



# HATTERAS

INVESTMENT PARTNERS

**BUSINESS CONTINUITY PLAN & DISASTER RECOVERY PLAN  
FOR  
HATTERAS INVESTMENT PARTNERS  
HATTERAS CAPITAL DISTRIBUTORS, LLC  
OVERVIEW**

Hatteras Investment Partners, Hatteras Capital Distributors, LLC (“HCD”), and the Hatteras Funds (collectively referred to here as “Hatteras”) are under common control and the management of Hatteras, and have adopted and implemented this Business Continuity Program and Disaster Recovery Plan (together the “BCP” or “Plan”) described herein. The BCP or Plan is designed to comply with FINRA Rule 4370 (“Business Continuity Plans and Emergency Contact Information”), as applicable and to help ensure that the essential advisory activities and business operations performed by Hatteras for its clients, which include unregistered pooled investment vehicles and registered investment companies (together, the “Funds”), can continue in the face of unanticipated circumstances or occurrences inclusive of pandemics which could render the normal systems, operations, procedures, sites and staff either internally or with key service providers inoperable. The BCP/Plan is administered by the Director of Operations and the Emergency Contacts include the CEO (Primary) and Director of Operations (Secondary). The BCP/Plan is intended to include the following third-party service providers:

- **Hatteras Investment Partners** – Investment Advisor
- **Hatteras Capital Distributors** – Broker Dealer
- **US Bancorp Fund Services, LLC** (“USBancorp”)
  - Administrator to the Hatteras Core Alternatives Fund, Hatteras Evergreen Private Equity Fund and the Hatteras GPEP Funds
  - Fund Accounting to the Hatteras Core Alternatives Fund, Hatteras Evergreen Private Equity Fund and the Hatteras GPEP Funds
  - Fund Custodian to the Hatteras Core Alternatives Fund, Hatteras Evergreen Private Equity Fund and the Hatteras GPEP Funds
  - Investor Services for the Hatteras Evergreen Private Equity Fund
- **U.S. Bank, NA** – Custodian to the Hatteras Core Alternatives Fund, Hatteras Evergreen Private Equity Fund and the Hatteras GPEP Funds
- **RCP Advisors** – Sub-Advisor to the Hatteras Evergreen Private Equity Fund
- **UMB Fund Services**
  - Fund Investor Services for the Hatteras Core Alternatives Fund, Hatteras Global Private Equity Institutional Fund, the Hatteras GPEP Fund II and the Hatteras VC Co-Investment Fund II Liquidating Trust.



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- **UMB Bank, N.A.** – Administrator and Custodian to the Hatteras VC Co-Investment Fund II Liquidating Trust.
- **Technology Associates** – Cybersecurity Vendor and Managed Service Provider to Hatteras

In the event of a disaster or interruption of the Funds' normal systems, processes and operations, certain areas of the daily operations of the Funds would be impacted in a greater manner than others (*i.e.*, Fund Accounting, Transfer Agency functions and Custodial services). These functions are integral to the daily creation of the Fund's Net Asset Value, and the processing of shareholder transactions, either directly or indirectly from third party distribution sources. As such, the disaster recovery procedures for the Funds' service providers are more extensive than for other non-daily essential functions.

The Advisor, Sub-Advisor, Administrator and Distributor, do not always have specific actions and tasks necessary to be performed on a daily basis to ensure the timely and accurate processing of the Fund's NAV and shareholder transactions. As such, the disaster recovery procedures for the Funds' service providers are more oriented toward re-establishing phone and internet communications with other key vendor areas.

It should be noted that with the various service providers to the Funds having offices in a broad geographic dispersion across the U.S., the opportunity for a localized 'disaster event' to affect all Fund functions is minimized.

### **HATTERAS INVESTMENT PARTNERS**

Hatteras Investment Partners has one office location:  
8510 Colonnade Center Drive, Suite 150  
Raleigh, NC 27615

Please see the attached Appendix A for Hatteras Investment Partners Disaster Recovery/Back-up Business Continuity Plan.

### **US BANCORP FUND SERVICES, LLC**

US Bancorp is one of the larger fund service organizations in the United States. US Bancorp has an annual SSAE18 which tests and reviews the systems and procedures used by US Bancorp. US Bancorp's SSAE18 is generally performed by PricewaterhouseCoopers, LLC. US Bancorp maintains its own Disaster Recovery Plan for all of their business lines. US Bancorp's disaster recovery plan is available to Hatteras upon request.



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## **U.S. BANK, N.A.**

US Bank has a significant registered fund custodial business in the United States. US Bank has an annual SSAE18 which tests and reviews the systems and procedures used by US Bank. US Bank's SSAE18 is generally performed by Ernst & Young. US Bank maintains its own BCP/Disaster Recovery Plan. U.S. Bank's disaster recovery plan is available to Hatteras upon request.

## **SUB-ADVISOR**

The Sub-Advisor, RCP Advisors conducts the on-going portfolio management of their respective Fund. Their primary interface operationally is with the Fund Accountant and Custodian on operational matters, and the Advisor on strategic issues.

The Sub-Advisor is responsible for their own BCP and disaster recovery plan independent of Hatteras. The Sub-Advisor provides its plan to Hatteras during the initial operational due diligence process. During the ongoing due diligence process the Sub-Advisor is asked to supply updated plans, if the plan has been materially revised. The Sub-Advisor is also asked to discuss annual testing of its disaster recovery plan.

As part of the structure of the Funds, Hatteras maintains control over all securities and cash. Should the sub-advisor become unavailable, Hatteras has the ability to either manage that portfolio or re-allocate those assets to other sub-advisors or portfolios.

## **UMB FUND SERVICES, INC.**

UMB Fund Services (UMB) has an annual SSAE18, which tests and reviews the systems and procedures used by UMB. UMB's SSAE18 is generally performed by Grant Thornton, LLP. UMB maintains its own disaster recovery plan for all of their business lines. Hatteras has access to this policy, among others, on an electronic portal provided by UMB.

## **UMB BANK, N.A.**

UMB Bank, NA (UMB Bank) has an annual SSAE18, which tests and reviews the systems and procedures used by UMB Bank. UMB Bank's SSAE18 is generally performed by Grant Thornton, LLP. UMB Bank maintains its own disaster recovery plan for all of their business lines. Hatteras has access to this policy, among others, on an electronic portal provided by UMB Bank.



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## APPENDIX A

### Disaster Recovery/Business Continuity Plan (BCP)

#### Hatteras Investment Partners Hatteras Capital Distributors, LLC

#### **I. EMERGENCY CONTACT PERSONS**

Our firm's emergency contact persons are: David B. Perkins, (919) 846-2324, david.perkins@hatterasip.com; or Brittney L. Chick-Reny, (919) 846-2324, brittney.chick-reny@hatterasip.com; or Thomas P. Riegert, (919) 846-2324, thomas.riegert@hatterasip.com or Stephanie M. Tindel, (919) 846-2324, stephanie.tindel@hatterasip.com. These names will be updated in the event of a material change and included on the FINRA Contact System housed in the Central Registration Depository ("CRD").

#### **II. FIRM POLICY**

It is policy to respond to a Significant Business Disruption (SBD) by safeguarding employees' lives and firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of the firm's books and records, and allowing our customers to transact business. In the event that we determine we are unable to continue our business; we will assure customers' prompt access to their funds and securities.

##### *A. Significant Business Disruptions (SBDs)*

Our plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only our firm's ability to communicate and do business, such as a fire in our building. External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, pandemic, a city flood, disruption to the power grid, or a wide-scale, national or regional disruption. Our response to an external SBD relies more heavily on other organizations and systems, especially on the capabilities of our administrator and custodian.

##### *B. Approval and Execution Authority*

David Perkins is responsible for approving the plan and for ensuring that the required annual review is conducted. David Perkins or Brittney Chick-Reny is responsible for executing this BCP.

##### *C. Plan Location and Access*

Our firm will maintain copies of its BCP plan and the annual reviews, and the changes that have been made to it for inspection. An electronic copy of our plan is located on our local server and is supported with a cloud-based data repository.



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### **III. BUSINESS DESCRIPTION**

Our firm provides investment advisory services. Our firm is an Investment Advisor registered with the U.S. Securities and Exchange Commission (“SEC”) and includes an affiliated capital acquisition broker also registered with the SEC that is a member of FINRA. Our firm contracts in the management of Investment Partnerships, and other pooled investment vehicles.

Furthermore, we do not hold customer funds or securities. We accept subscriptions to the funds we manage. All subscriptions are sent to our administrator and custodian firms, which execute our orders, compare them, allocate them, clear and settle them. Our administrator also maintains our customers’ accounts and can grant customers access to them. Our firm services retail and institutional customers that qualify as accredited investors and/or qualified purchasers.

Our Administrators are US Bancorp Fund Services, LLC (US Bancorp) located at 615 E. Michigan St, Milwaukee WI, 53202 and UMB Fund Services, Inc. located at 235 W. Galena Street, Milwaukee, WI, 53212. Our Custodians are U.S. Bank, N.A., located at 1555 N. River Center Drive, Suite 302, Milwaukee, WI 53212 for the closed-end funds and UMB Bank, NA, located at 1010 Grand Blvd. Kansas City MO 64106.

### **IV. OFFICE LOCATIONS**

Our principal office and office of supervisory jurisdiction location is located at 8510 Colonnade Center Drive, Suite 150, Raleigh, NC 27615. Our main telephone number is (919)846-2324. Our employees may travel to that office by means of foot and public or private transportation. In the event of a need for temporary relocation or access to work from home, provisions for alternate facilities and computer technology will be made.

### **V. CUSTOMERS’ ACCESS TO FUNDS AND SECURITIES**

Our firm does not maintain custody of customers’ funds or securities. These are maintained at the custodian, U.S. Bank, N.A. and/or UMB Bank, NA, depending on the investment offering. In the event of an internal or external SBD, if our Web access is available, our firm will post on our Website the method by which customers may access their funds and securities by contacting the fund administrator. The firm will make this information available to customers through its disclosure policy.

### **VI. DATA BACK-UP AND RECOVERY (HARD COPY AND ELECTRONIC)**

Our firm maintains its primary hard copy books and records and its electronic records at 8510 Colonnade Center Drive, Suite 150, Raleigh, NC, 27615. Brittney Chick-Reny, Director of Operations, (919) 846-2324 is responsible for the maintenance of these books and records.

Our firm maintains its back-up hard copy books and records in electronic format in a manner consistent with prevailing regulations under FINRA Rule and the Investment Advisers Act of 1940.



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Hatteras outsources Information and Technology to Technology Associates. Technology Associates highly specialized personnel has established industry standard IT infrastructure including redundancy and back-up systems for Hatteras Investment Partners.

Hatteras' primary server is backed up daily with a 7-year retention period. Files are replicated off-site to Datto's Cloud, a cybersecurity and data backup company. The server is running Virtual Switching System ("VSS") snapshots Hourly between 8:00 am ET until 6:00 PM ET.

Technology Associates maintains its own BCP and Disaster Recovery Plan for their business lines.

In the event of an internal or external SBD that causes the loss of our paper records, we will physically recover them from our back-up source. Investor documents are also maintained by the administrator, and all investment data is maintained by our custodian. If our primary site is inoperable, we will continue operations from an alternate location using our remote access through a Virtual Private Network ("VPN"). For the loss of electronic records, we will electronically recover data. If our primary site is inoperable, we will continue operations from an alternate location or implement remote work from home.

## **VII. FINANCIAL AND OPERATIONAL ASSESSMENTS**

### *A. Operational Risk*

In the event of an SBD, we will immediately identify what means will permit us to communicate with our customers, employees, critical business constituents, critical banks, critical counterparties, and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options we will employ will include our Web site, telephone, cellular phone, voice mail, and secure e-mail. In addition, we will retrieve our key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic).

### *B. Financial and Credit Risk*

In the event of an SBD, we will determine the value and liquidity of our investments and other assets to evaluate our ability to continue to fund our operations. We will contact our custodian and administrator, critical banks, and investors to apprise them of our financial status. If we determine that we may be unable to meet our obligations to those counterparties or otherwise continue to fund our operations, we will request additional financing from our bank or other credit sources to fulfill our obligations to our customers and clients. If we are unable to meet our financial commitments, we will immediately take appropriate steps, including:

- 1) Contact our investors by phone, mail, or by posting a notice on our website at <http://www.hatterasinvestmentpartners.com>; or a combination of these communications methods will be employed to apprise our clientele of our financial status.



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- 2) If need be, the firm will request additional financing to meet our obligations to creditors or clients. Such financing will be secured through existing banking relationships including Pinnacle Bank.

### **VIII. MISSION CRITICAL SYSTEMS**

Our firm's "mission critical systems" are those that ensure prompt and accurate processing of subscription and redemption documents.

We have primary responsibility for establishing and maintaining our business relationships with our customers and have sole responsibility for our mission critical functions. Our custodian provides, through contract, the execution, comparison, allocation, clearance and settlement of transactions, the maintenance of customer accounts, access to customer accounts, and the delivery of funds.

#### *A. Our Firm's Mission Critical Systems*

##### Subscription and Redemption Processing

Currently, the Transfer Agent receives subscriptions from customers via completed subscription documents by the customer. During an SBD, either internal or external, we will continue to take subscriptions through any methods that are available and reliable, and in addition, as communications permit, we will inform our customers when communications become available to tell them what alternatives they have to send their requests. Customers will be informed of alternatives by phone, voicemail, or by an answering machine.

#### *B. Mission Critical Systems Provided by Our Custodian*

Our firm relies, by contract, on our outsourced custodian and administration firms to provide order execution, order comparison, order allocation, the maintenance of customer accounts, and access to customer accounts.

### **IX. ALTERNATE COMMUNICATIONS BETWEEN THE FIRM AND CUSTOMERS, EMPLOYEES, AND REGULATORS**

#### *A. Customers*

We now communicate with our customers using the telephone, e-mail, video conferencing, fax, U.S. mail, courier, and in person visits at our firm or at the other's location. In the event of an SBD, we will assess which means of communication are still available to us and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party. For example, if we have communicated with a party by e-mail but the Internet is unavailable, we will call them on the telephone and follow up where a record is needed with paper copy in the U.S. mail.





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### *B. Employees*

We now communicate with our employees using the telephone, e-mail, video conferencing, and in person. In the event of an SBD, we will assess which means of communication are still available to us and use the means closest in speed and form. Hatteras normally communicates with employees via e-mail and given our remote access capability for all employees, we expect to continue using e-mail. However, if for any reason, e-mail is not available, all employees have the entire firm's cell phone numbers.

### *C. Regulators*

We communicate with our regulators using the telephone, e-mail, video conferencing, fax, and U.S. mail. In the event of an SBD, we will assess which means of communication are still available to us and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party.

## **X. CRITICAL BUSINESS CONSTITUENTS, BANKS, AND COUNTER-PARTIES**

### *A. Business Constituents*

We have contacted our critical business constituents (businesses with which we have an ongoing commercial relationship in support of our operating activities, such as vendors providing us critical services), and determined the extent to which we can continue our business relationship with them in light of the internal or external SBD. We will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services when we need them because of a SBD to them or our firm. A current list of service providers and contact information is maintained by the Office Manager.

### *B. Banks*

We will contact our banks and lenders to determine if they can continue to provide the financing that we will need in light of the internal or external SBD. The bank maintaining our operating account is: Pinnacle Financial Partners.

## **XI. REGULATORY REPORTING**

Hatteras is subject to regulation by various regulators inclusive of the SEC and FINRA. We now file reports with our regulators using paper copies in the U.S. mail, and electronically using fax, e-mail, and the Internet. In the event of an SBD, we will check with the SEC and FINRA to determine which means of filing are still available to us and use the means closest in speed and form (written or oral) to our previous filing method. In the event that we cannot contact our regulators, we will continue to file required reports using the communication means available to us. Our regulators can be reached at the following contact information:





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- A. SEC – IARD, (202) 551-6999
- B. FINRA – CRD (301) 590-6500

## **XII. KEY PERSONNEL**

In the event of the (temporary or permanent) loss of key personnel the following persons will assume the duties and responsibilities of the individual until such time as that person recovers or is replaced:

### **Key Personnel**

David B. Perkins, CAIA

Thomas P. Riegert, CFA

Brittney L. Chick-Reny

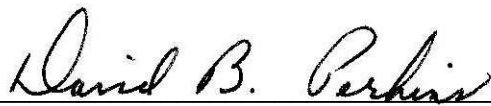
Stephanie M. Tindel, CAIA

## **XIII. UPDATES AND ANNUAL REVIEW**

Our firm will update this plan whenever we have a material change to our operations, structure, business or location. In addition, our firm will review this BCP annually, as needed, to modify it for any changes in our operations, structure, business, location or regulatory developments.

## **XIV. SENIOR MANAGER APPROVAL**

In my capacity as BCP Manager, I have approved this Business Continuity Plan as reasonably designed to enable our firm to meet its obligations to customers in the event of an SBD.

Signed:   
David B. Perkins, CAIA  
Chief Executive Officer, Co-Founder

Date: October 31, 2022