



GRAHAM CAPITAL MANAGEMENT, L.P.

**Graham Capital Management, L.P. (“Graham”)
Corporate Social Responsibility Statement
November 2023**

Graham’s fiduciary responsibility to clients is at the core of how we manage all aspects of the business, including Corporate Social Responsibility (“CSR”). Graham’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
- Proxy Voting and Engagement
- 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 emphasizes 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 clients for many years to come.

Graham’s mission statement reads:

The firm 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 contributions of its people. The firm seeks to cultivate talent, encourage the diversity of ideas, and respect 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. Collaboration across the EAC, the firm's Human Resources team, and senior management has resulted in a unique culture that is deeply rooted in every team and process at Graham and continues to evolve along with the needs of the firm.

We believe that inclusion and diversity of thought are integral to Graham's success. One key initiative is the development of the Women's Network of Graham, which facilitates education, mentorship, and networking while seeking to address some of the needs that may be unique to the firm's female employees. The group not only works together to promote these goals but collaborates with senior management and the broader firm to make sure ideas are heard and considered.

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:

Graham 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, consultants, and due diligence firms across the industry have acknowledged and commended the firm's strong oversight environment.

Graham 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. These committees provide appropriate forums for senior management to consider various operational and market risks that may impact Graham's business and



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formulate responses. The members of the committees, in their roles as senior managers of Graham's various business groups, are then able to implement the decisions of the committees. Formal committees include the following:

Executive Committee: Graham 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 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: Graham has a strong culture of compliance. 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, 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 Graham's Valuation Committee, which is responsible for reviewing any deviations from Graham'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: Graham's commingled funds have a Board of Directors that 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 clients. The Board is comprised of three directors, two of which are independent.

In order to support the long-term sustainability of the firm, Graham 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



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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, policies, and operational controls in place to ensure sustainable, responsible business practices over time. The Compliance Manual explicitly sets forth Graham's duty to supervise its personnel and sets forth Graham's supervisory and compliance framework. Graham's Internal Controls Policy demonstrates its commitment to maintaining a robust control environment. Central to this environment is Graham's commitment to acting with integrity in all relevant aspects of its business and adhering to ethical values. As set forth in its Compliance Manual, Graham 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."

Graham 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:

Graham 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. Graham endeavors to keep the human element of managing hedge fund assets a priority for everyone at the firm.

Amidst this backdrop, Graham 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. Graham 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 Graham'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 Graham's strategies is managed by the Risk Management team and reviewed by the Risk Committee.



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As previously mentioned, Graham'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:

Graham 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 Graham's strategic direction and key initiatives to help empower employees to meet and exceed the firm's collective goals. Additionally, Graham believes in fostering long-term relationships with clients and its Investor Relations team is at the heart of this effort.

Graham believes that investors are partners and must be informed and educated regarding their investments with Graham. As such, Graham 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.

Graham also takes pride in being a resource for the investment community and prospective candidates for the industry in general. As such, in recent years, Graham 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:

Graham's fiduciary responsibility to clients is paramount to how the firm implements its investment strategies in line with the investment objectives in the funds' governing documents. Graham 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.

Graham's investment capabilities span discretionary and quantitative strategies as well as blended (i.e., combined discretionary and quantitative) and customized investment solutions to help meet clients' specific portfolio objectives. Strategies are typically designed to generate absolute returns with low, zero, or negative correlation to traditional assets. Offering types include commingled funds, managed accounts, sub-advised mutual funds, and UCITS with a variety of return and volatility profiles. Graham'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. These strategies are comprised of multiple underlying strategies in the case of the discretionary programs and multiple underlying trading models in the case of the quantitative programs. Graham's strategies trade a broad market universe of investment products and contribute liquidity to a functioning market system as a byproduct of the firm's investment approach.



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Currently, the strategies offered via Graham's commingled fund offerings are not mandated to incorporate ESG or SRI considerations into individual security selection or trade generation as part of the respective underlying investment strategies. Graham recognizes that certain asset classes and instrument types, including many of those traded in Graham's investment strategies, are less straightforward than others with respect to the implementation of ESG and SRI considerations. Within this context, Graham 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, Graham understands that there are numerous criteria and different views amongst investors. This landscape continues to evolve and, as such, members of Graham's senior management team continue to monitor, assess, and discuss developments in order to address client needs. Importantly, Graham currently offers its quantitative strategies in managed account format, which can be customized to meet investors' specific needs.

Except as noted below, the firm's quantitative offerings trade liquid futures and foreign currencies and, to a lesser extent, interest rate swaps, across approximately 55 to 120 different markets, depending on the specific program. 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. Graham has experience implementing client-directed restrictions, including but not limited to ESG-related restrictions and parameters, into customized managed accounts. All such customizations are implemented and monitored through a robust and controlled process by the firm's Quantitative Operations and Execution team. As described further in the Advocacy of Responsible Investment section, Graham has actively engaged with the Managed Funds Association ("MFA") ESG working group and PRI regarding the role of ESG in futures and FX forwards markets.

In addition to the quantitative offerings described above which comprise the majority of the firm's quantitative AUM, from time to time Graham may utilize quantitative portfolio managers ("Quant PMs"). Similar to the discretionary business as described below, Quant PMs have specific investment mandates which may include a broader investment universe than described above including without limitation, single name equities, equity-linked derivatives and other securities. The firm also offers additional quantitative programs that trade securities; however as of this date such programs do not comprise a material portion of Graham's AUM. Similar to the firm's other investment offerings, these strategies are not mandated to incorporate ESG or SRI considerations into security selection or trade generation.

The firm's discretionary business follows a multi-portfolio manager ("PM") model. Graham's Risk Department and senior management team 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. The firm maintains comprehensive oversight processes for the discretionary portfolio managers. The PMs have defined investment mandates and market universes 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.



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Currently, the firm's discretionary strategies are not offered in a customizable, managed account format. 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. Investment decisions are made by the individual portfolio managers who conduct their own research and, while ESG considerations are not mandated to be part of their security selection process, PMs may elect to consider ESG factors as part of their overall investment process or as part of a macro theme.

Graham does not measure carbon emissions as part of the investment process and does not currently have an explicit net zero emissions goal at the portfolio or organizational level. However, Graham is actively engaged with investors, consultants, and industry groups regarding carbon emissions and climate change as the landscape evolves – both in terms of client needs and regulatory requirements in different regions.

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 Investor Relations team maintains ongoing dialogue with members of the senior management team at Graham to ensure that the firm stays informed and engaged as the landscape evolves.

Graham also focuses on its environmental impact as an organization and believes that together we can make a difference for our environment and future generations. The firm 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. In 2023, the firm honored Earth Day by donating trees to One Tree Planted, an environment non-profit organization that plants trees in countries around the world.

Proxy Voting and Engagement:

Graham has adopted policies and procedures regarding the voting of proxies as required under Rule 206(4)6 under the Advisers Act. These policies and procedures are designed to ensure that proxies received with respect to securities in client accounts are voted in the best interests of the clients and that Graham maintains records of its proxy voting in compliance with the Advisers Act. Graham's proxy voting policy includes provisions for mitigating and resolving conflicts of interest between Graham and its clients. Please note that Graham typically votes in line with the recommendation of ISS who provides research on ballots and vote recommendations. The firm's Chief Compliance Officer ensures that ISS votes proxies according to Graham's general guidance, and retains all required documentation associated with proxy voting. Please note that proxy voting is not currently relevant for our largest quantitative strategies which only trade exchange traded futures, FX forwards, and to a lesser extent, interest rates swaps. For reference, the full voting policy is included in the firm's Compliance Manual and is available for review onsite or in a virtual meeting.



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Graham does not have a formal engagement policy. Single name equities and fixed income issuers are a smaller portion of the firm's market universe, particularly for the strategy offerings comprising the majority of the firm's AUM. Graham does not typically engage with companies with regard to their corporate governance policies. While engagements are infrequent, from time to time, Graham's discretionary portfolio managers may engage with a company as part of their investment process. Engagement is not relevant to the quantitative strategies that do not invest directly in company issuers and typically is not relevant to Quant PM strategies that do invest in such issuers.

Diversity and Inclusion:

As written in the firm's mission statement, Graham 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 Graham community. The firm's primary objective is to meet its fiduciary responsibility to clients, and we are focused on building the best and most motivated team to accomplish that objective.

Importantly, Graham 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 Graham community, the manner in which we manage the business, and our investment process. Our approach to building a diverse team goes beyond demographics such as race, ethnicity, gender, and culture, and considers individuals' unique background, their thought process, education, values, solutions, and perspectives.

Diversification underpins not only Graham's investment philosophy but also our approach to people and culture as we believe a diversified "portfolio" of talent is essential to long-term success. Similar to creating a portfolio of investments that ranges in style, market universe, and time horizon that can succeed in various market environments, building a team of experts that contribute unique skills and perspectives allows the firm to navigate various business challenges.

Graham believes that it has the appropriate policies and work environment in place to attract and retain a diverse team over time and is committed to continuing to evolve these policies and environment as needed in the future.

The firm has taken meaningful strides in recent years and is committed to continue to help attract diverse team members, retain current diverse team members, and facilitate advancement for qualified individuals. Following are some examples of initiatives that were developed in this regard:

- **Employee Engagement:** 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.
- **Commitment to evolve policies:** Graham expanded the parental leave policy in 2019, including increasing the paid leave period for primary caregivers (irrespective of gender) and implementing a leave policy for secondary caregivers. In addition to expanding the parental leave period, a return- to-work program was implemented that allows for a flexible transition period for primary



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caregivers returning to work, as well as a meal service which allows for primary caregivers to receive a week of complementary dinners to assist in the work/life balance transition. These efforts underscore the importance Graham places on retaining primary caregivers and creating an environment that is supportive for employees during various periods in their personal lives.

- **Commitment to industry pipeline development:** Graham recognizes that diversity is a common challenge in the financial industry and not unique to our firm. With this in mind, Graham has also been focused on trying to help develop a diverse pipeline for Graham and the broader industry.
 - In the past, we hosted a university women’s group 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.
 - Members of the investment team visit university campuses to meet with relevant departments to educate students about quantitative finance and plan to engage in similar ways in the future.

- **Recruiting initiatives:** As a firm with approximately 200 employees¹ and typically low annual turnover, the limited number of new hires per year is factored into the firm’s recruiting and retention efforts. For example, the firm has focused on the following areas in recent years:
 - **Training:** In addition to ongoing manager training, all employees that are part of the interviewing process are required to be trained on a variety of important topics, including diversity and implicit bias, to help ensure the firm maintains an inclusive hiring process.
 - **Proactive recruiting:** Identifying qualified diverse candidates for certain roles can be more challenging than others for a variety of reasons, including trends in advanced education. With this in mind, Graham’s Human Resources department has engaged with recruiters who specialize in diverse pools of candidates.
 - **Attracting candidates through alternative means:** Graham has greatly increased the amount of information available on its public website and certain social media platforms and seeks to provide meaningful educational and research content to interested users. While these efforts are intended to provide resources to investors and potential investors, we also expect these resources will help attract qualified, diverse candidates for open roles.

- **Compensation equity:** Given the size of Graham, there are few instances of redundancy of positions and therefore limited instances of direct role comparison. However, department managers work with Graham's senior management team and Human Resources department to ensure appropriate transparency and fair pay across the firm, taking into account job function, title, firm tenure, industry experience and other factors as appropriate.

¹ As of November 1, 2023



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The firm seeks to promote diversity of thought within Graham 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. Graham has a “Diversity Summary” based on visual assessment, which is available upon request.

Graham is strongly committed to a work environment free from unlawful employment discrimination, bias and harassment in which all individuals are treated with dignity and respect. It is the policy of Graham that employment practices and decisions shall comply fully with all applicable federal, state and local laws respecting equal employment opportunity. Graham is committed to providing equal employment opportunity to all employees and applicants for employment without regard to their race, color, religious creed, gender, age, national origin, ancestry, alienage, citizenship status, handicap, disability, marital status, sexual orientation, gender identity or other personal characteristics as may be protected by applicable law. This policy applies to all terms and conditions of employment, including hiring, placement, promotion, layoff, termination, transfer, leave of absence and compensation. Graham has information outlining both reporting and resolving issues violating equal employment and allegations of harassment in the employee handbook. Graham has documented anti-discrimination, bullying and harassment policies in the employee handbook. Additionally, new hires receive harassment training / sensitivity training within their first two weeks.

Philanthropy:

We are grateful for the opportunities that are afforded to us by being part of the Graham 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 Graham.

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:

Graham 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:



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- Graham 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.
- Graham has also been a long-standing sustaining member of the 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 2021, Graham joined the MFA ESG working group in an effort to stay informed as the landscape continues to evolve and to proactively participate in ongoing dialogue on ESG and related topics, particularly as it relates to Graham’s market universe and discretionary and quantitative macro trading styles.
- In 2020, Graham became a PRI signatory to further support the importance of responsible business management and general best practices in the hedge fund industry. Graham has philosophically agreed to the set of principles outlined by PRI within the context our specific fiduciary responsibility to clients and in line with the investment objectives represented in our funds’ governing documents.
 - Importantly, as stated on www.unpri.org and discussed comprehensively with PRI 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 PRI principles within the context of our fiduciary responsibility to clients 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 PRI and our application of those requirements other than as explicitly outlined herein.
 - Transparency is integral to Graham’s process, and we encourage investors to review the funds’ governing documents for more information.
 - Graham has proactively engaged in ongoing discussions with the PRI team to better understand the principles relative to Graham’s market universe and trading strategies and to provide feedback to PRI on the current reporting framework.
- Graham’s participation in and active engagement with 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 PRI signatory demonstrate our advocacy of and commitment to responsible business.