

# Business Continuity Disclosure

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## ***Plan Overview***

Neuberger Berman's Business Continuity Plan (the "Plan") has been developed to respond to a significant business disruption impacting any of the critical processes of the firm. Since the timing and impact of disasters and disruptions are unpredictable, the Plan allows for flexibility in responding to actual events as they occur. The Plan is designed to permit the firm to resume operations as quickly as possible, given the scope and severity of the business disruption. Neuberger Berman has established a set of operating principles that govern how the Plan is enacted. The Plan's strategy for continuing business is to first ensure the safety and security of all employees and property. The Plan further addresses: data back-up and recovery for all mission-critical systems; financial and operational assessments to determine impact caused by the disruption event; alternative communications with customers, employees and regulators; alternate physical location of employees; critical supplier, bank, and counterparty impacts; protection of the firm's books and records in support of client, financial and regulatory reporting; and continued prompt access by clients to funds and securities. These principles are derived from an industry-wide set of best practices adapted to our firm's unique procedures, technologies, and markets.

## ***Incident Management***

The Incident Response Plan is maintained by Business Continuity Management. The Plan has a specific set of roles and responsibilities that must be performed during an incident, including but not limited to incident assessment, recovery coordination, business strategy, technology recovery, logistics and communications. The Plan is activated from first response and functions until business resumption.

## ***Alternative Employee Communications***

Communications with employees during a disaster will be accomplished via several methods: Neuberger Berman has established employee hotlines for its US, European, and Asia based operations, where employees can hear recorded messages with information on office closures, relocation, and other pertinent data. These numbers have been printed on the back of all employee identification cards. Neuberger Berman also employs an automated notification tool to send messages (voice, text and/or email) to all employees on their work, home, and mobile devices. The tool is a third-party product and is hosted out-of-region, with an additional out-of-region backup facility. Lastly, the corporate intranet can be used to post messages to all employees on incident status and instructions for recovery. The corporate intranet is a highly available web service that is housed in dual data centers.

### ***Remote Access***

Neuberger Berman has a robust Remote Access infrastructure that allows for uninterrupted global functionality across the entire employee population. The infrastructure is enabled by industry-leading remote desktop capabilities, along with remote videoconference and mobile telephone technologies. The NB Remote Access solution provides secure access to the user's applications and desktop from any internet connection. Multi-factor authentication (SecurID token) is utilized to control access and SSL is used to encrypt the user's session between their remote location and the corporate network.

The firm is migrating to a permanent Virtual Desktop (VDI) architecture, with 33% of the firm now using VDI. Those critical employees not yet migrated to permanent VDI do have a recovery VDI allocated to them that is tested at least annually. As a result of our Hybrid Work Environment our remote access is validated regularly.

### ***Alternative Locations***

Supplementing our remote access capabilities, Neuberger Berman's headquarter location in New York City has dual network capabilities and generator power to accommodate approximately 300 workstations/desktops. A displacement/relocation plan is maintained in the event a power disruption impacts the building or the surrounding area. Lastly, our Hybrid Work Environment provides for less concentration of employees in the office at any given time and we can workload transfer some functions to a non-impacted branch location in response to a disruption.

### ***Technology, Data Recovery***

Our firm's "mission critical systems" are those that ensure prompt and accurate processing of securities transactions, including order taking, entry, execution, comparison, allocation, clearance, settlement, the maintenance of customer accounts, access to customer accounts, and the delivery of funds and securities. Neuberger stores both physical and electronic copies of its data with third party agencies. Neuberger is currently dependent on multiple data centers in the United States. This design makes Neuberger's data highly available and resilient. "Mission critical systems" have their data replicated between data centers in real-time. This will allow Neuberger to failover and continue processing in the event of a datacenter disaster.

### ***Critical Business Constituents, Banks, and Counterparties***

Through its business continuity plan, Neuberger expects that it will maintain connectivity with all of its critical counterparties. However, in the event of a regional or wide-scale outage, Neuberger's ability to transact business with any critical bank or counterparty is dependent upon that organization's ability to perform its own recovery in a timely and effective way.

### ***Testing Procedures and Frequency***

Business Continuity and Disaster Recovery Tests are conducted at least annually. Tests include representatives from technology, critical business units, Internal Audit, and the Business Continuity Management team.

### ***Contacting Us***

In the event of a significant disruption, clients should refer to the Neuberger web site ([www.nb.com](http://www.nb.com)) or call one of the main Neuberger phone numbers listed below for information.

**Americas: 212.476.9000**

**Asia: 852 3664 8800**

**East Asia: 81 3 5218 1930**

**Europe: 44 20 3214 9000**

If you have questions about our business continuity planning program, you can contact your client services representative.