

DIVERSITY AND INCLUSION POLICY

Policy

III Capital Management (“III”) is committed to seeking and maintaining diversity at all levels of our firm, and to fostering an inclusive workplace that enables all employees to thrive and to achieve their full potential.

III has, since its inception, had a policy of providing equal opportunity and of tolerating no discrimination of any kind, including on the basis of race, gender, gender identity, sexual orientation, age, disability, religion, national origin, political affiliation, socioeconomic and family or marital status or similar characteristics (see: Equal Employment Opportunity Policy). Further, III is committed to a firm culture centered around character and ethics, which is incompatible with discrimination against or mistreatment of employees, potential employees or others on the basis of such characteristics.

While these principles are essential and foundational to III, we further believe that a workforce comprised of highly qualified individuals with diverse backgrounds, cultures and traditions can enhance our performance as a firm. Accordingly, III seeks to attract, retain and develop a workforce that represents a broad range of personal and professional backgrounds, experiences and perspectives. As such, III seeks to take additional measures with the goal of increasing diversity in hiring, development and leadership within III. In addition, III aspires to use its platform to help develop a broader and more diverse future applicant pool, as well as to have broader and increasingly meaningful ties to our communities, in particular in terms of helping communities with fewer resources and greater needs. This Diversity and Inclusion Policy (the “Policy”) outlines some of the ways III seeks to further these goals.

Diversity and Inclusion Committee: This committee meets no less frequently than quarterly to discuss and consider issues relating to diversity and inclusion and the goals of this Policy, as well as potential changes to the Policy. The current Committee members are: Karen Hansen, Chairperson (General Counsel); Yelena Anuar (CFO); Jennifer Davis (HR Director); Jerry Dupont (Co-Head of Financing, III Solutions); Francis Feeney (Co-Head of IR); and Scott Wyler (CEO). The Committee will consider any diversity-related issues that arise and is tasked with proposing and considering additional measures that III may pursue to advance its diversity and inclusion, including potential training, community engagement, considering hiring practices that might expand the firm’s access to diverse talent pools, studies of III’s diversity in practice, etc.

Hiring and Leadership: III seeks and will continue to seek to implement hiring practices and employment practices that are designed to attract, retain, promote and develop highly qualified talent from diverse groups, including underrepresented groups.

Community Engagement and Outreach: III supports causes and programs that help connect III to our communities and help people in need, including ones that are directly and specifically structured to benefit and assist communities that are majority composed of underrepresented groups. In addition to supporting such causes, III also seeks to develop and support programs (e.g., tutoring, internships, mentoring, scholarships, etc.) that help develop talent and foster interest in our business and our industry among these communities.
