

AURELIUS FINANCE COMPANY LIMITED ESG Commitment

At **AURELIUS FINANCE COMPANY LIMITED**, we are mindful of environmental, social and governance (ESG) issues as we manage every aspect of our business including employee practices. We respect the important duty Brean has to employees, vendors, customers and counter-parties and to the wider world when it comes to ESG. This policy will inform our ESG efforts on all fronts, including business practices, policies, procedures and investor relations. Human Resources and Compliance has overall responsibility for the effective operation of this policy.

Environmental

Brean is committed to sustaining the environment through a variety of initiatives. In 2021 we opened several offices closer to the homes of employees in New Jersey, Connecticut and Long Island in order to reduce commutes, gas consumption and pollution. Also in 2021, Brean moved its corporate headquarters to 505 Fifth Avenue, New York, a cast-in-place concrete structure that provides a level of building safety exceeding New York City Building Code requirements.

To ensure that its carbon footprint is minimized, and in an effort to offer safe electronics recycling, Brean consistently works in partnership with participating building and local recycling municipalities to coordinate electronics recycling. As part of our efforts to minimize waste, Brean participates in recycling and compost setups and programs where it is supported by local municipalities within each of our buildings.

Brean also challenges its individual contributors and teams to consider the role we each play in reducing carbon emissions. Brean employees consider the daily choices we make and their attendant environmental impact. For example, when meeting with clients we ask employees to consider whether there are environmentally friendly travel options and whether certain meetings can proceed virtually. On a daily basis, Employees consider whether to print documents or view them digitally to avoid wasting paper. These small measures taken throughout Brean contribute to environmental sustainability.

Social.

Brean is mindful of its relationships with employees, vendors, customers and the communities around us. Social consciousness begins in house, with Brean's employees. Employees are Brean's largest asset and as a result, Brean is focused on their health, safety and well-being. Brean provides comprehensive health care benefits and free access to an Employee Assistance Program for employees to utilize confidential assistance towards personal, family, and/or work-related issues. To ensure a safe and respectful workplace and support an inclusive culture among employees, Brean requires every employee to attend anti-harassment and anti-discrimination training annually and provides Diversity, Equity, and Inclusion (DEI) training.

In addition to providing education and access to healthcare and EAP, Brean fosters an environment that values and nurtures unique talents and contributions from each individual. Brean had done this by

building an inclusive workplace where all talents can thrive. We strive to recruit and employ highly qualified individuals representing diverse communities. We constantly strive to find ways to attract, develop and retain the talent needed to meet business objectives.

Brean approaches its external partnerships with the same eye towards diversity and inclusion. Brean has a diverse group of vendors and independent contractors, which include certified women and minority owned business enterprises. We partner with recruiters, community employment and internship programs and law firms that are minority or women owned, or focus on diversity initiatives. Through community and internship programs, Brean helps students explore career opportunities and gain experience otherwise unavailable to them.

Brean employees are involved with business initiatives that support minority and women owned businesses. Brean partners with housing finance authorities to provide liquidity for low to moderate income homebuyers and with issuers of small business administration loans to assist minority, women, and veteran owned businesses. Brean is also proud of its employees' charitable initiatives and contributions. We encourage and support employees' various volunteer and charitable efforts around the country.

We recognize, value, and affirm that social diversity contributes richness to the business community we service and enhances the quality of corporate life for individuals and leadership teams. We believe workplace diversity can provide tremendous benefits in terms of greater teamwork, outside-the-box thinking, improved morale, and an atmosphere of mutual understanding and respect.

Governance.

Good governance goes beyond having the right policies and procedures in place. It's about embedding compliance in your day-to-day work. From completing training on time to actively understanding how regulations affect your work, good governance starts from each individual acting ethically. We ask employees to take it upon themselves to be the compliance champion in your team. Employees regularly refer to policies and procedures and consult with compliance and legal, instead of taking shortcuts. We remind everyone to be aware of red flags for compliance failures and risks in every area of work and to report poor behavior or failures.

While Brean believes that ESG considerations can create positive value within the internal employee and external organization, Brean does not limit its investments and/or collaborations to those that meet a specific ESG criteria. Considering these impacts doesn't always mean refusing to work with someone in the value chain where there are concerns. Sometimes suppliers are limited, and customers and business partners have every right to access our services. It's about understanding the risks within each relationship and taking concerted action to reduce those risks.

The goal of this policy is to establish a unified view of ESG, increase understanding of all three aspects, environmental, social and governance, and to promote robust standards of corporate governance that

integrate all these approaches. For any questions, please contact ESG@Breancapital.com.