HARDING LOEVNER FUNDS PLC (the "Company")

Sustainable Finance Disclosure Regulation
Entity-Level Website Disclosure
January 2023

Introduction

Regulation (EU) 2019/2088 of the European Parliament and of the Council on sustainability-related disclosures in the financial services sector ("SFDR") requires certain EU-regulated entities, including the Company, to disclose the following information on a public website:

- Information about its policies on the integration of sustainability risks into the investment decision making process;
- Information on whether it considers principal adverse impacts ("PAIs") of investment decisions on sustainability factors; and
- Information regarding the promotion of environmental or social characteristics, for certain financial products.

KBA Consulting Management Limited (the "Manager"), the Company's third-party management company, is a "financial market participant," and each sub-fund of the Company ("collectively, the Funds") is a "financial product," under SFDR. The Manager delegates day-to-day investment decision making for the Company to the Company's investment manager, Harding Loevner LP (herein, "we," "our," the "Investment Manager" or "Harding Loevner").

Entity-level and product-level website disclosures have been prepared to satisfy the foregoing SFDR requirements, as follows:

- Entity-level website disclosure is available at: https://www.hardingloevner.com/ways-to-invest/ucits-funds/.

- Product-level website disclosure is available at: https://www.hardingloevner.com/ways-to-invest/ucits-funds/global-paris-aligned-equity-fund/

Any words or terms not defined herein shall have the same meaning given to them in the Company's Prospectus or any Supplement to the Prospectus.

Scope

The entity-level website disclosure applies to all of the following, except as otherwise noted herein:

The Harding Loevner Global Equity Fund
The Harding Loevner International Equity Fund
The Harding Loevner Emerging Markets Equity Fund
The Harding Loevner Frontier Emerging Markets Fund
The Harding Loevner Global Small Companies Equity Fund
The Harding Loevner Global Paris-Aligned Equity Fund

Sustainability Risk Policy

Objective and Scope

This Sustainable Risk Policy (the "Policy") provides an overview of the approach to the integration of sustainability risks taken by Harding Loevner with respect to all of the Funds.

Sustainability risk is an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of an investment.

Our approach to sustainability is always evolving as we develop our policies and processes. As such, this Policy will continue to evolve over time and will be reviewed regularly and updated as appropriate.

Our Approach to Sustainability Risk Integration

We are a global equities manager seeking to achieve superior risk-adjusted returns for our clients, including the Company, by identifying high-quality, sustainably growing companies through in-depth fundamental analysis. Companies that operate with disregard for their environment, for the societies in which they pursue their business, or for the principles of governance by which they should be supervised on behalf of shareholders put at risk their long-term cash flows and share price. Therefore, consideration of environmental, social, and corporate governance (ESG) issues is intrinsic to our investment process. Our investment selection approach, by its design, eschews companies engaging in unsustainable business practices or pursuing short-term profits at the expense of long-term growth and stability. We believe only companies that can create substantial long-term value are capable of producing meaningful "shared value" for the benefit of larger society as well as for shareholders and other direct stakeholders.

Upon commencing research on a company, the responsible analyst reviews its governance using a 14-point checklist intended to ensure companies with poor governance practices are eliminated from further consideration. The analyst also completes a 15-point environmental and social red flag checklist to determine if the company faces any severe risks in these areas that require closer analysis.

Harding Loevner includes in its equity security evaluation an explicit consideration of ESG risk factors. For each company under research coverage, the responsible Harding Loevner analyst evaluates the extent to which each of numerous ESG factors represents a risk that could threaten, or an opportunity that could support, the sustainability of the company's profitable growth. Having evaluated these individual factors, analysts assign scores for each company on E, S, and G pillars overall, which are then aggregated in equal proportion to determine an overall ESG score for the company. The scorecard provides a consistent framework for assessing and comparing companies' potential ESG risks and opportunities across all industries and geographies. A company's ESG score may affect the analyst's long-term forecasts of its growth, margins, capital intensity, or competitive position. A company's overall ESG score is also a parameter of Harding Loevner's equity valuation model, wherein it influences the estimated duration of future cash flow growth.

Analysts rely on their expertise to judge which ESG risks or opportunities are material to a company based on its business, where it operates, and any unique industry characteristics. They also have access to various internal and third-party ESG resources to help them in this regard. Harding Loevner also has an ESG materiality framework which helps analysts communicate the environmental and social issues most relevant to a specific industry. To create the framework, Harding Loevner adapted the SASB Materiality Map through feedback from sector analysts on the most material ESG exposures by industry, forming a customized tool.

Portfolio managers consider ESG factors among other factors affecting risk and expected returns in choosing among companies approved by analysts.

Harding Loevner's Chief Investment Officer oversees its investment process, including its responsible investing policies. He approves the elements of the firm's ESG scorecard. The Director and Deputy Director of Research are responsible for ensuring that tools and resources for ESG analysis, such as the scorecard, are available to analysts and are consistently used by them. Analysts are accountable for the quality and completeness of their company and industry research, which incorporates their assessments of ESG risks to the sustainability of companies' cash flows. The firm's ESG Analyst supports analysts in their ESG integration work and reports to the abovenamed senior managers on its effectiveness.

Harding Loevner's integration of ESG risks and opportunities as part of its investment process may diminish the impacts of sustainability risks on the returns, and improve the overall risk profile, of a Fund. Further, it may impact a Fund's performance, including relative to similar funds that do not consider such ESG risks and opportunities. Additionally, Harding Loevner's consideration of ESG risks and opportunities in connection with identifying and selecting investments may require subjective analysis and may be difficult if data about a particular company is limited. A company's ESG practices or Harding Loevner's assessment of such practices may change over time.

Consideration of Principal Adverse Impacts ("PAIs")

Unless otherwise set out in a Supplement for the relevant Fund, the Manager and Harding Loevner do not consider principal adverse impacts on sustainability factors. The reason is that while a partial consideration of adverse impacts is embedded in Harding Loevner's investment decision-making process as part of its integration of sustainability risks, such consideration is not systematic or uniform because it is impractical at this time, due to the continuing lack of ESG data provided by underlying investee companies and/or third-party providers. This position will be kept under review by the Manager and Harding Loevner and may change over time depending on the availability of ESG data, the evolution of the investment strategies pursued by the Funds, or other circumstances.

The Global Paris-Aligned Equity Fund considers principal adverse impacts of investment decisions on sustainability factors, as set forth in its Supplement. Further details are set out in the Annex thereto.