



## **Spyglass Capital Management – COVID-19 Statement September 2021**

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Spyglass Capital Management activated its Business Continuity Plan (“BCP”) on March 17, 2020, in response to the COVID-19 pandemic. The BCP was activated to ensure continuation of services to Spyglass clients and enhance the safety of its employees. The BCP was developed and tested to provide protocols in an emergency such as this. These procedures are designed to limit disruption in services and maintain efficient and effective operations. Spyglass has performed comprehensive firm-wide business continuity and disaster recovery testing over the years and previously implemented its BCP during the California wildfires of 2018. As a result, Spyglass has a well-defined plan and its controls and policies are effective.

As of this writing, the BCP remains active and Spyglass employees are, with limited exception, working from home with complete virtual access to cloud-based files, internet applications and other resources. This includes all complements of operations. Spyglass continues to conduct its day-to-day operations inclusive of equity research, portfolio analysis, trading and middle and back office daily procedures. Since activating the BCP in March 2020, operations have not been compromised and systems are functioning properly.

At this time, Spyglass employees are not traveling for business. All meetings are being conducted by telephone or video conference. Spyglass continues to conduct its regularly scheduled team daily and weekly meetings via video conference which includes robust screen sharing capabilities.

Spyglass’s Chief Compliance Officer, William Minor, is the designated Business Continuity Officer and is responsible for serving as the communication liaison between Spyglass and the federal and state regulatory agencies. Mr. Minor continues to monitor the COVID-19 situation to ensure business operations are not adversely impacted and that employees and their families are aware of the protective measures to reduce risk.

Please contact Spyglass if there are any questions regarding this statement or if you would like further information on the steps Spyglass is taking to maintain its investment management operations.

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