LORD ABBETT

Principal Adverse Impacts of Investment Decisions

The regulatory environment in which investment managers operate is evolving, as are regulatory and market expectations regarding how sustainability factors and their adverse impacts should be defined and evaluated. As such, there is limited guidance available and no developed market approach at this time in relation to the systems, controls and measures that would need to be put in place to provide a Principal Adverse Impacts Statement in line with Article 4(1)(a) of the EU Sustainable Finance Disclosure Regulation ("SFDR").

One of the challenges faced by financial market participants when integrating sustainability risks or Principal Adverse Impacts into their investment process is that data is not yet systematically disclosed by issuers or, when disclosed by issuers, may be incomplete or may follow various methodologies. Most of the information used to establish the exclusion lists or determine sustainability factors is based on historical data, which may not be complete or accurate or may not fully reflect the future sustainability performance or risks of the investments.

In light of these circumstances, Lord Abbett is applying Article 4(1)(b) of SFDR for reporting periods after the period covered by the report filed on June 30, 2024. Lord Abbett will keep this decision under review as matters evolve and will continue to consider financially material sustainability factors as part of its investment due diligence and monitoring processes and in accordance with the "do no significant harm" principle, which applies to our Article 8 fund, as set out in the supplement of the relevant fund.