

Columbus Circle Investors

BUSINESS CONTINUITY PLAN SUMMARY

Amended July 24, 2017

Columbus Circle Investors (**CCI**) has developed and implemented a Business Continuity Plan (**BCP**) to facilitate continued business in the event of a Significant Business Disruption (**SBD**). Due to the confidential nature and sensitivity of the information and procedures contained in its BCP, CCI has created this Summary. This Summary will provide a general overview of the BCP's contents and focal areas without divulging critically sensitive and protected information of CCI and its employees and service providers.

CCI's BCP addresses a variety of SBDs, including Local SBDs (flood, fire, power outage), Intermediate SBDs (inability to access the building, compromised primary computer servers), and Widespread SBD (East Coast blackout, pandemic, terror attack). In each SBD, the BCP provides for the safety of our employees as well as for redundant or alternate means of communication with our employees, clients, investors and service providers; strategies to monitor/cancel trade instructions and protect our required books and records; and methodologies to continue/resume normal business operations.

CCI's BCP and DR Plan identify primary teams to oversee the development and testing of the BCP as well as primary team members charged with the declaration of a disaster in which any (or all) portions of CCI's more detailed DR Plan will be implemented. As the majority of CCI's mission critical systems are not dependent on a single physical location, CCI expects to recover quickly from any SBD with minimal interruption based on the severity of the SBD. In support of the quick recovery initiative, CCI's BCP identifies: mission critical systems; key personnel; evacuation plans; alternate physical locations; remote access procedures; emergency communication plans (including call trees, and contact strategies for key service providers, clients and investors); data backup and recovery plans; and plan testing.

In the event of a SBD, clients, investors, and service providers may continue to contact us on our main phone line at 203-353-6000. During a SBD, the main line will be forwarded to a BCP team member who will be able to assist you with your concerns. If you are unable to reach us by phone, you may email Client Services at tas@columbuscircle.com and a member of CCI will respond as soon as practicable.

CCI's BCP Summary will be posted on its website, www.columbuscircle.com, along with any public communications related to the enactment of our DR Plan. Our BCP and DR Plan are subject to revision and modification and any revised BCP Summary will be posted to our website as necessary. For additional information about CCI's BCP, please contact CCICompliance@columbus.com.