

SECTION I - PROFILE

Policy Title: Exercising Voting Rights
Approved Date: September 2014

SECTION II - POLICY

BBH LUXEMBOURG FUNDS

EXERCISING VOTING RIGHTS

I. Introduction

This policy has been adopted pursuant to applicable requirements under CSSF Circular 12/546 and CSSF Regulation 10-4.

II. Exercising Voting Rights Policy

The BBH Luxembourg Funds rely on BBH&Co.'s Proxy Voting Policy. BBH may vote proxies for its investment advisory clients for whom it exercises investment discretion pursuant to an advisory contract and where BBH has been designated under such contract or otherwise to vote the client's proxies. BBH may also vote proxies for investment advisory clients holding nondiscretionary accounts where BBH has been designated to vote proxies on their behalf pursuant to a written agreement. In connection with this proxy voting authority, BBH incurs fiduciary responsibilities which generally include the duties of loyalty, care, impartiality and discretion.

A Copy of BBH&Co.'s Proxy Voting Policy is available upon request.