

## POLICY REGARDING DISCLOSURE OF PORTFOLIO HOLDINGS

Baird Funds, Inc. (the “Company”) prohibits the selective disclosure of the portfolio holdings of any of its mutual fund series (each, a “Fund” and collectively, the “Funds”) to any third party, other than in accordance with this policy. The Company may disclose information about the Funds’ portfolio holdings only in the following circumstances:

- Each Fund discloses its portfolio holdings by mailing its annual and semi-annual reports to shareholders approximately two months after the end of the fiscal year and six-month period. In addition, the Company discloses the portfolio holdings of each Fund as of the end of the first and third fiscal quarters by filing Form N-Q with the SEC and as of the end of the second and fourth fiscal quarters by filing Form N-CSR with the SEC.
- The LargeCap and MidCap Funds’ full portfolio holdings (without showing number of shares or dollar values) as of month-end and full portfolio holdings (showing number of shares and dollar values) and top ten holdings as of quarter-end are posted on the Company’s website no earlier than five business days after month-end and quarter-end, respectively.
- The Bond Funds’ full portfolio holdings as of month-end are posted on the Company’s website within fifteen calendar days after month-end.
- The Funds may also provide portfolio holdings information to various ratings agencies, consultants, broker-dealers, investment advisers, financial intermediaries, investors and others, upon request, so long as such information, at the time it is provided, is posted on the Company’s website or otherwise publicly available.

In limited circumstances, for the business purposes described below, the Funds’ portfolio holdings may be disclosed to, or known by, certain third parties in advance of being filed with the SEC or their publication on the Company’s website.

- Robert W. Baird & Co. Incorporated, the Funds’ investment advisor (the “Advisor”), may disclose Fund portfolio holdings to the Funds’ service providers (administrator, fund accountant, custodian, transfer agent and independent pricing service) in connection with the fulfillment of their duties to the Funds. These service providers are required by contract with the Funds to keep such information confidential and not use it for any purpose other than the purpose for which the information was disclosed.
- The Advisor may disclose Fund portfolio holdings to persons who owe a fiduciary duty or other duty of trust or confidence to the Funds, such as the Funds’ legal counsel and independent auditors.
- Disclosure of portfolio holdings as of a particular date may be made in response to inquiries from consultants, prospective clients or other persons, provided that the

recipient signs a confidentiality agreement prohibiting disclosure and misuse of the holdings information.

The Company is prohibited from entering into any other arrangements with third parties to disclose information regarding the Funds' portfolio securities without (1) prior approval of the Advisor's legal and compliance departments and (2) the execution of a confidentiality agreement by the third parties. No compensation or other consideration may be received by the Funds or the Advisor in connection with the disclosure of portfolio holdings in accordance with this policy.

The Board of Directors has delegated to the Chief Compliance Officer of the Company (the "CCO") the responsibility to monitor the foregoing policy and to address any violations thereof. The CCO shall report to the Board of Directors and the Board shall review any disclosures of Fund portfolio holdings outside of the permitted disclosures described above on a quarterly basis to ensure that disclosure of information about portfolio holdings is in the best interest of Fund shareholders and to address any conflicts between the interests of Fund shareholders and those of the Advisor or any other Fund affiliate.