

## **ESG & SUSTAINABILITY POLICY**

## Effective March 21, 2022

OHA is committed to sustainable practices in its own business and incorporating ESG factors in the analysis of and engagement with companies it financially supports. OHA believes it has a fiduciary duty to its partners to maintain best practices related to ESG integration. As such, OHA seeks to engage on and promote ESG-related initiatives among its investee companies and across the broader financial industry.

OHA takes a holistic approach to ESG & sustainability 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. At the firm level, OHA does not apply a formal exclusion policy, but rather seeks to evaluate the materiality of ESG risks on an industry and individual issuer basis.

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. ESG & 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 employs dedicated full-time professionals focused on the incorporation of ESG matters within the firm's investment process as well as other corporate sustainability

initiatives at the firm. OHA ESG & Sustainability staff report directly into Bill Bohnsack, President and Senior Partner of OHA. OHA 's ESG Committee, which includes partners and senior members across the organization, serves as the strategic body and forum for handling critical risk incidents related to the firm's ESG 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 and a supporter of the Taskforce for Climate Related Financial Disclosure (TCFD), OHA is committed to public reporting and transparency.

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.