



3800 Centerpoint Drive, Suite 1100
Anchorage, AK 99503

McKINLEY MANAGEMENT DIVERSITY, EQUITY, AND INCLUSION (DE&I) PLAN

ADOPTED February 23, 2003

Background & Corporate Commitment

This Statement applies to all McKinley Management, LLC's ("McKinley") subsidiaries including McKinley Capital Management, LLC, McKinley Alaska Private Investment, LLC, McKinley Alaska Growth Capital (Alaska Growth Capital BIDCO, Inc), and McKinley Research Group.

McKinley is an Alaska-rooted firm headquartered in Anchorage, Alaska. The firm embraces a people-first culture that aims to provide a diverse, inclusive, and equitable workplace where all employees, advisors, board members, shareholders, clients, and colleagues feel valued and respected whatever their gender, race, ethnicity, national origin, age, sexual orientation or identity, education, military status, or disability.

As an Alaska-based firm, McKinley is particularly aware of and sensitive to the inclusion and equity of Indigenous people, especially Alaska Natives.

Philosophy

McKinley recognizes that a diversity of perspectives will lead to better business outcomes and best serve our diverse society. Further, we recognize that businesses with an inclusive culture, awareness and education, and effective working relationships improve the workplace. We also understand the importance of cultivating equity, while acknowledging the level of commitment and intention needed to accomplish this purpose. Our commitment to this purpose is long-term and includes all organizational levels from our Board of Directors to each business unit.

Governance, Plan Oversight

McKinley's diversity, equity, and inclusion (DE&I) plan is governed by McKinley's ESG Council who sets ESG corporate level objectives, assigns responsibilities and approves ESG reporting/disclosure statements. 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.

Defining Terms

Below are definitions of diversity, equity, and inclusion (DE&I) for the purpose of this plan.

Diversity

Diversity is the presence of difference within a given setting or context, such as an organization. Differences typically refer to identity like race and gender, and sometimes ethnicity, religion, nationality, or sexual orientation. Diversity refers to a group, rather than an individual. Below are examples of diverse groups for consideration under this plan.

- Gender
- Gender expression/identity
- Sexual orientation
- Race
- Indigenous groups
- Ethnicity
- Generation (e.g., Gen Z, seniors)
- Socioeconomic status
- First generation college students
- Mental well-being
- Citizenship status
- Non-native-language speakers
- Physical ability (e.g., vision, mobility)
- Religion
- Veteran status
- Neurodiversity
- Geography

Equity

Equity means people have fair access, opportunity, resources, and power to thrive. Diversity and inclusion are both outcomes. Equity is not. It refers to the process an organization engages in to ensure that people with marginalized identities can grow, contribute, and develop.

Inclusion

Inclusion can be described as actions taken to understand, embrace, and leverage the unique strengths and facets of identity for all individuals so that they feel welcomed, valued, and supported. Inclusion is not a natural consequence of diversity. An organization can have a diverse team of talent, but that does not mean they feel welcomed or valued or given opportunities to grow.

Principles

McKinley's diversity, equity, and inclusion (DE&I) plan commits to the following principles:



- Recruitment — We aim to expand our recruiting and hiring practices to attract and create opportunities for more diverse talent.
- Education — We will work to provide ongoing DE&I training to employees to increase their awareness and provide appropriate tactics and tools.
- Communication — We aim to use our position and voice to promote the principles of diversity, equity, and inclusion in our company, our community, and our industry.
- Measurement - We plan to measure and report on our progress annually.

Legal statements

McKinley Capital Management, LLC and McKinley Alaska Private Investment, LLC are registered investment advisers with the U.S. Securities and Exchange Commission under the Investment Advisers Act of 1940. McKinley complies with the Americans with Disabilities Act (ADA) and with applicable state and local laws governing nondiscrimination in employment in every location in which McKinley has facilities. We commit to reviewing this plan 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, LLC are subsidiaries of McKinley Management, LLC.