

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, where appropriate, 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.

Investment Committee:

The Investment Committee for each strategy is responsible for integrating ESG principles into

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 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 responsible for the development, implementation, and ongoing maintenance of this ESG Policy and related materials. The ESG Committee is subject to oversight by our Management Committee, which is comprised of senior personnel throughout the Firm, including our Co-CEOs, Managing Directors and General Counsel & CCO. The Management Committee has ultimate oversight and approval power over our ESG Policy. Our ESG Committee is Chaired by Anne-Sofie Bilstoft, a Director on the Liquid Credit investment team, and is additionally comprised of senior leadership from compliance, and representatives from each of our investment strategies.

The ESG Committee generally meets weekly and reports to the Management Committee on at least a semi-annual 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.

IV. ESG Integration Into Investment Processes

During the diligence and decision-making process, our investment teams will seek to identify and assess material ESG factors. As a component of this process, investments in our Liquid Credit Strategy and Private Investment Strategies will be assessed, in part, on the following factors:

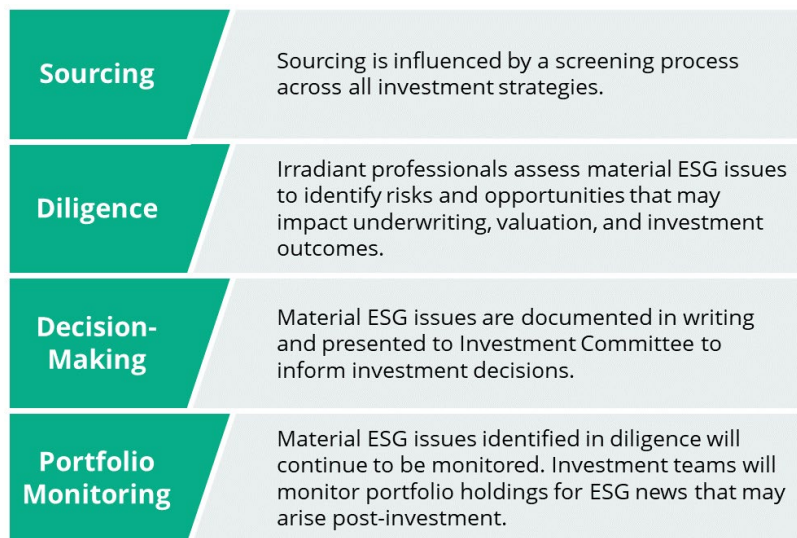
- *Environmental:* Environmental factors will generally be assessed for materiality and potential risk during the diligence phase of an investment with ongoing monitoring throughout the life of the investment. Examples of environmental risks are air quality impact, ecological impact including pollution of environment in which the company operates, energy and water management. Examples of environmental opportunities are companies actively trying to minimize any negative impact on the environment or affirmatively working to improve the environment. Further, we are increasingly aware of the potential ramifications that climate change-related risks and opportunities may have across various sectors. As a result, we seek to assess in our due diligence process how a portfolio company might be exposed to the physical and transitional risks or are otherwise situated to benefit from or be disadvantaged by a transition to a low carbon economy.
- *Social:* Social factors will generally be assessed for materiality and potential risk during the diligence phase of an investment. Companies may face legal, regulatory, and reputational risk as a result of issues such as human labor, human rights, product & safety, customer privacy, and access & affordability. Our investment teams seek to identify Social risk and opportunities. Additionally, at the firm level, Irradiant is signatory to the Solar Industry Forced Labor Prevention Pledge. At the portfolio level, the Investment Committee for each of our strategies is responsible for integrating ESG principles, including review of Social issues such as modern

slavery, into our investment processes from sourcing through diligence, investment decision-making and investment monitoring; we have adopted additional processes to review issues specific to modern slavery and supply chain for our investments within the Renewables Strategy.

- **Governance:** During the diligence our Investment teams aim to identify whether material governance factors create risk or opportunity for the portfolio companies. Examples of material governance factors may include independent board members, compliance with applicable laws and ethical matters.

While the method of analysis of these specific factors may vary depending on the respective investment strategy, asset class and investment horizon, our investment teams may leverage third-party ESG resources or access to an issuer/underlying investment. The above identified considerations may not be deemed material in all cases, and additional ESG considerations may be deemed relevant depending on the investment team’s analysis of material issues.

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. ESG integration into our investment processes is tailored to each of our specific investment strategies, as a result, these processes may differ by investment strategy. The below chart illustrates the integration of ESG considerations into our investment processes.



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 believe that our Firm benefits from a diverse set of views and backgrounds and is committed to fostering an environment that promotes inclusion and values and respects diversity in our daily operations and in our hiring and employment practices. To this end, we have established a Diversity, Equity and Inclusion Council charged with helping to promote and maintain such an environment.

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.