	8,504
	Air Travel	8,374
	Train Travel	130
Category 3.7	Employee Commuting	16,914
	Commuting to Office	13,252
	Telecommuting	3,662
Category 3.13	Downstream Leased Assets	682
Category 3.15	Investments	See page 38
Total GHG Emissions (Location-Based)		**149,145**
Total GHG Emissions (Market-Based)		**149,454**

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

Inventory Boundary and Methodology‡

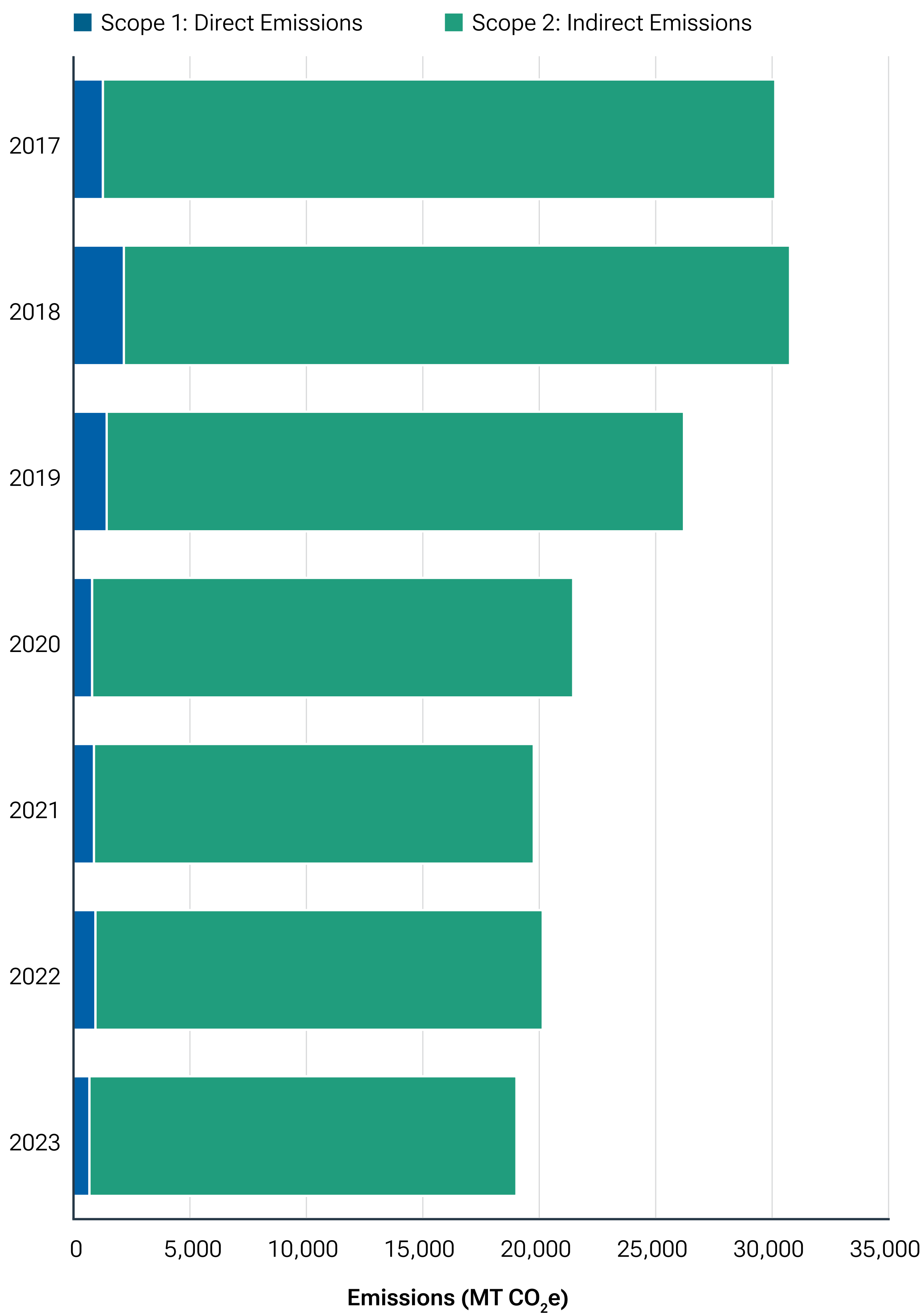
T. Rowe Price uses an operational control approach, which accounts for all the GHG emissions from operations over which we have control. This includes owned and leased facilities and data centers, but excludes co-location facilities, which are included in Scope 3.1 (Purchased Goods and Services) emissions.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

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

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

Scope	Dataset	Calculation Methodology
Scope 3.5 – Waste	Waste type	**Assumptions** ▪ Estimates were used for buildings where data could not be obtained. ▪ When data were received for whole-building waste, they were prorated on a square foot basis. **Emissions Factors** ▪ EPA Emission Factors for Greenhouse Gas Inventories, Table 9
Scope 3.6 – Business Travel	Distance traveled and spend	**Assumptions** ▪ Based on known air and rail travel. Excludes automotive travel and hotel stays. ▪ Approximately 80% of air and rail travel booked through our travel provider, which includes information on distance traveled. The remainder is captured in our expense system without details on distance traveled. ▪ Spend data collected by our travel provider were scaled to capture travel documented in our expense system, where data on distance traveled are absent. **Emissions Factors** ▪ Air: Follows the guidance from the EPA Emission Factors for Greenhouse Gas Inventories, Table 10, and utilizes DEFRA GHG Conversion Factors 2022 ▪ U.S. Rail: EPA Emission Factors for Greenhouse Gas Inventories, Table 10 ▪ International Rail: DEFRA GHG Conversion Factors 2023
Scope 3.7 – Employee Commuting	Distance traveled	**Assumptions** ▪ Utilized employee survey results on 2022 commuting patterns to scale emissions based the number of hybrid employees as of December 31, 2023. ▪ Assumes employees work 42 weeks per year, accounting for global holidays and paid leave. ▪ Teleworkers' full-time workweek is applied to telecommuting calculation. **Emissions Factors** ▪ Commuting: Federal Highway Administration; AFLEET ▪ Telecommuting: Energy Statistics Data Browser – Data Tools – IEA
Scope 3.13 – Downstream Leased Assets	Fuel and electricity consumption	**Assumptions** ▪ Includes purchased electricity and natural gas and gas diesel oil consumption from facilities leased by T. Rowe Price (the lessor) to a third party (the lessee). Emissions included in this category are the lessee's Scope 1 and 2 emissions. **Emissions Factors** ▪ IPCC 2006 Guidelines, Volume 2: Energy: Chapter 2: Stationary Combustion, Table 2.4 ▪ U.S. – EPA's Emissions & Generation Resource Integrated Database (eGrid) 2022 ▪ All other International – International Energy Agency (IEA) 2023
Scope 3.15 – Investments	Portfolio holdings	See page 37

Scope 1 and 2 Emissions Trends



Scope 1 and 2 Emissions Target‡

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

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

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

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

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

Year-Over-Year Scope 1 and 2 Emissions Intensity

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

* Total based on location-based emissions.

Reducing Operational Waste‡

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

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

Operational Waste Management‡[10]

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

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

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

Working With Our Supply Chain‡

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

Business Travel and Commuting‡

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

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

We have continued our partnership with Climate Vault, which began in 2022, to invest in climate solutions that address our emissions from travel each year. We will make a donation to Climate Vault to purchase carbon allowances for 8,504 metric tons of CO_2 emissions.[11] This amount approximates total emissions generated from our business travel during 2023. We anticipate that our relationship with Climate Vault may be broadened to supplement select areas of our net zero strategy and address shortcomings in our ability to eliminate emissions.

Climate Vault is an award-winning nonprofit that has been designated by the Carbon Disclosure Project as a Carbon Reduction- and SBTi-accredited service provider. It purchases and "vaults" carbon allowances on government-regulated compliance markets. Because the number of allowances is limited, keeping them off the market decreases CO_2 emissions and provides a quantifiable carbon reduction. Climate Vault's approach is easily measurable (1 permit = 1 metric ton of CO_2), provides price transparency, and is rigorously verifiable. Climate Vault will use the monetary value of the permits to fund carbon dioxide removal technologies to eliminate the CO_2 already in our atmosphere. In addition to annual financial audits, Climate Vault voluntarily requests allowance audits by Baker Tilly US, LLP, which verify that all donations made toward carbon metric tons are purchased in the respective compliance market.[12]

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

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

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

Glossary of Terms

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Report of Independent Certified Public Accountants

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

D +1 703 847 7500

REPORT OF INDEPENDENT CERTIFIED PUBLIC ACCOUNTANTS

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

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

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

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

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

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

GrantThornton

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

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

Our report relates to the specific TCFD information, 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 2023 TCFD Report. Accordingly, we do not express a conclusion or any other form of assurance on any amounts or disclosures included within the 2023 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, 2023, in order for it to be based on the Criteria set forth in Note 1.

Grant Thornton LLP

Arlington, Virginia
May 23, 2024

Note 1

Subject Matter		Criteria
Committees with ESG Oversight disclosures	Page 08	Global Reporting Initiative ("GRI") 1: Foundation 2021, Section 4: Reporting Principles
Management's Roles disclosures	Page 10	
Accountability chart	Page 11	
Climate-Related Risks and Mitigation Strategies disclosures	Pages 17 - 20	
Consideration in Investment Products and Strategies disclosures	Pages 20 - 21	
Product & Mandates: Net Zero Solutions disclosures	Pages 22 - 23	
Products & Mandates: Blue Bond Capability disclosures	Page 23	
Identifying Opportunities for New Product Offering disclosures	Page 23	
Consideration in Operational Strategy disclosures	Pages 27 - 30	
Our Risk Management Framework disclosures	Page 32	
Implications of Increasing Global Regulation disclosures	Pages 32 - 33	
Analyzing Investment Risks disclosures	Page 33	
Climate Stewardship disclosures	Pages 33 - 34	
Process for Managing Climate Related Risk disclosures	Page 34	

Grant Thornton

Our Approach disclosures	Page 36	
Measuring the Climate Impacts of Our Operations disclosures	Page 42	
Scope 1 and 2 Emissions Target disclosures	Page 45	
Reducing Operational Waste disclosures (exclusive of Operational Waste Management table)	Page 46	
Working with Our Supply Chain disclosures	Page 47	
Business Travel and Commuting disclosures	Page 47	
Operational Waste Management table and disclosures	Page 46	Developed by management – the metrics measure waste expressed as an absolute measurement of the identified activity to the stated benchmark
2023 Total Scope 1 Emissions:	681 MT CO_2e	World Resources Institute and World Business Council for Sustainability Development Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition) and the GHG Protocol Scope 2 Guidance
2023 Total Scope 2 Emissions (Location-Based)	18,340 MT CO_2e	
2023 Total Scope 2 Emissions (Market-Based)	18,649 MT CO_2e	
Purchased Electricity Location-Based	17,894 MT CO_2e	
Purchased Electricity Market-Based	18,203 MT CO_2e	
Purchased Steam	446 MT CO_2e	
Inventory Boundary and Methodology disclosures regarding Scope 1 and Scope 2 emissions (including table)	Page 43	

IMPORTANT INFORMATION

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

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

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

202406-3623953