

Statement on the Due Diligence Policies of Brown Advisory (Ireland) Limited on the Principal Adverse Impacts of Investment Decision

Statement

Brown Advisory (Ireland) Limited (“**Brown Advisory**”), as the UCITS management company of Brown Advisory Funds plc, defines sustainable investment as an investment approach that incorporates environmental, social and governance (“**ESG**”) research alongside fundamental research to drive performance. For purposes of Regulation (EU) 2019/2088 of the European Parliament and of the Council on sustainability-related disclosures in the financial services sector (the “**SFDR**”), our sustainable investment funds include those funds that promote environmental or social characteristics in their investment-decision making processes. This Statement is also the Investment Manager’s Principal Adverse Impact Due Diligence Policy for the purpose of SFDR.

Brown Advisory conducts an assessment of the principal adverse impacts of our investment decisions on sustainability factors across all of the holdings in our sustainable investment funds. The principal adverse impacts of our investment decisions on sustainability factors for funds that do not promote sustainability considerations in investment decision-making processes may be considered on a case-by-case basis, but a principal adverse impact assessment is not required for holdings in these funds. In all cases, an assessment of principal adverse impacts may not be possible if we are not able to conduct detailed due diligence or do not have access to reliable data and information necessary to perform this due diligence.

ESG Research Tools

We view issues such as climate change, inequality and poor corporate governance to be tangible risks in our sustainable investment funds. In order to address these risks, we have an in-house ESG research team to analyze both ESG risks and opportunities across our sustainable investment funds. These analysts are integrated into the overall fundamental research team that supports our funds.

In addition to ESG research, we may utilize screening capabilities for our sustainable investment funds. This screening process leverages third-party research that seeks to identify companies that may have controversial business involvement, as determined by Brown Advisory. Our ESG research team leverages third-party data as a supplement to its bottom-up research of individual securities.

Engagement

We seek to engage with the issuers in our sustainable investment funds on a case-by-case basis, when possible, to encourage actions that we believe create long-term value for stakeholders, increase resilience and generate positive impact on society (within the boundaries of a company’s business). Our engagement discussions are based on specific risks and opportunities that we may consider to be relevant and material in a given situation and at a given time.

Proxy Voting

We supplement our ESG research through engagement with companies and industry groups and through our proxy voting. Our sustainable investment funds generally seek to support ESG-related shareholder proposals that we consider likely to improve shareholder value over time.

International Standards and Codes of Conduct

Brown Advisory partners with a variety of groups that help coordinate engagement activity within the investment community, including Ceres, the United Nations-supported Principles for Responsible Investment, the International Capital Market Association, Confluence Philanthropy, and the Interfaith Center for Corporate Responsibility. In addition, our engagement approach and recommendations may be generally informed by the Financial Stability Board’s Task Force for Climate-related Financial Disclosure, the Impact Management Project, the Sustainability Accounting Standards Board and CDP.