MBG CONSULTING INC.
CORPORATE POLICIES

Updated January 2022

EXECUTIVE SUMMARY

MBG Consulting is specialty firm whose core expertise is lifecycle lease administration for complex portfolios and, as such, we are uniquely poised to provide Aruba Networks with the world-class expertise necessary to elevate your portfolio management function. We can support you in implementing an unparalleled lease administration program that will maximize the value of your portfolio and amplify the utility of your strategic data, while remaining durable and responsive to industry changes.

MBG Consulting is fully capable of providing full-spectrum lease administration services for Aruba Networks' portfolio of approximately 50 properties including:

- Portfolio database management & maintenance
- International data management
- Lease abstraction with key clause identification and abstracting
- Document processing
- Robust reporting
- Invoice reconciliation and monthly rental obligation payment
- Lease auditing (including desktop reviews and field audits as needed)
- Best practices consulting as needed

Drawing on our superior portfolio management expertise and technology agility, MBG Consulting will provide Aruba Networks with the support necessary to elevate your lease administration program.

Leading authority for lease administration & lease auditing
Lease administration and auditing are highly specialized disciplines that require in-depth knowledge of property management, real estate law, accounting, technology, and regulatory reporting requirements. Due to the detailed nature of the work, it is imperative that it be handled by experts in the field. When dealing with a large and complex portfolio such as Aruba Networks', this becomes particularly vital as any errors can easily become magnified several times over. Simply put, world-class lease portfolio management is MBG Consulting's core expertise and galvanizing mission. We will leverage our entire skill set to ensure your lease administration and auditing program is a focused and successful service line from the outset.

Software Solution: MBG LeasePilot or HarborFlex
As a natural extension of our lease administration practice, we have developed MBG LeasePilot, a best-in-class database platform for portfolio administration. Beginning with our firm's founding in 2002, we have honed this software to deliver unsurpassed performance and control. Alternatively, we have secured a relationship with LeaseHarbor and use their HarborFlex lease administration software which offers robust financial, reporting and data management capabilities in a secured and professionally managed software development environment. We can also assist in market wide technology assessment and provide

alternative solutions Aruba Networks may consider – from stand-alone software packages to various IWMS solutions.

Integrated support for strategic decision-making
We understand that pristine lease portfolio data plays a crucial role in real estate planning and overall business strategy development. MBG Consulting will support you every step of the way by generating the information needed for transaction projects, budgeting, forecasting, and other mission-critical decisions.

Global expertise fueled by local knowledge
MBG Consulting is unique among lease administration providers in our ability to provide in-house lease translation services. We also offer substantial experience developed while managing complex portfolios with global distribution for ten clients. From translating and abstracting to rent processing and data analysis, our knowledge of the intricacies of global lease portfolio administration is potent and wide-ranging. Drawing this experience, we have developed a world-class lease administration program shaped by our significant experience translating, abstracting, and managing leases in North America, Latin and South America, Europe, Australia, and Asia as well as Africa and the Middle East.

Document translation and insight into local real estate statutes and customs are the pillars of our success in international lease administration. Our ability to provide in-house translation of most major European and Asian languages is unique among lease administration providers and offers a true benefit to our clients as we can typically assess documentation in a matter of a few business days.

Streamlined boutique firm
Immediate attention, reliable service, superlative communication, and direct access to executive management are the defining qualities of MBG Consulting, and they mean that your needs won't get lost in the shuffle. They also give us the ability to implement decisions and process enhancements immediately, bypassing the slow drag of bureaucracy found in many larger organizations. Because of our lean organizational structure, our overhead costs are low and we pass these savings on to our clients.

Professional communication and ongoing relationship management
Our professional, proactive communication style fosters positive, collegial interactions among all stakeholders. We also stand by our impeccable record of relationship management; since our firm's inception we have not lost a single client for performance-related issues.

Certified WBE
MBG Consulting not only offers expert lease administration services and related technology but, as a certified WBE, we can also assist Aruba Networks in maintaining a diverse workplace.

AN INTRODUCTION TO OUR FIRM

MBG Consulting, Inc. is a focused specialty firm whose core competency is providing innovative solutions for lease portfolio management. We provide our clients with the edge they require to meet evolving demands and realize substantial savings through expert lease administration, auditing, and software applications tailored to the unique needs of each assignment. We offer a full menu of start-to-finish portfolio services: whether a client needs a simple site analysis, a comprehensive auditing of lease obligations, or a streamlined process to administer complex leases at sites across the globe, we can tailor a solution that will save time and money.

What Defines Us

Unparalleled expertise

Technological agility

Rigorous attention to detail and quality

Creative solutions

Best-in-class processes and procedures

Steadfast integrity

Unwavering dependability

Focus on your bottom line

MBG Consulting, a certified WBE (Woman Business Enterprise), was the vision of Mirela Gabrovska, MBA, MCR, President, who drew on her extensive corporate real estate experience to form the privately-owned corporation in 2002. Mirela brings over 20 years of industry experience to the table and leads the company in providing effective and financially-sound solutions for the administration of corporate real estate portfolios. Her financial, consulting, and executive management expertise coupled with her real estate savvy give MBG Consulting an unparalleled understanding of corporate real estate intricacies.

Our comprehensive understanding of the challenges inherent in managing complex portfolios makes us the provider of choice for a wide range of corporations, institutional owners, brokerage houses, and educational institutions. Our clients' portfolios are never lost in the bureaucratic shuffle, and our focused knowledge ensures they receive the best lease auditing and administration services available. Because we work exclusively for tenants, we avoid conflicts of interest that may be a concern with firms that provide multiple services on both sides of the fence.

MBG Consulting employs passionate, creative, and experienced professionals who are credentialed in finance, economics, real estate law, accounting and IT management. No matter what challenges our clients face, MBG Consulting can draw on the collective knowledge of our team to craft effective solutions that are backed by the personal attention and quick response time that only a streamlined firm can provide.

MBG Consulting's executive team is supported by a seasoned Board of Advisors composed of corporate real estate leaders from a range of industries. The Board's function is to advise the organization on strategy, business development, industry best practices, and business continuity. We have utilized our Board extensively since our inception, drawing on their exceptional real estate and business expertise to enhance the services we provide. This structure provides our clients with the security of effective, ongoing account management and corporate governance.

MBG CONSULTING INC.'S POLICIES

BACKGROUND POLICY

Background Check Requirements

Prior to Employment with MBG Consulting Inc. candidates shall be subject to a background check verification.

The purpose of background check verification is to assure employees' personal documentation and data accuracy, and confirm the honesty and integrity of all MBG employees who will have access to MBG's or MBG clients' sensitive data, intellectual property, systems, processes, procedures and other proprietary information.

The background verification shall include but would not be limited to the following investigation:

- Employment verification
- Identity verification
- National Criminal and Sex Offenders Search
- Credit History verification
- Drug screening

If particular assignments require additional or more extensive investigation, employees may be subject to such additional or more extensive background research. All data shall be kept strictly confidential.

CODE OF ETHICS

We adhere to the following corporate, personal, diversity, sustainability and world citizenship standards and code of ethics:

Business Standards –

1. We act with integrity
2. We act with professionalism
3. We strive for knowledge and we are prepared and qualified to deliver the best service to our clients
4. We operate with best standards, practices and procedures
5. We adhere to accounting controls, processes and record keeping standards
6. We serve our clients with no conflict of interests
7. We act with confidence based on knowledge, experience and common sense
8. We preserve clients' confidential information at all cost
9. We respect competition
10. We are committed to perform efficiently, at low cost and with maximum profits

Personal Standards –

1. Education
2. Knowledge
3. Accountability
4. Responsibility
5. Kindness
6. Appreciation for other countries and cultures
7. Trust
8. Commitment
9. Passion
10. Curiosity
11. Innovation
12. Team work

Diversity –

1. Respect for diversity of race, ethnicity, gender, age, sexual and political orientation
2. Respect, support and mindful acceleration of the growth and development of minorities, women and small businesses
3. Commitment to diverse workplace hiring practices

Sustainability -

1. Provide health and safe work environment
2. Operate with respect for energy, fuel, water, human, material, and environmental resources
3. Implement green technologies and conservation measures
4. Reduce carbon footprint

5. Comply with applicable environmental laws and regulations related to hazardous materials, waste, and air emissions

World Citizenship –
1. Conduct business while committing to balance between employees' interests, company's interests, corporate profits, community, world and the planet
2. Be a world citizen
3. Help people, your country and the world
4. Volunteer and promote volunteerism
5. Respect other cultures, values and living standards

DIVERSITY POLICY

MBG Consulting Inc. will be the leader and provider of choice for lease administration and lease audit services in the diverse marketplace. We will deliver best-in-class lease portfolio administration, lease audit and lease language consulting services augmented by superlative client satisfaction because we want clients to be comfortable, successful and fully satisfied while doing business with us.

To achieve our mission, we will:

- Proactively look to expand our client base with diverse clients who represent different racial, ethnic, gender, and economic profiles and who are committed to diversity

- Create innovative and tailored service solutions that will meet their unique needs

- Develop a diverse network of industry leaders with whom we can exchange ideas and collaborate on assignments bringing to our clients a strong and unique multicultural environment

- Build a workforce diverse in age, gender, nationality, ethnic, economic, and religion

- Promote and commit to a culture of inclusion that attracts a diverse talent pool and rewards people solely for their talents, work ethic, and contribution

- Participate in industry organizations that foster diversity. Lead organizations and programs that explain diversity, leadership, and commitment to a multicultural workforce

- Support organizations, events, programs, and functions dedicated to increased diversity in the industry and market place

- Expand corporate philanthropy related to diversity causes

- Mentor students from diverse backgrounds and support their interest and entry into the corporate real estate industry

MBG Consulting Inc. is committed to better serving the needs of the diverse market place by being an example of a superior service provider with a core dedication to internal and external workforce diversity, clients, service solutions, community integrity, and world peace support.

DATA SECURITY POLICY

INTRODUCTION

We view all client data as a vital resource that serves as fuel to our operational engine; as such, it must be protected and maintained with the utmost care. We safeguard client information by addressing privacy concerns from a variety of perspectives: external security; internal security; and long-term storage and archive maintenance. While we stringently adhere to industry best practices in all areas, we also strive to incorporate the needs and goals of individual clients in order to ensure that their unique data security and privacy needs are being addressed. Thus, this privacy policy is intended to provide a broad overview of the general principles we adhere to in a typical data management program. We are committed to working with each client to tailor our general approach to their specific requirements.

External Security

Our online access system utilizes a 128bit SSL certificate, the industry gold standard for online security. All daily system back-ups are encrypted as well. MBG Consulting runs a domain-based Windows 2016 server network with Active Directory and group-level, multi-tiered access. Our computer network is protected by a hardware firewall and state-of-the-art antivirus and malware defenders, and all system backups are encrypted. The network is monitored by an Intrusion Prevention System (IPS) and Intrusion Detection System (IDS) We perform daily off-site encrypted backups of our network data as well as running tape backups for added security. We have database servers at a data center in the Chicago area as well as out-of-state at a dedicated server-hosting facility to ensure continued operations in the event of an emergency. These facilities are physically isolated with 24-hour offsite video surveillance and strictly-controlled access. They are also protected against power outages with 48 hours of auxiliary power, guaranteed by a diesel generator.

Internal Security

We work with clients to designate and train authorized database users, including levels of authority, tiered permissions, etc. Levels of authorizations and restrictions are always defined and formalized. Some users may be granted permission to alter data while others are only allowed viewing access. Password policies, enforcing strength, duration, and session timeouts are also stringently enforced in order to ensure data security. We implement strict industry standard policies to enforce user-account password strength, as well as to control access to sensitive data. The user-management module of our system requires that users choose strong passwords and only a password hash is stored in the authorization database, which protects the database against hacking.

In addition, all changes to data are strictly monitored and scrutinized via date and time stamps, the name of the user accessing the data, and changes made to the data. We can then generate reports that track data requests, allowing us monitor access; the resulting data

access reports are reviewed monthly in order to detect any anomalies or irregularities, thus ensuring that data privacy and integrity are maintained at all times.

All computer operating systems, server and client, are patched regularly to mitigate risk. In the event of an emergency patch systems can be updated upon approving the patch for deployment. MBG IT will monitor computer inventory and will upgrade or retire computer computers utilizing operating systems which are no longer supported by the software manufacturer.

Data Privacy and Compliance

MBG Consulting shall implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk. A process for regularly testing, assessing and evaluating the effectiveness of technical and organizational measures for ensuring the security of the processing.

MBG Consulting will ensure that persons authorized to process the Personal Data have committed themselves to confidentiality or are under an appropriate statutory obligation of confidentiality;

Data Breach
In the event of a data breach or security vulnerability MGG Consulting will implement a security response plan. The response includes notifying customers and documented procedures to ensure action to resolve the issue is completed on a timely basis.

Long-Term Archiving and Records Storage
MBG Consulting maintains both digital and physical archives of pertinent client lease data. We work with clients to identify appropriate timelines and formats for storage of historical lease data and related documentation. Digital archives are subject to the same rigorous security standards as described above for active client datasets. Physical archives are maintained at secure, off-site locations. When it is deemed appropriate to destroy either digital or physical records, we proceed only with the client's expressed, written permission and follow current industry best practices for disposal.

Personnel Documentation
MBG Consulting maintains both digital and physical archives of employees' personal information. Documentation related to employees no longer employed by MBG Consulting Inc. are stored in a remote location and destroyed after seven (7) years unless records need be maintained for specific security reason, specific company policy or per Human Resources Manager's instructions.

Personnel Privacy and Cybersecurity Training
MBG Consulting employees must successfully complete a cybersecurity training course at the start of their employment. The course must be completed by existing employees every

calendar year. The course includes a wide variety of topics including hacking, phishing and protecting personally identifiable information. Employees completing the course receive a certificate which is retained in their file.   Weekly emails are delivered to employees keeping them up to date on the latest developments in cybersecurity.

RECORD RETENTION POLICY

INTRODUCTION

The responsibility for administering MBG Consulting Inc.'s Record Retention Program is designated to the President, with the assistance of the Vice President of Operations and Vice President of Compliance.

Destruction of specific records shall be carried out only in accordance with the authority of the above officers.

All records, including those maintained on electronic data processing storage media, shall be covered by this policy.

Despite any retention periods specified in the attached Record Retention Schedule, all records shall be retained for at least the minimum period as stated in applicable state or federal laws or regulations. Once the period for office retention of records has passed, a determination will need to be made whether the records shall be archived.

MBG's President, Vice President of Operations and Vice President of Compliance shall be responsible for interpreting this policy for application to specific situations.

RECORD RETENTION SCHEDULE

Type of Record	Retention Period *
ACCOUNTING	
Auditor's reports/work papers	Permanent
Bank deposit slips	3 years
Bank statements, reconciliations	7 years
Budgets	2 years
Canceled checks, generally	7 years
Cash disbursements journal	Permanent
Cash receipts journal	Permanent
Depreciation records	3 years*
Employee expense reports	3 years
Employee payroll records (W-2, W-4, annual earnings records, etc.)	6 years*

Employee pension records, including service, eligibility, personal information, pensions paid	6 years*
Employee time cards/sheets	4 years
Financial statements (annual)	Permanent
Financial statements (interim/internal)	3 years
General journal or ledger	Permanent
Invoices	3 years
Payroll journal	4 years

CORPORATE RECORDS

Annual reports	Permanent
Articles of Incorporation	Permanent
Bylaws	Permanent
Qualifications to do business	Permanent
Minutes and resolutions (Board and Committees with Board authority)	Permanent
Minutes (Committees without Board authority)	3 years
Authorizations and appropriations for expenditures	3 years
Policies and procedures, generally	For life of policy/procedure
Policies and procedures, employment practices	10 years*

CLIENTS' RECORDS

Invoices	3 years, then archived
Contracts	7 years, then archived
Rent Records	7 years, then archived
Audit Records	7 years, then archived
Abstract Records	Current, old are archived
Invoices for Services, Receipts from Client Payments	7 years
Policies and procedures, generally	For life of policy/procedure, then archived

RFP/RFI Documents	5 years, then archived

CONTRACTS

Contracts, generally	10 years*

INSURANCE

Insurance Claims	6 years*
Insurance Policies	6 years*

INTELLECTUAL PROPERTY

Copyright registrations and unregistered copyrightable materials	Permanent
Trademark registrations, patents	Permanent
Technology Source Code	Permanent
Domain name registration	For life of domain name

PERSONNEL

Applications	1 year
Employee files	6 years*
Employment contracts	10 years*
Garnishments	5 years
Pension, profit sharing plans	Permanent
Government reports	6 years
Time cards/sheets	4 years

REAL ESTATE

Leases	10 years*
Purchases, including title abstracts, opinions, insurance policies, sales agreements, mortgages, deeds	20 years after sale

RESEARCH MATERIALS

Research reports and data analysis	Permanent (final report only)
Underlying data, documentation, coding and analysis	Indefinite (review every 2 years); retain only portions necessary to document validation of the report
Data confidentiality, vendor and other research contracts	10 years*

STATEMENTS OF POLICY/POSITION

Policy statements	For the life of the document
Press releases	1 year, except if retained for historical archive purposes

TAXES

Annual information and/or income tax returns and canceled checks (federal, state and local)	Permanent
Payroll tax returns	4 years
Property tax returns	Permanent
Sales and use tax returns	4 years

GENERAL

Supporting correspondence and notes regarding patents, copyrights, licenses, agreements, bills of sale, permits, contracts, liabilities, etc.	For life of principal document which it supports
Correspondence not relating to other categories	1 year
Marketing and promotional materials, including brochures, Web site content	For the life of the materials to which it relates
Consents and "opt-out" request for facsimile and email solicitation	For life of consent or request
Historical archives (e.g., presidential speeches)	Permanent

STANDARDS MATERIALS

Professional Regulations and Standards	Permanent

LEGAL

Petitions for Employment	Permanent

* An asterisk ("*") following a number signifies that the retention period begins after final determination, payment, settlement, expiration, termination, decision, etc.

SECURITY RISK MITIGATION POLICY

INTRODUCTION

The Security Risk Mitigation Policy intends to address certain security incidents, qualify the risk involved and set policy for risk mitigation. Each incident is described, and pertinent risk mitigation policy - outlined.

SECURITY INCIDENTS CATEGORIES & RISK MITIGATION SOLUTIONS

The types of incidents have been classified into three levels depending on severity. The **Level One** incidents are least severe and should be handled within one working day after the event occurs. Level One incidents usually require that only the MBG IT person be contacted. **Level Two** incidents are more serious and should be handled the same day the event occurs (usually within two to four hours of the event). Level Two incidents must be escalated to the MBG IT, VP Operations, VP Compliance and President and possibly Peer 1. **Level Three** incidents are the most serious and should be handled as soon as possible.

Computer Security Incidents:

1) Level One Incident: Loss of passwords, shared passwords (both internal and external, for clients accessing MBG database).

Solution: Notify MBG IT within one working day; MBG IT will decide if a password change is necessary.

2) Level Two Incident: Employee termination, suspected violation of special access.

Solution – MBG IT is informed within 2 hours. Accounts are disabled and no personnel is permitted to provide access. Building access is revoked and system accounts are disabled.   MBG IT can escalate to upper management if necessary. Suspected violation of special access are minor or major based on whether they carry threat to MBG's data security. MBG IT is notified within one hour and resolves the issue.

3**) Level Three Incident:** Suspected Computer Break-in or Computer Virus.

Solution: MBG IT will isolate infected systems from the remaining MBG network as soon as possible. If a computer virus/worm is suspected, isolate MBG network from outside networks as soon as possible. Notify MBG IT within one hour. MBG IT will escalate to higher level management if necessary. MBG IT will attempt to trace origin of attack and determine how many systems (if any) have been compromised. Save copies of system log files and any other files which may be pertinent to incident. MBG will decide what further actions are needed. Where necessary, MBG IT will escalate to

Peer 1, our dedicated hosting provider. Upon completion of the investigation, MBG IT will write an incident summary report and submit to the appropriate levels of management.

Physical Security Incidents:

1) Level Two Incident: Illegal Building Access

Solution *- If during regular working hours an unauthorized person is in a controlled area, call or page the MBG IT immediately. If after working hours, call the Security/Duty office first and then page the MBG IT and/or MBG President. Escort the person outside the building or controlled area. Log incident and report to MBG IT/President.*

2) Level Two or Three Incident: Property Destruction or Personal Theft

Solution: *Unless the theft or destruction is major, notify the MBG IT and MBG President. If he/she cannot be reached within one hour, call or page the Security Office. If destruction involves a MBG computer, notify MBG IT immediately.*

BREACH RESPONSE PLAN

1. Record the date and time when the breach was discovered, as well as the current date and time when response efforts begin, i.e. when someone on the response team is alerted to the breach.
2. Alert and activate everyone on the response team, including external resources, to begin executing your preparedness plan.
3. Secure the premises around the area where the data breach occurred to help preserve evidence.
4. Stop additional data loss. Take affected machines offline but do not turn them off or start probing into the computer until forensics team arrives.
5. Document everything known thus far about the breach: Who discovered it, who reported it, to whom was it reported, who else knows about it, what type of breach occurred, what was stolen, how was it stolen, what systems are affected, what devices are missing, etc.
6. Interview those involved in discovering the breach and anyone else who may know about it. Document investigation.
7. Review protocols regarding disseminating information about the breach.
8. Assess priorities and risks based on information about the breach.
9. Bring in your forensics firm to begin an in-depth investigation.

Notify law enforcement, if needed, after consulting with legal counsel and upper management

IT CHANGE MANAGEMENT POLICY

INTRODUCTION

The purpose of this policy is to document the way that we manage information technology changes to minimizes risk and impact to the company.

Definition of a change
For the purposes of this document, a change will be defined as anything that transforms, alters, or modifies the operating environment or standard operating procedures of any system or service that has the potential to affect the stability and reliability of the infrastructure or disrupt the business of the University.

- Changes may be required for many reasons, including, but not limited to:
- User requests
- Vendor recommended/required changes
- Changes in regulations
- Hardware and/or software upgrades
- Hardware or software failures
- Changes or modifications to the infrastructure
- Environmental changes (electrical, air conditioning, data center, etc.)
- Unforeseen events
- Periodic Maintenance

Type of Changes
This section defines the different type of changes.

Minor/Routine Change: These are changes that may be done at any time as these have been categorized as low risk to the company and the procedures are known and well documented.
Examples of this type of are:

- Application-based security or business needs patches
- Regularly scheduled maintenance
- Operating system patches (critical, hot-fixes, and service packs) *
- Personnel onboarding, offboarding, password resets

Major/Significant Change: These are classified as needing approval changes and these must be planned in advance and submitted for approval from authorized personnel. The change request should also suggest a time for this change to take place via the change form before being carried out. Authorized personnel will have ultimate say if the change goes ahead at the suggested time or not. Detailed in the change request should be the documentation about what work is going to happen

and the perceived benefit and impact to the users. These types of changes should always have a back out plan or mitigating action plan attached.
Examples of this type of are:

- Change that results in an interruption to a service, or has a significant risk of an interruption to service
- Change that results in a business or operational practice change
- Changes in any system that affect disaster recovery or business continuity
- Introduction or discontinuance of a service

Emergency/Unscheduled Change: Unscheduled outages (server crashes, etc.) may require immediate attention whenever they happen. The Change logging form should still be filled in, but this could be done retrospectively.
Examples of this type of are:

- A severe degradation of service requiring immediate action
- A system/application/component failure causing a negative impact on business operations
- A response to a natural disaster
- A response to an emergency business need

New Development: This type of change is specifically for the deployment of new features/functionality, services or applications and is not a fix to a problem.

Change Procedure
All change requests need to be documented and logged; this will be facilitated using an online form or an email to the support desk. This documentation will be retained centrally within a change request database. For this reason, verbal requests and authorizations are not acceptable.

Authorized Personnel

- Mirela Gabrovska
- Stu Bahanov
- Neal Wankoff