

Investment and Engagement Policy

Responsible Investing

Since its inception, NorthStar has focused exclusively on socially responsible investing (SRI). NorthStar's mission is to provide integrative and effective portfolio management by connecting social concerns to stock selection, asset allocation, and activism. Our goal is to engage along the full spectrum of financial activity, from equities to loans and loan guarantees, to supporting local businesses, to finding private alternatives, and finally through philanthropy, in order to effect change.

We believe that creative shareholder engagement, local investing, financial literacy, and targeted giving are positive forces for change. We also believe that intentionally and purposefully perpetuating the wealth gap and income inequality is wrong. We screen all investments in light of five important criteria: race and gender; economic inequality; human rights; corporate governance; and environmental justice.

When NorthStar portfolios include public equities, we use a fundamental analysis approach for social and environmental issues in order to avoid investing in companies with poor track records in human rights, the environment, employee relations, and corporate citizenship and seek out companies with positive records (see more detail below). We use shareholder activism to address a variety of issues such as executive compensation (economic inequality), predatory lending practices, inequity in nondiscrimination policies, the human right to water, environmental impact, and other social and environmental concerns.

The Chief Executive Officer (CEO) and Chief Investment Officer (CIO) have the final say on decisions regarding issue priorities and investment decisions related to all client portfolio management decisions. These decisions are supported with research and diligence from the equity research team and the director of shareholder activism and engagement as well as our head of outside investments.

Public Equities

We believe that prioritizing short-term financial returns to shareholders can compromise the fair and equitable treatment of a company's employees, suppliers, and customers; it can

compromise a company's long-term planning, research, and development; and it can be environmentally destructive, discriminatory, and dangerous. Rather than expecting companies to minimize expenses in order to leave a higher profit for shareholders, we rearrange the financial equation so that we consider all constituents, including shareholders, on the same side rather than assuming that the right goal is to increase wealth for shareholders exclusively. This encourages us and the companies with which we engage to consider what a fair allocation of business revenues should look like rather than trying to minimize expenses, externalize costs, and defer capital outlays in order to increase the residual (return to shareholders). Refer to our section **Guidelines on Environmental, Social, and Corporate Governance Issues**, below, for a detailed discussion of NorthStar's integrated approach to these issues.

The public equity portion of our client portfolios consists of approximately 45 companies from around the globe. Stocks are selected to provide risk diversification across market capitalization size and industry sectors relative to a global benchmark with the goal of adding alpha¹ through idiosyncratic stock performance. We purchase public equities with an intended holding period of five to ten years. The equity portion of our client portfolios is comprised of individual stock holdings, which we call our "buy list." These stocks range in market capitalization from under \$1 billion to over \$150 billion. Our equity benchmark is 70% of the S&P 1500 plus 30% of EAFE.

The asset allocation of each NorthStar portfolio is client-specific, and we can modify each client portfolio to include or exclude specific investments based on the individual client's wishes. Our priority is to have each client portfolio reflect the desires of the client with respect to their social concerns and financial needs. Our allocation strategy is based on a combination of NorthStar's current economic forecast and a client's financial needs, investment horizon and tolerance for risk. This asset allocation is reviewed quarterly with an eye to client needs and changing market conditions.

Investing in stocks involves the risk of loss. Equity investment risks include, but are not limited to, changes in revenue, margins, earnings, dividends, cash flow, balance sheet, leverage, liquidity, solvency, legal matters, negative publicity, brand image, and general market volatility. To avoid significant individual security risk, we limit the holding weight for each individual stock to no more than 5% of the asset class. This means that no portfolio will have an equity holding that exceeds 5% of the entire portfolio.

Guidelines on Environmental, Social, and Corporate Governance Issues

We do not invest in gaming, tobacco, gambling, weapons manufacture, fossil fuels and other extractives, nuclear energy, or in companies with a track record of funding right wing, oppressive organizations through their philanthropy. We do not invest in companies that use forced labor or child labor, and our screens for these issues include the supply chain whenever possible. We do not invest in any for-profit prison company, and, given our

¹ Defined as the excess return of the fund relative to the return of the benchmark index

understanding of the inherently racist nature of the criminal legal system, we strive to avoid investing in companies that profit significantly from incarceration or lobby to increase rates of mass incarceration. As investors concerned about the risks related to prison labor (correctional industries), we screen companies to the best of our ability to identify those with exposure to prison labor. Any instances of prison labor identified in connection to a portfolio company requires heightened scrutiny and research by the CEO, CIO, and investment team for decisions about continued investment and engagement (as explained below). NorthStar does not invest in securities of companies that violate human rights as defined by U.N. and International codes, including but not limited to UN Global Compact Principles, UN Guiding Principles on Business and Human Rights, Universal Declaration of Human Rights, International Bill of Human Rights, International Labour Organization Conventions, United Nations Convention Against Corruption and the OECD Guidelines for Multinational Enterprises.

No investment is perfect, and this is particularly true of public equity. As a result, we engage with companies on our public equity “buy list” through targeted shareholder activism. We perform fundamental analyses on each potential and current portfolio company related to race and gender in senior management and the board of directors, and we evaluate companies on various human rights issues, employee relations, and environmental policies and actions. We believe there are companies performing important social functions that impact the lives of stakeholders throughout the globe. While there are some publicly traded stocks that NorthStar would never hold, from time to time we make a strategic decision to place a company on our buy list if it meets our financial criteria but is lacking in other areas and if we believe we can effect positive change in the company through our activism.

Across our portfolio of investee companies, environmental, social, and governance issues require the attention of active investors. These concerns are ever-evolving as companies react to public policy changes, political environments, worldwide human rights and environmental developments, and much more. We regularly update our [Proxy Voting Guidelines](#) to present our perspectives on these issues as related to both investment screening and proxy voting decisions.

Fixed Income

Our fixed income investments are selected from a pool of individual federal agency bonds, certificates of deposit, treasuries, inflation protected treasuries, municipal bonds, and corporate bonds. We select bonds that mature (or that we expect to be called) within a time horizon with which we feel comfortable given current yield curves, with the goal of holding them until maturity or until called. We match bond selections with the specific needs of each individual discretionary client. We regularly seek out fixed income opportunities that have stated social or environmental benefits, such as green bonds, social bonds, and women-focused bonds.

The safety of bonds, CDs, and money market funds cannot be taken for granted, and we pay as

much attention to structuring a portfolio of bonds that are appropriate for each client as we do when we are carefully selecting individual equity positions.

We regularly review our fixed income engagements, including “outside investments” (described below), and seek opportunities to engage issuers on issues or practices that are problematic from our SRI perspective.

Outside Investments

Often, clients add non-publicly traded investments to their existing portfolios. These “outside investments” in NorthStar client portfolios may consist of private equity investments, real estate investment trusts, private limited partnerships, community loan funds, micro-lending products, private loans and certificates of deposit. These investments are made in response to a particular client’s desire to have a more direct relationship with an organization or impact on a project in their community or area of interest. While these investments are made with input from NorthStar as to client suitability relative to risk and client objectives, the investments themselves are either held in custody by the clients or by the issuing organizations. These investments are often in the form of community loan funds, micro-lending corporate bonds, and innovative private equity investments that align with client and NorthStar values. NorthStar monitors and facilitates transactions related to these investments as part of the management process, providing recordkeeping, funding capital calls, and reinvesting interest, dividends and return of principal, all with written authorization from the client.

This type of investing involves greater risk than other types of investing and thus requires careful analysis and diversification. Adverse changes may include fraud, default, bankruptcy, poor management, lack of liquidity and other risks. Investments in private equity, unrated fixed income investments or other “outside” investments such as community loan funds or micro-lending bonds can be speculative and illiquid. Within the category of outside investments, there is a wide range of risk profiles depending on whether the investment is a diversified fund, a non-diversified fund, a single holding in a company or other enterprise, or a cash equivalent holding in a loan fund, lending organization, or community bank.

We perform in-depth analysis of potential new outside investments, including fundamental analyses of diversity of the organization’s management, staff, and board or trustees, as well as connections between the investee and our priority issue areas (race and gender; economic inequality; human rights; sustainable governance; and environmental justice). Our internal process includes a systematic review of these investments over the course of our investment. We reach out to issuers to access revised data or to engage on issues of concern.

Climate Change

NorthStar is committed to minimizing its impact on the environment through waste and emission reduction, energy efficiency, promoting sustainable practices both internally and

amongst clients and suppliers. NorthStar continually evaluates its current operations and strives to improve its environmental performance and implement sustainable business practices. Accordingly, we seek investment opportunities that align with our intentions for climate change mediation. As governments and companies slowly move toward a lower-carbon economy, NorthStar seeks investment opportunities that raise the bar on environmental matters such as lowered GHG emissions, innovative and creative ways to reduce energy usage, and community-based renewable energy systems.

Cash and Cash Management

We periodically review each client's cash flow needs in light of the interest rate environment and the client's risk tolerance in order to recommend an appropriate target percentage for cash held in the portfolio.

Shareholder Activism and Corporate Engagement

As long-term investors intending to hold investments for 5 to 10 years or longer, NorthStar views shareholder activism as a tool to protect our clients' public equity investments as well as a fiduciary duty to address social, environmental, and governance issues that concern our clients. Since 2000, we have sponsored resolutions on issues of predatory lending, executive compensation, equal rights, environmental practices, political spending, the human right to water, prison labor, and more. Each year, we use the Shareholder Proposal Process to encourage portfolio companies to make progress on issues that fall into our firm's five focus areas: human rights, race and gender, economic inequality, environmental justice, and sustainable corporate governance. We may choose to write to engage investee companies regarding an issue of concern, followed by a shareholder proposal as an escalation strategy as needed, we most often use the shareholder proposal process as our initial engagement strategy. Through this work, we have been able to affect identifiable change. Our activism is led by our Director of Shareholder Activism and Engagement who works closely with and reports to our Chief Investment Officer as well as our Chief Executive Officer.

Shareholder activism remains integral to our core purpose as a company – to effect social change. Learn more on our [Creating Change](#) webpage.

Reporting

NorthStar periodically produces an annual report detailing our shareholder activism & proxy voting activities that is published on our [Creating Change](#) webpage.

Proxy Voting

When NorthStar has discretionary authority to vote client shares, it is the firm's policy to monitor events affecting the issuers as required to cast informed votes and to exercise our voting authority in a manner consistent with the best interest of the client, including

alignment with firm and client social and environmental goals. Unless otherwise instructed by the client, NorthStar votes all client proxies in-house, according to its Proxy Voting Guidelines which are updated regularly as new issues arise.

Scope of the Policy

All discretionary assets under management (AUM) at NorthStar fall under the premises of this Investment and Engagement policy. At times, clients will come to NorthStar with legacy holdings or make specific holdings requests that fall outside of our buy list or discretionary holdings.

NorthStar details its fiduciary duties to clients in its Firm Brochure (Form ADV – Part 2), as required by the Securities and Exchange Commission. The Firm Brochure is publicly available on the FINRA website and covers all AUM. Additionally, NorthStar's Compliance Manual covers all AUM (discretionary and nondiscretionary) with regards to fiduciary responsibilities.