Harbor

Harbor Disciplined Bond ETF (AGGS)

STANDARD RFI

All responses are as of 03/31/2025.

Harbor Capital Advisors, Inc. (Advisor)
111 South Wacker Drive, 34th Floor
Chicago, IL 60606

Foreside Fund Services, LLC (Distributor)
3 Canal Plaza, Suite 100
Portland, ME 04101

Income Research + Management (Subadvisor)
115 Federal Street, 22nd Floor
Boston, MA 02110

harborcapital.com

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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

SUBADVISOR STRUCTURE

The subadvisor for the Harbor Disciplined Bond ETF (AGGS) is Income Research + Management (“IR+M”). IR+M is organized as a Delaware corporation and has been independent and privately-owned since its inception in 1987. IR+M has managed the Harbor Disciplined Bond ETF since May 2024.

HISTORY

IR+M was founded in 1987 by John and Jack Sommers to specialize in the US dollar-denominated fixed income market. The firm was registered as an investment adviser with the SEC on May 1, 1987, and began managing assets in June 1987.

IR+M’s commitment to clients and employees is the foundation upon which they were built; they believe that through fostering a culture of collaboration, staying true to their disciplined investment process, remaining diligent about security selection, and acting in the best interest of their clients, everyone will benefit.

TEAM BIOGRAPHIES

James E. Gubitosi, CFA
Co-Chief Investment Officer
Mr. Gubitosi joined IR+M in March 2007. Prior to IR+M, he was a Senior Analyst at Financial Architects Partners. Mr. Gubitosi began his investment career in 2004. He has a BSBA from Boston University School of Management.

Mike Sheldon, CFA
Co-Chief Investment Officer
Mr. Sheldon joined IR+M in 2007 and serves as the firm's Co-Chief Investment Officer. Prior to joining IR+M, Mr. Sheldon was an Institutional Fixed Income Bond Sales Representative and Vice President with HSBC. Mr. Sheldon began his investment career in 1991.

Bill O'Neill, CFA
Senior Portfolio Manager
Mr. O'Neill joined IR+M in 2004 and is a Senior Portfolio Manager. Prior to joining IR+M, he was a Trader at Investors Bank and Trust. Mr. O'Neill began his investment career in 2000. He has a BBA in Finance from the University of Rhode Island and an MBA from the F.W. Olin Graduate School of Business, Babson College.

Jake Remley, CFA
Senior Portfolio Manager
Mr. Remley joined IR+M in 2004 and is a Senior Portfolio Manager. Prior to joining IR+M, he was an associate with Lehman Brothers Holdings. Mr. Remley began his investment career in 2001. He has a BSE in Civil Engineering from Princeton University and an MBA from the Kellogg School of Management, Northwestern University.

Matt Walker, CFA
Senior Portfolio Manager
Mr. Walker joined IR+M in 2007 and is a Senior Portfolio Manager. Prior to joining IR+M, he was a Fixed Income Operations Representative at State Street Corporation. Mr. Walker began his investment career in 2003. He has a BS in Mechanical Engineering from Boston University and an MBA from the Sawyer Business School, Suffolk University.

Wesly Pate, CFA
Senior Portfolio Manager
Welsly joined IR+M in January 2011. Prior to joining IR+M, Wesly was an Equity Analyst with Eastern Investment Advisors. Mr. Pate began his investment career in 2008. Wesly has a BBA in Finance from Georgia State University, an MBA in Finance from the Boston University School of Management, and an MS in Accounting from the University of Massachusetts Amherst Isenberg School of Management.

Rachel Campbell
Portfolio Manager, Director of Securitized Research
Ms. Campbell joined IR+M in 2009 and is a Portfolio Manager and the Director of Securitized Research. Prior to joining IR+M, she was a Junior Risk Analyst at Cypress Tree Investment Management. Ms. Campbell began her investment career in 2006. She has a BA in Economics from Wheaton College and an MBA from the Boston University School of Management.

Ginny Schiappa, CFA
Portfolio Manager
Ginny joined IR+M in December 2014, Prior to joining IR+M, Ginny was a Private Placements Investments Analyst at Genworth Financial. Ms. Schiappa began her investment career in 2011. Ginny has a BS in Commerce from the University of Virginia. Ginny is SASB FSA accredited.

DECISION MAKING

IR+M is committed to their team approach to portfolio management. Portfolio managers make all final decisions regarding issues purchased for portfolios. The Portfolio Management Team is responsible for selecting securities, assessing relative value along the yield curve, and executing trades at competitive levels. Portfolio managers oversee and are involved in every aspect of the investment process, from research to security selection and ultimately trading, providing an overriding consistent theme throughout.

COMPENSATION & RETENTION OF INVESTMENT PROFESSIONALS

All IR+M employees, including the Investment Team, are compensated with a competitive salary plus bonus. The firm bonus pool is dictated by the firm's ability to achieve its annual goals, which includes the profitability of IR+M. An individual's bonus is based on the employee's overall contribution to the firm's and their team's success. IR+M's goal is to have collaborative high-performing teams that deliver for their clients, not to incentivize individual contributions over results. The qualitative drivers of bonus decisions are the beliefs represented in IR+M's Core Values: Invested, Respectful, Positive, and Motivated.

High-performing employees may be offered IR+M equity as part of their compensation package. Equity participation is reserved for those who have significantly contributed to the firm and demonstrated an unwavering commitment to their clients' success.

IR+M also offers employees tangible rewards, such as competitive compensation and medical benefits, as well as attractive retirement benefits, vacation time, unlimited sick time, floating holidays and tuition and certification reimbursement. IR+M's intangible benefits, such as their unparalleled culture, are equally important. Together, they place a premium on creating meaningful connections with their clients, community, and colleagues. For example, for the last 10 years, IR+M has come together to support the surrounding community and charities through a week of volunteerism and an employee granting contest. Events such as these are what define IR+M.

SUCCESSION PLANNING

Succession planning is a critical area of continuous focus at IR+M, with their Board of Directors and Management Committee both committed to work continuously to build and develop the next generation of leaders while ensuring talent and succession preparation are right-sized and appropriate to take IR+M to higher levels of excellence. IR+M's private ownership structure is a fundamental priority for the firm and key to their continued success, growth, and cultural evolution. IR+M understands that thoughtful succession planning can provide for long-term governance and leadership to perpetuate the firm's private ownership and ensure aligned future success to their key stakeholders and clients. Specifically, IR+M's approach to long-term succession planning includes:

- Focusing on continued development of their strong governance framework which they believe can facilitate a seamless transfer of ownership to key employees over time.
- IR+M's seven-member Board of Directors is an important part of our governance oversight function and partners with the IR+M Management Committee on matters pertaining to management, operations, and strategic positioning. They believe a variety of perspectives and experiences is critical and their seven-person Board includes five outside Directors

IR+M Board of Directors (as of March 31, 2025)

Name	Title
Jack Sommers, CFA	Co-Founder, Executive Chairperson
Bill O'Malley, CFA	Chief Executive Officer
Debbie Goldstein	Director
Bill Lawrence, CFA	Director
Kate Taylor	Director
Dune Thorne, CTFA, CWS	Director
Mike Miles	Director

- IR+M's seven-member Management Committee is responsible for setting the overall strategic direction of the firm, directing departmental activities, reviewing the firm's financial condition, examining resource planning, and discussing the strategies to maintain their unique culture.

IR+M Management Committee (as of March 31, 2025)

Name	Title
Bill O'Malley, CFA	Chief Executive Officer
Max DeSantis, CFA	Chief Operating Officer
Meghan Driscoll, CAIA	Chief Financial Officer and Co-Head of Client Team
Jim Gubitosi, CFA	Co-Chief Investment Officer, Chair of the Investment Committee
Sarah Kilpatrick	Chief of Staff
Erinn King, CFA	Chief Strategy Officer and Co-Head of Client Team
Bill O'Neill, CFA	Director of Portfolio Management, Senior Portfolio Manager

- Preparing the next generation of leaders to manage IR+M in alignment with the firm's core values and to serve the long-term needs of IR+M's clients and employees.
    - Senior leadership delegating decision rights as appropriate and providing opportunities to future leaders with executive coaching and other formal training programs.
- Committing to a deliberate succession planning process and leadership transition that is transparent to our clients, shareholders, and stakeholders.
    - Maintaining written succession plans in the event of an untimely death or disability of key leaders.
    - Consistently evaluating talent and potential while keeping a strong potential outside senior hire pipeline.

Specific to IR+M's Investment Team, in the event of retirement or other circumstances leading to the departure of a Senior Portfolio Manager, the remaining Investment Team members would continue to manage the portfolios and the firm would explore any necessary alternatives. Since all portfolios are managed using a team approach, IR+M does not rely on one individual and consequently has sufficient and seamless coverage for all of the products.

COMPETITIVE ADVANTAGES

IR+M has two fundamental goals: provide consistent investment results and deliver outstanding client service. The investment philosophy is consistent across all of their products and is based on the belief that careful security selection and active portfolio risk management provide superior returns over the long term. This philosophy has remained consistent since the inception of the firm. IR+M believes the following factors differentiate them from other investment managers:

- **They are an independent firm:** Their philosophy and process have remained consistent since their beginning. Privately owned since inception, IR+M has exhibited stability for more than 35 years over many market cycles.
- **They are relative-value investors:** Their investment process focuses on diligently scouring sub-sectors of the market for securities offering structural and price advantages. Portfolios are constructed using their best ideas, which are implemented in meaningful position sizes. Whether finding value through their credit research, their ability to understand complex structures, or their ability to recognize attractive opportunities to transact, they strive to construct portfolios with the best combination of bonds available.
- **They have a collaborative culture:** They use a combination of in-person interactions and virtual connections to maintain ongoing communication across their team. Their physical office is consciously designed to promote constant communication, the free flow of ideas, and consistent cross-functional collaboration. When working remotely, they keep these important tenets of their process intact through the use of Microsoft Teams and other technologies. Portfolio Managers make investment decisions as a team, promoting consistency of culture, philosophy, and process.

- **They are a client centric firm:** They work closely with their clients to identify and understand their needs in order to construct the most appropriate investment solutions. They believe in proactive client service and timely communication. They offer broad, focused, and customized investment strategies and are experienced in transitioning assets-in-kind.

HARBOR DISCIPLINED BOND ETF (AGGS)

OBJECTIVE

The **Harbor Disciplined Bond ETF (AGGS)** seeks total return.

OVERVIEW

The Harbor Disciplined Bond ETF invests primarily in U.S. dollar denominated fixed income securities. Under normal market conditions, the Fund invests at least 80% of its net assets, plus borrowings for investment purposes, in a diversified portfolio of fixed income instruments. Fixed income instruments include but are not limited to: obligations issued or guaranteed by the U.S. Government, its agencies, instrumentalities; corporate debt securities; municipal debt securities; U.S. dollar-denominated debt of foreign issuers; and securitized debt including mortgage-backed and asset-backed securities, which may also include non-agency mortgage-backed securities. These securities may have different types of interest rate payment and reset terms.

The Fund will not invest more than 5% of its total assets in the securities of any individual issuer, excluding debt issued or guaranteed, either implicitly or explicitly, by the U.S. Government or its agencies.

INVESTMENT PHILOSOPHY

IR+M's investment philosophy is consistent across all of their broadly marketed strategies and is based on the belief that careful security selection and active portfolio risk management will lead to superior returns over the long-term (e.g., a market cycle). Portfolios are constructed to meet client objectives by using a disciplined, bottom-up approach to selecting securities from US-dollar denominated fixed income sectors. IR+M believes that predicting the timing, direction, and magnitude of future interest rate changes is very difficult to consistently predict; as such, they keep duration and yield curve exposure neutral to the benchmark.

This philosophy has remained consistent since the inception of the firm.

INVESTMENT UNIVERSE

IR+M defines their universe of securities for their broad market strategies to be the entire US dollar-denominated fixed income realm, including but not limited to all of the constituents in the conventional broad fixed income market indices. High yield issues are also followed as part of the credit research process and as candidates for purchase within certain strategies such as Core Plus, Short Diversified Income, and High Yield.

Focus sectors include, as applicable, all sub-sectors within the US Credit, Securitized, Government, and Municipal bond markets. Given IR+M's size as a firm, they are able to be very selective and concentrate on their favorite opportunities within this broad universe without having to buy less attractive issues to stay fully invested.

Within the credit universe, IR+M's focus is on the large, index names with multiple structures, as well as out-of-index names, or smaller names that offer attractive relative-value. They screen issuers within their universe and eliminate those with limited liquidity, sovereign/political risk, and those we consider to be generally poor credits relative to the compensation for risk.

On the securitized side, their universe consists of Agency and Non-Agency MBS, CMBS and ABS, CLO and US Agency securities, such as Small Business Administration loans ("SBAs"). They focus on securitized issues that are senior in the capital structure with favorable convexity, solid collateral, and attractive structure. In addition, they focus on securitized issues with favorable underlying credit and underwriting standards, along with significant embedded credit enhancement.

INVESTMENT PROCESS

IR+M's investment process is driven by bottom-up security selection, which provides consistency over time relative to potentially more volatile macro decisions. Their Research Analysts, Portfolio Managers, and Traders work together to get their best ideas into the portfolios. They evaluate the credit, structure, and price of each issue and integrate both qualitative and quantitative data in their analysis. Given IR+M's size, they do not have to buy everything, and they can still be selective within smaller market sub-sectors in which larger managers may not be able to participate. They expect these factors will continue to allow them to add value going forward within all of our portfolios.

Overall, IR+M's investment strategy centers around several core principles: bottom-up security selection, a value orientation, appropriate diversification, and risk control. They may opportunistically sacrifice liquidity when compensation is generous; however, they are always vigilant as to the availability of overall liquidity, carefully limiting their exposure to any one sector and remaining diversified at the individual holding level.

RESEARCH PROCESS

IR+M's research process combines quantitative and qualitative analysis and is ultimately based on fundamentals. They do not use "black box" models, nor do they rely heavily on quantitative modeling to make investment decisions. Their team of sector-specialized Research Analysts drive their research efforts across the government, securitized, credit, and municipal sectors. Portfolio Managers oversee and are involved in every aspect of research, security selection, and portfolio construction, providing consistency throughout the process.

IR+M's approach to analyzing corporate credits focuses on fundamental research conducted by their Analysts. Analysts research credit ideas using a combination of internal and external sources including industry analysis, company reports, discussions with company management, and third-party sources such as CreditSights™, the major credit rating agencies, and street Analysts. They incorporate both traditional financial metrics and qualitative data to provide a more holistic analysis and risk assessment.

IR+M's securitized research process includes cashflow analysis, stress testing, scenario analysis, monitoring individual issues using quantitative tools including INTEX, Bloomberg, Bloomberg PORT+ ("PORT+"), The Yield Book, input from vendors such as Trepp Research, and internal models. Their process also includes a qualitative overlay that relies on the experience of our Portfolio Managers, allowing for a more complete evaluation. They often refer to our decisions as being made by "mosaic theory", where no particular influence, factor, model, etc. takes precedent and consideration is given to a variety of methods, information, and circumstances.

BUY DISCIPLINE

IR+M's goal is to purchase attractive, inefficiently priced securities, that when combined together in a portfolio strives to provide principal protection, attractive expected return potential, reasonable risk exposures, and necessary liquidity. Portfolio construction guidelines include maintaining a duration neutral stance and a neutral key rate exposure versus the Index. They do not forecast interest rates and do not use leverage or derivatives unless specifically requested by a client. Their selection process utilizes the following factors to identify a diverse mix of bonds used in creating portfolios:

- **Credit:** investment grade focus and US dollar denominated only; incorporate analysis of traditional credit metrics with additional qualitative data to arrive at more holistic decisions
- **Structure:** favor inherent attributes that create investor value over attributes that create issuer value. These may include factors such as embedded option features, collateral, or deal structure (vintage, deal size, etc.)
- **Price:** the assessment of the market's valuation of the credit and structure

SELL DISCIPLINE

IR+M's sell discipline is based on the same factors they use to evaluate purchases: credit, structure, and price. If any of these factors change materially or the credit deteriorates, the issue becomes a potential sale candidate. They review credits on an ongoing basis through both discussion and formal quarterly updates. If structural changes occur (e.g., callability or pre-payments change), we reassess the bond. They consistently monitor pricing, and they are always on the lookout for opportunities to pick up yield, move to a better part of the issuer's spread curve, improve liquidity, etc. The key lies in the experience of the Investment Team, which is focused on detecting potential deterioration while not panicking on false negatives.

BENCHMARK

The Harbor Disciplined Bond ETF is managed to the Bloomberg U.S. Aggregate Bond Index.

RISK MANAGEMENT

IR+M's Board of Directors and Management Committee are the executive sponsors of their enterprise risk management program and set 'managing risk' as one of the firm's primary goals. At IR+M, several functional and cross-functional teams are responsible for managing risk across their focus area or more broadly across the firm. Details are included below and organized by investment risk, operational risk, business risk, and legal, compliance, and regulatory risk.

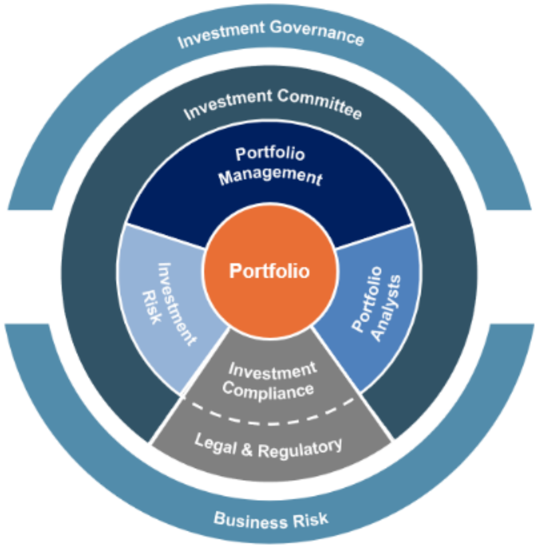
Investment Risk

- **Investment Governance Committee:** Chaired by IR+M's Chief Compliance Officer, the committee seeks to understand and oversee broad investment exposures and risks, with a focus on the discretionary positioning decisions of the Investment Team. The Committee focuses on investment metrics, investment limits, liquidity, quality, and leverage via internally developed tools.
- **Investment Committee:** Chaired by IR+M's Co-Chief Investment Officer Jim Gubitosi, the committee is responsible for overall risk management at the strategy level. The Committee communicates overall risk preference and sets sector targets and overall risk positioning based on relative value across sectors.
- **Investment Risk + Analysis Team:** The Investment Risk + Analysis Team works closely with the Investment Committee to identify, monitor, and escalate positioning risks. Bloomberg PORT+ ("PORT+") is IR+M's main calculation engine to manage, measure, and monitor risk on a total portfolio basis. PORT+ provides security and portfolio analytics such as yield, duration, convexity, option adjusted spread, and key rate exposure. PORT+ also estimates portfolio ex-ante tracking error relative to the Index and allows IR+M to perform advanced scenario analyses.
- **Portfolio Management Team:** The Portfolio Management Team is responsible for portfolio construction, risk management, and ensuring portfolios reflect Investment Committee and Sector Management intentions and preferences, while adhering to client guidelines and addressing portfolio need. On a regular basis, the Portfolio Managers review various internal risk reports that include portfolio and benchmark exposures, portfolio targets, and strategy dispersion exhibits using IR+M's internally developed proprietary tool, BEAM.
- **Portfolio Analyst Team:** The Portfolio Analyst team is responsible for implementing investment ideas across the portfolios, with a focus on allocating investment ideas and ensuring duration neutrality. The Investment Management Suite ("Minerva" & "Portfolio Studio") is comprised of the following components: investment decision, order generation, trade order management, and trade allocation. IR+M's proprietary tool, Target Management Application ("TMA"), is a controlled, restricted environment designed for adjusting sector exposure target levels set by the Investment Committee. In Minerva, the Portfolio Management Team reviews portfolio exposures relative to desired targets and implements fair trade allocation, which includes not exceeding the TMA target levels.
- **Investment Compliance Team:** IR+M's Investment Compliance Team provides independent oversight of the Investment Team through daily review of all trade activity. The primary responsibilities of the team include investment guideline monitoring and investment compliance reporting. The Compliance Engine ("Sentinel") is used for pre- and post-trade compliance. The Investment Compliance Team programs investment guidelines into Sentinel. Every buy and sell order is tested for pre-trade compliance at the portfolio level before it can be executed. The Compliance Team reviews the post-

trade check of compliance limits produced by Sentinel after all trades are posted to the system.

The following diagram highlights IR+M’s integrated approach to managing investment risk:

FUNCTIONAL OVERSIGHT



TECHNICAL OVERSIGHT

Third Party Solutions

+ Order Management System (Fidessa)
    + Guideline Compliance Monitoring (Sentinel)
    + Trade Allocations and Trade Workflow (Minerva)
    + Portfolio Partition Workbooks (Portfolio Studio)
+ Portfolio Risk & Analytics (Bloomberg PORT+)

Proprietary Tools

+ Portfolio Exposures & Historical Data (BEAM – Baseline Enterprise Analytics Model)
+ Sector Targets (TMA – Target Management Application)
+ Attribution (PAA – Performance Attribution Application)

Operational Risk

- IR+M’s Operating Committee seeks to understand, oversee, shape, and govern the Firm’s operating framework and associated risks. The Committee will accomplish its mission through regular reviews of operating policies, processes and controls, incidents, and industry regulations and trends. Through these reviews, the committee will determine the adequacy and any relevant changes to how they operate as a Firm.
- IR+M’s Best Execution Committee oversees and evaluates the quality of broker services, trading applications, and trading policies and practices. The Committee uses internally developed tools to evaluate broker trading volumes by sector and the effectiveness by settlement rates. The Committee utilizes FINRA reports to perform annual due diligence on all approved Brokers.
- The Compliance Team tests, among other areas, allocations, best execution, window dressing, and portfolio pumping via internally developed reports as part of IR+M’s Rule 206(4)-7 Compliance Program.

Business Risk

The Risk and Regulatory Compliance Team is responsible for business risk. Responsibilities include overseeing IR+M’s firmwide risk assessment, incident management and reporting, insurance management, physical security, vendor risk management, privacy and information management and business continuity.

In addition to IR+M’s internal firmwide risk assessment, they also conduct an annual SOC 1 examination with an external auditor, Ashland Partners, deploying the Statement on Standards for 18 (“SSAE18”) reporting standards. The most recent results cover the period of April 1, 2023, through March 31, 2024. The results of that yearly assessment are reported to our Management Committee and are available upon request.

To mitigate financial reporting misstatements and fraud risk IR+M’s financials are audited by an independent auditor, PricewaterhouseCoopers (“PwC”). They have used PwC in this capacity since 2010.

IR+M’s Technology Team and cross-functional IT Security Guild manage cybersecurity using a host of 3rd-party tools including SolarWinds and eSentire (Network monitoring), Proofpoint (SPAM), Microsoft Authenticator (multi-factor authentication), and Microsoft Defender for Endpoint (Anti-Virus).

Legal, Compliance, and Regulatory Risk

Richard ("Rick") Kizik, our Chief Compliance Officer, oversees the management of IR+M Compliance and reports to Sarah Kilpatrick, Chief of Staff. IR+M Compliance is dedicated to three functions as follows:

- IR+M's Investment Compliance Team, responsible for portfolio guideline coding, analysis, monitoring, and reporting, is led by Robert Gentile, Senior Vice President, who has been with IR+M since April 2012.
- IR+M's Risk and Regulatory Compliance Team, responsible for overseeing their Rule 206(4)-7 Compliance Program (Education, Policy Manual, Risk-based testing, and the Annual Compliance Review), regulatory reporting and filings, their Code of Ethics, annual SOC 1 examination, firm-wide risk assessment, and ongoing compliance-related education, is led by Katherine Trevor, Senior Vice President, who has been with IR+M since June 2008.
- Portfolio Risk and Compliance, responsible for overseeing IR+M's Rule 206(4)-7 policy administration, specific to transactions, Portfolio Risk-related policy administration, specifically focused on transaction-related risk inventory and testing, transaction error investigation, and guideline coding review, is led by Dave Hughes, who has been with IR+M since September 2015.

IR+M's Legal Team, responsible for all legal matters affecting the firm including legal research, general firm matters, and contract negotiation, is led by Matthew J. Cannata, Senior Vice President and General Counsel, and reports to Sarah Kilpatrick, Chief of Staff. Matt has been with IR+M since June 2008. Matt is admitted to the bar of the Commonwealth of Massachusetts and is a member of the Boston Bar Association.

CAPACITY

IR+M does not have a targeted level of assets where they would close any of their products, but they would seriously consider closing a strategy if growth compromised their ability to implement that strategy. The Investment Team and Management Committee periodically assess market conditions versus their capacity to ensure they are not constrained in any way.

ENVIRONMENTS OF OUT/UNDER-PERFORMANCE

IR+M's bottom-up security selection strategy attempts to capitalize on a number of different inefficiencies, including market anomalies, market conventions, non-economic investor trading, and new issue concessions.

Market anomalies tend to develop during periods of dislocation, illiquidity, and duress; IR+M strives to position themselves to take advantage of these opportunities when they occur. They have a phrase "take what the market gives you", which means they seek to increase market exposure when attractive opportunities abound. Conversely when there are fewer opportunities, such as in tighter spread environments, they look to reduce overweight positions to spread sectors, increase quality, and build "dry powder" in preparation for the next market swoon. In all cases, purchases undergo fundamental credit analysis, a detailed review of underlying structural features, and an appropriate relative value comparison to other opportunities.

Pricing inefficiencies may occur due to market convention; for example, securities collateralized by loans made within the Small Business Administration's 504 program ("SBAs") are priced with a market convention of 5% Conditional Prepayment Rate ("CPR"). IR+M's Securitized Team uses a proprietary tool to analyze SBA prepayments using pool level data from the collateral agent. The model generates cash flows under a variety of scenarios using custom prepayment ramps to generate expected returns. The CPRs generated by the model are often quite different from the 5% convention, creating opportunities. The final buy/sell decision utilizes output from the model along with market trends and relative value.

At times other investors may be motivated to trade by non-economic factors such as liquidity needs, taxes, guideline constraints, etc. As a result, underlying investment value may become a secondary consideration and trading activity under these circumstances often creates attractive opportunities. During 2008 – 2009, and more recently in 2020, many investors were forced to sell due to reasons unrelated to fundamental investment value (e.g., margin calls); IR+M took advantage of this activity to purchase undervalued but fundamentally sound securities. Similar opportunities, though less severe, occurred in 2012, 2016, and 2018.

IR+M believes that new issues can offer attractive entry points, particularly when they are priced at wider spreads than existing bonds issued by the same entity (new issue concessions). Given their size as a firm paired with their strong dealer relationships means they typically receive a higher fill ratio of a new issue

VEHICLE INFORMATION

The Harbor Disciplined Bond ETF incepted in May 2024 and is currently available as an active ETF (Ticker: AGGS).

Ticker Symbol	AGGS
Cusip	41151J794
Total Expense Ratio	0.35%
Inception Date	05/01/2024
Listing Date	05/02/2024
Manager Name	Income Research + Management (IR+M)
Initial Offering Price	$40.00
Listed Exchange	NYSE
Active/Passive	Active
Benchmark	Bloomberg U.S. Aggregate Bond Index
Lead Market Maker	Jane Street
Morningstar Category	Intermediate Core Plus

For complete details on Harbor Disciplined Bond ETF (AGGS), including 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 Disciplined Bond ETF, 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 subadvisor are provided by the subadvisor 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.

Investing involves risk, principal loss is possible. Unlike mutual funds, ETFs may trade at a premium or discount to their net asset value. Harbor ETFs are new and have limited operating history to judge.

There is no guarantee that the investment objective of the Fund will be achieved. Fixed income investments are affected by interest rate changes and the creditworthiness of the issues held by the Fund. As interest rates rise, the values of fixed income securities held by the Fund are likely to decrease and reduce the value of the Fund's portfolio. There may be a greater risk that the Fund could lose money due to prepayment and extension risks because the Fund invests, at times, in mortgage-related and/or asset backed securities. There can be no assurance that the Fund will grow to or maintain an economically viable size, in which case the Board of Trustees may determine to liquidate the Fund. High-yield investing poses additional credit risk related to lower-rated bonds.

Income Research + Management is an independent subadvisor to the Harbor Disciplined Bond ETF.

The Bloomberg US Aggregate Bond Index is an unmanaged index of investment grade fixed-rate debt issues with maturities of at least one year. This unmanaged index does not reflect fees and expenses and is not available for direct investment.

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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