

Privacy Policy

Kopernik Global Investors, LLC (“Kopernik”) and its affiliated funds (collectively, “we”) consider your privacy our highest concern. Kopernik takes the privacy of its clients, former clients, and prospective clients (collectively, “clients”) seriously and considers protecting that privacy of the utmost importance. In order to provide you with individualized service, we collect certain non-public personal information about you from information you provide on applications or other forms and information about your account transactions with us. This privacy policy lists the non-public personal information Kopernik may collect and describes the policies we apply to storing and disclosing that non-public personal information.

INFORMATION WE COLLECT

We collect the following information from our clients (if applicable): name, address, telephone number, e-mail address, birth date, driver’s license number, social security number, tax identification number, signature, or bank account information. We also collect information such as e-mail address, phone number, address, job title, and company information from non-clients through inquiries by mail, e-mail, telephone, or through the Kopernik subscription form found on Kopernik’s website.

INFORMATION WE DISCLOSE

We do not disclose any non-public personal information about you to anyone, except as permitted by law. Specifically, so that we may continue to offer you products and services that best meet your investing needs, and to effect transactions that you request or authorize, we disclose the information we collect, as described above, to companies that perform administrative or marketing services on our behalf, such as transfer agents, or printers and mailers that assist us in the distribution of investor materials. With respect to individuals that subscribe to receive emails containing Kopernik commentary and materials, non-public personal information including the individual’s name, email address, physical address, telephone number, job title, and company will be shared with companies hired to assist with the distribution of the material you have requested to receive. These companies will use this information only for the services for which we hired them and are not permitted to use or share this information with anyone for any other purpose. Furthermore, Kopernik will disclose non-public personal information in circumstances where Kopernik believes in good faith that a disclosure is required under applicable law, to cooperate with regulators, or to cooperate with law enforcement authorities. If you would like to opt out of Kopernik’s disclosure of non-public personal information, you may send an email to info@kopernikglobal.com.

HOW WE SAFEGUARD YOUR INFORMATION

If you decide at some point either to close your account(s) or to become an inactive client, we will continue to adhere to the privacy policies and practices described in this notice. With regard to our internal security procedures, Kopernik has safeguards in place to prevent unauthorized access to our systems and procedures to protect personal information from unauthorized access and use. Kopernik takes reasonable steps to protect the non-public personal information provided to it by its clients. Furthermore, we have implemented processes and procedures to prevent unauthorized access, disclosure, or theft of any non-public information including restricting access to your personal and account information to those employees who need to know that information to service your account. We maintain physical, electronic

and procedural safeguards to protect your non-public personal information and to comply with all applicable laws.

ADDITIONAL POLICIES APPLICABLE TO CALIFORNIA RESIDENTS

Pursuant to the California Consumer Privacy Act (“CCPA”), personal information includes information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, either directly or indirectly, with a California resident or household. “Personal data” for the purposes of this policy includes non-public personal information and personal information as defined under the CCPA with regard to California residents. Under the CCPA, California residents may have certain rights concerning their personal information, such as (i) the right to know what personal information Kopernik collects, (ii) the right to delete personal information collected (subject to exceptions), (iii) the right to opt-out of the sale of their personal information, and (iv) the right to not be discriminated against for exercising their rights under the CCPA. Kopernik may disclose your information for a business purpose to third party service providers as described above. We do not sell California resident personal information. If you are a California resident and wish to exercise your rights under the CCPA, to the extent they are applicable, please call 1-813-314-6100 or send an email to info@kopernikglobal.com. Kopernik will only provide certain information or delete personal information in response to a request from a California resident (or their designee) upon verification, in Kopernik’s sole discretion, that the person is a California resident or the legally authorized designee of a California resident. Kopernik reserves the right to retain the personal information of a California resident after a request to delete their information to the extent permitted by the CCPA or any other law or regulation.

Kopernik may update or revise this privacy policy at any time and without prior notice.