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COVID-19 & GGLG Business Continuity Preparedness

Clients & Colleagues: We are all struggling to be as safe *and* capable as possible during this COVID-19 Pandemic. Because of this pandemic's global scope, impact here in NYS and because this is a case of first impression for the New York real estate profession, we are remaining as fluid as possible and adapting constantly to the changing safety and business landscape as circumstances dictate.

The Gulotta Grabiner Law Group, PLLC ("GGLG") has positioned itself as a leader in law firm compliance, information security, business continuity planning & capabilities and information technology, and reacted to this current pandemic in late February by aggressively and proactively building upon our policies, procedures and capabilities to provide, relative to similarly situated firms, a strong, safe and effective solution.

The additional business continuity policies, systems, capabilities & staff training we've implemented and continue to implement daily, enable us to operate remotely and with minimal impact during this crisis and in some instances, increase operational efficiency via the remote work format.

GGLG Preparedness Leadership Team: Our IT, Compliance & Information Security Team includes:

- (i) IT Consultants: Our IT Consultants (who have serviced the Firm for over 20 years), have, since late February, provided constant real-time support. They were on-site for 3 weeks readying us for any contingency (e.g., preparing and testing systems and staff, aggressively ordering and configuring additional remote work equipment for staff and testing for operational effectiveness);
- (ii) Chief Information Security Officer ("CISO"): Our CISO is one of the leading real estate industry cybersecurity & compliance experts. He possesses over 20 years of military cyber security experience and for the last four years has served on ALTA's Best Practice Task Force, with lenders, title & settlement agents & attorneys to assess their compliance posture, identify vulnerabilities and help ensure the highest levels of compliance and preparedness. Over the past 4 years, he has been conducting at the GGLG continuous on-site security assessments (including vulnerability and penetration testing) and is now working with other members of our Preparedness Team to ensure we are as secure and capable as possible during this pandemic and given the increase in remote work functionality;
- (iii) GGLG Management: Includes: (i) Christopher Gulotta, Esq., CIPP, is a Certified Information Privacy Professional, a nationally recognized subject matter expert, author and speaker on

compliance, cybersecurity and lender oversight of service providers.; and (ii) Ryan Cabrita, Chief Security Officer at the GGLG, who is trained in Cybersecurity (currently attending the prestigious NYU Master's Program in Cybersecurity).

Preparedness Plan: The GGLG has a developed a Pandemic Policy and Preparedness Policy, detailing what actions should be taken in the event of a pandemic such as the current COVID-19. The following summary highlights our rapid response to the COVID-19 pandemic and some of the measures we've taken to continue to minimize impact.

Our Facility & Office Building: We have contacted and received from building management a detailed plan for cleaning all common areas and office space. All touch points are cleaned twice daily. Staff is advised to avoid contact with others, including handshakes, passing papers, etc.

GGLG Staff: 100% of GGLG employees are fully capable of working remotely and have, since late February, been undergoing training specific to a work remote scenario. Until circumstances change, and mandate otherwise, the plan is to continue operations as normally as possible. Currently, a core group of staff are working in-office on a voluntary basis to help support staff working remotely. Should conditions change, we are prepared to move to operating fully remotely.

Working remotely and Securely: Employees working remotely access the fully updated and tested VPN into GGLG's network that has been configured to access our network securely. GGLG Management has cross-trained employees in key areas should any individual employee be unable to work due to illness. All employees have and are required to continue to regularly test their company provided computers and access to ensure that all files and applications can be accessed with ease. All GGLG employees are advised to immediately report any issues or concerns with remote access to the IT Department, with the firm's ISO always available to assist.

On-Going Testing and Monitoring: GGLG Management is working closely with our IT Consultants to ensure regular monitoring and testing of networks, network security and applications.

GGLG Vendors: GGLG has been in contact with all critical third-party vendors to ensure each has a business continuity policy and pandemic plan in place.

COVID-19 Contact: Should a GGLG employee be determined to have interacted with an individual with COVID-19, the employee is to be sent home immediately. The employee's workstation will be thoroughly cleaned and any interactions with other employees from this employee will be carefully considered and measures taken appropriately. The employee may work remotely if he/she feels healthy enough to work but will not be required to. The employee will only be allowed to return to work if no symptoms emerge after 2 weeks of initial contact with the COVID-19 infected person and would not be permitted to return to the office until 1 week after symptoms have dissipated.

All vendors, clients, and customers are to be informed of any potential disruptions to service immediately.