



ENVIRONMENTAL, SOCIAL AND GOVERNANCE (ESG) POLICY

Effective January 31, 2019

ESG investing is a framework of sustainability-related metrics that investors use to evaluate how environmental, social and governance issues may impact a company's operations and activities. ESG factors vary among companies, depending on their industry, geography and stakeholders. Examples of ESG considerations are natural resource scarcity, chemical waste and disposal, workplace health and safety, data privacy, regulation and compliance, anti-fraud and anti-corruption practices, transparency and corporate governance.

OHA supports ESG principles by the way it conducts its own business as well as through the companies it financially supports through debt, equity or other investments.

Integration: OHA takes a holistic approach to investment analysis and believes that ESG factors and the assessment of other sustainable business practices are important to investment decisions and performance. When evaluating the credit quality of a potential investment or existing holding, in addition to traditional financial analysis, OHA investment professionals review ESG criteria for insight into the quality of a company's business, management, culture and its overall risk profile. ESG is an integral component of OHA's investment process and approach to seeking long-term value creation.

Engagement: Essential to OHA's investment process is dialogue with management teams, sponsors and other industry participants. OHA seeks to engage with management teams prior to investment and on a regular basis thereafter as part of its investment monitoring process. Active dialogue with companies and industry participants allows OHA to better understand a company's drivers, risks, strategy, culture and management team dynamics, which OHA believes leads to a better assessment of a company's long-term business prospects and value. ESG-specific matters are discussed and, if relevant, advocated for during these discussions.

Corporate Social Responsibility: OHA incorporates responsible business practices across its organization. The firm strives to foster a culture of diversity and inclusion, provides numerous benefit and wellness programs and promotes environmental and philanthropic efforts.

OHA maintains an ESG Committee, which includes senior members of the investment, legal, client coverage and operations teams. The Committee meets quarterly and is focused on reviewing, updating and monitoring the implementation of the firm's ESG Policy.