

BUSINESS CONTINUITY PLAN AND POLICY

SEACREST PETROLEO BERMUDA LIMITED

In order to preserve business continuity and to protect against destruction, loss or damage of Group and client information due to a significant business disruption (an "**SBD**"), such as storm, fire or water damage or significant technological failures, the Group has in place a formal business continuity plan. As used herein, "**Group**" means Seacrest Petroleo Bermuda Limited and its subsidiaries and affiliates, and "**Group Company**" means any of them.

The Group maintains back-up copies of paper books and records that are required by law or necessary for operating purposes at a third party service provider in Bermuda, who has a redundancy system in an alternative location. The Group's Chief Compliance Officer (the "**CCO**") or his or her designee is responsible for the maintenance of back-up paper books and records. The Group maintains back-up copies of required electronic books and records (including back-ups of e-mail and network file servers) on electronic storage media determined to be appropriate for such purposes by the Group. At least one copy of the Group's books and records are maintained electronically at an off-site record storage facility. The CCO or his or her designee is responsible for the maintenance of back-up electronic books and records.

In the event of an SBD that causes the loss of the Group's paper books and records, the Group will physically recover such books and records from its off-site record storage facility, to the extent required for operating purposes. In the event of an SBD that causes the loss of the Group's electronic books and records, the Group will either physically recover the electronic storage media or electronically recover data from its offsite records storage facility.

In the event of an SBD that renders any of the Group's offices inoperable, the Group will move all essential Group personnel from such office to an alternative office space or spaces. If an SBD is of such a nature that no alternative office space is available or if travel to the alternative office space is impractical, Group personnel may work remotely from their homes, hotels or other leased office space by logging into the Group's systems via internet access and using land lines and/or mobile phones. If an SBD is of such a nature that one or more of the Group's systems are unavailable, the CCO or his or her designee will contact applicable systems vendors to repair the systems, giving priority to repairing systems used by essential personnel.

The CCO or his or her designee shall notify all essential personnel of any SBD. In connection with this policy, a list of the current home and mobile phone numbers of each person working for the Group is kept off-site (and updated as necessary) by the CCO or his or her designee. The Group will seek to ensure that key investment professionals can access their desktops remotely via an internet connection in order to manage client accounts and to remain in close contact with the CCO or his or her designee. Although the nature of the SBD will influence the means of alternative communication, the communications options the Group may employ include, without limitation, mobile phones, portable electronic e-mail, voicemail and secure e-mail through a VPN connection, via Outlook Web Access or through Citrix.

In the event that normal telephone service is not available, all essential Group personnel have mobile phones and maintain contact information for other Group personnel on their laptops or home computer systems.

The Group shall notify any affected vendors, counterparties and/or other persons with whom the Group has ongoing business arrangements of any SBD and shall make arrangements with such vendors, counterparties and/or other persons to continue the provision of services, if possible, or, if not possible, shall make alternative arrangements for such services during the period of the SBD.

The CCO or his or her designee shall determine whether communications with any regulators and/or any required regulatory reporting are affected by any SBD and, if so, shall make alternative arrangements for such communications and/or reporting and shall communicate such alternative arrangements to all applicable regulators.

The CCO will test this plan periodically as he or she deems necessary.

ADOPTED: October 20, 2020