

Sculptor

CAPITAL MANAGEMENT

ENVIRONMENTAL, SOCIAL, AND GOVERNANCE (ESG) POLICY

Sculptor Capital Management seeks to create value through investment opportunities across Multi-Strategy, Credit and Real Estate. As part of our investment approach, we consider ESG-related issues and opportunities as part of the investment merit and risk monitoring processes across investment disciplines. The Firm is a signatory and seeks to align its ESG investment practices with the tenets set out by the United Nations Principles for Responsible Investment (“UN PRI”) through this ESG Policy and related ESG Procedures.¹

We seek to implement a process that considers ESG risks and opportunities while acting in the best interests of our clients. We recognize that industry guidelines and best practices for ESG management will continue to mature over time. As such, we periodically review our ESG Policy and related Procedures to ensure that they evolve accordingly.

ESG Management and Accountability

Our investment professionals have primary responsibility for identifying ESG risks and opportunities in the investment process. In instances where material risks are identified, our investment professionals are responsible for escalating those issues for consideration in the investment decision-making process by the relevant business unit head(s) or investment committees, as appropriate. Our business unit heads and the Partner Management Committee are responsible for maintaining ongoing awareness and monitoring of salient ESG matters across the portfolio.

We are committed to building the ESG management capacity of our investment team and make available dedicated training on ESG matters.

Investment Merit and Risk Monitoring

We take a best efforts approach to assess the materiality of ESG risks in our consideration of prospective fundamental investments and throughout the investment lifecycle. Consistent with our fiduciary duties and the investment mandates of our funds and client accounts, we do not negatively screen opportunities from our investable universe, but rather evaluate and monitor ESG issues that may have material impacts on investments. Risk exposure areas considered may include, for example, ethics, data privacy, bribery and corruption, labor conditions, diversity and inclusion, environmental impact, sustainability factors and supply chain compliance. We may engage ESG experts, where we believe appropriate, to enhance our investment process and evaluation of ESG risks.

¹ The UN PRI tenets are commitments to: (1) incorporate ESG issues into investment analysis and decision-making processes; (2) be active owners and incorporate ESG issues into ownership policies and practices; (3) seek appropriate disclosure on ESG issues by the entities in which investments are made; (4) promote acceptance and implementation of the UN PRI within the investment industry; (5) enhance effectiveness in implementing the UN PRI; and (6) report on activities and progress towards implementing the UN PRI.

Such ESG factors have been and will continue to be integrated in our continuous risk monitoring processes to inform ongoing portfolio and market awareness.

Responsible Engagement

Opportunities to engage in ESG conversations vary for public and private investments. The Firm works with those managing its private investments, where relevant, to increase awareness of ESG issues and risk factors, and drive value through ESG opportunities. To that end, and whenever we believe appropriate, we share our ESG policy with portfolio companies, communicate ESG findings identified in due diligence and encourage accretive ESG management.

We are committed to taking a “suggestivist” approach with our public investments.

Transparency

The Firm is committed to being transparent with our clients regarding ESG management practices in a manner consistent with all governing rules and regulations. As such, we integrate discussion of ESG matters, management activities and progress in communications with our constituents as appropriate.