

RESPONSIBLE INVESTMENT & SUSTAINABILITY POLICY

Effective June 30, 2021

OHA is committed to supporting responsible and sustainable practices in its own business and through the companies it financially supports. OHA seeks to make a positive impact and believes it has a fiduciary duty to its partners to maintain best practices related to responsible investing. As such, OHA seeks to engage on and promote ESG-related initiatives among its investee companies and across the broader financial industry.

Sustainable investing comprises a framework of metrics that investors use to evaluate how environmental, social and governance factors impact a company's operations and strategy. 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 takes a holistic approach to sustainable and responsible investing across all asset classes in which it invests. In addition to traditional financial analysis, OHA's investment professionals consider ESG criteria for insight into the quality of a company's business, management, culture and its overall risk profile from a sustainability perspective. OHA is committed to stewardship and engagement, seeking to use its influence where possible, to maximize the value of its investments, including on ESG and other sustainability matters.

Integration: The analysis of ESG risks and opportunities are a critical component of OHA's credit process, both prior to making an investment and in ongoing monitoring. OHA has a formal approach to the documentation of ESG analysis which guides its evaluation of sustainability-related issues during the underwriting process. OHA does not apply a formal exclusion policy, but rather seeks to evaluate the materiality of ESG risks on an individual issuer basis. Included in this analysis, among other factors, is the impact of climate change, near term tangible environmental issues (*e.g.*, climate-related physical damage) as well as medium to longer term climate-related risks and opportunities (*e.g.*, transition to a low carbon economy or a long term increase in average global temperature).

Stewardship / Engagement: OHA seeks to use its influence to promote awareness on sustainability and other ESG matters. In doing so, OHA prioritizes areas which it believes are most material to the credit profile of the investment, which can vary greatly among companies and industries. Maintaining active dialogue with company management teams, sponsors and other industry participants is a core tenet of OHA's investment process and philosophy. Proactive dialogue with companies and industry participants allows OHA to better understand the drivers of a company's success, risks, strategy, culture and management team dynamics,

which OHA believe leads to a better assessment of a company's long-term business prospects and value. OHA seeks to engage with management teams prior to making an investment and on a regular basis thereafter as part of its investment process. Sustainability matters are discussed and, if relevant, pursued with the company with the purpose of contributing to positive change. OHA is also committed to engagement efforts with non-issuer stakeholders which seek to improve disclosure and promote transparency on sustainability matters within the broader leveraged finance industry.

Governance: OHA 's ESG Committee, which includes partners and senior members across the organization, serves as the strategic body for the firm's responsible investment and sustainability initiatives.

Reporting: OHA is committed to transparency with respect to its ESG activities and provides customized reporting to many clients in addition to incorporating client sustainability preferences and requirements. Additionally, as a signatory to the UN-supported Principles for Responsible Investment, OHA is committed to public reporting in accordance with its standards and requirements.

Corporate Social Responsibility: OHA incorporates responsible business practices across its organization. The firm strives to foster a culture of diversity and inclusion, engage with employees through a variety of initiatives, provide numerous benefit and wellness programs and promote environmental and philanthropic efforts.