

## BUSINESS CONTINUITY PLAN

Scottsdale Capital Advisors (SCA) is responsible for creating and maintaining a business continuity plan to address the possibility of a business disruption that potentially results from power outages, natural disasters, or other events. In the event of a business disruption, we have plans designed to continue operations of critical business functions.

Our business continuity plan encompasses business disruptions that may be internal to SCA, and larger wide-spread disruptions that effect entire regions. Our plan is designed to address key areas of concern, including but not limited to the following:

- Data (electronic and hard-copy) back-up and recovery;
- Alternate communication between the firm and customers;
- Alternate communication between the firm and employees;
- Alternate locations for employees;
- Identification of mission critical systems;
- Regulatory reporting and communications;
- Identification of critical business constituent, bank and counter-party relationships;
- Financial and operational risk assessments;
- Ensuring customers access to cash and securities in the event SCA is unable to continue business.

With regard to client funds and securities, all customer cash and securities are held with our clearing firm. SCA has been supplied with a summary of our clearing firm's business continuity plans. Although SCA has taken steps to develop and implement business recovery plans, we cannot guarantee that systems will always be available or recoverable after a disaster or significant business disruption.

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