Harbor

Harbor Small Cap Growth Fund

STANDARD RFI

All responses are as of 06/30/2025.

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Harbor Funds Distributors, Inc. (Distributor)
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Westfield Capital Management Company, L.P. (Subadvisor)
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harborcapital.com

HARBOR CAPITAL ADVISORS, INC.

BACKGROUND INFORMATION

Harbor Capital Advisors, Inc. (“Harbor Capital”) was founded in 1983 to manage the pension and retirement plan assets of our former parent company, Owens-Illinois. In 1986, we introduced Harbor Funds, a family of no-load mutual funds featuring our manager-of-managers business model. In June of 2001, Harbor Capital was acquired by Robeco Groep N.V. (“Robeco”), a financial holding company located in the Netherlands, a wholly-owned subsidiary of Rabobank Nederland (“Rabobank”). On July 1, 2013, ORIX Corporation acquired 90% plus one share of the outstanding shares of Robeco from Rabobank. On October 21, 2016, ORIX Corporation acquired the remaining interest that Rabobank held in Harbor Capital's parent company, Robeco (10% less one share). As a result, Robeco is wholly-owned by ORIX Corporation. Effective January 2018, Robeco’s name changed to ORIX Corporation Europe N.V. (“ORIX Europe”). Harbor Capital remains an indirect, wholly-owned subsidiary of ORIX Corporation.

For over 35 years, Harbor has served as a gateway for clients to access talented asset managers through active, cost-aware investments. We aim to identify specialists in each asset class to manage portfolios and apply a comprehensive oversight program to monitor their performance in an effort to ensure their decisions are in the best interest of our clients. Harbor offers the benefit of an experienced portfolio manager, in addition to a professional adviser to maintain manager accountability.

Because Harbor partners with asset class experts for targeted strategies, we are not constrained by a single, overarching investment style. This flexibility allows us to examine any investment approach and enter a variety of assets classes, without bias, and has led to a diverse array of investment solutions to help meet investor needs.

SUBADVISOR STRUCTURE & INVESTMENT TEAM

SUBADVISER STRUCTURE

Westfield Capital Management Company, L.P. is a privately held limited partnership organized in Delaware. Monex Group Inc. owns a 20% non-controlling equity interest in Westfield. The remainder is employee-owned and led by William A. Muggia, President, CEO & CIO, who is the majority owner. Westfield’s 15 employee partners are broad-based across the firm, spanning Investments, Compliance, Finance, Marketing, Trading, and Technology. Westfield believes that this ownership has created an alignment of interests and fostered long-term employee retention. There are no other expected or pending changes to Westfield’s ownership structure.

HISTORY

Westfield was founded in 1989 as an SEC registered investment advisor dedicated to delivering attractive and consistent investment performance based on a disciplined, team-based approach, with exceptional client service to institutions and wealthy individuals. In 1997, Westfield became an autonomous subsidiary of Boston Private Financial Holdings, Inc. (“BPFH”) through a pooling of interests’ transaction. On June 30, 2008, Westfield closed a re-equitization agreement with BPFH, at which time Westfield became a partnership jointly owned by its management team and BPFH. On December 14, 2009, Westfield entered a revenue sharing agreement with BPFH, to fully effect a management buyout from BPFH. In 2018, Westfield concluded the revenue sharing agreement it had in place with its former parent, BPFH, as part of the management buyout in 2009.

Additionally, Lincoln Peak Capital converted its convertible preferred note which was entered into with Westfield at the time of the management buyout in 2009 into a minority partnership interest (3.71%) in Westfield. Effective January 2020, Westfield exercised its right to redeem Lincoln Peak’s minority interest in the Company. Lincoln Peak’s interest has since been redeemed and consideration was paid in full in February 2021 with no further obligations, returning Westfield to 100% employee owned. In April 2025, Westfield entered into a partnership with Monex Group, Inc and Monex Limited Partner (“Monex”) acquired a 20% non-controlling equity interest in Westfield. Importantly, Westfield continues to be employee-owned, with 15 equity partners; and William A. Muggia, President, CEO & CIO remains the largest shareholder.

TEAM BIOGRAPHIES

Harbor Small Cap Growth Fund Portfolio Managers

William A. Muggia
President, Chief Executive Officer and Chief Investment Officer
Mr. Muggia is President, Chief Executive Officer and Chief Investment Officer, and he also chairs the Investment Committee and serves as Market Strategist. He joined Westfield Capital Management Company in 1994. Previously, he spent three years at Alex. Brown & Sons, and eight years at Kidder Peabody & Co. He received a BA from Middlebury and an MBA from Harvard Business School.

Richard D. Lee, CFA
Managing Partner and Chief Investment Officer
Mr. Lee, CFA, is the Managing Partner and Deputy Chief Investment Officer. He has been with Westfield Capital Management Company since 2004 and covers Hardware and Semiconductors. Previously, he spent three years with KL Financial Group, two years with Soundview Technology Group, four years with Hambrecht & Quist, LLC, and three years with Salomon Smith Barney. He received a BA from Harvard University.

Matthew Renna
Partner, Head of the Health Care Sector Team, & Portfolio Manager
Mr.Renna joined Westfield in 2013 as a member of the Investment Committee covering the Health Care sector. Prior to joining Westfield, he was with Vinik Asset Management as a Health Care Portfolio Manager. His professional experience also includes Director, SMID Growth Equity team at BlackRock, Inc., Senior Equity Analyst at RA Capital Management and Director, Healthcare/Biotechnology at Soleil Securities Corporation, Neponset Equity Research. Matthew began his career in the Health Care industry at Merck & Co., before entering equity research as a Senior Research Associate covering Specialty Pharmaceuticals at Leerink Swann LLC. Mr. Renna began his investment career in 2004.

Edward Richardson
Partner, Head of the Industrials & Cyclicals Senior Team, & Portfolio Manager
Mr. Richardson joined Westfield in 2014, and is a Partner and Head of the Industrials Cyclicals Sector Team. Prior to joining Westfield, he worked at Delaware Investments, Merrill Lynch, and TM Capital. Mr. Richardson began his investment career in 2005.

DECISION MAKING AUTHORITY

Westfield utilizes an Investment Committee approach to portfolio management and all portfolio decisions for the Small Cap Growth Equity strategy are made by the Investment Committee on a consensus basis. If consensus is not reached, the security will not be approved for purchase. It is the responsibility of the sponsoring analyst to address any outstanding questions or concerns or re-present at a later date. Securities are reviewed in detail at the sector team level before being presented to the broader Investment Committee. Many names are pushed aside at that level before even being presented to the Investment Committee. As a result, they estimate around 80% of names are approved. Main reasons for a security not being approved are typically a result of valuation, timing, portfolio exposure, etc.

COMPENSATION & RETENTION OF INVESTMENT PROFESSIONALS

Members of the Westfield Investment Committee may be eligible to receive various components of compensation:

- Investment Committee members receive a base salary commensurate with industry standards.

- Investment Committee members are also eligible to receive an annual performance-based bonus award. The amount awarded is based on the employee's individual performance attribution and overall contribution to the investment performance of Westfield.

- Investment Committee members may also be eligible to receive equity or profits interests in Westfield which allow them to participate in the future profits of the firm. Individual awards are typically determined by a member's overall performance within the firm, including but not limited to contribution to company strategy, participation in marketing and client service initiatives, as well as longevity at the firm. Key members of Westfield's management team who receive equity interests in the firm enter into agreements restricting post-employment competition and solicitation of clients and employees of Westfield. This compensation is in addition to the base salary and performance-based bonus.

Westfield's Research Analysts and Traders receive a base salary commensurate with industry standards, a performance-based bonus award, and are eligible for profit sharing interests. Below, please find a summary of how these personnel are evaluated:

- Research Analysts are evaluated and compensated based on their general research efforts at the direction of the Investment Committee.

- Traders are evaluated and compensated on their ability to trade stocks relative to the trading range of a stock on that trade date.

SUCCESSION PLANNING

From an investment perspective, Rich Lee's promotions over the last decade from Deputy CIO to now CIO has marked the first step in a long-term succession plan for Westfield. Importantly, Westfield's traditional domestic growth equity strategies, including the Small Cap Growth Equity strategy, are managed collectively by the Investment Committee, as opposed to employing a single portfolio manager approach, limiting the reliance on one individual. Additionally, all economic sectors are covered by at least two members of the Committee – each with specific industry responsibilities. Therefore, while particular coverage responsibilities at the stock level are unique, the Investment Committee shares an understanding of the investments at the sector level. To this end, no single departure would leave the Committee with an uncovered economic sector

HARBOR SMALL CAP GROWTH FUND

INVESTMENT PHILOSOPHY

Westfield's Small Cap Growth Equity strategy utilizes an active, fundamental, bottom-up approach to investing in domestic equity securities. They employ a growth at a reasonable price (GARP) investment style and favor investing in earnings growth stocks given their conviction that stock prices follow earnings progress and that they offer the best investment opportunities. Westfield believes that reasonably priced stocks of companies with accelerating or underappreciated earnings potential are best identified through in-depth, fundamental research. Westfield believes that by implementing their investment discipline with a strong team that focuses on their core growth at a reasonable price philosophy, their strategy will add value over the long-term. Westfield's Small Cap Growth Equity portfolio is managed in accordance with their four primary beliefs:

1. Stock prices ultimately follow earnings progress.
2. Small cap companies coexist and compete with mid and large-cap companies, and Westfield's Investment Committee is at an advantage because they cover their respective industries across the capitalization spectrum and understand market dynamics across all cap ranges, and the relationships between the companies in each cap range.
3. Growth can be purchased at a reasonable price, and
4. A team approach ensures collective best thinking is implemented.

C. Michael Hazard, Westfield's founder, and Arthur J. Bauernfeind, Westfield's former Chairman Emeritus, were the original architects of the philosophy, which has remained consistent overtime.

There have been no changes to the investment philosophy, and they do not anticipate any changes in the future. Investments are typically initiated with a 12-18-month time horizon; however, Westfield does believe there is value for their clients in capitalizing on market movements and will seek to add or trim existing positions in response to large price movements. Instances where stocks can become mispriced include environments where investors flocked to the perceived safety of slow growing, high P/E stocks because they tend to do so at the expense of stocks more representative of their growth-at-a-reasonable-price style. In general terms, the stocks that worked best in those periods were either income focused or expensive based on valuation. Investors were willing to pay high price-to-earnings multiples for visible, hedged growth. These types of stocks made new highs, while less expensive companies where growth was on the rise were punished due to uncertainty about the pace of global economic growth.

INVESTMENT UNIVERSE

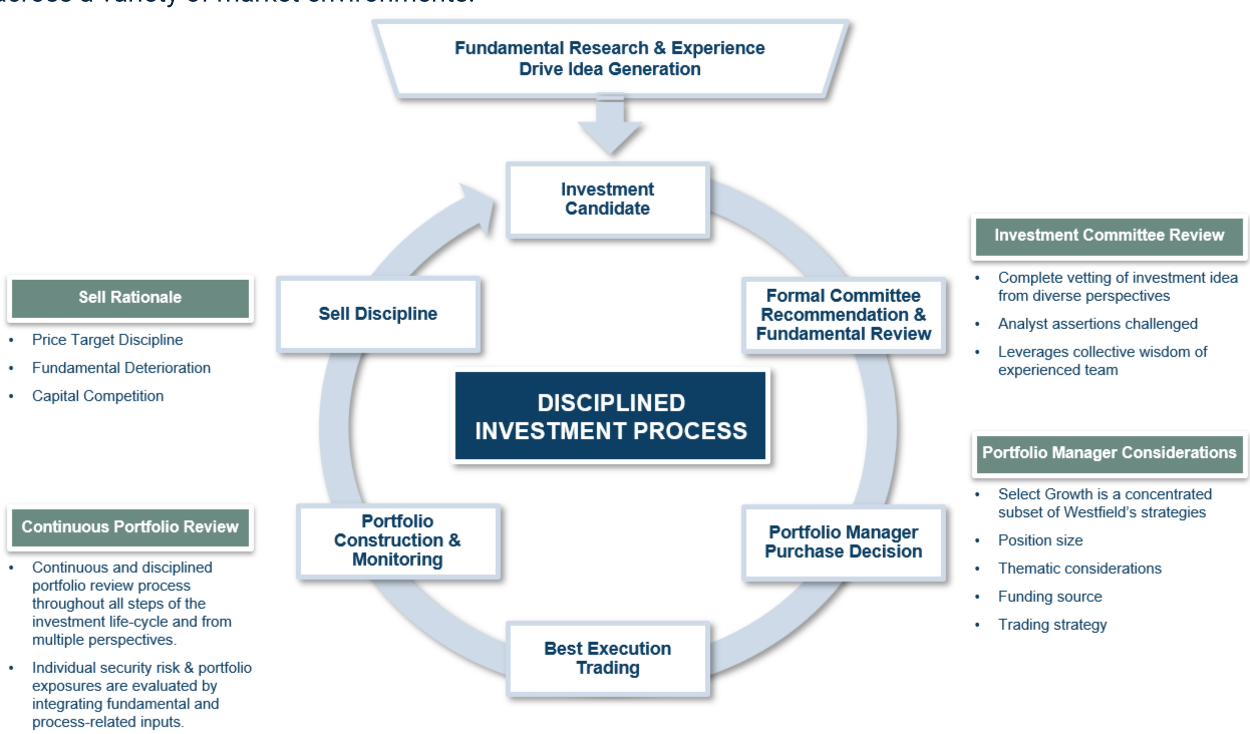
Westfield's Investment Team manages U.S. growth equity strategies that span the market cap spectrum. As a result, to ensure complete coverage of all investment opportunities, all securities within the Russell 3000® Growth Index are mapped to a specific member of our Investment Team, consistent with their coverage universe and areas of expertise. Each member of the Investment Team with research responsibility is responsible for a coverage universe of approximately 200 stocks across all market capitalizations.

Of that universe, approximately half are stocks that are of some interest to us given their historic growth, prospective growth or current valuation. This group of stocks is actively monitored (management meetings, conference calls, etc.). A smaller group of stocks (20-40) is followed more closely still, including face-to-face interaction with company management teams, on-site due diligence, etc.

As it relates to the Small Cap Growth Equity strategy's universe in particular, the investment universe is initially established by market capitalization. The Small Cap Growth Equity strategy consists of domestically-traded stocks and ADRs with market capitalizations within the range of the Russell 2000® Growth Index at time of initial purchase in the product.

INVESTMENT PROCESS

Westfield employs a disciplined and repeatable investment process to managing Small Growth Equity assets. Below, please find a summary of Westfield's investment process. We believe our rigorous research process, team-based approach to decision making and focus on risk management has allowed the process to be successful across a variety of market environments.



For illustrative purposes only

Investment Universe:
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Research-Driven Idea Generation & Due Diligence:
Westfield's investment team believes that companies with accelerating or underappreciated earnings potential are best identified through in-depth, fundamental, bottom-up research. Research is covered vertically by industry group. Each of Westfield's investment professionals follows several industries using a broad information network that includes company managements, suppliers, end-users, competitors and Wall Street sources to identify and evaluate companies capable of providing consistently high or accelerating earnings growth.

Coverage across the market cap spectrum and a career analyst model create their ideal structure to identify compelling investment opportunities. By covering companies that span the capitalization spectrum, Westfield's Investment Team gains perspective on all levels of the supply and distribution chain, grasping valuable insights into industry trends.

The due diligence process leverages the Investment Team members' industry expertise with deep fundamental research in the pursuit of identifying names with the most compelling probability weighted expected value. The goal is to analyze industry dynamics, market growth opportunities, and identify companies with a sustainable competitive advantage.

Westfield utilizes a variety of research sources and systems to help support our investment process. External research sources include sell side analysts, independent brokerage houses, and third-party research professionals. External research may also include expert networks, general industry reviews, and company information, as well as information on competitors and the supply and distribution chains. However, our analytical team most frequently uses Street research to gauge consensus thinking in order to understand where our investment theses may differ and when the consensus view has become in-line with ours. Westfield pays external research sources according to a quarterly research vote, not via a subscription for each service.

In addition to conducting research in our offices in Boston, Westfield's Investment Team members spend approximately 50-80% of their time traveling to meet with company management teams and attend industry conferences. Westfield's Investment Team typically visits or talks with the company management team before purchasing a security, and the Team averages over 300 company meetings a quarter. If a face-to-face meeting is not possible prior to investment, we will conduct an in-depth conference call and follow up with an on-site meeting. We feel that one-on-one meetings with company management teams are critical to our research process, allowing us to evaluate management's strategy for achieving long-term growth and their ability to execute that strategy. It is not enough to simply meet with company management teams; our investment professionals know the right questions to ask and assimilate that information into a discernible investment case. Their ability to piece together the mosaic of information that they gather from company management teams, suppliers, users and competitors, and then compare that information to what they hear from Wall Street sources to ensure a compelling investment theme, sets Westfield's Investment Team members apart from their peers.

As research specialists, all fundamental factors are important and in specific industries some may be more important than others; however, earnings growth is the most integral to our stock selection process. If there is one common theme to all of our holdings, it is that our forward earnings estimates (growth rates and projected EPS) are higher than Street consensus. Our analysts' deep fundamental research includes:

- Exhaustive industry and subsector analysis across market capitalizations
- Interviews with management, customer, suppliers, competitors, and expert networks
- Detailed bottom-up financial modeling
- Comparative analysis of internal forecasts vs. consensus
- Leverage of career sector analysts' broad networks
- Comprehensive analysis of historical, absolute and relative valuation

Additionally, our independent ESG research helps us more critically assess the investment opportunity. Westfield's sustainable investment program is implemented utilizing an integrated, research-driven approach which combines deep fundamental research with independent ESG research to enhance our assessment of investment opportunities and risks. This ESG research process includes interviews with key management team contacts, reviews of material sustainability metrics from public filings and third-party data, and additional independent research, to name a few.

Decision Making and Portfolio Construction:

Due diligence findings are presented by the industry analyst to the Investment Committee for formal review. Purchase recommendations are reviewed in detail, from a variety of viewpoints, before being approved for investment. The Investment Committee review ensures a thorough vetting of investment ideas from diverse perspectives and leverages the collective wisdom of an experienced team.

All portfolio decisions (buy/sell/add/trim) for the Small Cap Growth Equity strategy are made by the Investment Committee on a consensus basis. Initial position weights are a part of the recommendation made to the Investment Committee by the sponsoring analyst and are a reflection of a variety of factors including, quality of the business, conviction, differentiation of research, growth outlook, valuation and risk/reward profile of the security. We also have a position sizing tool to help the Investment Committee evaluate the conviction level of the analyst relative to the analyst's history of past recommendations. The tool is used to help maximize alpha generation for new research ideas where we have historically had a high hit rate of success. When making an initial allocation, the Committee will also consider current portfolio positioning from a sector, industry and thematic perspective and impact to current risk exposures.

The Investment Committee continuously reviews the portfolio in an attempt to ensure that position sizes are truly reflective of conviction and upside potential. The sponsoring analyst may recommend trims or adds to an existing position based on stock specific news, price action or changing market dynamics. All holdings are monitored continuously with respect to established price targets and business developments to ensure each of the portfolio's holdings maintain an appropriate appreciation potential.

Westfield's Small Cap Growth Equity portfolios typically consist of 60-80 securities. Typically, no equity position will exceed the greater of either 5% percent of the portfolio or 2% more than the security's benchmark weight, both valued at market. Sectors, as defined by GICS®, are limited to 20% or 2.5x the benchmark weight, whichever is greater. All industry and sector weights are a by-product of the individual securities weights that comprise them.

Integration with Trading:

The Portfolio Manager communicates all trades to Trading. Westfield's Trade Allocation Management team ("TAM") is responsible for entering trades into the order management system and works with the Compliance team to ensure the orders entered do not violate applicable strategy or client specific guidelines. Once trades have cleared the compliance check, TAM then sends the orders to the trading desk for execution.

Westfield employs four dedicated traders, John Myles, CMT, Partner & Head Trader, Elizabeth Lamberti, CMT, Senior Trader, Stephen Brown, CFA, Senior Trader, and Matthew Villano, Trader. Similar to our Investment Committee, Westfield's traders are sectorized and all work across the capitalization spectrum. This 'sectorization' allows our traders to develop deeper relationships with trading sector heads at bulge bracket firms and to have more active dialogue among regional brokers with a sector specialty in an effort to achieve best execution. It has also promoted more two-way dialogue between Westfield's Investment Committee members and Traders and created a structure that mirrors the sector expert principles employed by Westfield's Investment Committee. Westfield's traders are responsible for handling execution and for providing market-oriented insight on their economic sectors.

Ongoing Monitoring Process:

Westfield has a weekly Portfolio Review meeting where senior members of the investment team review the portfolio and focus on top-down portfolio exposures and key risks. This group is comprised of Will Muggia, Westfield's President, CEO & CIO, Sector Heads, and the Head of Portfolio Strategy & Risk Management, providing representation across every research vertical. During these weekly meetings, recent performance is reviewed, risk exposures are assessed, and opportunities to adjust positions are evaluated to ensure alignment with our current outlook. The actions of this group make the whole investment team more efficient and effective.

Sell Discipline:

Westfield's sell discipline has been an instrumental part of the Small Cap Growth Fund's performance. In general, stocks may be sold because:

- Price Target Discipline: Upside price target achieved or downside flag triggers review
- Fundamental Deterioration: For example, shifting secular backdrop, changing industry structure, poor management execution, or management turnover.
- Capital Competition: one-in, one-out philosophy ensures our best ideas remain in the portfolio.

A focus on identifying and understanding underperforming securities in the portfolio has been a core tenant in Westfield's risk management process since the firm's founding. Stocks with fundamental trends or price action at odds with our investment perspective are identified and undergo an intense review with a bias to act.

RESEARCH PROCESS

Westfield is a research-centric organization, with even the most tenured investment professionals conducting fundamental research. Their unique team process helps to ensure that the investment insights garnered at the individual stock level translate into portfolio action. They believe that the Fund is advantaged by the in-depth research the Investment Committee members perform, the team approach they utilize, and the detailed process measurement they conduct. The fact that the Investment Committee members are following stocks that span the capitalization spectrum magnifies this advantage. Small cap companies coexist and compete with mid and large cap companies, and the Committee members are at an advantage because they understand market dynamics across the small, mid, and large cap areas of the market, and the relationships between the companies within each capitalization range. Westfield's Investment Committee believes that reasonably priced stocks of companies with accelerating or underappreciated earnings potential are best identified through in-depth, fundamental, bottom-up research.

Research is covered vertically by industry group. Each of Westfield's investment professionals follows several industries using a broad information network that includes company management teams, suppliers, end-users, competitors and Wall Street sources to identify and evaluate companies capable of providing consistently high or accelerating earnings growth. By covering companies that span the capitalization spectrum, Westfield's Investment Committee gains perspective on all levels of the supply and distribution chain, grasping valuable insights into industry trends. Westfield's investment professionals seek to identify companies with broad market opportunities, accelerating earnings growth, and quality balance sheets. Superior company management, disciplined capital allocation, strong returns on invested capital trends, solid financial controls and accounting, unit volume growth, cash flow sufficient to fund growth and unique market position or pricing power are all criteria on which they place a high premium.

As a 'growth at a reasonable price' manager, Westfield's view is that companies with high foreseen earnings potential can be purchased at a reasonable valuation. Companies that are trading at excessive valuations, in their opinion, will be excluded from purchase. As research specialists, all fundamental factors are important and in specific industries some may be more important than others; however, earnings growth and cash are key to their stock selection process. If there is one common theme to all of their holdings, it is that their forward earnings and sales estimates (growth rates and projected EPS) are typically higher than Street consensus. Depending on the industry and market cycle dynamics, they may use a variety of metrics when valuing stocks, including but not limited to P/E, P/E to growth, EV/EBITDA, P/B and Discounted Cash Flow. These are viewed on absolute, relative, and historic levels. Westfield utilizes a variety of research sources and systems to help support their investment process.

External research sources include sell side analysts, independent brokerage houses, and third-party research professionals. External research may also include expert networks, general industry reviews, and company information, as well as information on competitors and the supply and distribution chains. However, their analytical team most frequently uses Street research to gauge consensus thinking in order to understand where their investment theses may differ and when the consensus view has come in-line with theirs. Westfield pays external research sources according to a quarterly research vote, not via a subscription for each service.

In addition to conducting research in their offices in Boston, Westfield's Investment Committee members spend approximately 50-80% of their time traveling to meet with company management teams and attend industry conferences. Typically, Westfield's Investment Committee visits or talks with the company management team before purchasing a security. The Investment Committee averages over 300 company meetings per quarter. If a face-to-face meeting is not possible prior to investment, they will conduct an in-depth conference call and follow up with an on-site meeting. Westfield feels that one-on-one meetings with company management teams are critical to their research process, allowing them to evaluate management's strategy for achieving long-term growth and their ability to execute that strategy. It is not enough to simply meet with company management teams; Westfield's investment professionals know the right questions to ask and assimilate that information into a discernible investment case. Their ability to piece together the information that they gather from company management teams, suppliers, users, and competitors, and then compare that information to what they hear from Wall Street sources to ensure a compelling investment theme, sets Westfield's Investment Committee members apart from their peers.

SELL DISCIPLINE

Westfield's sell discipline has been an instrumental part of the Small Cap Growth Fund's outperformance. In general, stocks may be sold because:

- Price Target Discipline: Upside price target achieved and downside flag triggers review.
- Fundamental Deterioration: For example, shifting secular backdrop, changing industry structure, poor management execution, or management turnover.
- Capital Competition: one-in, one-out philosophy ensures their best ideas remain in the portfolio.

A focus on identifying and understanding underperforming securities in the portfolio has been a core tenet in Westfield's risk management process since the firm's founding. Stocks with fundamental trends or price action at odds with their investment perspective are identified and undergo an intense review with a bias to act. Westfield will not automatically reduce a position when it reaches a certain percentage of the portfolio, but the Investment Committee continuously reviews the portfolio in an attempt to ensure that position sizes are truly reflective of conviction and upside potential. The sponsoring analyst may recommend trims or adds to an existing position based on stock specific news, price action or changing market dynamics. All holdings are monitored continuously with respect to established price targets and business developments to ensure each of the portfolio's holdings maintain an appropriate appreciation potential.

BENCHMARK

The Fund is most commonly compared to the Russell 2000® Growth Index, as Westfield believes it best represents the Fund's investable universe.

RISK MANAGEMENT

Risk management is fundamental to Westfield's process and is monitored and managed throughout all steps of the investment life-cycle and from multiple perspectives. The risk control process is aided by Westfield's Portfolio Strategy group, which is engaged in process management and investment strategy. Individual security risk and portfolio exposures are evaluated by integrating fundamental and process-relative inputs.

At the individual position level, we believe the best way to control risk is through our analysts' thorough understanding of the underlying fundamentals of the companies in which we invest. This analysis and monitoring is done continuously to ensure the underlying thesis remains intact. We also have a disciplined price targeting system to ensure the portfolio reflects our highest conviction ideas and a downside flag system to help identify stocks with fundamental trends or price action at odds with our investment perspective. Underperforming securities undergo an intense review with a bias to act.

At the portfolio level, we have standard investment guidelines to control risk at both the sector and position levels. Typically, no equity position will exceed the greater of either 5% percent of the portfolio or 2% more than the security's benchmark weight, both valued at market. Sectors, as defined by GICS®, are limited to 20% or 2.5x the benchmark weight, whichever is greater. As a fundamental, bottom-up manager, macro-economic forecasts do not drive our stock selection process but do help to shape our investment themes. The Investment Committee discusses changes in domestic and global economies, the current market, and market sentiment weekly to keep abreast of market indicators and economic data and how the portfolio could be impacted.

We also use MSCI Barra risk management analytics and our internally developed quantitative model as a supplementary way to help identify and monitor major types of risks involved in our investment activity. The primary goal of these tools is to help ensure that the risks we are taking in the portfolio are intentional. As part of the risk management process, portfolio performance is evaluated and attributed to common factor (growth, value, momentum etc.) and stock-specific risks. The findings are used in day-to-day portfolio management, supporting security and sector level concentrations, eliminating incidental bets, and enabling more control in the portfolio construction process.

Summary Risk Assessments are reviewed weekly for the strategy by the Portfolio Review team. The goal of these reviews is to understand the contributions to risk in the portfolio and to ensure they are intentional. Historically and currently, the majority of the risk in the strategy is coming from stock specific risk.

The Portfolio Review team meets weekly to review the portfolios, including the Small Cap Growth Equity strategy, with a focus on top-down portfolio exposures and key risks. The actions of this group ensure that all our bets are intentional, and risks are known. Individual security risk and portfolio exposures are evaluated by integrating fundamental and process-relative inputs.

CAPACITY

As an employee-owned organization, our ownership structure directly aligns our interests with those of our clients. To that end, Westfield is intimately aware of the need to preserve existing client returns and limit the growth of assets, proactively closing strategies in the past. We will continue to review the asset level and liquidity profile of the Small Cap Growth Equity strategy, and it will be closed if we determine that future asset growth could hinder our ability to achieve investment objectives. Based on our current liquidity analysis, which took into account current Market conditions and current portfolio holdings, we examined the median days to establish or liquidate an average position without market impact. We forecast that our investment process will be unaffected by liquidity considerations with strategy assets at or under $5 billion. Please note, Westfield has never "hard closed" one of our strategies as we want to allow current clients the ability to contribute to their accounts to appropriately manage their asset allocation.

ENVIROMENTS OF OUT/UNDER-PERFORMANCE

Westfield feels we have designed an investment process that is both disciplined and flexible, and one that has the potential to perform well in a variety of market environments. In particular, as stock selection drives our excess returns, we expect to perform best in discriminating "stock pickers" market conditions. We tend to gravitate toward companies with improving operating margins and misunderstood franchises where we project meaningful improvement in free cash flow growth. Therefore, our style will typically perform well during rational environments, where company fundamentals and earnings growth dictate stock performance. The Fund has historically kept up and outperformed in big up markets, while also preserving capital in more volatile markets where our quality bias has helped protect capital.

Westfield would typically underperform in an environment where investors flocked to the perceived safety of slowing growth. In general terms, the stocks that worked best in these types of environments are either income focused or expensive based on valuation. Investors were willing to pay high price-to-earnings multiples for visible, protected growth. Additionally, we will typically not own what we view as speculative, overpriced (high valuation) growth stocks that cannot achieve the growth that investors are pricing into them. This discipline may negatively impact relative performance when these "momentum" investments have outperformed, however, we expect these periods to be relatively short-lived.

Providing consistent results over time has been a focus of Westfield since its founding. It was the consistency of returns across Westfield's strategies that gave Will Muggia and the partners the confidence to buy the firm back. We believe that running concentrated portfolios has allowed our clients to benefit from the deep domain expertise of our career sector analysts. Additionally, we strongly believe that being able to add value in both cyclical and secular growth areas of the market has been key to the Fund's performance. We believe having this balance has allowed the Fund to more effectively navigate different market environments and has helped reduce the volatility.

TRADING PROCESS

Trade creation is performed by Westfield's Trade Allocation Management ("TAM") team, and trade execution is handled by the firm's traders. Portfolio management is primarily handled by the Investment Committee. Once the investment decisions are communicated to TAM, the orders will be entered into SS&C Eze's Order Management System ("Eze OMS"). Westfield's Compliance Department utilizes SS&C Eze compliance module ("Eze Compliance") to automate portfolio compliance checks at order creation and various other times during the trade lifecycle. Completed trades are uploaded into SS&C's Advent Portfolio Exchange ("APX"), the portfolio accounting system, at the end of each trade day. The Operations Department handles trade settlement and reconciliation of client accounts. Trades are matched and affirmed directly with Depository Trust & Clearing Company ("DTCC") via Trade Data Management System ("TDMS") to ensure accurate execution. Finally, cash and share balances are reconciled with the records of the custodian bank for each client account, with most reconciliations taking place automatically on a daily basis via Advent Custodian Data ("ACD").

COMPETITIVE ADVANTAGES

The key factors that differentiate Westfield from others in the marketplace are the in-depth research their Investment Committee members perform across the market capitalization spectrum, the valuation discipline the Committee employs, and the experience the Investment Committee has. All bottom-up growth equity firms place a premium on the quality of their research. However, Westfield's research process is distinctive because each member plays a vital role in every element of the process.

The Investment Committee is a vocal group of talented analysts, and each investment decision is carefully considered and critically evaluated by the group before investment decisions are implemented. The fact that Investment Committee members are following stocks that span the capitalization spectrum magnifies this advantage. Small cap companies coexist and compete with mid and large cap companies, and the Committee members are at an advantage because they understand market dynamics across the small, mid, and large cap areas of the market, and the relationships between the companies within each capitalization range.

As the Committee strives for consistent outperformance, the group's unique dynamic not only serves as a system of checks and balances, but also encourages teamwork and the sharing of information. Westfield's investment process has been successful in a variety of market environments, and they feel their constant review of where they can improve the process will allow them to continue to add value for clients going forward. To this end, Westfield's Portfolio Strategy group is a unique resource that contributes to the strategy's competitive advantage. The group is engaged in process management, tasked with measuring discrete steps of the investment process in order to uncover any areas where the Investment Committee might be able to improve their decision making. Process management entails the monitoring and analysis of Investment Committee decision making within the context of their investment disciplines.

Finally, Westfield believes their employee ownership structure aligns their interests with those of their clients and allows them to attract and retain top investment talent, ensuring the long-term stability of their business and investment model.

VEHICLE & SHARE CLASS INFORMATION

The Harbor Small Cap Growth Fund is currently offered as a no-load mutual fund and is available in the following share classes:

Harbor Small Cap Growth Fund	
Share Class	**Ticker**
Retirement	HNSGX
Institutional	HASGX
Administrative	HRSGX
Investor	HISGX

For complete details on fees and expenses, please contact your Harbor representative and/or refer to the Fund's prospectus available at harborcapital.com.

DISCLOSURES

Responses regarding the Harbor organization have been provided by Harbor Funds Distributors, Inc. Responses relating to the investment team of the Harbor Small Cap Growth Fund, including the process for making portfolio decisions and effecting the purchase and sale of securities held by the Fund, or any specific operational aspects of the subadviser are provided by the subadviser to the Fund and, to the best of our knowledge, are accurate.

This information should not be considered as a recommendation to purchase or sell a particular security. The sectors or countries mentioned may change at any time and may not represent current or future investments.

There is no guarantee that the investment objective of the Fund will be achieved. Stock markets are volatile and equity values can decline significantly in response to adverse issuer, political, regulatory, market and economic conditions. Stocks of small cap companies pose special risks, including possible illiquidity and greater price volatility than stocks of larger, more established companies.

Westfield Capital Management Company, L.P. is an independent subadviser to the Harbor Small Cap Growth Fund.

The Russell 2000® Growth Index is an unmanaged index representing the smallest 2000 stocks with the highest price-to-book ratio and future earnings. This unmanaged index does not reflect fees and expenses and is not available for direct investment. The Russell 2000® Growth Index and Russell® are trademarks of Frank Russell Company.

Investors should carefully consider the investment objectives, risks, charges and expenses of a Harbor fund before investing. A summary prospectus or prospectus for this and other information is available at harborcapital.com or by calling 800-422-1050. Read it carefully before investing.

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