

September 30, 2020

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

As a global enterprise with multiple offices, TortoiseEcofin continues to closely monitor the spread of COVID-19 and we are leaning into the guidance collected from various sources including the Centers for Disease Control and Prevention (CDC), World Health Organization (WHO), 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, TortoiseEcofin has identified critical firm functions, lines of communication and external relationships, and has verified back-up support capabilities for all such functions across teams. We have proactively communicated preventative actions and considerations to all employees. Furthermore, established procedures ensure the ability to work and coordinate tasks remotely. With that, in June, we re-opened our Kansas City office to a limited number of employees on a voluntary basis. Specific return to work guidelines were communicated and implemented. The majority of our employees continue to work remotely and will continue to do so until at least January 2021. We continue to restrict travel and have developed an approach for self-quarantining based on the guidelines and recommendations published by the CDC. TortoiseEcofin 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.

The firm continues to closely monitor the spread of COVID-19 and market volatility. Our investment teams have provided perspectives on pandemic preparedness & market volatility and will continue to do so.

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), we 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. TortoiseEcofin has the infrastructure in place to accommodate all employees to work remotely. The firm utilizes virtual desktop technology from VMware for 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?

TortoiseEcofin has identified critical firm functions, lines of communications and external relationships, and has verified back-up support capabilities for all such functions across teams. TortoiseEcofin currently has 53 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.

Beginning on March 13, 2020, we asked all employees to work remotely. While a limited number of employees voluntarily returned to work in-office as of June 29, 2020, the majority of employees continue to work remotely and will continue to do so until at least January 2021. 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. TortoiseEcofin continues to suspend all business travel and will re-evaluate on a regular basis. Further, all employees traveling for personal reasons are required to report travel to Human Resources to ensure recommended CDC measures are being followed. Employees must work remotely for up to 14 days before returning to the work area.