

CIMJ Whistleblower Policy

The Board of Directors of Catalyst Investment Management (CIMJ) has adopted this policy on the reporting of concerns to provide the means for employees, officers, directors, and other interested parties (e.g. contractors, shareholders, and consultants) to report good faith concerns they may have regarding inappropriate conduct. CIMJ encourages employees and others to raise concerns, no matter whom such concerns involve, without fear of retaliation. We fully support ethical conduct, compliance with applicable laws, and transparency and accountability in business practices.

1. Scope of Matters Covered

You should report good faith concerns regarding any of the following matters:

- Suspected violations of law or fraudulent activities
- Questionable accounting, violations of internal accounting controls, or any other auditing or financial matters, or the reporting of fraudulent financial information
- Suspected violations of our policies, including but not limited to our Code of Corporate Governance, Limited Partnership Agreement (LPA), Investment Policy (and all accompanying policies), Anti-Money Laundering Policy, and HR Manual.

2. Reporting of Concerns

You may report good faith concerns in one of the following ways:

- To the Managing Director.
- Via CIMJ's secure reporting system hosted & received by an independent third-party service provider, through which you may choose to remain anonymous and all reports will be received by a designated third-party provider, who also functions as the leader of CIMJ's Internal Audit function within the Internal Audit & Ethics Committee. The secure reporting system is available on CIMJ's website via <https://catalystpe.com/contact/#askaquestion> for 24/7 access.

We provide for the above reporting mechanisms so that we can be made aware of any suspected wrongdoings and address them as quickly as possible. However, nothing in this policy is intended to prevent you from reporting concerns in any other manner including, for example, to federal or state law enforcement agencies.

3. Handling of Reported Concerns

CIMJ's designated the Managing Director will promptly review all reported concerns to determine the appropriate course of action. The specific action taken in a particular case depends on the nature of the concern.

Reported concerns relating to accounting, internal accounting controls and other auditing or financial matters will be communicated to the Audit and Ethics Committee (AEC) at the next meeting of the committee (or more promptly, as appropriate), who shall direct and oversee an investigation as it determines to be appropriate. The AEC may also delegate the oversight and investigation of such reports to management or outside advisors, as appropriate.

Reports regarding all other matters will be reviewed under the direction of the Managing Director, who will forward them to the appropriate person or department for investigation, unless it is determined that other treatment is necessary. The Managing Director may refer any report to the AEC or the Board for consultation or oversight.

During Board meetings, representative(s) from the AEC will brief the Board on the status of any reports previously brought to the attention of the Board, as well as any new reports. Upon the conclusion of the investigation of any report, prompt and appropriate action will be taken as warranted.

Any reporting person who knowingly and intentionally files a false report or provides false or misleading information in connection with an investigation of a report may face disciplinary action or other legal action.

4. Confidentiality

Information regarding all concerns reported pursuant to this policy will be treated confidentially to the maximum extent possible consistent with applicable law and CIMJ obligations. To the extent practical and appropriate, CIMJ will advise the reporting person(s) on the status of their report. However, due to confidentiality and other obligations, there may be times when CIMJ cannot provide details regarding corrective or disciplinary action taken.

5. Anti-Retaliation

CIMJ strictly prohibits and does not tolerate any retaliation against a reporting person for reporting a good faith concern pursuant to this policy or for otherwise cooperating in an investigation of a reported concern. CIMJ considers retaliation to be a violation of this policy, which will result in disciplinary action, up to and including termination of employment.