



Proxy Policy

In instances where a client owns equity securities in which it has the right to vote via shareholder proxy (each a "Voting Security"), Ares generally retains proxy voting authority with respect to these Voting Securities. Ares has adopted and implemented written Proxy Voting Policies and Procedures ("Proxy Voting Procedures") that are designed to reasonably ensure that Ares votes proxies in the best interests of its advisory clients for whom Ares has voting authority.

The Proxy Voting Procedures describe the positions Ares generally takes in voting proxies on particular issues and require Ares to keep records with respect to the votes cast.

We utilize a third-party proxy voting vendor ISS to capture all of our votes. The custodians send their ballots to ISS, then we can make selections for those amounts. We send out all voting items to their respective portfolio managers and investment analysts for how we would like to vote, then input said votes into custodian ballots in ISS. ISS is also responsible for all of our proxy voting reporting.