

Sustainable Investment Statement

Jefferies Mission

Jefferies' culture of resilience, community, and partnership of diverse people and ideas helps build value for clients, stakeholders, and the communities in which we operate. As a people-driven business, our greatest contribution to the world flows through our team of outstanding individuals who embody Jefferies' culture.

Sustainability Governance

The Jefferies ESG, Diversity, Equity and Inclusion Committee of the Board of Directors (the ESG/DEI Board Committee) is responsible for approving this statement and overseeing its implementation. The ESG Working Group is responsible for enforcing the policy.

Leucadia Asset Management, LLC (LAM), a subsidiary of Jefferies, has an ESG Steering Committee (the LAM ESG Committee) that supports LAM's ongoing commitment to ESG principles and its own Environmental, Social and Governance (ESG) Statement. The LAM ESG Committee reports to the Chief Operating Officer of LAM, who also serves on the management ESG Working Group.

We recommend reading our [Corporate Social Responsibility Principles](#), which are also adopted by many of Jefferies Merchant Banking portfolio companies, and the Jefferies ESG Report.

Scope

This statement applies to the following Jefferies business segments:

- Investment Banking/Capital Markets (Jefferies Group and its global subsidiaries)
- Asset Management (Leucadia Asset Management)

Definitions

The field of sustainable investing includes many different types of investment capabilities. Jefferies deploys these capabilities in different ways, depending on the nature of the investment business.

Active ownership, also called investment stewardship, is how shareholders leverage proxy voting and direct engagement for objectives such as financial value creation, improved transparency, or business practice change.

ESG analysis refers to environmental, social and governance considerations that may affect a company's ability to execute its business strategy and create financial value over the long-term, and the integration of that analysis into investment decision making.

Impact investing is the explicit inclusion or exclusion of securities based on the consequences that the provision of their products and services may have on the environment or society.

Responsible investing is defined by the Principles for Responsible Investment (PRI) as a strategy and practice to incorporate environmental, social and governance (ESG) factors in investment decisions and active ownership.

Sustainable investing refers to ESG integration, impact investing, values-based investing, active ownership, or investing for financial sustainability over long-term horizons. This is the term that Jefferies uses to refer to its broad set of investment capabilities.

Values-based investing, historically known as socially responsible investing (SRI), is the explicit inclusion or exclusion of securities based on moral or ethical reasons.

ESG Philosophy

Jefferies believes that systematically considering ESG issues leads to a more complete investment analysis and better-informed investment decisions. ESG integration is natural for Jefferies given our long-term investor focus on financial value creation and risk mitigation.

As part of the investment due diligence process, Jefferies assesses various factors that include, but are not limited to, financial performance, industry trends, quality of management, reputational and other risks, environmental, social, and governance factors. We make these assessments because we believe this approach is consistent with robust investment management, as well as driving a positive impact in our communities. The factors included in our evaluation process continue to evolve and are assessed and adjusted on an ongoing basis.

Application of Sustainable Investment Capabilities to Different Business Units

We apply the principles of sustainable investing primarily in three ways:

1. On behalf of investments where Jefferies is the beneficial owner;
2. On behalf of investments where Jefferies is a fiduciary on behalf of clients that are the beneficial owners; and
3. Through our other investment banking and capital markets activities, including research developed for institutional investors.

The following summarizes our approach to sustainable investment by business unit:

Leucadia Asset Management

Leucadia Asset Management (LAM) manages and provides services to a diverse group of alternative asset management platforms across a spectrum of investment strategies and asset classes. LAM is a signatory to the Principles for Responsible Investment and has also adopted its own ESG statement outlining environmental, social and governance considerations that are integral to how it manages the business within the broader organization. Sustainable investment capabilities of external managers are externally developed and implemented. Certain external managers may have their own sustainable investment policies, commit to integrate ESG considerations into their investment decision making, evaluate ESG impact as part of the investment process, and deploy active engagement and proxy voting as part of their responsible investment program.

Investment Banking and Capital Markets

Investment banking focuses on advisory and capital markets capabilities, including debt advisory and restructuring, debt capital markets, equity capital markets, mergers & acquisitions, and private capital advisory. The investment banking team primarily serves institutional investors, corporations and government entities across all products and sectors. In this capacity, they may advise companies that have a wide range of ESG profiles and capital needs, including arranging financing for renewable energy companies, financing green or sustainable bonds, and underwriting essential housing revenue bonds.

Research

Jefferies' equities and fixed income research teams provide research on investments to other institutional investors. Equities research integrates ESG analysis into research products, connects with clients on ESG considerations, drives thematic research, incorporates ESG into corporate access strategies, and facilitates interactions for analysts to conduct ESG research. The research team also engages with corporate issuers

on ESG themes to ensure that we have a clear sense of how global companies of various sizes are evolving their strategies and reporting based on ESG considerations.

Fixed Income research focuses on how green, sustainable, and other impact bond issues across global credit, are impacting the primary market, secondary market, fund flows, and credit analysis.

Strategy

The ESG Strategy team engages with investors, corporates, regulators, and policymakers with a focus on three themes: 1) Net Zero, 2) Human Capital and Corporate Culture, and 3) ESG Policy and Regulation. With rich content and access to experts, the team integrates material ESG issues into its analysis, which in turn add value to clients' investment processes. Our ESG Strategy team is led by Jefferies Group's Global Head of Environmental, Social and Governance (ESG) and Sustainable Finance Strategy, and their work offers insights to Investment Banking, ECM, Fixed Income, and other departments of Jefferies as the firm continues to advance the ESG conversation forward in the investment community.

Industry Involvement in Support of Sustainable Investing

Jefferies regularly engages in industry initiatives, conferences, and other events to enhance our effectiveness as a sustainable and responsible company, advisor, and investor.

Climate Change and Our Investments

We are participating in the fight against climate change by deploying capital for green energy, other positive impact businesses, and a more circular economy. We are increasing the number of green, sustainable, and SDG-linked bonds and are continuing to invest in mission driven companies that are making huge strides toward a more sustainable world. We are discussing opportunities to help us better understand climate risk throughout our investment portfolio and to continue to manage that risk over time.

Corporate Alignment with the Investment Statement

Jefferies' own corporate sustainability is aligned with SASB (Sustainability Accounting Standards Board) and the United Nation's Sustainable Development Goals (UNSDG). We consider how to leverage ESG for long-term financial value creation, and the impacts that we have on the environment and society. Furthermore, Jefferies is working to reduce its corporate carbon footprint by measuring our GHG emissions. We have committed to carbon neutrality for Scope 1 and 2 emissions. We are also prioritizing diversity, and inclusion with a goal of attracting and retaining the best talent through professional development, business resource groups, and other activities.

Reporting

We are committed to transparency with our employee-partners, investors, shareholders, and other stakeholders about our ESG initiatives and goals. Our annual ESG report provides updates regarding our firm wide ESG programming, and we provide periodic ESG updates on our website. For a comprehensive view into our corporate sustainability, please refer to the Jefferies ESG Report.