ARDEAPARTNERS

Business Continuity and Technology Disaster Management and Recovery Program Overview

Last reviewed: February 14, 2020

Purpose and Governance

Business continuity and technology disaster management and recovery is a critical priority for Ardea. Ardea maintains its business continuity and technology disaster management and recovery program (the "Program") to reasonably ensure its continued ability to serve its clients and facilitate activities designed to protect Ardea during a business continuity event (i.e., an interruption with potential impact to normal business activity of Ardea's personnel, operations, technology, suppliers, and/or facilities). The Program's core functions are business continuity planning (with associated testing) and crisis management. Ardea has identified key management personnel responsible for coordination of the Program with oversight by Ardea's senior management.

No contingency plan can be failsafe or provide absolute assurance that an interruption in business will not occur or that negative consequences will not ensue from a crisis or event. Because natural and other disruptions — even if anticipated — generally are unpredictable and can change over time, no plan when originally designed or even if later modified can anticipate every contingency or need. That said, Ardea is committed to ensuring that its Program is comprehensive and up-to-date, particularly as new information, techniques, and technologies become available. Ardea may alter, add to, or eliminate specific aspects of the Program as it judges appropriate.

Business Continuity Planning

Ardea maintains business continuity plans identifying processes and strategies to continue business critical processes during a business continuity event. These plans address operational disruptions of varying scope, including, but not limited to, Ardea-only disruptions, medium scale and large scale events involving the disruption of operations and displaced personnel or disruptions at critical third party vendors that the firm depends on. Operational disruptions caused by cyber-security incidents impacting the confidentiality, availability or integrity of our systems and the systems at critical third-party vendors are also in scope. Ardea also periodically tests the plans so as to provide a reasonable expectation that, during a business continuity event, Ardea will be able to recover and perform its critical business processes and limit the impact of the event to Ardea and its clients.

As part of its business continuity planning, Ardea identifies and assesses the potential impact of threats that may significantly disrupt its business or its business operations. As part of this assessment, Ardea periodically conducts an impact analysis to prioritize business processes, which is subsequently reviewed and approved by senior management. Ardea also tests the viability of its business continuity plans by performing critical business processes using the recovery strategy incorporated in its business continuity plans, including testing its failover capability. Ardea's plans also consider the potential need for its business operations to be supported by personnel operating from non-Ardea premises, including their homes, through the use of secure remote access solutions should an incident occur which requires personnel to be dispersed. Potential scenarios include a biological, chemical or pandemic "event" in or near a location in which Ardea does business.

Business continuity plans document recovery strategies that identify and detail the options available to recover critical business processes during an event. The plans also identify roles and responsibilities and communication procedures when plans are invoked for an event. Business continuity plans are periodically reviewed by designated Ardea personnel and disseminated to staff.

Business Continuity Crisis Management

Crisis management is the process of identifying and managing Ardea's operations during business continuity events. Designated Ardea personnel monitor and assess situations for the impact on business operations and to determine their potential to become business continuity events. Designated Ardea staff are responsible for escalating business continuity events to Ardea senior management and designated personnel, as appropriate. Ardea's crisis management process also includes coordination of internal and external communication to key stakeholders, including personnel, regulators, suppliers, and customers.

Business Continuity Training and Awareness

Ardea has developed a program for providing periodic business continuity training to all personnel. Training is designed to promote an understanding of business continuity and the roles of designated Ardea personnel during a business continuity event and as the business recovers. Personnel are responsible for completing the training and familiarizing themselves with Ardea's business continuity plans.

Business Continuity Supplier Risk

Ardea assesses and performs risk-based due diligence on third-party service providers' resiliency and ability to continue to provide services during an event. As part of that assessment and due diligence, Ardea periodically evaluates vendors and suppliers of in-scope services. Technology testing with these vendors is conducted periodically, as appropriate.

For specific vendor locations where vendor staff provide services on behalf of Ardea using Ardea data and support a critical business process, Ardea and those vendors develop and maintain a business continuity plan for those vendors.

Technology Disaster Recovery

Ardea's primary data centers are built to be redundant, resilient and fault tolerant. Disaster recovery plans supporting business continuity are in place for critical technology assets across Ardea. Recovery capabilities are tested regularly to confirm that technology assets will operate as intended during a business continuity event.