



### **Business Continuity Plan Summary**

Spouting Rock is committed to safeguarding the interests of our clients and customers in the event of an emergency or Significant Business Disruption (“SBD”). The Company has developed a Business Continuity Plan (“BCP”) in order to respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions are unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you the following information regarding our BCP.

#### **Our Business Continuity Plan**

We plan to quickly recover and resume business operations after an SBD and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm’s books and records, and allowing our customers to transact business. In short, our BCP is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the SBD. Our business continuity plan addresses: data backup and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

Spouting Rock routinely reviews disaster prevention and fault tolerance, risk assessment and best practices to continually enhance its business resiliency. This review is part of each new system implementation and is enhanced by a technology infrastructure designed to provide heightened continuity measures.

#### **Disclaimers**

Spouting Rock’s BCP is designed to be prepared for SBDs and to resume our business operations as quickly as possible if an event did occur. The information contained within is a summary of that plan. Because of the confidential nature of much of the plan, it is not possible to distribute the entire plan to clients, customers or other external entities. Recovery-time objectives provide concrete goals to plan for and test against. They are not, however, hard and fast deadlines that must be met in every emergency situation, and various external factors surrounding a disruption, such as time of day, scope of disruption, and status of critical infrastructure—particularly telecommunications—can affect actual recovery times.

#### **Contacting Us**

If after an SBD you cannot contact us as you usually do, you should go to our website at [www.spoutingrock.us](http://www.spoutingrock.us) or call (610) 788-2128 for further information.