



First Eagle Alternative Capital BDC, Inc.

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Part 2A of Form ADV: Firm Brochure

March 30, 2022

This brochure provides information about the qualifications and business practices of First Eagle Alternative Capital BDC, Inc. If you have any questions about the contents of this brochure, please contact us at 800-450-4424. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (the “SEC”) or by any state securities authority.

Additional information about First Eagle Alternative Capital BDC, Inc. is also available on the SEC’s website at www.adviser.info.sec.gov, as well as in its public filings made from time to time with the SEC. An investment adviser’s registration with the SEC does not imply a certain level of skill or training.

Important Note about this Brochure

This Brochure is not:

- *An offer or agreement to provide advisory services to any person;*
- *An offer to sell interests (or a solicitation of an offer to purchase interests) in any private investment fund (each, a “Fund”) or any other pooled investment vehicle;*
- *An offer to enter into any separately managed account or “fund of one” (each, an “SMA”); or*
- *A complete discussion of the features, risks or conflicts associated with any Fund, SMA or advisory service offered by First Eagle Alternative Capital BDC, Inc.*

As required by the Investment Advisers Act of 1940, as amended (“Advisers Act”), First Eagle Alternative Capital BDC, Inc. provides this Brochure to current and prospective clients.¹ In its discretion, First Eagle Alternative Capital BDC, Inc. may also provide this Brochure to current or prospective investors in clients, together with other relevant documents applicable thereto, including but not limited to a client’s organizational documents, a Fund’s offering or private placement memorandum and other related transaction documents or the SMA agreement for an SMA (collectively, the “Relevant Documents”), prior to, or in connection with, their investments. Additionally, this Brochure is available through the SEC’s Investment Adviser Public Disclosure website. Although this publicly available Brochure describes investment advisory services and products of First Eagle Alternative Capital BDC, Inc., persons who receive this Brochure (whether or not from First Eagle Alternative Capital BDC, Inc.) should be aware that it is designed solely to provide information about First Eagle Alternative Capital BDC, Inc. as necessary to respond to certain disclosure obligations under the Advisers Act. As such, the information in this Brochure differs from information provided in the Relevant Documents. More complete information about each Fund or SMA is included in the Relevant Documents, certain of which may be provided to current and eligible prospective investors only by First Eagle Alternative Capital BDC, Inc. or by persons authorized to communicate with current or potential eligible investors by or on behalf of First Eagle Alternative Capital BDC, Inc. To the extent that there is any conflict between discussions herein and similar or related discussions in any such Relevant Documents, such Relevant Documents shall govern and control. No offer or solicitation for an investment in a Fund or SMA advised by First Eagle Alternative Capital BDC, Inc. will be made before the delivery of the applicable Relevant Documents to potential investors who should read the Relevant Documents carefully and consult with their tax, legal and financial advisors before making any investment decision.

¹ Throughout this Brochure, “clients” refers to the investment vehicles and separately managed accounts to whom First Eagle Alternative Capital BDC, Inc. provides (or may in the future provide) discretionary or non-discretionary investment advisory services and “investors” refers to underlying investors in the clients.

Item 2. Material Changes

This Item 2 discusses only specific material changes that are made to this brochure since the last annual update of our brochure on March 31, 2021.

Item 8 reflects updates to certain risk factors.

Item 11 has been updated to practices with respect to principal and cross transactions.

A copy of this brochure may be requested free of charge by contacting us at (800) 450-4424.

Item 3. Table of Contents

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Item 4. Advisory Business

First Eagle Alternative Capital BDC, Inc. provides advisory services to pooled investment vehicles that are exempt from registration under the Investment Company Act of 1940, as amended (the “1940 Act”), and whose securities are not registered under the Securities Act of 1933, as amended (the “Securities Act”) and to institutional separate account clients.

As of March 30, 2022, First Eagle Alternative Capital BDC, Inc. had the following two clients: First Eagle Greenway Fund II, LLC (the “Greenway Fund”), and an institutional separately managed account client. The Greenway Fund is also a portfolio company of First Eagle Alternative Capital BDC, Inc.

First Eagle Alternative Capital BDC, Inc.’s clients provide debt and equity capital to lower middle-market companies primarily through long-term capital investments. In accordance with a client’s investment objectives, investments are expected to be made in companies doing business in a wide range of industries and sectors. First Eagle Alternative Capital BDC, Inc. refers to its investment activities and those of its clients as its “Direct Lending Platform.”

First Eagle Alternative Capital BDC, Inc. provides advisory services to each client in accordance with an investment management agreement with such client or the limited liability company agreement or limited partnership agreement (or analogous organizational document) of such client (collectively, the “Governing Documents”). First Eagle Alternative Capital BDC, Inc.’s advisory services consist of investigating, identifying and evaluating investment opportunities, structuring, negotiating and making investments on behalf of clients, managing and monitoring the performance of such investments and disposing of such investments.

Investment advice is provided directly to the clients and not individually to the underlying investors in any pooled investment vehicle that is a client, such as the Greenway Fund. Services are provided to each client in accordance with its Governing Documents. Investment restrictions for a client, if any, are generally established in its Governing Documents.

First Eagle Alternative Capital BDC, Inc. is a publicly held business development company. There are no holders of 25% or more of First Eagle Alternative Capital BDC, Inc.’s capital stock. First Eagle Alternative Capital BDC, Inc., including its predecessors, has been in business since 2007. Measured as of December 31, 2021, First Eagle Alternative Capital BDC, Inc. manages a total of \$3,123,358 in client assets, all of which is managed on a discretionary basis. First Eagle Alternative Capital BDC, Inc. is listed on the NASDAQ and trades under the symbol “FCRD.”

In addition to providing investment advisory services to its clients, First Eagle Alternative Capital BDC, Inc. also makes direct investments in privately negotiated debt and equity investments in lower middle-market companies. Accordingly, First Eagle Alternative Capital BDC, Inc. expects to invest in companies in which its clients also invest. First Eagle Alternative Capital BDC, Inc.’s investment activities are managed by First Eagle Alternative Credit, LLC (“FEAC”) and supervised by First Eagle Alternative Capital BDC, Inc.’s board of directors, a majority of whom are independent of FEAC and its affiliates. In January 2020, FEAC was acquired by a wholly owned subsidiary of First Eagle Investment Management, LLC (“FEIM”). With a heritage that dates back to 1864, FEIM is an independent investment management firm that provides investment

advisory services to institutional clients through a range of investment strategies and retail mutual funds.

Please see Items 11 and 12 for more information on First Eagle Alternative Capital BDC, Inc.'s trade allocation practices.

Item 5. Fees and Compensation

Greenway Fund

As compensation for investment supervisory services rendered by First Eagle Alternative Capital BDC, Inc. to the Greenway Fund, the Greenway Fund pays First Eagle Alternative Capital BDC, Inc. a management fee, an incentive fee (i.e., carried interest) and a portion of closing fees paid to the Greenway Fund in connection with investments (collectively, the “Greenway Fees”). The Greenway Fees are set forth in the Governing Documents for the Greenway Fund.

The Greenway Fees are paid to First Eagle Alternative Capital BDC, Inc. by the Greenway Fund through a wire transfer from the Greenway Fund’s bank account. The management fee is paid quarterly, the incentive fee (if earned) for the Greenway Fund is paid at the time of any distribution by the Greenway Fund to its investors but not less than quarterly, and the closing fees are paid at the time of or promptly following the closing of the related investments. Each periodic distribution notice sent to First Eagle Alternative Capital BDC, Inc. (as investment adviser) and the Greenway Fund’ investors sets forth any Greenway Fees that have been wired to First Eagle Alternative Capital BDC, Inc. The Greenway Fees are paid in arrears.

In addition, the Greenway Fund reimburses First Eagle Alternative Capital BDC, Inc. for any organizational expenses and fees that First Eagle Alternative Capital BDC, Inc. may incur on the Greenway Fund’s behalf, such as the fees and expenses of outside counsel in forming the Greenway Fund and the annual corporate fees such as for resident agent representation in Delaware.

Upon the dissolution of the Greenway Fund, under the terms of the applicable Governing Documents First Eagle Alternative Capital BDC, Inc. will recalculate the incentive fee earned during the entire term of the Greenway Fund. To the extent First Eagle Alternative Capital BDC, Inc. received the payment of any incentive fee in excess of this recalculated amount, the investors in the Greenway Fund may claw back such excess from First Eagle Alternative Capital BDC, Inc.

Separate Accounts

The separate account pays First Eagle Alternative Capital BDC, Inc. a management fee, an incentive fee (if earned) and a portion of closing fees paid to such separate account in connection with investments. The fees are set forth in the Governing Document for the separate account. The management fee and the incentive fee (if earned) are paid quarterly, and the closing fees are paid at the time of or promptly following the closing of the related investments. Each quarter, First Eagle Alternative Capital BDC Inc. (as investment adviser) sends the separate accounts an invoice for the separate account fees. The separate account fees are paid in arrears.

In addition, the separate account reimburses First Eagle Alternative Capital BDC, Inc. for any organizational expenses and fees that First Eagle Alternative Capital BDC, Inc. may incur on such separate account’s behalf.

Upon dissolution of the separate account, under the terms of the applicable Governing Documents, First Eagle Alternative Capital BDC, Inc. will recalculate the incentive fee earned during the

entire term of such separate account. To the extent First Eagle Alternative Capital BDC, Inc. received the payment of any incentive fee in excess of this recalculated amount, the separate account may claw back such excess from First Eagle Alternative Capital BDC, Inc.

Additional Fees and Expenses

The private funds and separately managed accounts can also be subject to administrative, legal, audit and any other professional expenses. Please refer to the applicable Governing Document for more information.

Item 6. Performance-Based Fees and Side-By-Side Management

Performance-Based Fees

First Eagle Alternative Capital BDC, Inc. has the right to earn performance fees as follows:

- 1) As noted above in Item 5, a portion of the profits of the Greenway Fund is distributed to First Eagle Alternative Capital BDC, Inc. as an incentive fee or “carried interest.” This fee is aggregated with other income to First Eagle Alternative Capital BDC, Inc. and factored into the calculation of fees paid by First Eagle Alternative Capital BDC, Inc. to its investment adviser, FEAC.

To the extent supervised persons of First Eagle Alternative Capital BDC, Inc. face any conflicts of interest by First Eagle Alternative Capital BDC, Inc.’s managing the Greenway Fund in creating an incentive for First Eagle Alternative Capital BDC, Inc. to disproportionately allocate time, services or functions to clients paying carried interest or allocate investment opportunities to such clients, these potential conflicts are mitigated by (i) contractual provisions requiring the Greenway Fund to purchase and sell investments contemporaneously with First Eagle Alternative Capital BDC, Inc. and/or (ii) contractual provisions and procedures setting forth investment allocation requirements.

- 2) First Eagle Alternative Capital BDC, Inc. from time to time enters into arrangements with separate account clients where clients are assessed an incentive fee or “carried interest.” The incentive fee is calculated based on a percentage of excess distributions after such client has received distributions equal to the amount of its capital contributions, plus its applicable preferred return. The incentive fee and preferred return may vary by client.

The existence of carried interest creates an incentive for First Eagle Alternative Capital BDC, Inc. to cause such clients to make more speculative investments than they would otherwise make in the absence of performance-based compensation.

Side-by-Side Management Risks

As noted above in Item 5, both First Eagle Alternative Capital BDC, Inc. and its clients make direct debt and equity investments in lower middle-market companies. In addition, the fees received by First Eagle Alternative Capital BDC, Inc. can vary by client. Accordingly, First Eagle Alternative Capital BDC, Inc. is subject to significant side-by-side management conflicts of interest. First Eagle Alternative Capital BDC, Inc. and its affiliates have adopted compliance policies and procedures in an attempt to mitigate such risks. Please see Items 11 and 12 for more information on the actual and potential side-by-side management conflicts.

Item 7. Types of Clients

First Eagle Alternative Capital BDC, Inc. currently provides investment supervisory services to private funds and separate accounts. In the case of the private funds, investment advice is provided directly to the funds and not individually to the underlying investors. First Eagle Alternative Capital BDC, Inc. is not currently seeking new clients.

Item 8. Methods of Analysis, Investment Strategies and Risk of Loss

First Eagle Alternative Capital BDC, Inc. uses fundamental credit analysis to identify attractive investment opportunities and seeks attractive risk-adjusted returns, primarily through investments in privately negotiated debt and equity securities of lower middle-market companies. Investment decisions are made by First Eagle Alternative Capital BDC, Inc.'s Investment Committee. The members of First Eagle Alternative Capital BDC, Inc.'s Investment Committee are the same members as FEAC's Investment Committee and may also serve on the investment committees of other affiliates.

Investment selection

First Eagle Alternative Capital BDC, Inc. has identified several factors it believes are important in evaluating investment opportunities. These criteria provide general guidelines for investment decisions. Each investment First Eagle Alternative Capital BDC, Inc. makes on behalf of a client may not meet all of these criteria.

Value orientation/positive cash flow. First Eagle Alternative Capital BDC, Inc.'s investment philosophy places a premium on fundamental credit analysis and has a distinct value orientation. First Eagle Alternative Capital BDC, Inc. focuses on companies in which it can invest at relatively low multiples of operating cash flow and that are profitable at the time of investment on an operating cash flow basis. Although First Eagle Alternative Capital BDC, Inc. will obtain liens on collateral on behalf of its clients when appropriate, it is primarily focused on the predictability of future cash flow.

Seasoned management with significant equity ownership. Strong, committed management teams are important to the success of an investment, and First Eagle Alternative Capital BDC, Inc. intends to invest in companies where either strong management teams are already in place or new management teams have been identified. Additionally, First Eagle Alternative Capital BDC, Inc. generally requires the portfolio companies to have in place compensation provisions that appropriately incentivize management to succeed and to act in the clients' interests as investors.

Strong competitive position. First Eagle Alternative Capital BDC, Inc. seeks to invest on behalf of the clients in companies that have developed competitive advantages and defensible market positions within their respective markets and are well positioned to capitalize on growth opportunities.

Exit strategy. First Eagle Alternative Capital BDC, Inc. seeks companies that it believes will generate consistent cash flow to repay the clients' loans and reinvest in their respective businesses. First Eagle Alternative Capital BDC, Inc. expects such internally generated cash flow in portfolio companies to be a key means by which the clients exit from such investments over time. In addition, First Eagle Alternative Capital BDC, Inc. will also seek to invest on behalf of clients in companies whose business models and expected future cash flows offer attractive exit possibilities for the equity component of their returns. These companies include candidates for strategic acquisition by other industry participants and companies that may repay the client's investments through an initial public offering of common stock or another capital market transaction.

Due diligence and investment process

First Eagle Alternative Capital BDC, Inc. employs a rigorous and disciplined underwriting and due diligence process. Its process includes a comprehensive understanding of a borrower's industry, market, operational, financial, organizational and legal position and prospects. It seeks borrowers who have proven management teams that have a vested interest in the company in the form of a meaningful level of equity ownership, who generate cash flow that is stable and predictable, and whose market position is defensible. First Eagle Alternative Capital BDC, Inc. will invest in companies with the expectation that the clients will own the investment through a complete business cycle, and possibly a recession, and First Eagle Alternative Capital BDC, Inc. determines the appropriate amount of debt for the company accordingly. In addition, First Eagle Alternative Capital BDC, Inc. views a sale of the company that might result in a refinancing of the clients' investments as a possibility but not an expectation. First Eagle Alternative Capital BDC, Inc. conducts thorough reference and background checks on senior management for all investment transactions.

First Eagle Alternative Capital BDC, Inc.'s due diligence typically includes the following elements (although not all elements will necessarily form part of every due diligence project):

Portfolio Company/Issuer Characteristics: key levers of the business including a focus on drivers of cash flow and growth; revenue visibility; customer and supplier concentrations; historical revenue and margin trends; fixed versus variable costs; free cash flow analysis; company versus industry performance; and sensitivity analysis around various future performance scenarios (with a focus on downside scenario analysis);

Industry Analysis: including the company's position within the context of the general economic environment and relevant industry cycles; industry size and growth rates; competitive landscape; barriers to entry and potential new entrants; product position and defensibility of market share; technological, regulatory and similar threats; and pricing power and cost considerations;

Management: including the quality, breadth and depth of the issuer's management; track record and prior experience; background checks; reputation; compensation and equity incentives; corporate overhead; and motivation; interviews with management, employees, customers and vendors;

Financial Analysis: an understanding of relevant financial ratios and statistics, including various leverage, liquidity, free cash flow and fixed charge coverage ratios; impact on ratios in various future performance scenarios and comparison of ratios to industry competitors; satisfaction with the auditor of the financial statements; quality of earnings analysis;

Capital Structure: diverse considerations regarding leverage (including understanding seniority and leverage multiples); ability to service debt; collateral and security protections; covenants and guarantees; equity investment amounts and participants (where applicable); and review of other significant structural terms and pertinent legal documentation; and

Collateral and Enterprise Value: analysis of relevant collateral coverage, including assets on a liquidation basis and enterprise value on a going concern basis; assignment of recovery

percentages by type of hard asset; matrix analysis of cash flow and valuation multiples under different scenarios along with recovery estimates; comparison to recent transaction multiples and valuations.

Risk Factors

Investing in directly originated loans and/or securities involves a substantial degree of risk. A client may lose all or a substantial portion of its investments, and clients must be prepared to bear the risk of a complete loss of their investments.

In addition, material risks relating to the investment strategies and methods of analysis described above, and to the types of securities typically purchased by or for the clients, include the risks described in the section entitled “Item 1A. Risk Factors” to First Eagle Alternative Capital BDC, Inc.’s annual report on Form 10-K for the year ended December 31, 2021.

The material risks set forth below are qualified in their entirety by the more detailed risk disclosure in the applicable Governing Documents. Direct lending is subject to a number of risks that may affect the value of securities including, but not limited to:

Credit Risk is the risk that the inability or perceived inability of the issuer to make interest and principal payments will cause the value of its securities to decrease and cause a loss. If an issuer’s financial health deteriorates, it may result in a reduction of the credit rating of the issuer’s securities and may lead to the issuer’s inability to honor its obligations, including making timely payment of interest and principal. Declines in credit quality can result in bankruptcy for the issuer and permanent loss of investment.

Interest Rate Risk is the risk that fixed income securities will decline in value because of changes in interest rates. Generally, the value of debt securities falls as interest rates rise. Specific fixed income securities differ in their sensitivities to changes in interest rates depending on their particular characteristics. Fixed income securities with longer durations tend to be more sensitive to changes in interest rates, usually making them more volatile than securities with shorter durations. Duration is determined by a number of factors including coupon rate, whether the coupon is fixed or floating, time to maturity, call or put features, and various repayment features.

Leverage Risk magnifies the potential gains and losses from an investment and increases the risk of loss of capital. To the extent that income derived from investments purchased with borrowed funds is greater than the cost of borrowing, net income will be greater than if borrowing had not been used. Conversely, if the income from investments purchased with borrowed funds is not sufficient to cover the cost of borrowing, the net income will be less than if borrowing had not been used. The extent to which the gains and losses associated with leveraged investing are increased will generally depend on the degree of leverage employed. Leverage may also be limited with respect to specific securities held in a portfolio due to margin rule considerations.

Additionally, interest or similar costs associated with such leverage will be a direct or indirect expense of the client, and, to the extent not covered by net returns attributable to the assets acquired, will cause the returns of such clients to be lower than if they have not used leverage. Interest or similar costs associated with leverage may be based on one or more interest rate indices, which can be different from the interest rate indices applicable to the assets supporting such

leverage. Any such mismatch will not necessarily be hedged. If an event of default occurs under the related facility, the lenders or other counterparties to the facility (or some designated portion or agent thereof) would be able to exercise remedies with respect thereto including but not limited to the liquidation of or taking title to the collateral for such facility which will terminate the rights thereto of the client and could result in a full or partial loss of the client's direct or indirect investment therein.

Liquidity Risk exists when particular investments are difficult to purchase or sell. During periods of market turbulence or low trading activity, in order to meet client withdrawals it may be necessary for First Eagle Alternative Capital BDC, Inc. to cause its clients to sell securities at prices that are less advantageous. Additionally, the market for certain investments may become illiquid independent of any specific adverse changes in the condition of a particular issuer. Smaller portfolios may have increased exposure to liquidity risk.

Management Risk exists because securities selected by First Eagle Alternative Capital BDC, Inc. may not perform to expectations for its clients. This could result in underperformance compared to other portfolios with similar investment objectives.

Market Risk involves the possibility that the value of the investments will decline, sometimes unpredictably or rapidly, due to drops in the securities markets generally or particular industries. The prices of and the income generated by securities held may decline in response to certain events, including those directly involving the companies and governments whose securities are owned in portfolios, general economic and market conditions, regional or global instability, and interest rate fluctuations.

Prepayment Risk. If interest rates fall, it is possible that issuers of certain fixed income securities will call, or prepay, before the maturity date, First Eagle Alternative Capital BDC, Inc. cannot predict the actual rate of prepayments that will be experienced.

Economic Conditions. Changes in economic conditions, including, for example, interest rates, inflation rates, industry conditions, competition, technological developments, trade relationships, political and diplomatic events and trends, tax laws and innumerable other factors, can affect substantially and adversely a client's investments.

Availability of Investment Strategies. Identification and exploitation of certain investment strategies to be pursued by First Eagle Alternative Capital BDC, Inc. can involve a high degree of uncertainty. No assurance can be given that First Eagle Alternative Capital BDC, Inc. will be able to locate suitable investment opportunities.

Analytical Model Risks. First Eagle Alternative Capital BDC, Inc. employs certain strategies which depend upon the reliability, accuracy and analyses of its analytical models. To the extent such models (or the assumptions underlying them) do not prove to be correct, the investments may not perform as anticipated, which could result in substantial losses. All models ultimately depend upon the judgment of the investment team and the assumptions embedded in the models.

Diversification. Although diversification is used as one of the tools of risk management, First Eagle Alternative Capital BDC, Inc. is not always restricted as to the percentage of the assets that may be invested in any particular instrument or market in order to optimize the risk-reward profile. To the extent First Eagle Alternative Capital BDC, Inc. concentrates investments by its clients in a particular issuer, security, currency or market, the investments will become more susceptible to fluctuations in value resulting from adverse economic or business conditions affecting that particular issuer, security, currency or market.

Changes in Law. Changes in non-U.S. or U.S. state and federal laws applicable to First Eagle Alternative Capital BDC, Inc. or its clients, and other securities or instruments in which a client may invest may negatively affect a client's returns. The global financial markets continue to be subject to extensive and unprecedented governmental intervention. Such intervention has in certain cases been implemented on an emergency basis with little or no notice, with the consequence that some market participants' ability to continue to implement certain strategies or manage the risk of their outstanding positions has been suddenly and/or substantially eliminated or otherwise negatively impacted. Given the complexities of the global financial markets and the limited time frame within which governments have been able to take action, these interventions have sometimes been unclear in scope and application, resulting in confusion and uncertainty, which in itself has been materially detrimental to the efficient functioning of such markets as well as previously successful investment strategies.

Cybersecurity Event. The failure in cyber security systems, as well as the occurrence of events unanticipated in First Eagle Alternative Capital BDC, Inc.'s disaster recovery systems and management continuity planning, could impair First Eagle Alternative Capital BDC, Inc.'s ability to conduct business effectively. The occurrence of a disaster such as a cyber-attack, a natural catastrophe, an industrial accident, a terrorist attack or war, events unanticipated in First Eagle Alternative Capital BDC, Inc.'s disaster recovery systems, or a support failure from external providers, could have an adverse effect on First Eagle Alternative Capital BDC, Inc.'s ability to conduct business and on First Eagle Alternative Capital BDC, Inc. results of operations and financial condition, particularly if those events affect our computer-based data processing, transmission, storage, and retrieval systems or destroy data. If a significant number of First Eagle Alternative Capital BDC, Inc.'s investment adviser's senior management and employees were unavailable in the event of a disaster, our ability to effectively conduct our business could be severely compromised.

First Eagle Alternative Capital BDC, Inc. depends heavily upon computer systems to perform necessary business functions. Despite our implementation of a variety of security measures, our computer systems could be subject to cyber-attacks and unauthorized access, such as physical and electronic break-ins or unauthorized tampering. Like other companies, First Eagle Alternative Capital BDC, Inc. may experience threats to its data and systems, including malware and computer virus attacks, unauthorized access, system failures and disruptions. If one or more of these events occurs, it could potentially jeopardize confidential, proprietary and other information processed and stored in, and transmitted through, First Eagle Alternative Capital BDC, Inc.'s computer systems and networks, or otherwise cause interruptions or malfunctions in operations, which could result in damage to First Eagle Alternative Capital BDC, Inc.'s reputation, financial losses, litigation, increased costs, regulatory penalties and/or customer dissatisfaction or loss.

Uncertain Economic, Social and Political Environment. Terrorist acts, acts of war, global health emergencies or natural disasters may disrupt our operations, as well as the operations of the businesses in which clients invest. Consumer, corporate and financial confidence may be adversely affected by current or future tensions around the world, fear of terrorist activity and/or military conflicts, localized or global financial crises or other sources of political, social or economic unrest. Such erosion of confidence may lead to or extend a localized or global economic downturn. Such acts have created, and continue to create, social, economic and political uncertainties and have contributed to global economic instability. A climate of uncertainty may reduce the availability of potential investment opportunities, and increases the

difficulty of modeling market conditions, potentially reducing the accuracy of financial projections. Additionally, a serious pandemic or a natural disaster could severely disrupt global, national and/or regional economies. No assurance can be given as to the effect of these events on the value of clients' investments. Future terrorist activities, military or security operations, global health emergencies or natural disasters could further weaken the domestic/global economies and create additional uncertainties, which may negatively impact the businesses in which First Eagle Alternative Capital BDC, Inc. invests directly or indirectly and, in turn, could have a material adverse impact on our business, operating results and financial condition. Losses from terrorist attacks, health emergencies and natural disasters are generally uninsurable. In addition, limited availability of credit for consumers, homeowners and businesses, including credit used to acquire businesses, in an uncertain environment or economic downturn may have an adverse effect on the economy generally and on the ability of First Eagle Alternative Capital BDC, Inc. and its investments on behalf of clients to execute their respective strategies and to receive an attractive multiple of earnings on the disposition of businesses. This may slow the rate of future investments on behalf of clients and result in longer holding periods for investments. Furthermore, such uncertainty or general economic downturn may have an adverse effect upon clients' investments. Many investments on behalf of clients may be susceptible to economic slowdowns or recessions and may be unable to repay our debt investments during these periods. The recent global outbreak of COVID-19 has disrupted economic markets and the prolonged economic impact is uncertain. Some economists and major investment banks have expressed concern that the continued spread of the virus globally could lead to a further world-wide economic downturn. Many manufacturers of goods in China and other countries in Asia saw a downturn in production due to the suspension of business and temporary closure of factories in an attempt to curb the spread of the illness. In the past, instability in the global capital markets has resulted in disruptions in liquidity in the debt capital markets, significant write-offs in the financial services sector, the re-pricing of credit risk in the broadly syndicated credit market and the failure of major domestic and international financial institutions. In particular, in past periods of instability, the financial services sector was negatively impacted by significant write-offs as the value of the assets held by financial firms declined, impairing their capital positions and abilities to borrow, lend and invest. In addition, continued uncertainty surrounding the negotiation of trade deals between the United Kingdom and the European Union following the United Kingdom's exit from the European Union and uncertainty between the United States and other countries, including China, with respect to trade policies, treaties, and tariffs, among other factors, have caused disruption in the global markets. There can be no assurance that market conditions will not worsen in the future.

Furthermore, commencing in 2021, Russian President Vladimir Putin ordered the Russian military to begin massing thousands of military personnel and equipment near its border with Ukraine and in Crimea, representing the largest mobilization since the illegal annexation of Crimea in 2014. President Putin has initiated troop movements into the eastern portion of Ukraine and continues to threaten an all-out invasion of Ukraine. On February 22, 2022, the United States and several European nations announced sanctions against Russia in response to Russia's actions. On February 24, 2022, President Putin commenced a full-scale invasion of Russia's pre-positioned forces into Ukraine, which could have a negative impact on the economy and business activity globally (including in the countries in which First Eagle Alternative Capital BDC, Inc. invests), and therefore could adversely affect the performance of the investments First Eagle Alternative Capital BDC, Inc. makes on behalf of Clients. Furthermore, the conflict between the two nations and the varying involvement of the United States and other NATO countries could preclude prediction as to their ultimate adverse impact on global economic and market conditions, and, as a result,

presents material uncertainty and risk with respect to First Eagle Alternative Capital BDC, Inc. and the performance of its investments or operations, and the ability of First Eagle Alternative Capital BDC, Inc. to achieve Clients' investment objectives. Additionally, to the extent that third parties, investors, or related customer bases have material operations or assets in Russia or Ukraine, they may have adverse consequences related to the ongoing conflict.

Natural Disaster; Public Health Emergencies; COVID-19. Natural or environmental disasters, such as earthquakes, fires, floods, hurricanes, tsunamis and other severe weather- related phenomena, generally, have been, and can be, highly disruptive to economies and markets, adversely impacting individual companies, sectors, industries, markets, currencies, interest and inflation rates, credit ratings, investor sentiment, and other factors affecting the value of clients' investments. Given the increasing interdependence among global economies and markets, conditions in one country, market, or region are increasingly likely to adversely affect markets, issuers, and/or foreign exchange rates in other countries, including the United States.

Pandemics and other widespread public health emergencies, including outbreaks of infectious diseases such as SARS, H1N1/09 flu, avian flu, ebola and the current outbreak of COVID-19 (as defined below), have and are resulting in market disruption, and future such emergencies have the potential to materially and adversely impact economic production and activity in ways that are impossible to predict, all of which may result in significant losses to clients.

Currently, there is an ongoing outbreak of a novel and highly contagious form of coronavirus ("COVID-19"), which the World Health Organization formally declared in March 2020 to constitute a global "pandemic." This outbreak has caused a worldwide public health emergency, straining healthcare resources and resulting in extensive and growing numbers of infections, hospitalizations and deaths. In an effort to contain COVID-19, national, regional and local governments, as well as private businesses and other organizations, have taken severely restrictive measures, including instituting local and regional quarantines, restricting travel (including closing certain international borders), prohibiting public activity (including "stay-at- home" and similar orders), and ordering the closure of large numbers of offices, businesses, schools, and other public venues. In many jurisdictions, restrictive measures have been re- imposed to address subsequent waves of infection. As a result, COVID-19 has significantly diminished global economic production and activity of all kinds and has contributed to both volatility and a severe decline in all financial markets. Among other things, these unprecedented developments have resulted in material reductions in demand across most categories of consumers and businesses, dislocation (or in some cases a complete halt) in the credit and capital markets, labor force and operational disruptions, slowing or complete idling of certain supply chains and manufacturing activity, steep increases in unemployment levels in the United States and several other countries, and strain and uncertainty for businesses and households, with a particularly acute impact on industries dependent on travel and public accessibility, such as transportation, hospitality, tourism, retail, sports and entertainment.

The ultimate impact of COVID-19—and any resulting decline in economic and commercial activity—on global economic conditions, and on the operations, financial condition and performance of any particular industry or business, is impossible to predict, although ongoing and potential additional materially adverse effects, including a further global or regional economic downturn (including a recession) of indeterminate duration and severity, are possible. The extent of COVID-19's impact will depend on many factors, including the ultimate duration and scope of

the public health emergency and the restrictive countermeasures being undertaken, as well as the effectiveness of other governmental, legislative and financial and monetary policy interventions (including the effectiveness of vaccines and the implementation of vaccination programs) designed to mitigate the crisis and address its negative externalities, all of which are evolving rapidly and may have unpredictable results. Even if and as the spread of the COVID-19 virus itself is substantially contained and economies are able to “re-open,” it will be difficult to assess what the longer-term impacts of an extended period of unprecedented economic dislocation and disruption will be on future macro- and micro-economic developments, the health of certain industries and businesses, and commercial and consumer behavior.

The ongoing COVID-19 crisis and any other public health emergency could have a significant adverse impact and result in significant losses to clients. The extent of the impact on each client’s investments objectives and First Eagle Alternative Capital BDC, Inc.’s operational and financial performance will depend on many factors, all of which are highly uncertain and cannot be predicted, and this impact may include significant reductions in revenue and growth, unexpected operational losses and liabilities, impairments to credit quality and reductions in the availability of capital. These same factors may limit the ability of First Eagle Alternative Capital BDC, Inc. to source, diligence and execute advantageous investments and to manage, finance and exit investments in the future, and governmental mitigation actions may constrain or alter existing financial, legal and regulatory frameworks in ways that are adverse to the investment strategy that First Eagle Alternative Capital BDC, Inc. intends to pursue, all of which could adversely affect First Eagle Alternative Capital BDC, Inc.’s ability to fulfill its clients’ investment objectives. They may also impair the ability of counterparties to perform their respective obligations under debt instruments and other commercial agreements (including their ability to pay obligations as they become due), potentially leading to defaults with uncertain consequences. In addition, the operations of First Eagle Alternative Capital BDC, Inc. may be significantly impacted, or even temporarily or permanently halted, as a result of government quarantine measures, restrictions on travel and movement, remote-working requirements and other factors related to a public health emergency, including its potential adverse impact on the health of any such entity’s personnel. These measures may also hinder First Eagle Alternative Capital BDC, Inc.’s ability to conduct its affairs and activities as it normally would, including by impairing usual communication channels and methods, hampering the performance of administrative functions such as processing payments and invoices, and diminishing its ability to make accurate and timely projections of financial performance.

Any of the foregoing disruptions could prevent First Eagle Alternative Capital BDC, Inc. from executing advantageous investment decisions in a timely manner and negatively impact First Eagle Alternative Capital BDC, Inc.’s ability to achieve clients’ investment objectives. Any such event(s) could have a significant adverse impact on the value and risk profile of investments with First Eagle Alternative Capital BDC, Inc.

Monetary Policy and Governmental Intervention Affecting the Broader Investment Climate.

In response to the global financial crisis in 2008, the Board of Governors of the U.S. Federal Reserve System (the “Federal Reserve”) and certain non-U.S. central banks, including the European Central Bank, acted to hold interest rates to historic lows in addition to taking other governmental actions to stabilize markets and seek to encourage economic growth. These and other actions by the Federal Reserve and other central banks, including changes in policies, may continue to have a significant effect on interest rates and on the U.S. and world economies generally, which in turn may affect the performance of clients’ investments on an absolute and/or

relative basis. In addition, the consequences of the extensive changes to the regulation of various markets and market participants contemplated by the legislation and increased regulation arising out of the global financial crisis have not been fully implemented in all cases and therefore the ultimate effects thereof are difficult to predict or measure with certainty. Recently, certain U.S. banks, citing Federal Reserve liquidity requirements and/or the costs and/or decreased profitability of holding capital deposits, have pursued imposing a negative interest rate and/or a balance sheet utilization fee on certain deposits from certain institutional customers. Other non-U.S. banks have also adopted similar measures. Negative interest rates and/or fees of this type could have an adverse effect on client investments. Clients may be forced to bear such costs, effectively losing money on cash deposits, or seek to find alternative means of holding short-term reserves and cash balances. Such alternative arrangements may bear greater risk of loss of principal, longer lock-up periods (e.g., money market funds or certificates of deposit), or other less favorable terms. In addition, as a result of the foregoing, First Eagle Alternative Capital BDC, Inc. may choose to keep less cash or reserves on hand for clients which could result in a greater frequency of capital calls from investors in clients and/or greater reliance on borrowing, along with related costs.

Custodial Risk. There are risks involved in dealing with any custodians who hold assets for First Eagle Alternative Capital BDC, Inc. It is expected that all cash and other non-loan assets deposited with custodians will be clearly identified as being assets of First Eagle Alternative Capital BDC, Inc. However, it may not always be possible to achieve this segregation and there may be practical, or timing problems associated with enforcing First Eagle Alternative Capital BDC, Inc.'s rights to their assets in the case of an insolvency of any custodian.

Fraud, Misrepresentation or Omission by a Borrower. The value of an investment made by First Eagle Alternative Capital BDC, Inc. may be affected by fraud, misrepresentation or omission on the part of the borrower to which the loan relates, by parties related to the borrower or by other parties to the loan (or related collateral and security arrangements). Such fraud, misrepresentation or omission may adversely affect the value of the collateral underlying the loan in question or may adversely affect First Eagle Alternative Capital BDC, Inc.'s ability to enforce their contractual rights under the loan or for the borrower of the loan to repay the loan or interest on it or its other debts.

Concentration. A concentration in a client's portfolio of loans to a limited number of underlying loan obligors or of loans in a limited number of industries or geographic regions or with a limited type of collateral securing such loans could impair the client's portfolio if the underlying obligors, industries or geographic regions were to experience economic difficulties or if the asset class collateralizing the loans were to fall out of favor in the market. As a result, obligors could default on their loans, and the client could be unable to recover the full amount owed on such loans. Under such circumstances clients (and investors, as applicable) might not realize their rate of return objectives and could suffer losses.

Limited Control of Underlying Investments; Lack of Information. First Eagle Alternative Capital BDC, Inc. does not have the right to participate in the management of each investment. Investments by many of our clients will include debt instruments and other securities of companies that we do not control. The day-to-day operations of issuers will be the responsibility of such company's management team. Clients are therefore subject to the risk that an issuer may make business decisions with which First Eagle Alternative Capital BDC, Inc. disagrees, and the

stockholders and management of such company may take risks or otherwise act in ways that do not serve a client's interests. As a result, an issuer may make decisions that could decrease the value of a client's investment and, in turn, have a material adverse effect on the value of the interests. Additionally, issuers may not provide timely or complete information to First Eagle Alternative Capital BDC, Inc. and First Eagle Alternative Capital BDC, Inc. would be unable to cause such issuers to provide such information. Such a lack of information could have adverse consequences for clients to the extent First Eagle Alternative Capital BDC, Inc. is unable to properly evaluate an issuer's continued operations or where a lack of information impairs First Eagle Alternative Capital BDC, Inc.'s ability to value the related investment.

Participation on Creditors' Committees; Lender Liability; Equitable Subordination.

Representatives of First Eagle Alternative Capital BDC, Inc. sometimes participate on committees formed by creditors to negotiate with loan obligors in connection with loan restructurings or bankruptcies. There can be no assurance that such representatives would be successful in obtaining results most favorable to a particular client in connection with such negotiations and significant legal fees and other expenses may be incurred in connection with such representation, all or a portion of which may be borne by the related client(s). Judicial decisions have upheld the right of loan obligors to sue lending institutions on the basis of various legal theories, collectively termed "lender liability." Generally, lender liability is founded on the premise that a lender has either violated a duty, whether implied or contractual, of good faith and fair dealing owed to the loan obligor or has assumed a degree of control over the loan obligor resulting in the creation of a fiduciary duty owed to the loan obligor or its other creditors or equity owners. To the extent that First Eagle Alternative Capital BDC, Inc. participates on such committees, clients could become subject to allegations of lender liability. First Eagle Alternative Capital BDC, Inc. cannot provide assurance that these claims will not arise or that it (or such client) will not be subject to significant liability if a claim of this type did arise.

Valuation. For loans and other assets that are not publicly traded or where reliable trade prices are not available, First Eagle Alternative Capital BDC, Inc. values such loans in accordance with its valuation policies and procedures. Such valuations require judgment, are inherently uncertain, can fluctuate and are generally based on estimates. It is possible that First Eagle Alternative Capital BDC, Inc.'s determinations of fair value will differ materially from the values that would have been used if an active market for the relevant assets existed. If First Eagle Alternative Capital BDC, Inc.'s determinations regarding the fair value of such loans are materially higher than the values that are ultimately realized upon the sale of such loans, the returns to clients and investors would be adversely affected.

The amount and timing of fees received by First Eagle Alternative Capital BDC, Inc. or its affiliates with respect to a client will depend in part on the value of such client's assets and liabilities. If the valuations are incorrect, the amount of fees received, or the timing of receipt of such fees, could also be incorrect.

First Eagle Alternative Capital BDC, Inc. has adopted valuation policies and procedures for use in the valuation of assets held by clients. First Eagle Alternative Capital BDC, Inc. has also established a Valuation Committee to oversee the valuation process in accordance with the policies and procedures. First Eagle Alternative Capital BDC, Inc. values assets at fair value generally in accordance with U.S. generally accepted accounting principles ("GAAP"). Where First Eagle

Alternative Capital BDC, Inc. believes a reliable market price is readily ascertainable for an asset, First Eagle Alternative Capital BDC, Inc. will value such asset at such current market price. Assets for which First Eagle Alternative Capital BDC, Inc. believes reliable market prices are not readily ascertainable are fair valued by First Eagle Alternative Capital BDC, Inc. in good faith and in accordance with its policies and procedures.

Overlapping Investments with Other Clients. From time to time, multiple clients of First Eagle Alternative Capital BDC, Inc. and First Eagle Alternative Credit (defined below) acquire or hold positions in the same investments. Such investments and transactions can raise potential conflicts of interest for our clients, particularly if different clients invest in different classes or types of securities or investments of the same underlying company. In that regard, actions may be taken by some clients that may be inconsistent, if not adverse to other clients, including, but not limited to, interests in different parts of a company's capital structure during a restructuring, bankruptcy or other insolvency proceeding or similar matter.

Where our clients invest in different parts of the capital structure of an issuer, their respective interests may diverge significantly in the case of financial distress of the company. In a bankruptcy proceeding, a client's interest may be subordinated or otherwise adversely affected by virtue of another client's involvement and actions relating to their investment. This may result in loss or substantial dilution of one client's investment, while another client recovers all or part of amounts due to it. In addition, where one client is a creditor of an issuer in which another client holds more junior securities, that client may take actions in its own interests with respect to its rights as a creditor (e.g., with respect to breaches of covenants) that may be adverse to the interests of the other client. There can be no assurance that the terms of or the return on each client's investment will be equivalent to or better than the terms of or the returns obtained by other clients participating in the transaction. Our ability to implement a client's strategies effectively may be limited to the extent that contractual obligations entered into in respect of investments made by other clients impose restrictions on clients engaging in transactions that we may otherwise be interested in pursuing.

Risks Associated with "Brexit." On March 29, 2017, the United Kingdom ("UK") formally notified the European Council of its intention to leave the European Union ("EU"). The UK formally left the EU on January 31, 2020, and entered a transition period that ended on December 31, 2020. On December 24, 2020, the UK government and the EU Commission provisionally agreed a trade and cooperation agreement governing their future relationship, which, following a ratification process, is expected to apply on a provisional basis through an additional transition period.

Although provisionally agreed, the terms of UK's ongoing and future relationship with the EU are still uncertain, including the extent to which UK businesses will have access to the EU single market and the extent to which EU businesses have access to the UK market. There is also risk of significant disruption to trade between the UK and the EU, particularly as new trade arrangements are intended to be ratified and implemented.

There can be no assurance that any renegotiated laws or regulations will not have an adverse impact on First Eagle Alternative Capital, Inc. and/or clients' investments objectives. The legal, political and economic uncertainty generally resulting from the UK's exit from the EU may

adversely affect both First Eagle Alternative Capital, Inc. and/or its clients, as applicable. This uncertainty may also result in an economic slowdown and/or a deteriorating business environment in the UK and in one or more EU Member States.

LIBOR. The London Interbank Offered Rate, or “LIBOR,” has historically been the principal floating rate benchmark in the financial markets. However, as a result of longstanding regulatory initiatives, LIBOR is being discontinued. Its discontinuation has affected and will continue to affect the financial markets generally and may also affect our operations, finances and investments specifically. The date of discontinuation will vary depending on the LIBOR currency and tenor. In March 2021, the UK Financial Conduct Authority (the “FCA”), which is the regulator of the LIBOR administrator, announced that LIBOR settings will cease to be provided by any administrator or will no longer be representative after specified dates, which will be June 30, 2023, in the case of the principal U.S. dollar LIBOR tenors (overnight and one, three, six and 12 month), and December 31, 2021, in all other cases (i.e., one week and two month U.S. dollar LIBOR and all tenors of non-U.S. dollar LIBOR). Thus, many existing LIBOR contracts will transition to another benchmark after June 30, 2023 or, in some cases, after December 31, 2021. For some existing LIBOR-based obligations, the contractual consequences of the discontinuation of LIBOR may not be clear. In the United States, there have been various efforts to identify a set of alternative reference interest rates for U.S. dollar LIBOR. The market has generally coalesced around recommendations from the Alternative Reference Rates Committee (the “ARRC”) convened by the Board of Governors of the Federal Reserve System and the Federal Reserve Bank of New York. The ARRC has recommended that U.S. dollar LIBOR be replaced by rates based on the Secured Overnight Financing Rate (“SOFR”) plus, in the case of existing LIBOR contracts and obligations, a spread adjustment. As a consequence of the FCA announcement described above (and a related announcement from the LIBOR administrator), the spread adjustments for different tenors of U.S. dollar LIBOR have been set. The FCA and certain U.S. regulators have emphasized that, despite expected publication of U.S. dollar LIBOR through June 30, 2023, no new contracts using U.S. dollar LIBOR should be entered into after December 31, 2021 and that, for certain purposes, market participants should transition away from U.S. dollar LIBOR sooner. Although the foregoing reflects the likely timing and certain details and consequences of the LIBOR discontinuation, there is no assurance that LIBOR, of any particular currency and tenor, will continue to be published until any particular date or in any particular form.

Financial markets, particularly the trading market for LIBOR-based obligations, may be adversely affected by the discontinuation of LIBOR, the remaining uncertainties regarding its discontinuation, the alternative reference rates that will be used when LIBOR is discontinued (including SOFR-based rates) and other reforms related to LIBOR. There is no assurance that SOFR-based rates, as modified by an applicable spread adjustment, will be the economic equivalent of U.S. dollar LIBOR. SOFR-based rates will differ from U.S. dollar LIBOR, and the differences may be material. As a result of the LIBOR discontinuation, the Fund’s performance or net asset value may be adversely affected. In addition, SOFR-based rates or other alternative reference rates may be an ineffective substitute for LIBOR, resulting in prolonged adverse market conditions for us. There also remains uncertainty and risk regarding the willingness and ability of issuers to include enhanced provisions in new and existing contracts or instruments. Abandonment of or modifications to LIBOR could lead to significant short-term and long-term uncertainty and market instability. If LIBOR ceases to exist, we and our portfolio companies may need to amend or restructure our existing LIBOR-based debt instruments and any related hedging arrangements that extend beyond 2023, which may be difficult, costly and time consuming. In addition, from

time to time we invest in floating rate loans and investment securities whose interest rates are indexed to LIBOR. Uncertainty as to the nature of alternative reference rates and as to potential changes or other reforms to LIBOR, or any changes announced with respect to such reforms, may result in a sudden or prolonged increase or decrease in the reported LIBOR rates and the value of LIBOR-based loans and securities, including those of other issuers we or our affiliates currently own or may in the future own. It remains uncertain how such changes would be implemented and the effects such changes would have on us, issuers of instruments in which we invest and financial markets generally.

First Eagle Alternative Capital, Inc.'s systems and processes have been updated to handle loans with reference rates other than LIBOR, but the expected discontinuation of LIBOR could still have a significant impact on First Eagle Alternative Capital, Inc. and clients. The dollar amount of any debt investments and borrowings that are linked to LIBOR with maturity dates after the anticipated discontinuation date of 2023 could be material. The transition away from LIBOR has involved significant operational efforts, including, but not limited to, amending existing loan agreements with borrowers on investments that may have not been modified with fallback language and adding effective fallback language to new agreements in the event that LIBOR is discontinued before maturity. Such efforts may continue and result in operational challenges in the future. Beyond these challenges, we anticipate there may be additional risks to our current processes and information systems during the transition away from LIBOR. Due to the uncertainty of the replacement for LIBOR, the potential effect of any such event on Clients' cost of capital and returns cannot yet be determined. In addition, the cessation of LIBOR could:

- Adversely impact the pricing, liquidity, value of, return on and trading for a broad array of financial products, including any LIBOR-linked securities, loans and derivatives that are included in our assets and liabilities;
- Create a further mismatch between the interest rate payable with respect to any leverage facility and the interest income earned thereby from the loans collateralizing such facility, or between the interest rate payable with respect to loans held by CLOs and the interest rate utilized for such CLOs;
- Cause an increase in the portion of loans and temporary investments that calculate interest based on a benchmark rate other than LIBOR or bear interest at a fixed rate;
- Require extensive changes to documentation that governs or references LIBOR or LIBOR-based products, including, for example, pursuant to time-consuming renegotiations of existing documentation to modify the terms of outstanding investments;
- Result in inquiries or other actions from regulators in respect of our preparation and readiness for the replacement of LIBOR with one or more alternative reference rates;
- Result in disputes, litigation or other actions with portfolio companies, or other counterparties, regarding the interpretation and enforceability of provisions in our LIBOR-based investments, such as fallback language or other related provisions, including, in the case of fallbacks to the alternative reference rates, any economic, legal, operational or other impact resulting from the fundamental differences between LIBOR and the various alternative reference rates;
- Require the transition and/or development of additional systems and analytics to effectively transition our risk management processes from LIBOR-based products to those based on one or more alternative reference rates, which may prove challenging given the limited history of the proposed alternative reference rates; and

- Cause us to incur additional costs in relation to any of the above factors.

First Eagle Alternative Capital, Inc. intends to cease making LIBOR-based loans when the middle market generally transitions away from such reference rate. There is no guarantee that a transition from LIBOR to an alternative will not result in financial market disruptions, significant increases in benchmark rates, or borrowing costs to borrowers, any of which could have a material adverse effect on First Eagle Alternative Capital, Inc. and clients. In addition, the transition to a successor rate could potentially cause (i) increased volatility or illiquidity in markets for instruments that currently rely on LIBOR, (ii) a reduction in the value of certain instruments held by Clients, or (iii) reduced effectiveness of related transactions, such as hedging. It remains uncertain how such changes would be implemented and the effects such changes would have on the First Eagle Alternative Capital, Inc. and clients, issuers of instruments in which the First Eagle Alternative Capital, Inc. and clients invest and financial markets generally.

Limited Access to Information. The rights of a client or investor to information regarding investments in many cases will be limited. With respect to a Fund, such rights will be specified, and in many cases strictly limited, by the applicable Fund’s governing documents. In particular, it is anticipated that First Eagle Alternative Capital BDC, Inc. will obtain certain types of material information from or relating to a investments that will not be disclosed to clients or investors, as applicable, because such disclosure is prohibited, including as a result of contractual, legal or similar obligations outside of First Eagle Alternative Capital BDC, Inc.’s control. Decisions by First Eagle Alternative Capital BDC, Inc. or its affiliates to withhold information may have adverse consequences for clients or investors, as applicable, in a variety of circumstances. For example, an investor that seeks to transfer its interest in a Fund may have difficulty in determining an appropriate price for such interest. Decisions to withhold information may also make it difficult for a client or investor to monitor First Eagle Alternative Capital BDC, Inc. and its performance. Additionally, it is anticipated that certain clients or investors (such as clients that have entered into non-disclosure agreements with First Eagle Alternative Capital BDC, Inc. or investors that designate representatives to participate on a Fund’s advisory board) generally may, by virtue of such participation, have more or earlier information about investments in certain circumstances than other clients or investors, as applicable.

Privacy and Data Protection Law Compliance Risk. The adoption, interpretation and application of consumer protection, data protection and/or privacy laws and regulations (“Privacy Laws”) in the United States, Europe and elsewhere could significantly impact current and planned privacy and information security related practices, the collection, use, sharing, retention and safeguarding of personal data and current and planned business activities of First Eagle Alternative Capital BDC, Inc. and companies in which clients have investments, and increase compliance costs and require the dedication of additional time and resources to compliance for such entities. A failure to comply with such Privacy Laws by any such entity or their service providers could result in fines, sanctions or other penalties, which could materially and adversely affect the results of operations and overall business, as well as have a negative impact on reputation and investment performance. As Privacy Laws are implemented, interpreted and applied, compliance costs for First Eagle Alternative Capital BDC, Inc. and companies in which clients have investments, are likely to increase, particularly in the context of ensuring that adequate data protection and data transfer mechanisms are in place.

For example, California has passed the California Consumer Privacy Act of 2018, and the EU has

enacted the General Data Protection Regulation (EU 2016/679), each of which broadly impacts businesses that handle various types of personal data, potentially including private fund managers and their funds and investments. Such laws impose stringent legal and operational obligations on regulated businesses, as well as the potential for significant penalties.

Other jurisdictions, including other U.S. states, have proposed or are considering similar Privacy Laws, which if enacted could impose similarly significant costs, potential liabilities and operational and legal obligations. Such Privacy Laws and regulations are expected to vary from jurisdiction to jurisdiction, thus increasing costs, operational and legal burdens, and the potential for significant liability for regulated entities, which could include FEAC and companies in which clients have investments.

Risks of Specific Security Types

Common Stock. Although common stock has historically generated higher average total returns than fixed-income securities over the long term, common stock also has experienced significantly more volatility in those returns. An adverse event, such as an unfavorable earnings report, may depress the value of a particular common stock. Also, the price of common stock is sensitive to general movements in the stock market and a drop in the stock market may depress the price of common stock. Common stock prices fluctuate for several reasons, including changes in investors' perceptions of the financial condition of an issuer or the general condition of the relevant stock market or when political or economic events affecting the issuers occur. In addition, common stock prices may be particularly sensitive to rising interest rates, as the cost of capital rises and borrowing costs increase.

Convertible Securities. First Eagle Alternative Capital BDC, Inc. may cause its clients to invest in convertible securities, which are debt securities or preferred equity securities that are exchangeable for other debt or equity securities of the issuer at a predetermined price. Convertible securities entitle the holder to receive interest payments paid on corporate debt securities or the dividend preference on preferred equity securities until such time as the convertible security matures or is redeemed or until the holder elects to exercise the conversion privilege. As a result of the conversion feature, convertible securities typically offer lower interest rates than if the securities were not convertible. Also, in the absence of adequate anti-dilution provisions in a convertible security, dilution in the value in a holding may occur in the event the underlying stock is subdivided, additional securities are issued, a stock dividend is declared or the issuer enters into another type of corporate transaction which increases its outstanding securities.

Corporate Debt. Corporate debt securities are subject to the risk of the issuer's inability to meet principal and interest payments on the obligation and may also be subject to price volatility due to such factors as interest rate sensitivity, market perception of the creditworthiness of the issuer and general market liquidity. When interest rates rise, the value of corporate debt securities can be expected to decline. Debt securities with longer maturities tend to be more sensitive to interest rate movements than those with shorter maturities.

Middle Market Portfolio Securities. Investments in middle-market companies involve a number of significant risks. Generally, little public information exists about these companies, and First Eagle Alternative Capital BDC, Inc. relies on the ability of its investment professionals to obtain adequate information to evaluate the potential returns from investing in these companies. First Eagle Alternative Capital BDC, Inc. may be unable to uncover all material information about these companies, and First Eagle Alternative Capital BDC, Inc. may not make a fully informed

investment decision on behalf of its clients and may cause its clients to lose money on the investment. Middle-market companies may have limited financial resources and may be unable to meet their obligations, which may be accompanied by a deterioration in the value of any collateral and reduction in the likelihood of realizing any guarantees First Eagle Alternative Capital BDC, Inc. may have obtained in connection with an investment. In addition, they typically have shorter operating histories, narrower product lines and smaller market shares than larger business, which tend to render them more vulnerable to competitors' actions and market conditions, as well as general economic downturns. Additionally, middle-market companies are more likely to depend on the management talents and efforts of a small group of persons; therefore, the death, disability, resignation or termination of one or more of these persons could have a material adverse impact on the portfolio company and, in turn, on First Eagle Alternative Capital BDC, Inc.'s clients' investment. Middle-market companies also generally have less predictable operating results, may from time to time be parties to litigation, may be engaged in rapidly changing business with products subject to substantial risk of obsolescence and may require substantial additional capital to support their operations, finance expansion or maintain their competitive position. In addition, First Eagle Alternative Capital BDC, Inc. or its clients may be named as defendants in litigation arising from investments in these portfolio companies.

Non-Investment Grade Securities. Below investment-grade securities are more likely to pose a credit risk, as the issuers of these securities are more likely to have problems making interest and principal payments than issuers of higher-rated securities. Lower-rated securities may be more susceptible to real or perceived adverse economic and competitive industry conditions than higher-grade securities, and prices of these securities may be more sensitive to adverse economic downturns or individual corporate developments. If the issuer of the securities defaults, investors may incur additional expenses to seek recovery. The secondary market in which below investment-grade securities are traded may be less liquid than the market for higher grade securities.

Preferred Stock. Preferred stock has a preference over common stock in liquidation (and generally dividends as well) but is subordinated to the liabilities of the issuers in all respects. As a general rule, the market value of preferred stock with a fixed dividend rate and no conversion element varies inversely with interest rates and perceived credit risk, while the market price of convertible preferred generally also reflects some element of conversion value. Because preferred stock is junior to debt securities and other obligations of the issuer, deterioration in the credit quality of the issuer will cause greater changes in the value of a preferred stock than in a more senior debt security with similar stated yield characteristics. Unlike interest payments on debt securities, preferred stock dividends are payable only if declared by the issuer's board of directors. Preferred stock also may be subject to optional or mandatory redemption provisions.

Private Placements; Illiquid Assets. In addition to the risks that exist with respect to privately placed securities due to the nature of such securities (i.e., risks associated with common stock), privately placed securities are often illiquid. Illiquid securities include securities whose disposition of is subject to substantial legal or contractual restrictions. First Eagle Alternative Capital BDC, Inc. may experience significant delays in disposing of illiquid securities on behalf of its clients and may not be able to sell them for the price that was paid or the price at which First Eagle Alternative Capital BDC, Inc. has valued them. Transactions in illiquid securities may entail registration expenses and other transaction costs that are higher than those for transactions in liquid securities.

Certain loans acquired and owned by First Eagle Alternative Capital BDC, Inc.'s clients will also be illiquid assets for which no ready market of purchasers exists and often are subject to transfer restrictions and are not publicly traded. Investments in illiquid assets could reduce their ability to

dispose of such assets in a timely fashion and for a fair price. Illiquid assets typically trade at a discount from comparable, more liquid investments.

Secured Loans. Although the senior loans in which First Eagle Alternative Capital BDC, Inc. will invest generally will be secured by specific collateral, there can be no assurance that liquidation of such collateral would satisfy the borrower's obligation in the event of nonpayment of scheduled interest or principal, or that such collateral could be readily liquidated. In the event of the bankruptcy of a borrower, a portfolio could experience delays or limitations with respect to its ability to realize the benefits of the collateral securing a senior loan or could recover nothing of what it is owed on the senior loan. If the terms of a senior loan do not require the borrower to pledge additional collateral in the event of a decline in the value of the already pledged collateral, a portfolio will be exposed to the risk that the value of the collateral will not at all times equal or exceed the amount of the borrower's obligations under the senior loans. To the extent that a senior loan is collateralized by stock in the borrower or its subsidiaries, such stock may lose all of its value in the event of a bankruptcy of the borrower. There can be no assurance that the collateral can be readily liquidated or that the liquidation of the collateral would satisfy the borrower's obligation in the event of nonpayment of scheduled interest or principal. Uncollateralized (i.e., non-secured) senior loans involve a greater risk of loss. In addition, the collateral and security arrangements in relation to such loans will be subject to such security or collateral having been correctly created and perfected and any applicable legal or regulatory requirements which may restrict the giving of collateral or security by a borrower under a loan, such as, for example, thin capitalization, over-indebtedness, financial assistance and corporate benefit requirements. If senior loans do not benefit from the expected collateral or security arrangements, it may affect the value of such senior loans.

Small Companies. First Eagle Alternative Capital BDC, Inc. may invest on behalf of its clients in small and/or less well-established companies. While smaller companies generally have potential for rapid growth, they often involve higher risk because they lack the management experience, financial resources, product diversification and/or competitive strength of larger corporations. Such companies may have shorter operating histories upon which to judge future performance and, in many cases, may have negative cash flows. In addition, in many instances, the frequency and volume of their trading is substantially less than is typical of larger companies. As a result, the securities or loans of smaller companies may be subject to wider price fluctuations. In addition, due to thin trading in some of those stocks, bonds or loans, an investment in those stocks, bonds or loans may be considered less liquid than an investment in many large-capitalization stocks, bonds or loans. When making large sales, First Eagle Alternative Capital BDC, Inc. may have to cause its clients to sell portfolio holdings at discounts from quoted prices or may have to make a series of small sales over an extended period of time due to the trading volume of smaller company securities.

Combination or "Layering" of Multiple Risks

Although the various risks to which clients are subject are discussed in this Item 8 and in the offering documents of the relevant client, as applicable, separately, the risks that clients bear are increased based on the effects of the interplay of risk factors; where more than one significant risk factor is present, the risk of loss can be significantly increased.

Item 9. Disciplinary Information

Item 9 is not applicable to First Eagle Alternative Capital BDC, Inc. as it has no reportable material legal or disciplinary events.

Item 10. Other Financial Industry Activities and Affiliations

First Eagle Alternative Capital BDC, Inc. is an externally managed, non-diversified closed-end management investment company incorporated in Delaware on May 26, 2009, that has elected to be regulated as a business development company, or BDC, under the 1940 Act. Its investment activities are managed by FEAC and supervised by its board of directors, a majority of whom are independent of FEAC and its affiliates. Officers of First Eagle Alternative Capital BDC, Inc. are also employees of FEAC.

FEAC is the wholly owned subsidiary of FEIM. FEIM provides investment advisory services primarily to mutual funds, private funds and institutional separately managed accounts. FEIM is the investment adviser to certain registered investment companies the First Eagle Funds and First Eagle Variable Funds, which are registered investment companies. Client accounts are generally managed by FEIM on a discretionary basis. Investment decisions are based on the investment strategy chosen by the client, in line with any applicable guidelines and/or restrictions. For separately managed accounts, FEIM has agreed with clients to abide by certain restrictions, including but not limited to restrictions on securities or types of securities. In FEIM's management of a client's account, FEIM is not responsible for and does not consider any securities, cash or investments owned by the client, the client's financial circumstances or investment objectives outside of the client's investment with FEIM.

FEIM is a subsidiary of First Eagle Holdings, Inc., a holding company incorporated in Delaware ("FE Holdings"). A controlling interest in FE Holdings is owned by BCP CC Holdings L.P., a Delaware limited partnership ("BCP CC Holdings"). BCP CC Holdings GP L.L.C., a Delaware limited liability company ("BCP CC Holdings GP"), is the general partner of BCP CC Holdings and has two managing members, Blackstone Capital Partners VI L.P. ("BCP VI") and Corsair IV Financial Services Capital Partners L.P. ("Corsair IV"). BCP VI and Corsair IV are indirectly controlled by The Blackstone Group L.P. ("Blackstone") and Corsair Capital LLC ("Corsair"), respectively. Investment vehicles indirectly controlled by Blackstone and Corsair and certain co-investors own a majority economic interest in FE Holdings and FEIM through BCP CC Holdings.

Certain private investment funds, including BCP VI and Corsair IV, are managed by affiliates of Blackstone and Corsair, along with certain co-investors, who indirectly own or have the power to directly own a controlling interest in FE Holdings. (Blackstone Management Partners, L.L.C., a registered investment adviser, is the investment adviser to BCP VI. Blackstone and Corsair own and/or control other investment advisers, broker dealers and sponsors of investment funds.) FE Holdings is the managing member of FEIM. There are also non-managing members of FEIM that were formed to provide employees of FEIM and certain of its subsidiaries with equity interests in FEAC. FEAC is a wholly owned subsidiary of FEIM and is marketed as the alternative credit group of FEIM. From time to time, various potential and actual conflicts of interest arise from the overall advisory, investment and other activities of Blackstone and Corsair, their affiliates and personnel. In addition to policies and procedures that have been adopted by FEIM and FEAC to mitigate potential conflicts and comply with applicable law, Blackstone and Corsair have adopted certain policies and procedures (e.g., information barriers) to mitigate potential conflicts of interest that each has with its portfolio companies and to address certain regulatory requirements and contractual restrictions. This could result in fewer investment opportunities for FEIM and First Eagle Alternative Capital BDC, Inc. clients.

Certain other employees have interests in or are affiliated with other investment advisers, broker dealers or financial services firms. Certain directors of FE Holdings have industry affiliations with other financial firms, including firms affiliated with Blackstone and/or Corsair; a non-employee director founded another registered investment adviser and serves on the board of the Funds; two employee-directors are principals of an investment advisor invested in FE Holdings; and certain FE Holdings non-employee directors may serve as directors of broker-dealer firms or as principals of investment adviser firms which may do business with FEIM and its clients.

From time to time, various potential and actual conflicts of interest arise from the overall advisory, investment and other activities of Blackstone and Corsair, their affiliates and personnel. The following briefly summarizes some of these conflicts but is not intended to be an exhaustive list of all such conflicts. Certain of these potential or actual conflicts exist notwithstanding that neither Blackstone, Corsair nor their affiliates may technically be a management person or an affiliated person of FEAC.

On behalf of clients, First Eagle Alternative Capital BDC, Inc. has the right to enter into agreements, transactions, loans, brokerage, underwriting or other arrangements with Blackstone and/or Corsair affiliates and portfolio companies, including transactions involving the securities of such companies. From time to time, employees of Blackstone and Corsair serve as directors or advisory board members of certain issuers of clients' investments or other entities and earn compensation from such activities. It is expected that FEAC's investments in such issuers, if any, would not have a material impact on such compensation.

Information Barriers and Blackstone/Corsair

By virtue of their respective ownership interests in FEAC, Blackstone and Corsair will have access to information that First Eagle Alternative Capital BDC Inc.'s clients, including their investors, will not have. Blackstone and Corsair will be entitled to receive information regarding FEAC and its activities, including, without limitation, information about First Eagle Alternative Capital BDC Inc., its clients (together with information about clients' portfolios, subscriptions, withdrawals and other information relating to clients), as well as confidential, proprietary information about First Eagle Alternative Capital BDC Inc..

In addition to policies and procedures that have been adopted by FEIM and FEAC to mitigate potential conflicts and comply with applicable law, Blackstone and Corsair have adopted certain policies and procedures, including information barriers, to mitigate potential conflicts of interest that each has with its portfolio companies and to address certain regulatory requirements and contractual restrictions. This results in reduced investment opportunity for First Eagle Alternative Capital BDC Inc.'s clients. First Eagle Alternative Capital BDC Inc. maintains a restricted list of companies whose securities are subject to trading prohibitions due to the business activities of Blackstone and Corsair. A client's account could be prohibited from buying or selling securities on the restricted list until the restriction is lifted, which could disadvantage the client's account. Notwithstanding internal controls, it is possible that a breach of the information barrier policies and procedures could occur which breach could result in the potential misuse of material non-public information. Such a potential misuse of material non-public information could have adverse effects on the reputations of FEIM, FEAC and First Eagle Alternative Capital BDC Inc., potentially resulting in the imposition of regulatory or financial sanctions and, as a consequence, negatively impacting First Eagle Alternative Capital BDC Inc.'s

ability to perform investment management services on behalf of its clients.

Blackstone and Corsair have represented creditors or debtors in proceedings under Chapter 11 of the Bankruptcy Code or prior to such filings. From time to time Blackstone and Corsair serve as advisors to creditor or equity committees. While FEAC has adopted policies and procedures, including information barriers, to mitigate potential conflicts and reduce the risk that First Eagle Alternative Capital BDC Inc. would face restrictions under these circumstances, the participation of Blackstone or Corsair in any such activities could potentially limit or preclude the flexibility that First Eagle Alternative Capital BDC Inc.'s clients may otherwise have to participate in restructurings. Alternatively, First Eagle Alternative Capital BDC Inc. could be required to liquidate any existing client positions of the applicable portfolio entity. The inability to transact in any security, derivative or loan held by a client could result in significant losses to a client.

In addition, Blackstone or Corsair, as applicable, may take actions with respect to an issuer of an investment held by clients that have a material adverse effect on the value of such investment.

Information Barriers and FEIM

As a general matter, there is no information barrier between First Eagle Alternative Capital BDC Inc. and FEIM. Accordingly, FEIM's receipt of confidential information in the course of its business activities will restrict First Eagle Alternative Capital BDC Inc.'s trading and investment activities. However, from time to time, in limited circumstances, First Eagle Alternative Capital BDC Inc. and FEIM could determine it appropriate to implement an information barrier. Any such information barrier would be reasonably designed to restrict communications as between First Eagle Alternative Capital BDC Inc. and FEIM so that First Eagle Alternative Capital BDC Inc. may continue to receive confidential information in the course of its business activities, without restricting FEIM's trading and investment activities. In such circumstances, each of FEIM's and First Eagle Alternative Capital BDC Inc.'s investment professionals would be instructed as to their responsibilities not to discuss investment activities with employees on the other side of the information barrier. Legal and compliance personnel would monitor the information barrier and manage any communications between FEIM and First Eagle Alternative Capital BDC Inc. related to potential conflicts and receipt of material, non-public information.

Because there is generally no information barrier between FEIM and First Eagle Alternative Capital BDC Inc., there will be instances where First Eagle Alternative Capital BDC Inc. will be prohibited from making an investment that it would have made if there were an information barrier, resulting in reduced investment opportunity for clients.

Notwithstanding the maintenance of restricted lists and other internal controls, it is possible that a breach of policies and procedures could occur which breach could result in the potential misuse of material non-public information. Such a potential misuse of material, non-public information could have adverse effects on the reputations of FEIM and First Eagle Alternative Capital BDC Inc., potentially resulting in the imposition of regulatory or financial sanctions and, as a consequence, negatively impacting each of FEIM and First Eagle Alternative Capital BDC Inc.'s ability to perform investment management services on behalf of its respective clients.

Other Affiliations

Additionally, FEAC is affiliated with FEF Distributors, LLC ("FEFD"), a limited purpose broker dealer. Certain employees of FEAC are also registered representatives and/or associated persons of FEFD and are required to abide by the Code of Ethics and other policies of FEFD.

First Eagle Alternative Capital BDC, Inc. formed a joint venture with Perspecta Trident LLC to create First Eagle Logan JV, LLC. This joint venture invests primarily in senior secured first lien loans to middle market companies and other corporate debt investments.

Item 11. Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Code of Ethics

First Eagle Alternative Capital BDC, Inc. has adopted a written Code of Ethics and a Code of Business Conduct (collectively, the “Codes”) that are applicable to all of its directors, officers and employees (collectively, “First Eagle Alternative Capital BDC, Inc. Personnel”). In addition, First Eagle Alternative Capital BDC, Inc. has a Compliance Manual (collectively, the “Compliance Manuals”) that are applicable to all employees (with certain exceptions) of First Eagle Alternative Capital BDC, Inc. and FEAC in performing advisory services for clients. The Codes and Compliance Manuals, which are designed to comply with Rules 204A-1 and 206(4)-7 under the Investment Advisers Act of 1940 (as amended, the “Advisers Act”). Rule 204A-1 establishes guidelines for professional conduct and personal trading procedures, including certain pre-clearance requirements and reporting obligations. Rule 206(4)-7 established the requirement for investment advisers to, among other things, have reasonably designed compliance policies and procedures. First Eagle Alternative Capital BDC, Inc. personnel and their families and households may, in limited circumstances, purchase investments for their own accounts, including the same investments as may be purchased or sold for a client, subject to the terms of the Codes and Compliance Manuals. Under the Codes and Compliance Manuals, as applicable, First Eagle Alternative Capital BDC, Inc. personnel are also required to file certain periodic activity reports with First Eagle Alternative Capital BDC, Inc.’s Chief Compliance Officer as required by Rule 204A-1 under the Advisers Act. The Codes and Compliance Manuals help First Eagle Alternative Capital BDC, Inc. detect and prevent potential conflicts of interest.

First Eagle Alternative Capital BDC, Inc. personnel who violate the Codes or Compliance Manuals may be subject to remedial actions, including, but not limited to, profit disgorgement, fines, censure, demotion, suspension or dismissal. First Eagle Alternative Capital BDC, Inc. personnel are also required to promptly report any violation of the Codes of which they become aware. Senior management and all directors of First Eagle Alternative Capital BDC, Inc. are required to annually certify compliance with the Codes.

Copies of the Codes are available, free of charge, to any client or prospective client upon written request to: First Eagle Alternative Capital BDC, Inc., Attention: Chief Compliance Officer, 227 W. Monroe Avenue, Suite 3200, Chicago, IL 60606.

Conflicts of Interest

The Greenway Fund is a portfolio company of First Eagle Alternative Capital BDC, Inc. Certain of First Eagle Alternative Capital BDC, Inc.’s officers serve or may serve in an investment management capacity to the Greenway Fund. As a result, investment professionals may allocate such time and attention as is deemed appropriate and necessary to carry out the Greenway Fund’s operations. In this respect, they are expected to experience diversions of their attention from First Eagle Alternative Capital BDC, Inc. and potential conflicts of interest between their work for First Eagle Alternative Capital BDC, Inc. and their work for the Greenway Fund in the event that the interests of the Greenway Fund run counter to First Eagle Alternative Capital BDC, Inc.’s interests.

The Greenway Fund and related separate account invest in securities similar to those of First Eagle Alternative Capital BDC, Inc. pursuant to investment and allocation guidelines in the applicable Governing Documents which may address, among other things, the size of the borrowers, the types of transactions and the concentration and investment ratio amongst the Greenway Fund and related separate account and First Eagle Alternative Capital BDC, Inc., and are subject to certain approvals by the First Eagle Alternative Capital BDC, Inc. board of directors, if applicable. However, First Eagle Alternative Capital BDC, Inc. has the discretion to invest in other securities. Clients' investments may be made at the direction of the same individuals acting in their capacity on behalf of First Eagle Alternative Capital BDC, Inc. and the clients. As a result, there may be conflicts in the allocation of investment opportunities between First Eagle Alternative Capital BDC, Inc. and the clients.

Additionally, First Eagle Alternative Capital BDC, Inc. is subject to certain co-investment conditions pursuant to an SEC Exemptive order received on (i) September 5, 2014 with respect to transactions with the Greenway Fund and (ii) July 13, 2021 with respect to transactions with certain affiliates other than the Greenway Fund (replacing the Exemptive orders received on September 19, 2018 and December 8, 2015).

In the case of all conflicts of interest, First Eagle Alternative Capital BDC, Inc.'s determination as to which factors are relevant, and the resolution of such conflicts, will be made using First Eagle Alternative Capital BDC, Inc.'s best judgment, but in its sole discretion, and are subject to certain approvals by the First Eagle Alternative Capital BDC, Inc. board of directions, if applicable. In resolving conflicts, First Eagle Alternative Capital BDC, Inc. may consider various factors, including the interests of the applicable clients with respect to the immediate issue and/or with respect to their longer-term courses of dealing. In recognition of its fiduciary duties, it is the policy of First Eagle Alternative Capital BDC, Inc. to treat clients fairly and equitably in the allocation of investment opportunities and transactions more generally.

First Eagle Alternative Capital BDC, Inc. has adopted written policies and procedures relating to the allocation of investment opportunities, and it will make allocation determinations consistently therewith.

Follow-On Investments

Follow-on investments in portfolio companies, including investments to finance follow-on acquisitions, may present conflicts of interest, including determination of the terms of the new financing as well as the allocation of the investment opportunities and are subject in certain circumstances to the approval by the First Eagle Alternative Capital BDC, Inc. board of directors. Conflicts of interest are expected to arise, including determinations of whether existing investors are being cashed out at a price that is higher or lower than market value and whether new investors are paying too high or too low a price for the company or purchasing securities with terms that are more or less favorable than the prevailing market terms.

Material, Nonpublic Information

First Eagle Alternative Capital BDC, Inc. from time to time becomes aware of material, nonpublic information that affects its ability to buy, sell, or hold a security for a client account. In addition, employees, directors and officers of First Eagle Alternative Capital BDC, Inc. and/or its

affiliates occasionally serve as directors or officers of outside companies. In these situations, First Eagle Alternative Capital BDC, Inc. or its associated persons obtain material, nonpublic or other confidential information that, if disclosed, might affect an investor's decision to buy, sell or hold a security. Under applicable law, such persons cannot improperly disclose or use this information for their personal benefit or for the benefit of any person, including clients of First Eagle Alternative Capital BDC, Inc. If First Eagle Alternative Capital BDC, Inc. or its associated persons obtain nonpublic or other confidential information in breach of a duty about any issuer, First Eagle Alternative Capital BDC, Inc. will have no obligation to disclose the information to any client or use it for any client's benefit. Due to these restrictions, a transaction in a client account may not be able to be initiated that First Eagle Alternative Capital BDC, Inc. otherwise might have initiated and may not be able to sell an investment that it otherwise might have sold. First Eagle Alternative Capital BDC, Inc. has implemented policies and procedures reasonably designed to prevent the misuse of material, nonpublic information. Specifically, the procedures address the prohibition on trading on inside information, physical security and prohibited communications surrounding inside information, and the maintenance of restricted lists.

Principal Transactions

First Eagle Alternative Capital BDC, Inc. is authorized to engage in effecting a transaction on behalf of a client while acting as principal for its own accounts and must disclose its role in the transaction to the client in writing and obtain the client's consent before the transaction settles. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any client. The mechanics of such transactions are discussed further below.

Agency Cross Transactions / Cross Transactions

An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the Client and for another person on the other side of the transaction. Agency cross transactions arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer. FEAC's affiliate, FEFD, is a limited purpose broker-dealer engaged in the distribution of investment products sponsored by FEIM and its affiliates, including FEAC.

To the extent permitted under applicable law, from time to time, when it deems it to be appropriate for one client to purchase a security and for another to sell the same security (i.e., a cross trade), First Eagle Alternative Capital BDC, Inc. may place such cross trades for its clients. Cross trades conducted by First Eagle Alternative Capital BDC, Inc. may be conducted with one or more broker-dealers or First Eagle Alternative Capital BDC, Inc. will effect the cross trade through the applicable custodians in an attempt to seek the best execution for each client by obtaining reduced transaction or executions costs for each client. In certain private transactions, First Eagle Alternative Capital BDC, Inc. from time to time expects to conduct cross trades in directly originated loan transactions which may not be exposed to market forces and, in such instances, it is possible that a Client will not receive the best price otherwise possible. Since, in any such cross-trade transaction, First Eagle Alternative Capital BDC, Inc. will represent both the client-seller and the client-buyer, First Eagle Alternative Capital BDC, Inc. will have a conflict of interest given the obligation to seek the best price and most favorable execution. First Eagle Alternative Capital BDC, Inc. has established policies and procedures to mitigate such conflicts of interest and execute such transactions in compliance with the Advisers Act. First Eagle Alternative Capital BDC, Inc. will not execute cross trades for client accounts that are subject to the Employee Retirement

Income Security Act of 1974, as amended (“ERISA”), and when executing cross trades for registered investment companies, e.g., mutual funds, it will only do so in accordance with Section 17(a) of the 1940 Act. First Eagle Alternative Capital BDC, Inc. will not receive any commission or other transaction-based compensation for effecting any such transaction.

Overlapping Ownership

From time to time, First Eagle Alternative Capital BDC, Inc. invests clients’ assets in investments that are also held by:

- (1) First Eagle Alternative Capital BDC, Inc. or its affiliates;
- (2) other clients;
- (3) funds or accounts in which First Eagle Alternative Capital BDC, Inc. or its affiliates or their respective officers or employees have an ownership or economic interest; or
- (4) First Eagle Alternative Capital BDC, Inc.’s officers or employees or the officers or employees of First Eagle Alternative Capital BDC, Inc.’s affiliates.

First Eagle Alternative Capital BDC, Inc. also invests on behalf of clients in the same or different instruments of issuers in which the following also hold instruments issued by such issuers:

- (1) First Eagle Alternative Capital BDC, Inc. or its affiliates;
- (2) other clients;
- (3) funds or accounts in which First Eagle Alternative Capital BDC, Inc. or its affiliates or their respective officers or employees have an ownership or economic interest; or
- (4) First Eagle Alternative Capital BDC, Inc.’s officers or employees or the officers or employees of First Eagle Alternative Capital BDC, Inc.’s affiliates who have an ownership interest as a holder of the debt, equity or other instruments of the issuer.

First Eagle Alternative Capital BDC, Inc. also invests, on behalf of clients, in funds that FEAC or its affiliates advise. Clients, from time to time, engage in cross trades where investments held by one client are purchased or sold to another client. Cross trades are typically done for investment reasons such as asset rebalancing, for tax, legal or regulatory reasons or to maximize leverage.

A conflict of interest often exists in connection with these transactions since investments by clients could benefit First Eagle Alternative Capital BDC, Inc. and its affiliates, officers and employees by potentially increasing the value of the investments held in the issuer. From time to time, clients purchase or sell investments from or to other clients or clients of affiliates. Any investment First Eagle Alternative Capital BDC, Inc. makes on behalf of clients or any related disposition will be consistent with applicable law, First Eagle Alternative Capital BDC, Inc.’s fiduciary obligations to act in the best interests of clients and such clients’ investment objectives.

First Eagle Alternative Capital BDC, Inc. generally permits certain of First Eagle Alternative Capital BDC, Inc.’s officers and employees to invest in private funds that First Eagle Alternative Capital BDC, Inc. or its affiliates advise and/or share in the returns, fees or income received from such funds. When an officer or employee is responsible for both the portfolio management of the private fund and other client accounts, such person faces a conflict of interest in connection with investment decisions since the person has an incentive to direct the best investments, or to allocate trades, in favor of the fund in which he or she is invested or otherwise entitled to share in the returns, fees or income.

Certain of First Eagle Alternative Capital BDC, Inc.’s affiliates, officers and employees have

made, and will likely continue to make, small, minority investments in affiliated and unaffiliated private equity funds using investment vehicles other than client. As a result, clients have invested and will likely continue to invest in loans to portfolio companies that are primarily owned by one or more of these unaffiliated private equity funds. Therefore, First Eagle Alternative Capital BDC, Inc. has an incentive to cause clients to invest in portfolio companies owned by private equity funds in which First Eagle Alternative Capital BDC, Inc.'s affiliates, officers and employees have invested. However, because the indirect minority interest that First Eagle Alternative Capital BDC, Inc.'s affiliates, officers and employees have acquired in any such portfolio company is and will likely continue to be very small relative to clients' investments in the loans to such portfolio company, First Eagle Alternative Capital BDC, Inc. believes that the incentive is merely theoretical. Furthermore, First Eagle Alternative Capital BDC, Inc. believes that investments in private equity funds by its affiliates, officers and employees will help us build and improve our relationships with these funds' respective private equity sponsors. First Eagle Alternative Capital BDC, Inc. believes that these improved relationships could yield a greater number of potential investment opportunities for clients in loans to portfolio companies to be acquired, or that are controlled, by these private equity sponsors.

First Eagle Alternative Capital BDC, Inc.'s and its affiliates' portfolio managers are often responsible for the day-to-day management of multiple accounts, including our accounts and the accounts of our affiliates. The potential for material conflicts of interest exists whenever a portfolio manager has responsibility for the day-to-day management of multiple advisory accounts. As noted above, these conflicts could be greater if a portfolio manager is also responsible for managing a proprietary account or when First Eagle Alternative Capital BDC, Inc. and/or its affiliates have an investment in one or more such accounts or an interest in the performance of one or more such accounts through the receipt of a fee.

Certain conflicts of interest are disclosed in client documents. Some conflicts of interest are particularly acute, in particular, principal trades, and First Eagle Alternative Capital BDC, Inc. has the ability to seek client consent for transactions of this nature. Client consent could come directly from the client or its investors, or if permitted by the client documents, by an independent investor representative or adviser, independent directors or an independent conflicts committee. In situations in which consent is required from a private fund in connection with a principal trade, consent generally will be obtained from, respectively, the investor advisory committee of the applicable private fund, and not the individual investors of the private fund interests. The mechanics for obtaining consent or other conflicts resolution are summarized below with respect to funds (as well as holding companies) and are described in more detail in the relevant Governing Documents.

Differing Investment Positions

First Eagle Alternative Capital BDC, Inc. generally takes directionally similar positions on behalf of clients. For example, if one client purchases a loan in a particular issuer, it would be atypical for another client to take a short position in that same issuer.

However, it is possible that, from time to time, an account First Eagle Alternative Capital BDC, Inc. advises will take an investment position different from a position taken by another account that First Eagle Alternative Capital BDC, Inc. or a related party manages. For example, a client that First Eagle Alternative Capital BDC, Inc. manages could hold a senior loan in an issuer, while a client that First Eagle Alternative Capital BDC, Inc. or a related party advises holds a mezzanine loan or an equity investment in the same issuer. If an issuer in which different accounts hold different types of investments encounters financial problems, decisions over the terms of any

workout will raise conflicts of interest (including, for example, conflicts over proposed waivers and amendments to debt covenants). For example, a senior debt holder would likely be advantaged by a liquidation of an issuer in which such holder will be paid in full, whereas a junior debt holder or an equity holder would likely prefer a reorganization that holds the potential to create more value for such holders. Further, a certain client, from time to time, will seek to sell interests in loans that are also held by other client. In certain circumstances, the sale of an interest in a loan by one client could temporarily affect the market value of the interests in the loan that are held by other clients. In these situations, positions First Eagle Alternative Capital BDC, Inc. takes could disadvantage one or more accounts.

Where conflicts occur, in all circumstances, First Eagle Alternative Capital BDC, Inc. will act in a manner that First Eagle Alternative Capital BDC, Inc. believes to be consistent with our fiduciary duties to all clients, without consideration of our interests or the interests of a related party.

Management of Client Accounts

First Eagle Alternative Capital BDC, Inc. is subject to certain additional conflicts of interest in its management of client accounts. These conflicts could arise primarily from the involvement of First Eagle Alternative Capital BDC, Inc., FEAC, and their affiliates (collectively, the “FEAC Group”) in other activities that may conflict with those of client accounts. The FEAC Group engages in a broad spectrum of activities. In the ordinary course of its business activities, the FEAC Group may engage in activities where the interests of the FEAC Group or the interests of its clients are likely to conflict with the interests of First Eagle Alternative Capital BDC, Inc.’s clients. Other present and future activities of the FEAC Group may give rise to additional conflicts of interest that may have a negative impact on First Eagle Alternative Capital BDC, Inc. client accounts. In addition, officers, directors, members or employees of First Eagle Alternative Capital BDC, Inc. serve or expect to serve as officers, directors, principals, consultants to or members of entities that operate in the same or a related line of business, or of accounts sponsored or managed by the FEAC Group. Furthermore, such officers, directors, members or employees of the FEAC Group are also permitted to serve on boards or act in other roles unaffiliated with the FEAC Group and clients, including boards of charitable and educational institutions, public companies and former portfolio companies, and receive compensation in connection with such services and roles. In serving in these multiple capacities, they may have obligations to other clients or investors in those entities, the fulfillment of which likely will not always be in the best interests of First Eagle Alternative Capital BDC, Inc. client accounts.

In addressing these conflicts and regulatory, legal and contractual requirements across its various businesses, certain members of the FEAC Group and its affiliates have implemented certain policies and procedures. For example, FEAC and its affiliates from time to time expect to come into possession of material non-public information with respect to companies in which First Eagle Alternative Capital BDC, Inc. may be considering making an investment or companies that are FEAC’s and its affiliates’ advisory clients. As a consequence, that information, which could be of benefit to First Eagle Alternative Capital BDC, Inc. client accounts, could also restrict the client accounts’ activities and the investment opportunity may otherwise be unavailable to client accounts. Additionally, the terms of confidentiality or other agreements with or related to companies in which any account managed by FEAC Group have or have considered making an investment or which is otherwise an advisory client of FEAC Group and its affiliates may restrict or otherwise limit the ability of First Eagle Alternative Capital BDC, Inc. to direct investments in such companies.

The FEAC Group frequently participates on creditors' committees with respect to the bankruptcy, restructuring or workout of issuers. In such circumstances, First Eagle Alternative Capital BDC, Inc. or FEAC from time to time expect to take, or be required to take, positions on behalf of itself and other accounts and clients that are adverse to the interest of other clients. As a result of such participation, First Eagle Alternative Capital BDC, Inc. may be restricted in trading in such issuers or securities of such issuers.

First Eagle Alternative Capital BDC, Inc. and its affiliates have organized or advised, and expect to organize or advise in the future, investment vehicles that invest in similar or different types of underlying investments.

Legal & Regulatory Restrictions

Applicable agreements with its clients and/or law or regulation may also limit the ability of First Eagle Alternative Capital BDC, Inc. to buy or sell, on behalf of its clients, portfolio companies of funds managed by First Eagle Alternative Capital BDC, Inc. or its affiliates, including funds managed by FEIM. The 1940 Act prohibits certain First Eagle Alternative Capital BDC, Inc. clients from making "joint" transactions with certain of FEAC Group affiliates or affiliated funds, which could restrict such clients from making investments in the same portfolio companies as such affiliates or affiliated funds (whether at the same or different times).

The 1940 Act also prohibits certain "joint" transactions with certain of First Eagle Alternative Capital BDC, Inc. affiliates, which could include investments in the same portfolio company (whether at the same or different times). As a result of these restrictions, First Eagle Alternative Capital BDC, Inc. may be prohibited from buying or selling any security directly from or to any portfolio company of a fund managed by FEAC or its affiliates. These restrictions may limit the scope of investment opportunities that would otherwise be available to First Eagle Alternative Capital BDC, Inc. client accounts.

Fee Structure

As discussed above in Item 6, First Eagle Alternative Capital BDC, Inc. is entitled to a performance fee (i.e., carried interest) under the terms of the Governing Documents of the clients. The existence of carried interest may create an incentive for First Eagle Alternative Capital BDC, Inc. to cause such clients to make more speculative investments than they would otherwise make in the absence of performance-based compensation.

Conflicts Relating to Service Providers

First Eagle Alternative Capital BDC, Inc. reserves the right, in its discretion, to contract with any related person of First Eagle Alternative Capital BDC, Inc. (including but not limited to First Eagle Alternative Capital BDC Inc.'s contracting with FEAC) to perform services for First Eagle Alternative Capital BDC, Inc. in connection with its provision of services to clients. When engaging a related person to provide such services, First Eagle Alternative Capital BDC, Inc. will have an incentive to recommend the related person even if another person is more qualified to provide the applicable services and/or can provide such services at a lesser cost. In most cases, the relevant client will not consent, participate in the negotiations or be directly involved in such arrangements.

First Eagle Alternative Capital BDC, Inc. reserves the right, in its discretion, to recommend to a client or to a portfolio company thereof (in response to a solicitation for a recommendation or

otherwise) that it contract for services with (i) a related person of First Eagle Alternative Capital BDC, Inc. (including but not limited to a portfolio company of a client) or (ii) an entity with which First Eagle Alternative Capital BDC, Inc. or its affiliates or a member of their personnel has a relationship or from which First Eagle Alternative Capital BDC, Inc. or its affiliates or their personnel otherwise derives financial or other benefit. When making such a recommendation, First Eagle Alternative Capital BDC, Inc. may, because of its financial or other business interest, have an incentive to recommend the related or other person even if another person is more qualified to provide the applicable services and/or can provide such services at a lesser cost.

First Eagle Alternative Capital BDC, Inc. may make material investments in portfolio companies that may be service providers of First Eagle Alternative Capital BDC, Inc., FEAC or its affiliates, unless prohibited by client guidelines or regulatory statutes. Certain employees may receive discounts on products and services offered by companies in which a client is an investor or otherwise has interest, similar to what would be given to an employee of such company. In addition, First Eagle Alternative Capital BDC, Inc. may engage certain of clients' portfolio companies to provide goods and services. In these instances, First Eagle Alternative Capital BDC, Inc. engages with the portfolio company at an arm's length, and the portfolio company provides the same pricing and service levels as it would any comparable client or purchaser.

Shared Services Expenses

In the operation of First Eagle Alternative Capital BDC, Inc.'s business and the management of clients, an inherent conflicts are likely to exist arise in connection with shared service expenses. Pursuant to the applicable agreements with clients, certain overhead and back office expenses are allocated to certain clients. In the case of certain categories of services provided, the allocation of expenses requires judgment to determine whether the expense is to be allocated to First Eagle Alternative Capital BDC, Inc., to the client or split ratably between First Eagle Alternative Capital BDC, Inc. and the client. Accordingly, the use of judgment creates a conflict of interest since it is both in First Eagle Alternative Capital BDC, Inc.'s best interest and in the clients' best interest to pay less expenses.

Other Potential Conflicts

First Eagle Alternative Capital BDC, Inc. and the clients will generally engage common legal counsel and other advisors in a particular transaction, including a transaction in which there may be conflicts of interest. In the event of a significant dispute or divergence of interest between clients, First Eagle Alternative Capital BDC, Inc. and/or its affiliates, the parties may engage separate counsel in the sole discretion of First Eagle Alternative Capital BDC, Inc. and its affiliates, and in litigation and other circumstances separate representation may be required.

Please see the discussion above in this Item 11 for a description of the means by which the First Eagle Alternative Capital BDC, Inc. and its related persons may seek to alleviate conflicts of interest among the clients or other persons.

Potential Conflicts in Legal Counsel Engagements

First Eagle Alternative Capital BDC, Inc. and clients generally engage common legal counsel and other advisors in a particular transaction, including a transaction in which there may be conflicts of interest. In the event of a significant dispute or divergence of interests between clients, First

Eagle Alternative Capital BDC, Inc. and/or its affiliates, in their sole discretion, may engage separate counsel, and in litigation and other circumstances separate representation may be required.

Management of Conflicts

All of the transactions and relationships described above involve the potential for conflict of interest between First Eagle Alternative Capital BDC, Inc. (or its employees) and its clients. The Advisers Act and the 1940 Act impose certain requirements designed to mitigate the possibility of conflicts of interest between an investment adviser and its clients. In some cases, transactions may be permitted subject to fulfillment of certain conditions. Certain other transactions may be prohibited. First Eagle Alternative Capital BDC, Inc. has instituted policies and procedures designed to prevent conflicts of interest from arising and, when they do arise, to ensure that it effects transactions for clients in a manner that is consistent with First Eagle Alternative Capital BDC, Inc.'s fiduciary duty to its clients and in accordance with applicable law. First Eagle Alternative Capital BDC, Inc. seeks to ensure that potential or actual conflicts of interest are appropriately resolved, taking into consideration the overriding best interest of the applicable client.

Item 12. Brokerage Practices

First Eagle Alternative Capital BDC, Inc. has the discretion to determine its clients' investments in lower middle-market companies. Given the nature of these direct lending investments, First Eagle Alternative Capital BDC, Inc. does not utilize broker-dealers in connection with such investments.

First Eagle Alternative Capital BDC, Inc.'s allocation of investment opportunities among clients is described in Item 6, "Performance-Based Fees and Side-By-Side Management", Item 10, "Other Financial Industry Activities and Affiliations" and Item 11, "Code of Ethics, Participation or Interest in Client Transactions and Personal Trading."

Item 13. Review of Accounts

Oversight and Monitoring

The investment portfolios of the clients are generally private, illiquid and long-term in nature. Accordingly, First Eagle Alternative Capital BDC, Inc.'s review of them is not directed toward a short-term decision to dispose of securities. However, First Eagle Alternative Capital BDC, Inc. closely monitors the portfolio companies of the clients and generally maintains an ongoing oversight position in such portfolio companies. The portfolios are reviewed by a team of investment professionals on an on-going basis. The team includes the members of the Investment Committee and other investment professionals of First Eagle Alternative Capital BDC, Inc.

Reporting

Investors in the clients will receive, among other things, a copy of audited financial statements of the relevant client within 120 days after the fiscal year end of such client, as well as quarterly financial reports within 45 days after each fiscal quarter end. Clients that are consolidated with First Eagle Alternative Capital BDC, Inc. (if any) will receive such financial statements on a consolidated basis. First Eagle Alternative Capital BDC, Inc. may from time to time, in its sole discretion, provide additional information relating to such client and to one or more investors in such client as it deems appropriate.

First Eagle Alternative Capital BDC, Inc. provides separate account clients with certain unaudited quarterly and annual reports as set forth in the applicable Governing Documents.

Item 14. Client Referrals and Other Compensation

First Eagle Alternative Capital BDC, Inc. has no current solicitation arrangements or placement agreements in place and does not anticipate entering into any in the future.

Item 15. Custody

First Eagle Alternative Capital BDC, Inc. may be deemed to have custody of the Greenway Fund's assets. Custody of the Greenway Fund's assets is maintained in compliance with applicable rules and regulations set forth in the Advisers Act. Where required, cash and securities are maintained at a financial institution meeting the Advisers Act definition of a "qualified custodian". In addition, the financial statements of the Greenway Fund are audited annually and distributed to investors within 120 days of the applicable fiscal year-end of the respective Greenway Fund.

First Eagle Alternative Capital BDC, Inc. is deemed to have custody of the separately managed client account. The separately managed account client receives a statement from the qualified custodian. Separately managed clients are urged to compare the qualified custodian statements to those provided by First Eagle Alternative Capital BDC, Inc. for accuracy.

First Eagle Alternative Capital BDC, Inc. has implemented written policies and procedures to ensure compliance with the Advisers Act custody requirements.

Item 16. Investment Discretion

Investment advice is provided directly to the clients. To the extent a client is a private fund, the advice is provided to the client and not individually to the underlying investors in the fund. Services are provided to each client in accordance with its Governing Documents. Investment restrictions for a client, if any, are generally established in a client's Governing Documents.

Item 17. Voting Client Securities

Clients generally cannot direct First Eagle Alternative Capital BDC, Inc.'s vote.

First Eagle Alternative Capital BDC, Inc. has delegated its proxy voting responsibility to FEAC. The Proxy Voting Policies and Procedures of FEAC are set forth below. The guidelines are reviewed periodically by FEAC and First Eagle Alternative Capital BDC, Inc.'s independent directors, and, accordingly, are subject to change.

FEAC is registered as an investment adviser under the Advisers Act. As an investment adviser registered under the Advisers Act, FEAC has fiduciary duties to First Eagle Alternative Capital BDC, Inc. As part of this duty, FEAC recognizes that it must vote client securities in a timely manner free of conflicts of interest and in First Eagle Alternative Capital BDC, Inc.'s best interests and the best interests of its clients and stockholders. FEAC's Proxy Voting Policies and Procedures have been formulated to ensure decision-making consistent with these fiduciary duties.

These policies and procedures for voting proxies for First Eagle Alternative Capital BDC, Inc.'s clients are intended to comply with Section 206 of, and Rule 206(4)-6 under, the Advisers Act.

FEAC evaluates routine proxy matters, such as proxy proposals, amendments or resolutions on a case-by-case basis. Routine matters are typically proposed by management, and FEAC will normally support such matters so long as they do not measurably change the structure, management control, or operation of the corporation and are consistent with industry standards as well as the corporate laws of the issuer's state of incorporation.

FEAC also evaluates non-routine matters on a case-by-case basis. Non-routine proposals concerning social issues are typically proposed by stockholders who believe that the corporation's internally adopted policies are ill-advised or misguided. If FEAC has determined that management is generally socially responsible, FEAC will generally vote against these types of non-routine proposals. Non-routine proposals concerning financial or corporate issues are usually offered by management and seek to change a corporation's legal, business or financial structure. FEAC will generally vote in favor of such proposals provided the position of current stockholders is preserved or enhanced. Non-routine proposals concerning stockholder rights are made regularly by both management and stockholders. They can be generalized as involving issues that transfer or realign board or stockholder voting power. FEAC typically would oppose any proposal aimed solely at thwarting potential takeovers by requiring, for example, super-majority approval. At the same time, FEAC believes stability and continuity promote profitability. FEAC's guidelines in this area seek a middle road and individual proposals will be carefully assessed in the context of their particular circumstances.

If a vote involves a material conflict of interest or the appearance of one, prior to approving such vote, FEAC must consult with its chief compliance officer to determine whether the potential conflict is material and if so, the appropriate method to resolve such conflict. If the conflict is determined not to be material, FEAC's employees shall vote the proxy in accordance with FEAC's proxy voting policy.

Copies of relevant proxy voting records, identifying how proxies were voted in connection with a client and copies of proxy voting policies are available free of charge to any client or prospective client upon written request to Chief Compliance Officer, First Eagle Alternative Capital BDC, Inc., 227 W. Monroe Avenue, Suite 3200, Chicago, IL 60606 or andrew.morris@firsteagle.com.

Item 18. Financial Information

First Eagle Alternative Capital BDC, Inc. does not require or solicit prepayment of its fees. There are no financial conditions that are likely to impair First Eagle Alternative Capital BDC, Inc.'s ability to meet its contractual commitments to clients. First Eagle Alternative Capital BDC, Inc. is not otherwise required to provide information about its financial position.