



## **ESG & SUSTAINABILITY POLICY**

**Effective June 12, 2024**

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. As such, OHA seeks to adopt best practices related to ESG integration, including engaging on and promoting ESG initiatives most likely to be financially material with portfolio companies and across the broader financial industry.

OHA takes a holistic approach to ESG & sustainability across the 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 certain issuers' business, management, culture and/or its overall risk profile from a sustainability perspective. OHA is committed to stewardship and engagement, seeking to use its influence where appropriate to maximize the value of its investments, including on ESG and other sustainability matters.

*Integration:* The analysis of ESG risks and opportunities is a key component of OHA's credit process. OHA utilizes a formal approach to ESG review, as applicable, which guides its evaluation of sustainability-related issues. OHA does not apply a formal exclusion policy; instead, it evaluates the materiality of any identified ESG risks on an industry and individual issuer basis.

*Stewardship / Engagement:* OHA seeks to promote awareness on sustainability and other ESG matters most likely to be financially material. In doing so, OHA prioritizes areas which it believes are most material to the credit profile of an issuer, which can vary greatly among companies and industries. Maintaining active dialogue with company management teams, sponsors and other industry participants, as applicable, 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 believes leads to a better assessment of a company's long-term business prospects and value. OHA seeks to engage with management teams as appropriate as part of its investment process. ESG & sustainability matters are discussed and may be pursued with the company with the purpose of contributing to positive outcomes. OHA undertakes engagement efforts with non-issuer stakeholders, which seek to improve disclosure and promote transparency on sustainability matters within the broader leveraged finance industry. Finally, OHA has an ESG incident response process, which may dictate engagement with relevant stakeholders, depending on the severity and nature of the issue.

*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. The OHA ESG & Sustainability team reports directly into Bill Bohnsack, President and Senior Partner of OHA. The ESG team also reports into Adam Kertzner Portfolio Manager and Senior Partner, and Fritz Thomas Head of Client Coverage and Partner. OHA's ESG Committee, which includes partners and senior members across the organization, serves to provide strategic guidance and input for the direction of OHA's ESG program.

*Reporting:* OHA is committed to transparency with respect to its ESG activities and provides customized reporting to clients, in addition to incorporating client sustainability preferences and requirements, as agreed. Additionally, as a signatory to the UN-supported Principles for Responsible Investment and a supporter of the Task Force on 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, engages with employees through a variety of initiatives, provides numerous benefit and wellness programs, and promotes environmental and philanthropic efforts.

*Climate:* OHA has a Climate Policy reflecting the firm's approach and application of its ESG & Sustainability policy on climate related matters.