



GRAHAM CAPITAL MANAGEMENT, L.P.

July 2020

Corporate Social Responsibility Statement

GCM's fiduciary responsibility to investors is at the core of how we manage all aspects of the business, including Corporate Social Responsibility ("CSR"). GCM's approach to CSR is based on the firm's mission statement and highlights our commitment to our clients and to the longevity of our business.

This overview focuses on the following key areas:

- Firm Culture
- Governance, Oversight and Controls
- Alignment of interests
- Risk Management
- Transparency
- Environmental, Social, and Governance & Socially Responsible Investment Considerations
- Diversity and Inclusion
- Philanthropy
- Advocacy of Responsible Business

The firm is committed to ongoing focus in these areas, reviewing this statement at least annually, and evolving its policies and processes as appropriate over time.

Firm Culture:

The foundation of how we conduct business and implement our investment philosophy starts with our firm culture and professional environment, which emphasize employee engagement. We foster a sense of community to develop talent that can lead our organization to succeed as a dynamic, innovative asset management firm and meet our fiduciary responsibility to investors for many years to come.

GCM's mission statement reads:

Graham Capital endeavors to deliver robust, diversifying alpha solutions and meet its fiduciary responsibility to clients through three guiding principles: Collaboration, Innovation and Integrity.

The foundation of Graham's sustainability and success is the experience and effectiveness of its people. The firm cultivates talent, encourages the diversity of ideas, and respects the contributions of all. In turn, each employee shares in the responsibility of strengthening those around them.

Guiding Principles:

- Collaboration: We aim to create a motivating and collaborative environment where people can share ideas and work together towards a common goal of creating unique and profitable investment strategies.



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- **Innovation:** Work at Graham brings new challenges and ongoing stimulation. Our industry and firm evolve over time, and each employee has the ability to contribute to this evolution. Over the firm's history, we have developed new trading strategies, enhanced our portfolio construction and risk management techniques, and launched new investment products to a broad range of clients.
- **Integrity:** Integrity is fundamental to our organization and is a core part of our pledge to clients. We hire professionals who are motivated to work hard and learn from peers. Our team is comprised of individuals who are fair and respectful, and employees are empowered to contribute views and opinions. Integrity guides employees when confronted by the unexpected for which no rules exist.

An important element of the firm's culture is the commitment to the Graham community. In 2017, Graham's senior management team implemented the Employee Advisory Committee ("EAC") to increase focus on enhancing the Graham employee experience and to provide a voice to the Graham community. The mandate of the EAC is to liaise between employees and senior management to facilitate the most productive environment to retain and recruit the best employees across every department. Members of the EAC help empower the Graham community by focusing on key areas including: communication and transparency, career development and mentoring, education, social programs related to community outreach and philanthropy, employee recognition and engagement, and wellness & life/work balance.

This carefully designed and maintained culture positions the firm to continue to evolve over time in a thoughtful and proactive manner to meet a broad spectrum of investor needs.

Governance, Oversight, and Controls:

GCM recognizes that oversight through governance is a key element of the firm's corporate social responsibility from both an investment and business management perspective and investors and due diligence firms across the industry have acknowledged the strong oversight environment as "best in breed."

GCM is managed by committees that focus on governance, investment, operational, and compliance related topics. Members of senior management and other leaders at the firm sit on various committees to ensure that there is appropriate oversight and controls across the business and that thoughtful, informed decisions are made regarding the firm. Formal committees include the following:

Executive Committee: GCM is managed by the Executive Committee, which is ultimately responsible for the day-to-day operations of the firm. The Executive Committee takes a partnership-like approach and seeks to arrive at decisions by consensus.

Investment Committee: The Investment Committee is responsible for oversight of the firm's investment portfolios. The Investment Committee meets formally each month to decide discretionary portfolio allocations, target leverage, and to discuss ongoing investment matters for both the systematic and discretionary strategies.

Risk Committee: The Risk Committee is comprised of senior members of the firm's management team and meets daily to review position-level information and related risks for each of the firm's strategies



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within the context of prevailing market conditions. The daily Risk Committee process is designed to inform members of the firm's senior management team of the various risks to which the firm is exposed and, if appropriate, the Risk Committee will affect a reduction in risk within a particular strategy, or across a specific portfolio of strategies.

Compliance Committee: GCM has a culture of compliance. The firm has a long history of regulatory compliance and has the appropriate controls and processes in place to do so over time. The Compliance Committee has overall responsibility for monitoring compliance with the policies and procedures detailed in the firm's Compliance Manual and Code of Ethics as well as other matters that it believes are within its oversight. The firm's Compliance Committee, made up of senior representatives from Legal/Compliance, Trading Services, and GCM's management team, meets on a monthly basis to review all compliance-related issues that require firm-wide cooperation, including trading efficiency and best execution. The members of this committee are also the members of GCM's Valuation Committee, which is responsible for reviewing any deviations from GCM's valuation and pricing policies.

Cybersecurity Awareness Committee: The Cybersecurity Awareness Committee is comprised of a cross-section of senior management from various areas of the firm and meets quarterly to discuss cybersecurity-related initiatives. It is imperative that we protect both our client information as well as intellectual property related to our investment programs. The Firm's cybersecurity efforts are led by the Chief Information Security Officer within the internal Information Technology department.

Fund Board of Directors: GCM's commingled funds have a Board of Directors that currently meets no less frequently than quarterly to review the investments and administrative affairs of the funds and ensures appropriate governance of the funds with respect to the firm's fiduciary responsibility to investors. The Board is comprised of three directors; two of which are independent.

In order to support the long-term sustainability of the firm, GCM has processes and procedures in place to ensure the continuous operation of the firm in the unlikely event that the Chairman or other personnel in leadership become incapacitated. Furthermore, the firm has transferred key components of the firm's leadership to a new group of leaders in recent years, which underscores the institutional nature of the firm through reduction of key man risk and our commitment to business continuity.

The firm also has extensive infrastructure and operational controls in place to ensure sustainable, responsible business practices over time. The compliance manual explicitly sets forth GCM's duty to supervise its personnel and sets forth GCM's supervisory framework. That framework is founded on operational committees comprised of senior management personnel representing a cross section of GCM's operations areas, including the Executive, Investment, Risk, Compliance and Valuation Committees. These committees provide appropriate forums for senior management to consider various operational and market risks that may impact GCM's business and formulate responses. The members of the committees, in their roles as senior managers of GCM's various business groups, are then able to implement the decisions of the committees.

GCM's Internal Controls Policy demonstrates its commitment to maintaining a robust control environment. Central to this environment is GCM's commitment to acting with integrity in all relevant



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aspects of its business and adhering to ethical values. As set forth in its compliance manual, GCM recognizes its role as a fiduciary to its clients, which requires all personnel to adhere to the following principles: “You must always place the interests of clients before your own interests or the interests of Graham. You may not cause a client to take any action, or not to take any action, for your personal benefit, and not for the sole benefit of the client. You must report any actual or potential conflict of interest involving you or a family member to the CCO so that the CCO can determine whether or not a transaction may proceed, and whether the conflict must be disclosed to the Client.”

GCM is committed to ensuring that its personnel treat clients in a just and equitable manner, and accordingly has established an ethics training program for all personnel, as further described in its compliance manual.

Alignment of interests:

GCM recognizes the importance of our role in clients’ investment portfolios. A significant portion of our assets come from public pension investors, with additional assets from endowments, foundations, and high net worth individuals. Our ability to generate non-correlated returns for these underlying investors may impact an individual’s ability to retire or live comfortably following a life of public service, or may impact important research and development at universities and hospitals, or fund charitable work by a non-profit. GCM endeavors to keep the human element of managing hedge fund assets a priority for everyone at the firm.

Amidst this backdrop, GCM believes that it is important to demonstrate an alignment of interest with our investors in order to conduct responsible business. As such, the firm’s founder and other members of senior management have significant proprietary capital invested across the firm’s strategies, which ensures that the firm’s interests are aligned with those of its investors.

Risk Management:

An essential part of oversight and controls is risk management. GCM firmly believes that the preservation of investment capital is imperative to long-term success. The application of a disciplined risk management process is a cornerstone of the firm’s overall investment philosophy and remains a key consideration in GCM’s approach to portfolio construction. The overall goal is to achieve compelling absolute and risk-adjusted returns by strategically managing risk during both favorable and unfavorable market environments. The monitoring and reporting of risk for all of GCM’s strategies is managed by the Risk Management team and reviewed by the Risk Committee.

As previously mentioned, GCM’s Risk Committee meets daily to review position-level information and related risks within the context of prevailing market conditions. This process enables the firm’s senior management team to be fully informed of the various risks to which the firm and our clients are exposed.

Transparency:

GCM prides itself in transparency and ongoing communication both internally and externally to investors and to the public. The firm’s senior management team endeavors to keep the Graham community appropriately informed of GCM’s strategic direction and key initiatives to help empower employees to meet and exceed the firm’s collective goals.



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GCM believes that investors are partners and must be informed and educated regarding their investments with GCM. As such, GCM provides all clients with extensive transparency, which includes daily performance and risk reporting, weekly and monthly performance, monthly market and performance commentary, as well as an in-depth monthly risk report that includes full position transparency on a lagged basis. Additionally, GCM believes in fostering long-term relationships with clients and its Investor Relations team is at the heart of this effort.

GCM also takes pride in being a resource for the investment community and prospective candidates for the industry in general. As such, in recent years, GCM has significantly expanded the information that it provides to the public, including topical research white papers and other analyses as well as general information about the firm and its endeavors in the broader investment community as well as our local community.

Environmental, Social and Governance & Socially Responsible Investment Considerations:

GCM's fiduciary responsibility to investors is paramount to how the firm implements its investment strategies in line with the investment objectives in the funds' governing documents. GCM is committed to a disciplined and repeatable investment process and its Investment and Risk Committee structure seeks to employ governance and responsibility over the systematic and discretionary investment process.

GCM's quantitative and discretionary strategies are designed with the objective of producing attractive absolute and risk-adjusted returns with low correlation to traditional assets and other alternative strategies, within a market universe of primarily regulated investment products. GCM's strategies trade a broad market universe of investment products and contribute liquidity to a functioning market system. Currently, GCM's commingled fund offerings do not incorporate ESG or SRI considerations into individual security selection or trade generation. However, GCM currently offers its quantitative strategies in managed account format, which can be customized to meet investors' specific needs.

GCM recognizes that certain asset classes and instrument types, including many of those traded in GCM's investment strategies, are less straightforward than others with respect to the implementation of ESG and SRI considerations. Within this context, GCM promotes an open dialogue with clients and prospective clients to understand individual client needs, including ESG and SRI considerations. In evaluating ESG and SRI factors, GCM understands that there are numerous criteria and different views amongst investors. This landscape continues to evolve and, as such, members of GCM's senior management team continue to monitor, assess, and discuss developments in order to address client needs.

The firm's quantitative portfolios trade liquid futures and foreign currencies across approximately 80 different markets. These strategies trade equity index futures, but not individual securities, and therefore there is no direct exposure to individual companies that may not meet a client's ESG/SRI criteria. Portfolio positions are determined by the underlying systematic trading signals, which are based on algorithmic models and the market universe, and subsequently ESG compliance can be incorporated into the models programmatically prior to the commencement of trading for specific client mandates. Importantly, these strategies can be customized to trade a subset of markets or different indices in order to satisfy a client's portfolio requirements, including the exclusion of certain markets or controlling exposure to particular markets. GCM has experience implementing ESG restrictions into customized managed accounts. All such



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customizations are implemented and monitored through a robust and controlled process by the firm's Quantitative Operations and Execution team.

The firm's discretionary business follows a multi-portfolio manager model. Investment decisions are made by individual portfolio managers who conduct their own research, wherein ESG considerations are not part of their investment process (i.e., not part of their security selection process). Many of the instruments traded across the strategies are in liquid futures and foreign currency markets; however, single name equities and credit positions are also traded. GCM's risk and senior management teams foster an open dialogue with individual portfolio managers, including formal quarterly reviews, and actively monitor each PM's strategy to ensure risks are controlled for each strategy and in turn the overall fund level. Currently, the firm's discretionary strategies are not offered in a customizable, managed account format.

The firm maintains comprehensive oversight processes for the discretionary portfolio managers. The PMs have defined investment mandates and market universe and any changes require approvals from multiple departments. The PMs are subject to the firm's risk management process, including stress tests and drawdown limits, in addition to quarterly reviews with members of the Executive Committee.

Members of our Investor Relations team monitor the ongoing developments within the ESG and SRI space through dialogue with investors and industry experts as well as by attending relevant industry conferences. The IR team maintains ongoing dialogue with members of the senior management team at GCM to ensure that the firm stays informed and engaged as the landscape evolves.

GCM also focuses on its environmental impact as an organization, and has made substantial efforts in recent years to improve its footprint. Given the historical nature of the firm's headquarters, there are unique challenges in some areas, but the firm is committed to its "Graham Goes Green" program, which endeavors to incrementally improve the firm's environmental impact over time. For example, the firm has implemented environmental waste reduction solutions and continues to implement energy efficient mechanical systems and lighting.

Diversity and Inclusion:

As written in the firm's mission statement, GCM believes that inclusion and diversity of thought are integral to the firm's success and is committed to the equal treatment and respect of all members of the GCM community. The firm's primary objective is to meet its fiduciary responsibility to investors, and we are focused on building the best and most motivated team to accomplish that objective.

Importantly, GCM does not require employees to self-identify gender, ethnicity, disability or veteran status, but believes that a successful team should include team members with diverse backgrounds that bring unique perspectives and strengths to the GCM community, the manner in which we manage the business, and our investment process. The development in recent years of the Employee Advisory Committee, Women's Network of Graham, and a Recruiting Committee tasked with idea generation for augmenting talent searches demonstrate the firm's commitment to diversity of thought and perspective as well as the respect for all team members' contribution to the process.

Recognizing this is a common challenge in the financial industry, GCM has also been focused on developing a diverse pipeline for GCM and the broader industry. During 2019, we hosted a university women's group



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onsite for an educational seminar that focused on each key area within a hedge fund, ranging from investment roles to operational functions and relationship management and plan to conduct more events like this in the future. We are also developing a Women's Fellowship program, which is a rotational internship program with more comprehensive qualification requirements than our standard summer internships, intended to expose participants to a wider range of career choices within our industry. We are hoping this program may act as a pilot program for other underrepresented groups in the future.

The firm seeks to promote diversity of thought within GCM and within the investment community. These efforts are not limited to gender, age, and ethnicity, but also include background, experience, and perspective as essential elements that make a firm, a community, and a society, stronger over time.

Philanthropy:

We are grateful for the opportunities that are afforded to us by being part of the GCM team, and believe it is our responsibility to support others when we can. We believe that philanthropy is an integral part of our business both in terms of supporting our external community, as well as fostering a strong sense of team and community within GCM.

By participating in charitable efforts and interacting with our local community, people from different areas of the firm - with varying backgrounds and expertise - have the opportunity to connect by advocating worthy causes. Working together to help others motivates and inspires the team, creates camaraderie, and ultimately fuels a more engaged and productive workforce. This environment facilitates collaboration, which is an important pillar of our mission statement.

In addition to a variety of catalyst-driven philanthropic endeavors, Graham partners with a local homeless shelter, the Open Door. We support the shelter in their efforts to address the causes and complexities of the homeless and working poor by providing shelter, food, clothing, case management services, treatment services, transitional planning for short and long term goals, subsidized housing, education, employment, and a path towards independence and success. Graham organizes drives for food, clothing and school supplies, and team members regularly volunteer to assist with food service. We also believe that our unique skillset can be additive to our community. For example, members of the Graham team mentor children in a local school, and we offer technology assistance to the shelter.

Advocacy of Responsible Business:

GCM not only manages its own business in a responsible manner that is consistent with industry best practices, but also advocates responsible business management through a variety of forums, including:

- GCM is a signatory to the Standards Board for Alternative Investments ("SBAI"), which is committed to developing robust frameworks for the deployment, implementation and observance of responsible business and investing across the industry.
- GCM has also been a long-standing sustaining member of the Managed Funds Association ("MFA"), which represents the global alternative investment industry and its investors by advocating for sound industry practices and public policies that foster efficient, transparent, and fair capital markets.
- In 2020, GCM became a UNPRI signatory to further support the importance of responsible business management and general best practices in the hedge fund industry.



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- GCM has philosophically agreed to the set of principles outlined by UNPRI within the context of our specific fiduciary responsibility to investors and in line with the investment objectives represented in our funds' governing documents.
- Importantly, as stated on www.unpri.org and discussed comprehensively with UNPRI staff, the principles are voluntary, aspirational, and can be interpreted based on the specific parameters of an investment manager, investment strategy, and client base.
- This CSR Statement outlines our approach to responsible business management and how we consider the UNPRI principles within the context of our fiduciary responsibility to investors and within our funds' investment objectives.
- This CSR Statement coupled with the funds' governing documents should be utilized as the only source of information regarding how we implement ESG and SRI considerations into the overall management of the firm and our investment process. No inferences can be made between the stated requirements of UNPRI and our application of those requirements other than as explicitly outlined herein.
- Transparency is integral to GCM's process, and we encourage investors to review the funds' governing documents for more information.
- GCM's participation in these organizations, including the firm's commitment to SBAI's disclosure, valuation, risk management, fund governance, and shareholder conduct guidelines as well as our long-term MFA sustaining membership and becoming a UNPRI signatory demonstrate our advocacy of responsible business.