

BUSINESS CONTINUITY DISCLOSURE POLICY

Securities Industry regulations require each member firm to create and maintain a business continuity plan reasonably designed to meet its obligations to its clients and counterparties. In accordance with these requirements, R. Seelaus & Co., LLC (RSC) has designed a business continuity plan to address possible scenarios to minimize any service impact to our clients. A copy of the actual plan can be obtained on request.

In keeping with the regulatory requirements, the business continuity plan for RSC is designed to address key areas of concern – including but not limited to the following:

- Data back-up and recovery.
- Financial and operational assessments.
- Alternate means of communication between RSC and its customers.
- Alternate means of communication between RSC and its employees.
- Alternate physical location.
- Communication with and reporting to regulators; and
- Communication with Pershing LLC for clearing to ensure customer access to accounts and funds.

Since events creating business disruptions may vary in nature and scope, RSC anticipates scenarios in which the following are affected:

- A primary location (Chatham, NJ)
- A branch location
- A regional area

In the case of the primary location being disrupted all mission critical system back-ups are stored at an offsite location and telecommunications will be switched to a secondary branch. The secondary branch will have complete interface with Pershing. If the disruption occurs in a secondary branch, that location will be switched to the main office in Chatham, NJ. A regional area outage will depend on Pershing's capacity to restore their systems. We have incorporated Pershing's plan into our own. At a minimum the RSC business continuity plan is reviewed, updated, and tested on an annual basis. This review will continue to incorporate Pershing's annual review and test. Making sure that any type of business disruption does not unduly impact our clients is extremely important to us, and our business continuity is designed to allow us to provide the quality service clients expect from RSC.

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8 Wright Street | 1st Floor | Westport, CT 06880
151 Bodman Place | Suite 401 | Red Bank, NJ 07701
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Business Continuity Disclosure Policy

Securities Industry regulations require each member firm to create and maintain a business continuity plan reasonably designed to meet its obligations to its clients and counterparties. In accordance with these requirements, Seelaus Asset Management LLC (“SAM”) has designed a business continuity plan to address possible scenarios in efforts to minimize any service impact to our clients.

In keeping with the regulatory requirements, the business continuity plan for SAM is designed to address key areas of concern – including but not limited to the following:

- Data back-up and recovery.
- Financial and operational assessments.
- Alternate means of communication between SAM and its customers.
- Alternate means of communication between SAM and its employees.
- Alternate physical location.
- Communication with and reporting to regulators; and
- Communication with Pershing to ensure customer access to accounts and funds.

Since events creating business disruptions may vary in nature and scope, SAM anticipates scenarios in which the following are affected:

- A primary location (Chatham, NJ)
- A branch location
- A regional area

In the case of the primary location being disrupted, all mission critical system back-ups are stored at an offsite location and telecommunications will be switched to a secondary branch. The secondary branch will have complete interface with Pershing. If the disruption occurs in a secondary branch, that location will be switched to the main office in Chatham, NJ. A regional area outage will depend on Pershing’s capacity to restore their systems. We have incorporated the Pershing plan into our own.

At a minimum the SAM business continuity plan is reviewed, updated, and tested on an annual basis. This review will continue to incorporate Pershing’s annual review and test.

Making sure that any type of business disruption does not unduly impact the service we provide to our clients is of paramount importance to us, and our business continuity plan is designed to allow us to provide the quality service clients expect from SAM.

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