

ARTIUS' RESPONSIBLE INVESTMENT POLICY

Effective: September 7, 2020

Artius is committed to the thoughtful management of environmental, social, and governance (ESG) issues in connection with our investment activities. We believe that a commitment to sustainable investing is especially important in today's rapidly changing world, and that a proactive focus on ESG issues throughout the life of our investments will contribute to the creation of long-term value for all our stakeholders.

GUIDING PRINCIPLES

Artius has aligned its ESG policy with the American Investment Council's Guidelines for Responsible Investing (set forth in the Appendix), and is also guided by the following principles as they relate to responsible investing and corporate conduct:

- Responsible corporate behavior with respect to ESG factors mitigates investment risk, including regulatory, compliance, litigation and reputational risks, and contributes to long-term value creation.
- All our stakeholders, including our partners, employees and the community at large, have a vested interest in positive corporate conduct and adherence to sustainable investment principles.
- Our investment analysis for each investment should incorporate ESG factors, recognizing that key ESG factors vary across industries and geographies.
- We promote a culture of integrity, fairness, transparency and respect in all our business practices.
- We seek to implement governance structures that provide appropriate oversight in the areas of risk management, accountability and transparency, including as they relate to ESG matters.
- We strive to reduce our own environmental footprint and seek to improve the levels of environmental responsibility and energy efficiency of the companies in which we invest.
- We strive to provide stakeholders with clear, transparent information regarding our approach to ESG matters, including the risks and opportunities we encounter in our investment activities.

ACCOUNTABILITY AND GOVERNANCE

Our managing entities provide ultimate oversight of our responsible investment efforts and regularly revisit and update our ESG policy to facilitate our efforts to implement a responsible investment approach and to reflect evolving best practices, standards and regulations. Our compliance team oversees the implementation of our ESG policy, and our investment team monitors and manages the ESG issues identified in our investment process and seeks to instill the guiding principles of our ESG policy across the companies in which we invest.

American Investment Council's Guidelines for Responsible Investing

1. Consider environmental, public health, safety, and social issues associated with target companies when evaluating whether to invest in a particular company or entity, as well as during the period of ownership.
2. Seek to be accessible to, and engage with, relevant stakeholders either directly or through representatives of portfolio companies, as appropriate.
3. Seek to grow and improve the companies in which they invest for long-term sustainability and to benefit multiple stakeholders, including on environmental, social and governance issues. To that end, American Investment Council members will work through appropriate governance structures (e.g. board of directors) with portfolio companies with respect to environmental, public health, safety, and social issues, with the goal of improving performance and minimizing adverse impacts in these areas.
4. Seek to use governance structures that provide appropriate levels of oversight in the areas of audit, risk management and potential conflicts of interest and to implement compensation and other policies that align the interests of owners and management.
5. Remain committed to compliance with applicable national, state, and local labor laws in the countries in which they invest; support the payment of competitive wages and benefits to employees; provide a safe and healthy workplace in conformance with national and local law; and, consistent with applicable law, will respect the rights of employees to decide whether or not to join a union and engage in collective bargaining.
6. Maintain strict policies that prohibit bribery and other improper payments to public officials consistent with the U.S. Foreign Corrupt Practices Act, similar laws in other countries, and the OECD Anti-Bribery Convention.
7. Respect the human rights of those affected by their investment activities and seek to confirm that their investments do not flow to companies that utilize child or forced labor or maintain discriminatory policies.
8. Provide timely information to their limited partners on the matters addressed herein, and work to foster transparency about their activities.
9. Encourage their portfolio companies to advance these same principles in a way that is consistent with their fiduciary duties.