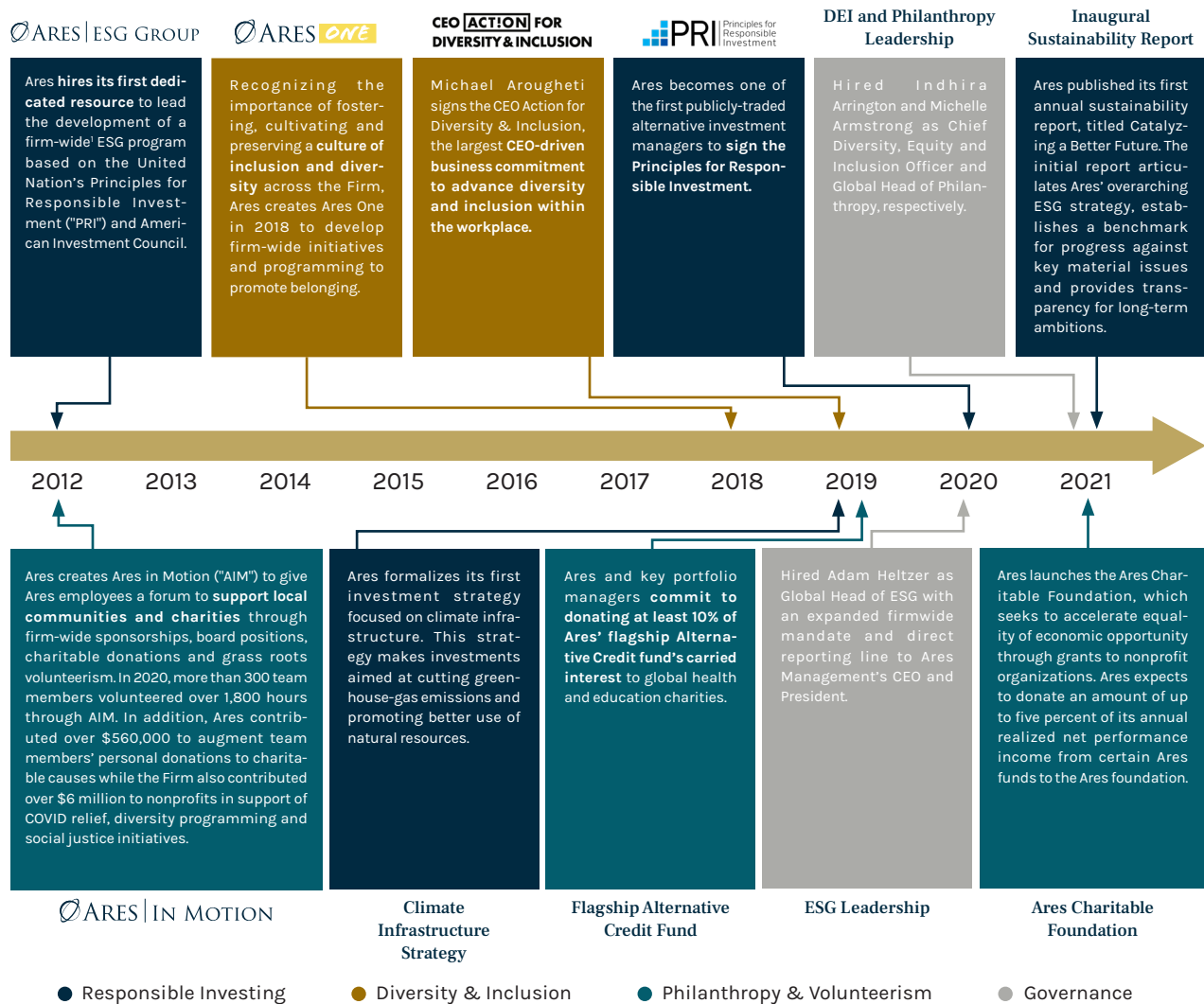


## Ares Responsible Investment Policy

### I. Introduction

Ares Management Corporation ("Ares" or the "Firm") is one of the largest global alternative investment managers, operating an integrated platform across five business groups: Credit, Private Equity, Real Estate, Secondary Solutions and Strategic Initiatives. We believe that integrating environmental, social and governance ("ESG") factors into the investment and portfolio management processes across our platform not only helps enable us to generate superior risk adjusted returns but provides the opportunity to drive positive change in our local communities and the world at large.

Ares has prioritized both ESG initiatives at the corporate level and responsible investing in the alternative investment management industry for nearly a decade:



1. Certain investment strategies and business groups are in the process of implementing their respective ESG integration process and Champions. We are currently integrating Secondary Solutions and Strategic Initiatives into Ares' formal ESG program. Both asset classes currently have individual ESG efforts.

## II. Objectives

Ares' objectives for integrating ESG factors into its investment and portfolio management processes are to:

1. Identify incremental value-creation opportunities and potential risks to make better investment decisions in an effort to enhance investment returns; and
2. Engage portfolio companies and investments to act in a responsible manner towards their stakeholders.

## III. Principles

The following principles guide Ares' approach to ESG integration:

1. **Engage Stakeholders.** We work closely with our stakeholders – employees, investors, shareholders, portfolio companies, regulators, among others – to inform on ESG risk factors and incorporate these items into our investment approach.
2. **Focus on Materiality.** We focus our attention on material ESG factors, as defined by a) their importance to a given investment's stakeholders and b) the likelihood and magnitude of business, environmental or social impact.
3. **Implement Systematically.** Implementation of ESG factors should follow a systematic framework through process; not anecdotally or as an exception to the rule.
4. **Tailor to Each Strategy.** We adapt our firm-wide ESG objectives to the specific dynamics and levels of influence in each investment strategy.
5. **Avoid Harm.** We seek to avoid investments whose practices or products cause significant environmental or social harm.
6. **Improve ESG Performance.** We are active investors and commit to improving the ESG performance and reporting practices of our investments through the levers of influence specific to each strategy. We believe this can enhance the long-term value of our investments.
7. **Provide Leadership.** We seek a leadership role in ESG integration processes, continuously improving to push out the frontier of best practice.
8. **Transparently Disclose & Drive Adoption.** We disclose our ESG practices to promote transparency and catalyze wider adoption of ESG practices across the industry.

## IV. Implementation

Below we define the implementation objectives at each stage of the investment and portfolio management process; this applies across various asset classes, industries and countries in which Ares invests. While this sets out the high-level objectives for each stage, individual investment strategies maintain more specific implementation plans tailored to the unique dynamics and levers of influence inherent to the strategy.

	Stage	Key Objectives
<b>REPORTING</b> Implement data management and reporting practices that provide transparency into: <ul style="list-style-type: none"> <li>• Adherence to and quality of ESG implementation steps</li> <li>• Impact achieved</li> </ul>	<b>Sourcing</b>	<ul style="list-style-type: none"> <li>• Negative screen for opportunities involving harmful products/ services</li> <li>• Seek out investments with positive impact on the environment and/or society</li> </ul>
	<b>Diligence</b>	<ul style="list-style-type: none"> <li>• Identify and strive to mitigate investment and reputational risks from ESG factors</li> <li>• Where possible, identify opportunities for value creation from ESG factors</li> <li>• Document evaluation of ESG factors in investment materials</li> </ul>
	<b>Holding &amp; Ownership</b>	<ul style="list-style-type: none"> <li>• Use available levers of influence to improve management of ESG factors</li> <li>• Monitor investments to identify and address adverse ESG incidents in a responsible manner</li> </ul>
	<b>Exit</b>	<ul style="list-style-type: none"> <li>• Where possible and as appropriate, capture and communicate Ares' value creation, risk mitigation, social and environmental impacts from ESG factors during the ownership/ holding period</li> </ul>

### TRAINING

We believe that effective implementation depends on a widespread understanding of ESG factors, how they can impact value, and the tools or process necessary to evaluate them. As a result, Ares strives to integrate ESG content into existing and ongoing investment professional's education programs.

## SCREENING FRAMEWORK

Ares' screening framework guides investment professionals while sourcing top-of-funnel decision-making by identifying both **products/services** and **practices** that may require a more proactive ESG evaluation. Certain investments are typically excluded from Ares' investment universe while others are escalated to the applicable investment committee early in the process. Ares seeks out, or applies a positive screen to, investments that may generate positive impacts.<sup>2</sup> Note the screening principles are individually tailored to each investment strategy as appropriate.

### Ares' ESG Screening Philosophy

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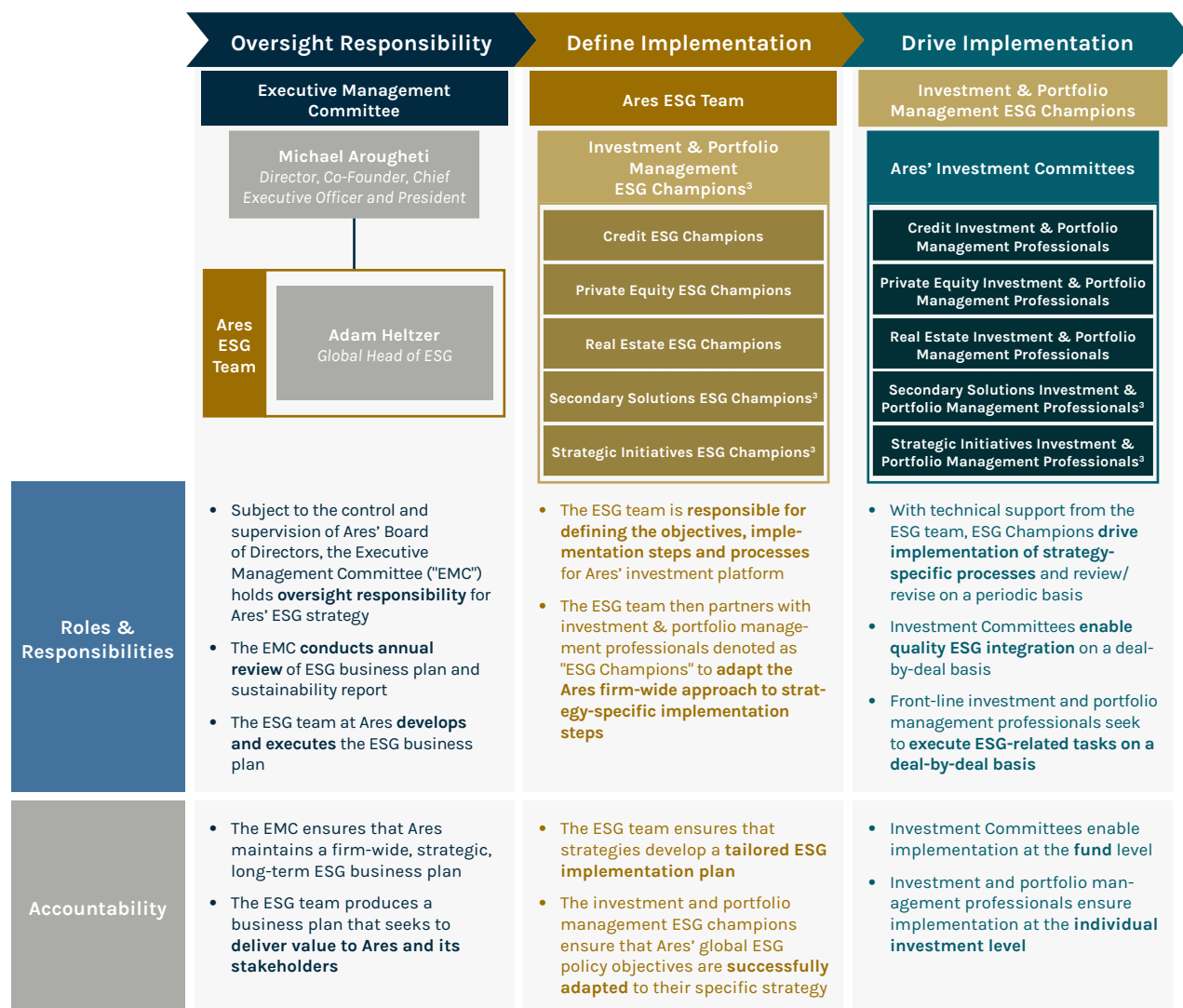
 <p>Negative Screen</p>	<ul style="list-style-type: none"> <li>• There are companies and assets that we <b>avoid</b> due to potential significant harm to the environment or society</li> </ul>
 <p>Escalation</p>	<ul style="list-style-type: none"> <li>• For potential investments in industries that have a possible adverse impact on the environment or society, we <b>escalate</b> key ESG-related diligence items and make our investment decision based on objective data and analysis</li> </ul>
 <p>Positive Screen</p>	<ul style="list-style-type: none"> <li>• We <b>seek out</b> investments with products/services that may generate positive impacts on the environment or society and those with market-leading sustainability practices</li> </ul>

Even the most robust screening frameworks cannot be collectively exhaustive. When in doubt over the sensitivity of a prospective investment's products/services or practices, investment professionals proactively reach out to the ESG team for consultation.

<sup>2</sup> See Appendix A for additional detail on specific ESG practices that Ares seeks out in its investment process.

## V. Governance

In order to continuously improve Ares' ESG integration processes, we have defined the following roles and responsibilities for oversight and implementation.



## VI. Reporting

### PUBLIC DISCLOSURE

In Q2 2021, Ares published its first Sustainability Report detailing the objectives and accomplishments of its responsible investment strategy, as well as summarizing Ares' impact as a firm through its various sustainability initiatives. Ares expects to publish this report on an annual go forward basis.

### ARES' FUND INVESTORS DISCLOSURE

To the extent possible Ares discloses qualitative and quantitative ESG-related data to fund investors through regular or ad hoc fund reports and advisory board meetings.

<sup>3</sup> Certain investment strategies and business groups are in the process of implementing their respective ESG integration process and Champions. We are currently integrating Secondary Solutions and Strategic Initiatives into Ares' formal ESG program. Both asset classes currently have individual ESG efforts.

**Appendix A – Illustrative ESG Principles for Investments & Portfolio Companies**

Ares believes that the effective management of material environmental, social and governance factors can lead to both enhanced long-term value creation and minimized negative impact on stakeholders. The following table represents some of the common ESG principles that Ares seeks to promote across its existing investments and evaluate in new investment opportunities, where material.

<p><b>Environmental</b></p>	<ul style="list-style-type: none"> <li>• Limit consumption of scarce and/or non-renewable resources</li> <li>• Limit emissions of greenhouse gases and other forms of harmful waste</li> <li>• Take a proactive approach to managing environmental risks</li> </ul>
<p><b>Social</b></p>	<ul style="list-style-type: none"> <li>• Promotion of diversity, equity and inclusion</li> <li>• Respect and protect customers, with an emphasis on customer health &amp; safety, data security &amp; privacy and responsible marketing practices</li> <li>• Provide employees with fair and responsible compensation, benefits and working conditions</li> </ul>
<p><b>Governance</b></p>	<ul style="list-style-type: none"> <li>• Manage the business with integrity and high moral conduct</li> <li>• Document corporate governance structure with clear responsibilities and procedures</li> <li>• Formally integrate material ESG topics into management and board meetings</li> <li>• Enforce policies that comply with all applicable laws and regulations (including those related to human rights, child labor, forced labor, bribery and corruption)</li> </ul>