

Business Continuity: Response to COVID-19

May 6, 2020

Describe your firm's BCP plan to address the situation of COVID-19?

As a global enterprise with multiple offices, Tortoise continues to closely monitor the spread of COVID-19, the novel coronavirus and we are leaning into the guidance collected from various sources including the CDC, WHO and other businesses as well as city, county and/or state guidelines. We have implemented actions to help minimize the potential impact of the virus on our employees, clients and operations. With regard to viral outbreaks, Tortoise has identified critical firm functions, lines of communication and external relationships, and has verified back-up support capabilities for all such functions across teams. Tortoise has proactively communicated preventative actions and considerations to all employees. Furthermore, established procedures ensure the ability to work and coordinate tasks remotely. With that, we are following stay-at-home guidelines through the end of May and are carefully considering a return to work plan. We have restricted travel and developed an approach for self-quarantining restrictions based on the guidelines and recommendations published by the Centers for Disease Control and Prevention (CDC). Tortoise is ready to respond as necessary should COVID-19 become more prevalent in the areas where we operate and will support our employees and clients and the continuity of our operations.

Describe the operational steps your firm is taking to manage through the market volatility and any liquidity challenges you have experienced due to the COVID-19 pandemic.

Tortoise continues to closely monitor the spread of COVID-19 and the recent market volatility. Tortoise's team has provided perspectives on pandemic preparedness & market volatility and will continue to do so.

All of these can be found at the link below, please check back for periodic updates.

<https://tortoiseadvisors.com/resources/perspectives-on-pandemic-preparedness-market-volatility/>

Has your BCP/DR plan been tested in the past 12 months?

Yes. In addition to our yearly DR testing (last conducted December 10th, 2019), Tortoise conducted a firm-wide remote work exercise on March 11th, 2020. No issues were reported from the exercise in business continuity.

Are your employees properly equipped to work from a remote location?

Yes. Tortoise has the infrastructure in place to accommodate all employees to work remotely. Tortoise utilizes virtual desktop technology from VMware to all employees. The virtual

environment is encrypted and allows for secure remote access to the firm's information resources.

Do you foresee any impact from the spread of COVID-19 impacting the Firm's ability to trade and manage strategies as a result of any current or potential future business continuity planning (BCP) measures?

Tortoise has identified critical firm functions, lines of communications and external relationships, and has verified back-up support capabilities for all such functions across teams. Tortoise currently has 70 investment professionals and relies on a team approach for portfolio management decisions.

We believe we have adequate resources to continue managing all strategies without impediment.

Has your BCP plan been activated as a result of COVID-19? If so, have there been any material business disruptions as a result? If yes, please describe them.

At this time, we have asked all employees to work remotely and there is no longer a skeleton crew working onsite. This will be in effect until the end of April and will be reevaluated as needed. There have been no material business disruptions reported.

Are you working with your critical vendors to confirm their pandemic plans and ensure that they can provide continued service to your firm? Have you uncovered any material concerns?

We are in regular contact with key vendors to ensure they have the ability to continue providing services without interruption. To date, there are no material concerns.

At the firm level, have you provided employees any guidance on travel and/or implemented travel restrictions (both business and personal)?

We are continually monitoring developments based on information from the CDC and other health agencies around the globe. Tortoise has suspended all business travel through the end of April and will then re-evaluate. Further, all employees traveling for personal reasons are required to report travel to Human Resources to ensure recommended CDC measures are being followed. Before an employee can return to the work area, Human Resources will evaluate and very likely request employees to work remote for up to 14 days.