

ENVIRONMENTAL, SOCIAL AND GOVERNANCE POLICY

Irradiant Partners, LP

Most Recently Revised: October 2022

I. Introduction

Irradiant Partners, LP (“Irradiant” or the “Firm”) is an alternative investment manager focused on three strategies – liquid credit (the “Liquid Credit Strategy”), opportunistic credit (the “Solutions Strategy”), and renewable private equity and credit (the “Renewables Strategy”). Our Solutions Strategy and Renewables Strategy are collectively referred to as our “Private Investment Strategies”.

The Firm was founded in 2021 to serve as a unified platform for our distinct strategies with overall consideration of environmental, social and governance (“ESG”) issues. Our Renewables Strategy is designed to be an ESG-themed strategy while our Solutions Strategy and Liquid Credit Strategy are ESG-informed. Irradiant believes that the consideration of ESG issues, where deemed material, has the potential to meaningfully impact economic value for portfolio companies over time. We therefore view the consideration of material ESG issues in our investment process as a component of our fiduciary obligation to our Clients to maximize returns while mitigating risks. As a Firm, we understand the importance of ESG factors in driving long-term success, and therefore we are committed to incorporating ESG principles into our day-to-day operations.¹

II. Scope and Purpose

The purpose of this ESG policy is to codify our belief in the value of assessing material ESG issues in our investments and to establish a formal framework for the integration of material ESG considerations throughout our investment lifecycle. The ESG principles described within this Policy are applied to 100% of our assets under management. The specific approach to ESG integration utilized within each of Irradiant’s three strategies may differ depending on the strategy and asset class. As a signatory to the United Nations Principles for Responsible Investment (“UN PRI”), Irradiant further seeks to demonstrate our commitment to the six principles of the UN PRI.

III. Roles and Responsibilities

Investment Teams:

The investment teams are responsible for evaluating ESG opportunities and risk factors for each investment, as well as ESG tracking and reporting within their respective strategy. For our Private Investment Strategies, the investment teams are also responsible for engaging with portfolio companies and partners to highlight our responsible investment principles and to encourage alignment with our ESG Policy.

¹ While Irradiant seeks to integrate certain ESG factors into its investment process, there is no guarantee that Irradiant’s ESG strategy will be successfully implemented or that investments will have a positive ESG impact. Applying ESG factors to investment decisions involves qualitative and subjective decisions and there is no guarantee the criteria used by Irradiant to formulate decisions regarding ESG, or Irradiant’s judgement regarding the same, will reflect the beliefs or values of any particular investor. There are significant differences in interpretation of what constitutes positive ESG impact and those interpretations are rapidly changing.

Investment Committee:

Each of our strategies' respective Investment Committees are responsible for integrating ESG principles into investment decision-making and ensuring responsible investment practices are adequately integrated by the respective investment teams.

ESG Committee:

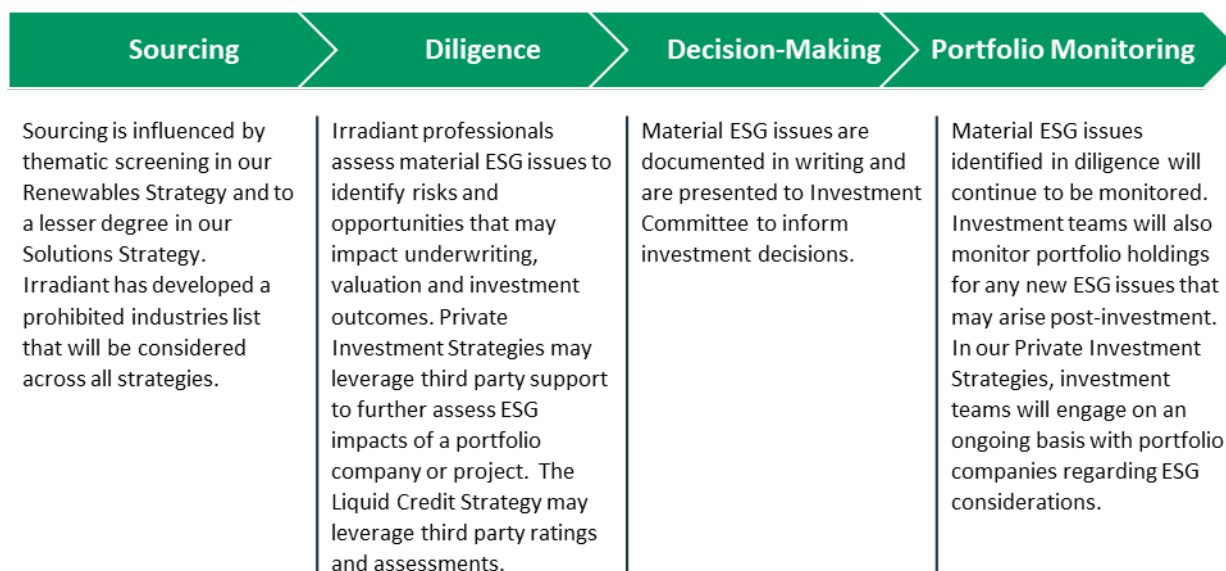
Irradiant has established an ESG Committee which is subject to oversight by our Management Committee, to which the ESG Committee reports on a quarterly basis. Our ESG Committee is Chaired by Irradiant's Vice Chairman and is additionally comprised of senior leadership from compliance, and representatives from each of our investment strategies.

The ESG Committee is responsible for the development, implementation and ongoing maintenance of this ESG Policy. The ESG Committee generally meets weekly and reports to the Management Committee on a quarterly basis. On no less than an annual basis, the ESG Committee will conduct a review of the ESG Policy and implementation outputs, and determine whether updates are warranted to the Policy and/or associated implementation tools and guidance. As part of its review, the ESG Committee will also assess whether investment team members require additional training or resources for effective policy implementation, and organizing such training as required. Below are the members of our ESG Committee. Biographies for each of the members are available in Appendix G to our Firm Due Diligence Questionnaire.

- Jarvis Hollingsworth, Vice Chairman (Chair)
- Linda Ba, Managing Director
- Anne-Sofie Bilstoft, Vice President
- Anthony Garcia, Director
- Elizabeth Greenwood, General Counsel & CCO
- Megan Neligan, Vice President
- Alta Yen, Managing Director

IV. ESG Integration Into Investment Processes

Irradiant implements a bottom up approach to ESG integration in which individual research analysts and deal teams are responsible for incorporating ESG factors into their investment processes. We complement this process with top-down oversight and support from our ESG Committee as we seek to implement a best-in-class approach to our investments. The below chart illustrates the integration of ESG considerations into our investment processes.



Sourcing:

Irradiant has developed a prohibited list of industries that we believe present outsized ESG risks. As part of the initial screening process, Investment Committee for each strategy reviews whether a particular company has material exposure to an industry on the prohibited industries list.

Diligence:

As noted below, our ESG integration approach is tailored to each of our specific investment strategies.

In our Liquid Credit Strategy, we use the Sustainability Accounting Standards Board (SASB) sector guide as the backbone of our due diligence analysis. We then incorporate ESG data, analyses, and insights from several third-party ESG research vendors to inform our investment decisions. Irradiant has developed a proprietary ESG scoring methodology which is applied to all investments within our portfolios. All of the Liquid Credit Strategy investments are rated in accordance with this methodology. This score is based upon three fundamental factors: i) internal analyst's ESG risk rating, which is guided by SASB's materiality map, ii) ESG rating from Sustainalytics, one of the largest ESG rating agencies in the market, and iii) real-time reputational risk rating from RepRisk, a provider that aggregates ESG news. This approach provides us with a process that goes a step further than just exclusionary/negative screenings and allows us to incorporate risk rating into our investment decision-making and monitoring process. The Liquid Credit team generally reviews ESG scores on a monthly basis with a high level of scrutiny given to the companies with the highest ESG risk rating.

In our Private Investment Strategies, Irradiant is generally able to conduct in-depth due diligence and may have influence or control over portfolio companies and projects. In these strategies, we are generally able to perform detailed qualitative reviews of material ESG factors to identify both positive ESG opportunities and negative ESG risks. We may also seek to quantify ESG impacts.

Decision-Making:

For an investment to be considered for approval, an assessment of material ESG issues, along with any

associated recommendations, is required to be included in the final Investment Committee memorandum. The Investment Committee for the respective Strategy is then responsible for final approval of each investment.

Portfolio Monitoring:

Following approval, each investment is monitored for both material ESG issues identified during the initial underwriting and new material ESG issues that might come to surface during the holding period. Aside from idiosyncratic ESG events, the analysts and deal teams, with support of the ESG Committee, further follow trends in the industry and new regulations which might impact the company or the market within which it operates. For our Private Investment Strategies, the investment teams are responsible for engaging with portfolio companies and operating partners to highlight our responsible investment principles and to encourage alignment with our ESG Policy.

V. ESG Integration Into Internal Operations

Environmental:

We seek to develop and implement environmentally friendly practices that are consistent with a Firm of our size – this includes seeking to implement sustainable practices at our office locations. As one example, for meetings with investors and other third parties, rather than printing materials on paper, we have tablets available for guest use.

Social:

Irradiant endeavors to demonstrate integrity in its interactions with all of its stakeholders: investors, employees, portfolio companies, and in the communities where we operate. We have established a Diversity, Equity and Inclusion Council and are committed to diversity, equity and inclusion in our hiring and employment practices.

Governance:

We are committed to compliance with all applicable laws and regulations in the jurisdictions where we operate and have established a governance structure to appropriately manage areas of risk and potential conflicts of interest.

VI. Transparency and Reporting

As part of our commitment to transparency, we will share the progress and impact of our ongoing ESG efforts. ESG reporting will vary by strategy and may include written public reports, informal oral reports, or confidential reports to investors. Additionally, as a signatory to the United Nations-supported Principles for Responsible Investment, Irradiant is committed to public reporting in accordance with its standards and requirements in the form of the annual Transparency Report.

VII. Definitions

Irradiant incorporates definitions from the UN PRI and other leading frameworks such as SASB.

- **Material ESG issues:** Material environmental, social and governance (ESG) factors are non-financial topics that are relevant to value preservation and value creation in our debt and equity

investments. *While material topics will vary based on the investment being assessed, Irradiant has an overarching focus on the following material topics: clean energy, decarbonization, and diversity, equity, and inclusion.*

- **Screening of investments:**
 - **Negative/exclusionary screening:** The exclusion from a fund or portfolio of certain sectors, companies or practices based on specific ESG criteria. *See Irradiant's prohibited industries list.*
- **Sustainability themed investment:** Investment in themes or assets specifically related to sustainability (for example clean energy, green technology or sustainable agriculture). *This applies to Irradiant's Renewables Strategy.*
- **Integration of ESG issues:** PRI defines this as the systematic and explicit inclusion of material ESG factors into investment analysis and investment decisions.
- **UN PRI Principles**
 - Principle 1: We will incorporate ESG issues into investment analysis and decision-making processes.
 - Principle 2: We will be active owners and incorporate ESG issues into our ownership policies and practices.
 - Principle 3: We will seek appropriate disclosure on ESG issues by the entities in which we invest.
 - Principle 4: We will promote acceptance and implementation of the Principles within the investment industry.
 - Principle 5: We will work together to enhance our effectiveness in implementing the Principles.
 - Principle 6: We will each report on our activities and progress towards implementing the Principles.

VIII. Conclusion

This Policy will be reviewed by our ESG Committee at least semi-annually and adjusted as needed based on the evolution of our ESG program, ongoing dialogue with our Clients and investors, and emerging industry trends and regulatory developments.