



Harbor Mid Cap Strategy

STANDARD RFI QUESTIONNAIRE

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Effective November 2021

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.

Harbor Funds is a family of subadvised mutual funds that offers access to a lineup of respected institutional investment firms sourced worldwide. Recognizing that no single firm can excel in managing all types of asset classes, Harbor utilizes a “manager-of-managers” approach where we seek to identify experienced portfolio managers with proven track records, who specialize in a particular asset class. These managers are responsible for making the day-to-day investment decisions and effecting the purchase and sale of the securities held by the individual mutual fund portfolios.

Our arrangements with third-party investment teams, combined with our internal philosophy of closely managing costs, allow us to offer a family of funds that we believe delivers long-term value to our shareholders.

SUBADVISER & INVESTMENT TEAM

SUBADVISER STRUCTURE

The subadviser for the Harbor Mid Cap Strategy is EARNEST Partners LLC (“EARNEST Partners”). EARNEST Partners is 100% owned by its employees.

HISTORY

EARNEST Partners’ equity business began in 1998.

Their investment approach focuses on the merits of individual securities when making investment decisions.

EARNEST Partners employs over 50 professionals, many with advanced degrees and other professional designations such as CFA or CPA. The principals average over 20 years of experience. The quality and experience of the investment team is an important advantage.

EARNEST Partners’ personnel have specialized knowledge in consumer products, energy, financial services, home building, industrials, media, restaurants, retail, technology, telecommunications, utilities, waste management, and other areas of opportunity. Additionally, the team is comprised of individuals with varying functional experiences including credit, investment banking, management consulting, accounting, and engineering to name a few.

EARNEST Partners has experience with various types of clients including corporations, public funds, jointly trusteed plans, endowments, foundations, and high net worth individuals.

PORTFOLIO MANAGER

Paul E. Viera

CEO and Partner

Mr. Viera is the founder and Chief Executive Officer of EARNEST Partners, a global investment firm responsible for overseeing over \$25 billion for municipalities, states, corporations, endowments, and universities. He conceived and developed Return Pattern Recognition®, the investment methodology used to screen equities at EARNEST Partners. Mr. Viera has a BA in Economics from the University of Michigan, an MBA from the Harvard Business School, and has over thirty years of investment experience. He was a Vice President at Bankers Trust in both New York and London. He later joined Invesco, where he became a Global Partner and senior member of its Investment Team. Mr. Viera serves as a member of the following Boards: the Board of Take-Two Interactive (TTWO), the Board of Dean's Advisors for Harvard Business School, the Board of Foreign Advisors of Haitong Securities (the second largest Chinese securities firm), the Carter Center Board of Councilors, the National Center for Human & Civil Rights, the University of Michigan School of Information External Advisory Board, the Cristo Rey Atlanta Jesuit High School Board, and the Emory University Board of Visitors. Mr. Viera also serves as a Trustee of the Woodruff Arts Center and a member of its investment committee. Additionally, he is a member of the Council on Foreign Relations, and a commentator for several news organizations, including, among others, CNBC and Bloomberg News.

DECISION MAKING AUTHORITY

The investment team at EARNEST Partners is responsible for all portfolio management decisions and is comprised of all investment professionals. They meet on a regular basis to review existing holdings, research new securities identified by their screen as having the highest expected returns, and monitor the risk of all portfolios (prospective downside deviation to assigned benchmark.) The investment team holds a vote to determine the consensus to buy or sell a stock. Everyone on the team has an equal vote.

The investment team will decide whether to purchase a security based on the Return Pattern Recognition® screen, a thorough fundamental analysis performed by the investment professionals, and an analysis of the marginal contribution to risk of the individual security. Each investment professional can influence the final buy decision through his or her involvement in, and contributions to, the investment team. Any investment professional can convene an investment team meeting at any time to discuss information impacting a current holding.

COMPENSATION & RETENTION OF INVESTMENT PROFESSIONALS

EARNEST Partners' compensation system is designed to align their interests with their clients, to promote employees longevity and to be competitive in their industry.

All EARNEST Partners personnel are paid a fixed salary and a discretionary bonus. A portion of the bonus may consist of profit sharing and/or deferred compensation. The Company also matches a portion of employees' 401(k) contributions, if any. The bonus is a function of client satisfaction with respect to investment results and service.

Mr. Viera is an owner of the firm. Equity ownership and profits derived from the firm's business activities are another component of compensation for the portfolio manager.

SUCCESSION PLANNING

No senior management member intends to leave in the foreseeable future. EARNEST Partners emphasizes a team approach. The depth of experience and team orientation among the EARNEST Partners professionals is such that an individual loss would not adversely affect a client's well-being.

HARBOR MID CAP STRATEGY

INVESTMENT PHILOSOPHY

EARNEST Partners' system of beliefs form their philosophy.

- They believe equity markets are inefficient and that creates opportunities to find alpha.
- They believe an investigative team with deep subject matter knowledge is key to identifying alpha.
- They believe that an intimate knowledge of the culture and preferences where you invest is essential to producing alpha.
- They believe that a company's ESG profile is predictive of its financial performance.
- They believe that the proper approach to risk management does not eliminate your alpha.
- They believe that hard work matters.

INVESTMENT UNIVERSE

The Strategy is benchmarked to the Russell Midcap[®] Index. At purchase, names are generally within the market capitalization range of the benchmark.

INVESTMENT PROCESS

EARNEST Partners believes it follows a different approach than most of their competitors. They utilize a team approach that is based on the constant, ongoing interaction between their investment professionals. EARNEST Partners believe that as a team, they are smarter, more diligent, more thoughtful, more discerning, more experienced, more creative and more stable than any investment firm that feeds research and investment ideas to individual decision-makers.

EARNEST Partners also believes their investment professionals have a more diverse professional experience than their competitors' employees. In addition to holding MBA or Ph.D. degrees from some of the most prestigious schools in the world, many of the team members have hands-on work experience across a wide range of job functions and industries.

Screening: The first step in EARNEST Partners' investment process is to screen the relevant universe to identify stocks that they believe are likely to outperform. Using an approach called Return Pattern Recognition[®], they seek to identify the financial and market characteristics that have been in place when an individual company has produced outstanding performance. These characteristics include valuation measures, market trends, operating trends, growth measures, profitability measures, and macroeconomics.

Vetting: The best companies identified in the screening process are put through a rigorous review by the investment team, which is comprised of individuals with diverse professional backgrounds and hands-on work experience across a range of industries. This allows EARNEST Partners to research potential investments from the viewpoint of industry practitioners as well as financial analysts. They believe that this leads to a deeper and broader debate among investment professionals, which is the basis for better investment decisions.

During the investment team's review of each company, they thoroughly test the company's investment thesis. This test generally includes conversations with the company's management team, industry specialists and other experts in EARNEST Partners' global network, review of the company's financial reports, analysis of industry and company-specific studies, and independent field research. They seek companies in attractive industries with developed strategies, talented and honest management teams, sufficient funding, and strong financial results.

Voting: Companies that successfully complete a vetting process are put to a vote by the investment team, which makes decisions on the basis of what EARNEST Partners calls a critical consensus (consisting generally of 80% of all investment team members).

Scaling: Once a company's stock has been approved for purchase by the investment team, they add it to existing positions through a portfolio construction process that focuses on reducing the possibility that the portfolio will meaningfully underperform the assigned benchmark. This is done by analyzing the marginal contribution to risk of the individual security while taking into consideration the current cash position of the portfolio.

Monitoring: The investment team monitors the companies they own on an ongoing basis and they can convene at a moment's notice to discuss relevant developments in a name or in the market. The team meets several times weekly to discuss the portfolio holdings and prospective names under consideration for purchase.

Selling: EARNEST Partners' goal is to own the best companies that fit within the applicable mandate. The ongoing monitoring of the portfolio will cause them to sell a name if (a) the investment thesis has fulfilled its promise, (b) the investment thesis has failed to fulfill its promise and the company's prospects have deteriorated accordingly, or (c) they have identified another company that they believe has superior return and risk characteristics. Their portfolios seek to contain only their best investment ideas therefore "crowding out" less attractive investments.

RESEARCH PROCESS

The companies identified in EARNEST Partners' screening process are put through a rigorous fundamental review conducted by the investment team, which is comprised of individuals with diverse professional backgrounds and hands-on work experience across a range of industries. This allows EARNEST Partners to research potential investments from the viewpoint of industry practitioners as well as financial analysts. They believe that this leads to a deeper and broader debate among their investment professionals, which is the basis for better investment decisions.

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The majority of EARNEST Partners' research is generated internally utilizing resources such as FactSet, Reuters, Compustat, Bloomberg, the SEC's EDGAR database, and I/B/E/S. The resources are used primarily as data sources for independent research. In addition, their fundamental research also leverages contacts of the Firm to obtain the insight of industry experts, competitors, customers, suppliers, and other industry groups.

EARNEST Partners does utilize external research on a limited basis to gauge overall market sentiment toward a prospective holding, but it does not use it as a basis for making investment decisions. Every investment decision is made on the basis of their own internal research.

SELL DISCIPLINE

The key to EARNEST Partners' sell decision is discipline. A stock is sold if one of the following situations arise:

- a) The company executes according to EARNEST Partners' investment thesis and the market recognizes it in the stock's valuation;
- b) EARNEST Partners' investment process identifies a company they believe has superior return and risk characteristics. In this situation, the more attractive stock would force EARNEST Partners to sell the less attractive stock so that they continue to own only their best investment ideas; or
- c) The company's prospects deteriorate as a result of poor business plan execution, new competitors, management changes, a souring business environment or other adverse effects.

Equity portfolios contain only what EARNEST Partners believes are their best investment ideas therefore "crowding out" less attractive investments.

BENCHMARK

The Russell Midcap[®] Index is the comparative benchmark for the Harbor Mid Cap Strategy.

INVESTMENT GUIDELINES

The Strategy invests primarily in equity securities, principally common and preferred stocks, of mid cap companies.

Investment Guidelines	
# of Holdings	Approximately 60
Security Allocations	Generally limited to 5%
Maximum Cash Allocation	5%
Sector Allocation	Generally will not represent more than 2.5x the benchmark
Market Capitalization	Minimum at purchase: \$250 million Maximum at purchase: largest position currently in the Russell Midcap [®] Index

RISK MANAGEMENT

EARNEST Partners uses a statistical approach called downside deviation to measure and then constrain the likelihood of significantly underperforming the benchmark. Using this information, investments are selected that blend together in a way that best manages downside risk. The result is a portfolio of approximately 60 stocks with expected excess returns and limited risk of meaningful underperformance.

If the initial portfolio produces a "downside deviation" measure that properly controls risk, the portfolio is then subject to a rigorous fundamental review. If the risk parameter is violated, an iterative algorithm is employed to address the issue. This algorithm either reduces position sizes or supplants one stock for another or both, until all risk considerations are met.

Each security is evaluated on its marginal contribution to the risk of the total portfolio. Individual positions are generally limited to 5% of the portfolio.

CAPACITY

EARNEST Partners foresees no capacity constraints in the product at this time.

ENVIRONMENTS OF OUT/UNDER-PERFORMANCE

EARNEST Partners' investment process works best when valuation levels are consistent with fundamentals. The investment process may underperform when investment results are concentrated in a handful of speculative stocks or in environments where the market uncharacteristically rewards companies with low quality earnings and/or excessive operating leverage.

TRADING PROCESS

Trades are entered into Bloomberg AIM system manually by an investment team member once the decision has been made to take a position in a name. The trader who receives the notification will confirm the trade with another member of the investment team to ensure the accuracy before proceeding. The trade is then routed automatically to EARNEST Partners' compliance department for further review with restrictions and client guidelines. The trade moves through the Bloomberg management system automatically from one department to the next for proper checks and balances. Once the position is ready to be built, the traders execute the trade manually.

COMPETITIVE ADVANTAGES

Industry Practitioners: EARNEST Partners investment team members are distinguished by years of hands-on work experience across a wide range of industries and functional experiences and nearly all investment team members have worked, studied or lived abroad. This expertise allows them to not just analyze financial metrics, but dig deeper and evaluate from the perspective of industry practitioners if a company is set up to compete in the global marketplace. While academic credentials provide a foundation of intellectual rigor, it is the investment team's real-world judgment at the heart of each investment thesis that differentiates their approach to discerning fundamentally sound investment opportunities from those that simply appear attractive.

Better Analysis: EARNEST Partners believes that their Return Pattern Recognition® and its capability to identify the specific drivers of each stock provides an advantage over systems that attempt to apply the same dogma to each stock. Companies are unique and they consider the specific characteristics of each company when selecting companies that they believe make good investments because they are mispriced and misunderstood in the market.

Focus on Risk that Matters: Unlike many other firms, EARNEST Partners does not limit their risk management to tracking error, but instead focus on managing the risk of significantly underperforming their assigned benchmark, which is the risk that they believe matters most to their clients. EARNEST Partners measures and then constrains the likelihood of significantly underperforming the assigned benchmark through a focus on "downside deviation." Using this information, they seek to select investments that blend together to manage downside risk. The result is a client portfolio with expected excess returns and limited risk of meaningful underperformance versus the assigned benchmark.

VEHICLE & SHARE CLASS INFORMATION

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

Share Class	Ticker
Retirement	HMCRX
Institutional	HMCLX
Investor	HMCNX

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

DISCLOSURE

Responses regarding the Harbor organization have been provided by Harbor Funds Distributors, Inc. Responses relating to the investment team of the Harbor Mid Cap Strategy, including the process for making portfolio decisions and effecting the purchase and sale of securities held by the Strategy, or any specific operational aspects of the subadviser are provided by the subadviser to the Strategy 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 Strategy will be achieved. Stock markets are volatile and equity value can decline significantly in response to adverse issuer, political, regulatory, market and economic conditions.

EARNEST Partners LLC is an independent subadviser to the Harbor Mid Cap Strategy.

The Russell Midcap[®] Index is an unmanaged index representing the smallest 800 companies of the 1,000 companies that comprise the Russell 1000[®] Index. This unmanaged index does not reflect fees and expenses and is not available for direct investment. The Russell Midcap[®] Index, Russell 1000[®] Index and Russell[®] are trademarks of Frank Russell Company.

There is no guarantee that the investment objective of the Strategy 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 mid cap companies pose special risks, including possible illiquidity and greater price volatility than stocks of larger, more established companies.

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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