

ESG Policy

MARCH 2022



GoldenTree
ASSET MANAGEMENT

EST. 2000



Introduction

GoldenTree Asset Management LP (“GoldenTree” or the “Firm”) seeks to deliver superior risk-adjusted returns to its investors across market cycles and credit sectors through a prudent and deliberate investment process while similarly seeking to maintain, what we believe to be, a high margin of safety.

We are dedicated to conducting ourselves, consistent with the fiduciary standards we owe to our advisory clients, in accordance with the highest legal, ethical and professional standards in our business.

To this end, GoldenTree recognizes that environmental, social and governance (“ESG”) factors can directly, where material, impact both financial and non-financial operations of an issuer and hence, investment performance. For example, unsafe products or services or substandard corporate governance procedures can produce a threat of litigation, regulatory fines and create significant reputational risk for a company that may hinder its ability to meet ongoing financial obligations. Similarly, certain climate-related factors may have consequences that impact a company’s financial return.

Accordingly, where GoldenTree views ESG factors to be material with respect to a particular issuer, it will assess such factors as part of its investment process, as we believe long-term value can be enhanced if relevant ESG risk is managed appropriately.

We are dedicated to conducting ourselves, consistent with the fiduciary standards we owe to our advisory clients, in accordance with the highest legal, ethical and professional standards in our business.



ESG Considerations

ENVIRONMENTAL FACTORS

may include, but are not limited to: CO2 emissions and other pollutants, waste mitigation practices, utilization of alternative fuel and energy efficiency in general, commitment to water and resource conservation.

SOCIAL FACTORS

may include, but are not limited to: an issuer's reputation with respect to human rights abuses (including child labor), maintenance of worker health and safety standards and adherence to anti-bribery, money laundering and other relevant laws and commitment to ethical material sourcing, selling practices, and product labeling.

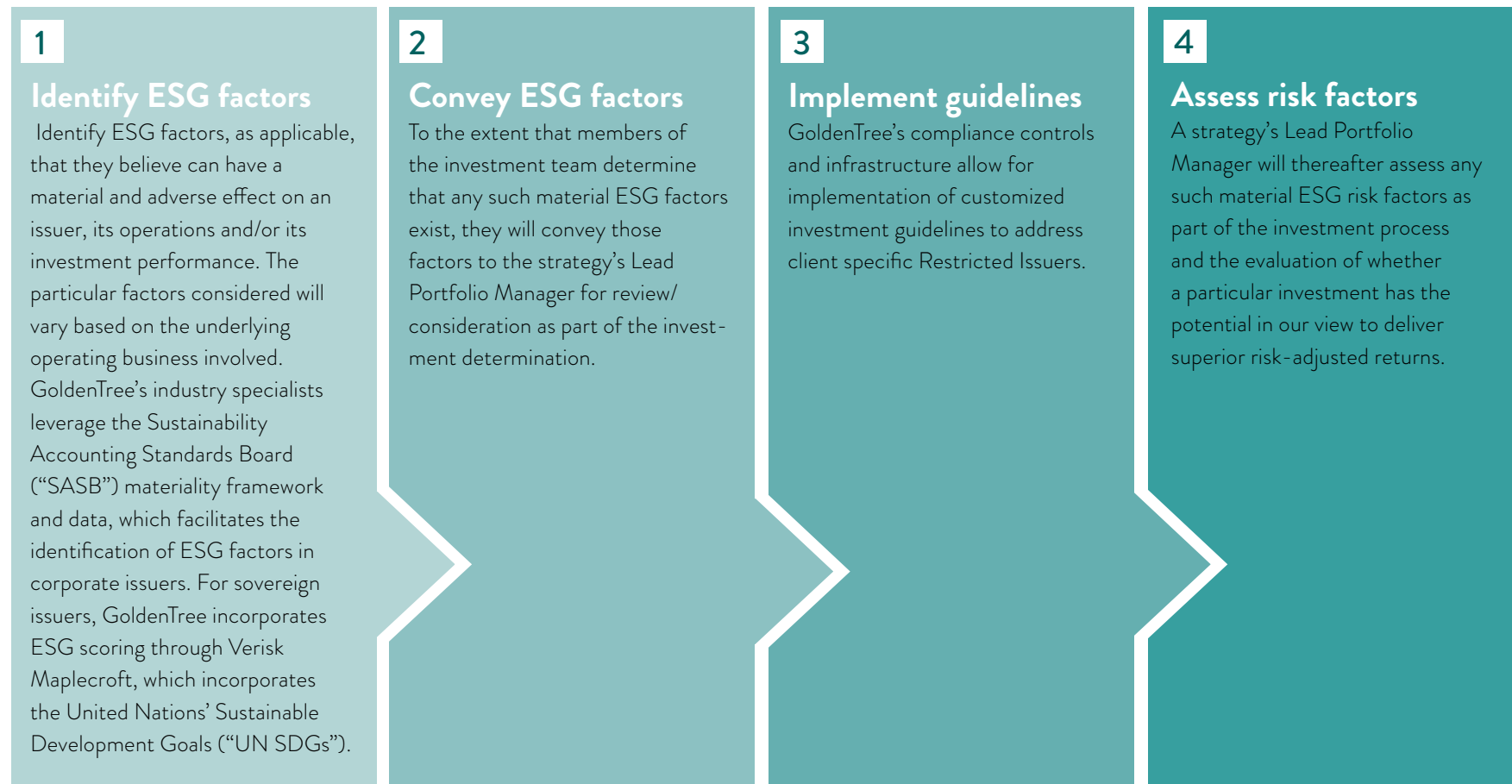
GOVERNANCE FACTORS

may include, but are not limited to: an issuer's behavior towards corporate transparency, internal controls, shareholder rights, board composition and independence, mitigation of conflicts of interest, appropriate executive compensation, and legal and regulatory compliance.

ESG Evaluation Process

The Firm has implemented internal tracking of ESG factors in investments through its proprietary system, which records the presence of an ESG factor in an issuer, the rationale for investing, and any mitigating factors.

IN EVALUATING AN INVESTMENT, GOLDENTREE'S INVESTMENT PROFESSIONALS WILL:





Advancing ESG Principles

To the extent GoldenTree has significant influence¹ with respect to an issuer, the Firm's investment professionals may seek to engage management teams and foster change in applicable circumstances to advance ESG practices, particularly where they believe that such engagement would enhance the investment performance of the underlying issuer or would bring investments into closer alignment with GoldenTree's ESG Policy.

Presently, GoldenTree tracks issuer engagement information. Such information includes the number of issuers engaged, the types of topics engaged and any notable progress made.

Governance

GoldenTree has created an ESG Committee that is responsible for coordinating efforts in this area. The ESG Committee is responsible for maintaining/updating the Firm's ESG policy, articulating the Firm's policy to clients and providing relevant feedback.

The ESG Committee draws upon the expertise of external and internal resources to implement identification and tracking processes for ESG factors and to provide input on ESG principles as needed. Moreover, the ESG Committee may review the Firm's policies from time to time versus the principles set forth in the U.N. Principles for Responsible Investment (the "UN PRI") to consider whether any such principles should be incorporated into GoldenTree policies, as the ESG Committee may deem appropriate.

The ESG Committee shall at a minimum consist of at least the following individuals² and meet semi-annually or more frequently as needed.

- Member, Senior Attorney from the Legal Department
- Member, Director/Managing Director from the Business Development Group
- Member, Senior Portfolio Manager
- Member, Executive Committee
- Member, Executive Committee

¹ For additional detail, please refer to Appendix—GoldenTree's ESG Approach to Distressed Investments.

² To the extent an Executive Committee Member is also a Portfolio Manager or Business Development member, the above requirement for representation from such areas shall also be met.