

Business Continuity Plan Summary

Harbor Capital Advisors, Inc. and each of its wholly-owned subsidiaries, including Harbor Services Group, Inc., Harbor Funds Distributors, Inc., and Harbor Trust Company, Inc. (collectively, “**Harbor**”), maintain a Business Continuity Plan (the “**Plan**”) that addresses how Harbor will respond to events that may significantly interrupt its business. Since the timing and impact of disasters and disruptions is unpredictable, Harbor will aim to be flexible in its approach to respond to business disruptions. With that in mind, Harbor maintains a robust Plan and this document provides a summary of the Plan.

Harbor’s policy is to respond to a business interruption by ensuring employee safety, safeguarding firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of Harbor’s books and records, and allowing investors in Harbor-sponsored products to transact business. In the event that Harbor determines it is unable to continue its business, it will take steps to ensure all of its clients’ prompt access to their funds and/or securities.

In that regard, the goals of the Plan are to:

- Understand and incorporate business priorities into business continuity practices.
- Incorporate relevant regulations into business continuity practices.
- Prepare for events or scenarios that impact Harbor’s primary place of business, critical systems & infrastructure, or related disaster recovery processes.
- Implement appropriate strategies for executing recovery of critical systems.
- Provide alternative and emergency response notification and communication measures for all Harbor related critical parties in the event of a business disruption.
- Improve responsiveness by employees in times of a disaster so as to ensure that all aspects of primary facilities, backup sites, people, processes, hardware, software, communication, and legal responsibilities are accounted for.
- Provide business process availability to all employees from remote locations without any significant business impact.

Business interruptions can vary in scope. They may impact just the office location(s) or may impact an entire city or larger geographic area. In all such situations, Harbor seeks to continue business operations and notify all important stakeholders of how to contact Harbor employees via several means including, but not limited to, telephone, fax, email, or via Harbor’s website (harborfunds.com). Based on a company-wide risk analysis, Harbor has put in place a Plan that helps in response and recovery measures during business interruptions. Harbor’s Plan includes the following elements:

- Data backup and recovery of all mission critical systems
- Alternative communication methods with shareholders, employees, third-party vendors, suppliers, banks, counterparties, and regulators, including re-routing of critical communication mechanisms
- Capability to work from home or other locations outside of the primary offices
- Employee preparedness training including disaster testing and recovery
- Regulatory reporting and communication
- Critical business constituents and third-party impact
- Access to funds and securities in the event of a disruption
- At a minimum, an annual review and/or maintenance of our plan.

While Harbor cannot eliminate all risks of interruption, Harbor is committed to having a Plan in place to keep all stakeholders informed during times of business interruptions. If you have questions about Harbor’s Business Continuity Plan, feel free to contact us at 800-422-1050, Monday through Friday, between 8:00 a.m. and 6:00 p.m. Eastern time.