

# Active Stewardship Policy

## 1. POLICY INTRODUCTION:

As primarily a credit manager, the opportunities available to CFI Partners, LLC and its wholly owned subsidiary, CFIP Capital Solutions, LLC (collectively, "CFIP" or the "Firm") for active stewardship can be limited. However, CFIP has implemented the following responsible investment stewardship policy ("Active Stewardship Policy", or "Policy"), which applies where opportunities exist, consistent with and subject to any applicable fiduciary, legal, regulatory, and contractual requirements. The Policy applies to all assets under CFIP's management.

## 2. STEWARDSHIP OBJECTIVES:

CFIP may engage on responsible investment ("RI") issues and other financial issues relevant to the investment. Our primary stewardship objective is to maximize our portfolio-level risk-adjusted returns. In addition, our ability to perform engagement is impacted heavily by the level of disclosure made by investee entities or managers. Where possible, we may engage with investee entities or managers to improve disclosure, including:

- Requesting standardized reporting (e.g., in line with industry standards such as the ISSB Standards, ESG Data Convergence Initiative (EDCI), or Global Reporting Initiative);
- Requesting RI issues, such as pecuniary ESG factors and externalities associated with operations, to be integrated into general annual financial reporting; and
- Requesting information about alignment to international standards (e.g., UN Global Compact).

## 3. SCOPE AND LIMITATIONS:

The extent to which CFIP has the opportunity and is able to conduct active stewardship activities will depend on the specific investment structure and terms. There may be instances where our capacity to conduct active stewardship activities or manage RI concerns is limited due to our position in the investment or fund structure. In such cases, CFIP will selectively apply this Active Stewardship Policy to the extent it is commercially feasible. For instance, at the investment level, our influence might be limited if our fund is a minority debtholder, our governance rights are restricted, or other conditions hinder our ability to assess, establish, or oversee RI-related performance objectives. Similarly, at

the fund level, our influence might be limited in cases such as a jointly managed fund, a fund that acts as a lender without any signs of control, or an existing collateralized loan obligation vehicle with virtually unalterable investment criteria.

#### **4. STEWARDSHIP PRIORITIZATION:**

CFIP has established a set of RI considerations to be advanced by stewardship, which are set out in template engagement letters. We may review our prioritization occasionally, depending on the RI issues we deem most material and relevant to our asset classes and investment strategies.

CFIP prioritizes stewardship activities based on a range of criteria, including, but not limited to:

- The relevance and financial materiality of ESG factors, especially those which may relate to broader, systemic risks (e.g., GHG emissions, biodiversity, human rights);
- The ESG rating of the corporate entity or manager;
- The level of transparency provided by the corporate entity or manager; or
- The size of our investment and the size of the corporate entity or manager (i.e., our level of likely influence).

#### **5. STEWARDSHIP APPROACHES AND ESCALATION:**

The CFIP investment team may engage with investee entities or managers through any available method, including direct conversations (meetings or calls) with company management, emails, letter writing, or participation in collaborative engagement.

Where the investment team identifies appropriate engagement opportunities and can engage with an investee entity or manager, they should endeavor to do so. CFIP may engage with investee entities or managers at any stage in the investment process, including pre-issuance/pre-deal, pre-investment, during the holding period, at refinancing, or during a default.

Template engagement letters have been drafted for the investment team and will be sent to investee entities or managers. The engagement letters articulate our RI priorities and

expectations and contain guidance and resources on the RI issues highlighted. The investment team may edit the engagement letters on a case-by-case basis.<sup>1</sup>

If initial stewardship approaches are deemed unsuccessful, CFIP may make additional efforts. The respective investment teams are not limited by any measures that may be taken and will determine the best course of action in accordance with their fiduciary responsibilities.

## **6. COLLABORATIVE ENGAGEMENT:**

CFIP is open to collaborative engagement when opportunities present themselves. We recognize the value of collective action and prioritize collaborative stewardship efforts where appropriate. We participate in broader industry initiatives through organizations such as the Alternative Investment Management Association ("AIMA") to share best practices and tools, collectively address emerging issues, and further develop our approach to collaborating initiatives.<sup>2</sup>

## **7. PROXY VOTING:**

CFIP has a separate Proxy Voting Policy, which forms part of the Firm's Compliance Manual.

Due to the nature of the asset classes in CFIP's investment universe, the opportunity for proxy voting is rarely present; however, where possible, we support shareholder initiatives and resolutions promoting RI disclosures.<sup>3</sup>

Each trading desk voting a proxy will undertake a business analysis, maintain sufficient records, and engage the CCO to undertake the requisite conflicts of interest analysis.

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<sup>1</sup> While CFIP intends to use such engagement letters when appropriate and feasible, there can be no assurance that CFIP's template engagement letters, or any engagement letter, will be used for a particular engagement.

<sup>2</sup> There is no guarantee that CFIP will become or remain a signatory, supporter, or member of any organization, initiative, or industry framework.

<sup>3</sup> For the avoidance of doubt, CFIP votes in accordance with its Proxy Voting Policy, consistent with CFIP's fiduciary duties. As such, no vote is predetermined, and CFIP cannot guarantee how it will vote on any particular shareholder resolution. CFIP considers various factors when deciding how to vote on any particular shareholder resolution, including factors related to the details of the company and of the resolution, to determine whether CFIP believes a resolution is likely to enhance company value or address risk.

## 8. PUBLIC POLICY ENGAGEMENT:

CFIP may engage policymakers on pertinent responsible investment-related issues where relevant. The RI Committee provides oversight over any responsible investment-related political engagement, and the RI Committee should be consulted prior to policy engagement related to sustainable investing, to help ensure that our policy activities are aligned with our position on sustainable finance and our commitment to the 6 Principles of the Principles for Responsible Investment ("PRI"). In addition, by joining membership organizations such as AIMA,<sup>4</sup> we will be able to engage with members where opportunities present, by:

- Participating in regulatory consultation discussions and responses relevant to our industry and asset class;
- Participating in sign-on letters on RI policy topics; and
- Assisting in fixed income specific working groups to provide our technical expertise.

## 9. STEWARDSHIP OVERSIGHT, REPORTING, AND CONFLICTS OF INTEREST:

The investment teams oversee stewardship activities and maintain engagement records through an Engagement Tracker. It is the duty of the investment teams to monitor the outcomes of stewardship activities and incorporate them into the investment decision-making process.

The stewardship efforts and the Engagement Tracker will be reported to the RI Committee for review and oversight. The RI Committee may make ESG-related recommendations, but investment decisions will ultimately reside with the investment teams.

In addition, the Firm's Conflicts of Interest Policy applies to our stewardship activities. As an oversight mechanism, the RI Committee must be consulted for any policy engagement or political influence to ensure that our policy activities align with our position on sustainable finance and our commitment to the 6 Principles of the PRI.

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<sup>4</sup> See footnote 2, *supra*.

## **10. POLICY REVIEW:**

The Active Stewardship Policy is reviewed annually and may be changed as CFIP considers necessary or advisable.

Since 2024, this policy has been updated primarily to reflect its application to CFIP's wholly-owned subsidiary, CFIP Capital Solutions, LLC.