

**Policy Name****BBH Luxembourg Funds - Exercising Voting Rights Policy****Executive Summary**

This policy has been adopted pursuant to applicable requirements under CSSF Circular 18/698 and CSSF Regulation 10-4.

**Policy Statement****I. Introduction**

This policy has been adopted pursuant to applicable requirements under CSSF Circular 18/698 and CSSF Regulation 10-4.

**II. Exercising Voting Rights Policy**

The BBH Luxembourg Funds rely on Brown Brothers Harriman & Co.'s ("BBH") Proxy Voting Policy. BBH may vote proxies for its investment advisory clients for whom it exercises investment discretion pursuant to an advisory contract and where BBH has been designated under such contract or otherwise to vote the client's proxies. BBH may also vote proxies for investment advisory clients holding nondiscretionary accounts where BBH has been designated to vote proxies on their behalf pursuant to a written agreement. In connection with this proxy voting authority, BBH incurs fiduciary responsibilities which generally include the duties of loyalty, care, impartiality, and discretion.

A Copy of BBH&Co.'s Proxy & Corporate Action Voting Policy is available upon request.

*Reviewed: December 2024*