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McKINLEY MANAGEMENT CORPORATE ESG INVESTMENT POLICY

ADOPTED February 23, 2023
Adoption 2

Background & Corporate Commitment

This Statement applies to all McKinley Management, LLC's ("McKinley") investment subsidiaries and investment teams including both McKinley Capital Management, LLC and McKinley Alaska Private Investment, LLC. Descriptions of specific Environmental, Social, and Governance ("ESG") investment practices by each investment team are available upon request.

McKinley is an Alaska-rooted firm headquartered in Anchorage, Alaska. The firm has a longstanding commitment to environmental stewardship and community engagement. McKinley was founded in 1990 by Bob Gillam, an avid outdoorsman whose life's goal was to protect Alaska fisheries from the development of the Pebble Mine. Bob was also passionate about education, food security, and the preservation of cultural traditions among Alaska's Indigenous people. McKinley today remains a firm committed to preserving and protecting our Alaskan way of life. As dedicated citizens of the world, we believe it is our duty to leave future generations with equal or more opportunity than that with which we have been presented.

ESG at McKinley Management, LLC

McKinley believes that the prudent application of ESG practices may be a source of value-creation and opportunities.

McKinley acknowledges that sustainability and ESG issues may influence its investment activity, business model, and diversity, equity, and inclusion policy ("DEI") (link to DEI Policy) as well as the entire organization's interaction with local and distant communities around the world.

Due to the complexity and variety of issues, ESG-specific governance is established with the following council responsible for executing the policy.

Governance, Policy Oversight

The McKinley ESG Council ("Council") sets ESG corporate level objectives, assigns responsibilities





and approves ESG reporting/disclosure statements. Specific to investments, it designs frameworks and identifies best practices in relation to its subsidiaries for: a) ESG integration; and b) Stewardship, Engagement and Regulatory issues.

The group is comprised of the Chief Executive Officer, Chief Investment Officer, Chief Compliance Officer, General Counsel, Chief Operating Officer, Chief Strategy Officer, two members from the investment teams, (Public and Private), Director of Sustainability, Director of Global Distribution, and Director of Human Resources.

Philosophy

McKinley Management employs a team approach to managing investment products. Each investment team uses a systematic, disciplined investment process in accordance with clients' investment objectives and guidelines, to deliver excess returns over an investment cycle.

As a fiduciary, we believe that ESG criteria may add value and should not compromise performance, unless performance is secondary to a client's objectives and/or investment goals.

As an investment firm which offers a wide spectrum of investment strategies, we may adopt different forms of ESG integration, as required by the asset class and the client's needs. McKinley recognizes that there is not a single source or framework of ESG-related principles and that only certain factors may be relevant and material for each individual strategy. McKinley also expects ESG practices to change and evolve over time and that our intent is to adapt with the goal of continual improvement.

ESG Investment Capabilities

McKinley Management has developed an ESG platform to offer our clients the opportunity to generate returns while aligning their investments with their core values and principles.

Exclusionary screens

McKinley's investment teams can use negative screening to eliminate investment holdings according to a client's predetermined criteria. Negative screens previously used include: Controversial Weapons, Cluster Munitions, Coal Exposure, UN Global Compact Principals: Human Rights, Labor Standards, Environment, and Anti-Corruption, Tobacco, Alcohol, Cannabis, Firearms, "Sin" Stocks, Iran/Sudan/Syria/Ukraine Sanctions, U.S. Conference of Catholic Bishops Guidelines.



Positive screens

McKinley’s investment teams may use positive screens which are portfolios that seek “best-in-class” companies based upon predetermined metrics that reflect clients’ values and missions. We engage well-known industry partners which we believe to be best-in-class in their respective industries.

ESG Integration

McKinley’s investment teams may pursue diverse forms of ESG integration to support diverse asset classes and investment mandates. In public equities research, we rely on external ratings and data feeds to complement our investment analysis. Institutional Shareholder Services ("ISS") and Bloomberg are among our data providers. Governance ratings, disclosure ratings, gender diversity ratings, greenhouse gas ("GHG") emissions and GHG intensity ratios are some of the data factors regularly collected and monitored for all our portfolios. Tilting a portfolio to an ESG rank may also preserve a client’s values-based criteria while allowing for flexibility in portfolio construction and risk management. In addition, when evaluating the effects of ESG factors on performance, our quantitative research team has identified potential sources of alpha in the rate of change of Governance scores.

McKinley may, for private investments, conduct a review of practices, determine materiality, and develop an ESG plan with goals and recommendations for management. We may be interested to seek appropriate disclosure on ESG issues by the entities in which we invest and/or require disclosure and reporting practices consistent with our investment mandates. ESG policies will be sought/encouraged, commensurate with the industry and maturity of the company. In all instances, McKinley will seek a high degree of assurance that management’s ESG philosophy is sufficiently consistent with McKinley’s ESG policy and the entity’s or fund’s mandate. For early-stage companies, McKinley will encourage and support founders in building and implementing ESG policies consistent with the entity’s or fund’s mandate. For applicable investments, Managers will be requested to include formal ESG policies and procedures that are consistent with our guidelines and commitments, and in addition, Managers will be requested to promote disclosure and reporting practices consistent with our mandates.

Proxy voting & Engagement

McKinley Capital offers clients the option to leverage either a corporate governance-centered voting policy, or a sustainability-centered voting policy. Both policies were developed with a leading ESG service provider and promote long-term shareholder value and risk mitigation through



responsible corporate governance requirements. Some clients reserve the right to vote their own proxies or direct McKinley to vote their proxies in a certain manner. To assist in its voting process, McKinley currently engages ISS. ISS is a service provider that specializes in providing a variety of fiduciary level proxy related services to institutional investment managers, plan sponsors, custodians, consultants, and other institutional investors. ISS also provides the firm with reports that reflect proxy voting activities for McKinley Capital's client portfolios which provide information for appropriate monitoring of such delegated responsibilities.

McKinley will take an active approach to all private investments and incorporate ESG into our ownership policies and practices.

As necessary, McKinley will report on ESG-related matters in investor reporting throughout the course of the year.

Legal statements

McKinley Capital Management, LLC is registered as an investment adviser with the U.S. Securities and Exchange Commission under the Investment Advisers Act of 1940. We comply with the U.S. regulatory guidance statements and guidelines regarding ESG and are committed to transparency regarding our future ESG developments. We also commit to reviewing this Policy on an annual basis while updates and amendments may be adopted at any time throughout the year.

McKinley Capital Management, LLC, McKinley Alaska Private Investment, LLC, McKinley Alaska Growth Capital (Alaska Growth Capital BIDCO, Inc.), and McKinley Research Group are subsidiaries of McKinley Management, LLC.