Sustainable Financial Disclosure Regulation ("SFDR")

Ares Management Luxembourg

Disclosures for the purposes of European Union Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector ("SFDR").

The consideration of environmental, social and governance ("ESG") factors generally and sustainability risks specifically is integrated into Ares Management Luxembourg's ("the Firm") investment processes. It is primarily the responsibility of the specific investment team evaluating an investment, along with the other risks which the team considers in line with the particular strategy and investment guidelines for the relevant product.

In order to ensure that sustainability risks are considered in a systematic manner, investment teams are required wherever practicable to highlight key sustainability considerations at the early stages of proposed investments, and subsequently to include sustainability risk assessment information within relevant internal documentation such as papers for investment committees, including wherever practicable by the application of ratings to individual sustainability risks together with overall conclusion ratings. Once investments are made, the Firm continues as part of its portfolio management processes to monitor for sustainability risks.

The Firm's policy and approach as described above ensures that sustainability risks are integrated into both investment decision making and portfolio management to the extent that they represent potential or actual material risks to and opportunities for investments made for a particular product. As part of that process, the Firm has determined that sustainability issues are potentially relevant to the investment returns of its products, having regard in each case to the particular product's strategy and investment guidelines. With regard to any particular product, many or all of the specific investment decisions involved will remain to be made in the future and, accordingly, identification and assessments of risks, including sustainability risks, will necessarily take place on an investment-by-investment basis.

With reference to the above, the Firm will consider environmental and/or social issues which represent potential or actual material risks to the investments in its products' investment portfolios. The identification, assessment and mitigation of such risks, including sustainability risks, will be made on an investment-by-investment basis as outlined above.

Remuneration

The Firm ensures that the variable remuneration of its staff takes into account compliance with the Firm's policies and procedures, including those relating to the impact of sustainability risks on the investment decision-marking process.

No consideration of sustainability adverse impacts

The Firm does not consider the principal adverse impacts of its investment decisions on sustainability factors in the manner specifically prescribed by Article 4 of SFDR, including because, as at the date of this disclosure, the extent of Article 4's requirements remains unclear. The Firm continues to use its own procedures, policies and metrics to track investment decisions on an ongoing basis, including impacts such decisions may have on sustainability factors. The Firm considers that its approach is aligned with its objectives of delivering long-term risk adjusted returns to investors together with its overall approach to ESG and sustainability. The Firm keeps this situation under review.