

**WHISTLEBLOWER PROTECTION POLICIES AND PROCEDURES**  
**FOR**  
**PENNANTPARK INVESTMENT CORPORATION**  
**PENNANTPARK FLOATING RATE CAPITAL LTD.**  
**PENNANTPARK PRIVATE INCOME FUND**  
**PENNANTPARK ENHANCED INCOME FUND**

- **Requirement.** Pursuant to Section 301 or Section 806, as applicable, of the Sarbanes-Oxley Act and, as applicable, Rule 10A-3(b)(3), the audit committee of the board of directors/trustees for PennantPark Investment Corporation (“PNNT”), PennantPark Floating Rate Capital Ltd. (“PFLT”), PennantPark Private Income Fund (“PIIF”) and PennantPark Enhanced Income Fund (“PEIF”, and each of PNNT, PFLT, PIIF, and PEIF a “Company”) (each, an “Audit Committee”) must establish procedures for:
  - the receipt, retention, and treatment of complaints received by such an issuer of concerns regarding accounting, internal accounting controls, or auditing matters; and
  - the confidential, anonymous submission by employees of the listed issuer of concerns regarding questionable accounting or auditing matters.
  
- In addition, Section 922 of the Dodd-Frank Act established a whistleblower program prohibiting any form of retaliation by an employer against a whistleblower because of any lawful act done by the whistleblower in providing information to the SEC and no Firm or “person may take any action to impede an individual from communicating directly with the Commission staff about a possible securities law violation, including enforcing, or threatening to enforce, a confidentiality agreement . . . with respect to such communications.”
  
- **Policy.** Each Company wishes to maintain a strong compliance program with policies and procedures reasonably designed to prevent the violation of the federal securities laws. Each Audit Committee therefore has established these procedures and adopted the policies set forth below to ensure a robust whistleblower program (the “Policy”).
  - Each Company and its officers, employees, contractors and agents are prohibited from taking retaliatory action against any other officer, contractor and agent, or employee, who provides information or assists in investigations regarding any alleged securities fraud or securities violations.<sup>50</sup> If a Company were to take retaliatory action, it would be forced to pay the employee a comprehensive list of compensatory damages, including litigation costs. Individuals that intentionally take such retaliatory action are subject to fines and up to 10 years imprisonment.
  - Furthermore, nothing contained in this policy limits or impedes an employees' ability to report concerns or a complaint directly with the SEC, the Equal Employment Opportunity Commission, the National Labor Relations Board, the Occupational Safety and Health Administration or any other federal, state or local governmental agency or commission (“Government Agencies”). This Policy does not limit employees' ability to communicate with any Government Agencies or otherwise participate in any investigation or proceeding that may be conducted by any Government Agencies or other authority, including providing documents or other information, without notice to the Company. Finally, the

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<sup>50</sup> Each Company is externally managed and has no employees. Accordingly, references herein to “employees” are intended to include employees of the relevant Company’s investment adviser performing similar functions.

Policy does not limit employees' right to receive an award for information provided to any Government Agencies or other authority.

- **Reporting.** Officers of each Company are encouraged to report to their supervisor, senior management and/or Chief Compliance Officer (“CCO”) any of the following: (a) questionable or improper accounting, internal controls, auditing matters, disclosure, or fraudulent business practices and (b) violations and suspected violations of the Investment Advisers Act of 1940, as amended, Investment Company Act of 1940, as amended, or other federal securities laws (hereinafter, collectively referred to as the “Concerns”). The Concerns can be submitted confidentially or anonymously and may be report to the CCO or a member of the Audit Committee as deemed necessary by the whistleblower.
- **Records.** The CCO will maintain all documentation with respect to reported Concerns and the investigation thereof for a minimum of five years, commencing as of the end of the fiscal year during which the record or the last entry on the record was made, whereby the first two years such documentation will be accessible at an appropriate office of the Firm or as otherwise appropriate.
- **State Specific Requirements.** Any employee in California also has the right to report suspected unlawful activity to the California Office of the Attorney General’s whistleblower hotline at (800) 952-5225. The Attorney General shall refer calls received on its whistleblower hotline to the appropriate governmental authority for review and possible investigation.

November 20, 2025