

CAPTRUST Temporary Telecommuting Policy in response to the COVID-19 Pandemic

Objective

While we need to continue to meet the needs of our clients, the safety of our colleagues is paramount. In response to the recent outbreak of COVID-19 in the United States, CAPTRUST is implementing this Temporary Telecommuting Policy (the "Policy"). Telecommuting allows employees to work at home, on the road or in a satellite location for all or part of their workweek.

Policy

Any employee can telecommute at this time and until further notice. CAPTRUST continues to monitor recommendations and best practices in response to COVID-19 and will attempt to provide advance notice of any modifications to this Policy. This Policy may be modified in the future by CAPTRUST in response to various factors and may have different applications to different employees based on those factors.

This Policy provides for alternative work locations, for the safety of our colleagues – it is not intended to change or supersede other CAPTRUST policies and practices.

Best Practices

Employees should remain in regular communication with their direct managers and ensure that their managers are aware of their telecommuting status. As a best practice, we expect the employee, the employee's manager, and other colleagues the employee interacts with will have regular communication via phone, email, video conference, or similar technology. Given the risk in our communities, and to ensure any responsibilities to clients or within the firm are covered, we also ask that employees communicate with their managers if they become ill while telecommuting. Employees are encouraged to use technology such as Jabber or Outlook auto-responders to communicate their status/availability within the firm more broadly.

Employees should coordinate with their direct managers to address any specific requirements they have in order to successfully telecommute.

Security

Consistent with the organization's expectations of information security for employees working at the office, telecommuting employees should ensure the



protection of proprietary company and customer information accessible from their home office.