

Piton Investment Management

Business Continuity Plan

Date: May 2018

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1. Introduction

Although Disaster Recovery and Business Continuity Plans focus largely on technical issues and the continued functioning of information technology infrastructure, their overriding purpose is the survival of the business as a whole.

This document is intended as a guideline for processes and procedures that will assist Piton Investment Management (Piton) in protecting critical business functions in the event of a localized or widespread disaster.

2. Firm Policy

Our firm's policy is to respond to a Significant Business Disruption (SBD) by safeguarding employees' lives and firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of the firm's books, records, and assets. In the event that we determine we are unable to continue our business, we will ensure that the asset value of our firm is protected.

2.1 Plan Location & Access

Our firm will maintain copies of its BCP plan and the annual reviews, and the changes that have been made to it for inspection.

We maintain an electronic copy of our plan on our internal computer system. In addition, electronic copies of our plan are maintained with Proactive Technologies, LLC with whom we maintain technology consulting support agreements.

3. Office Locations

Piton's main office is located at:

Headquarters
777 3rd Avenue
22nd Floor
New York, NY 10017

Piton also has a DR facility which houses failover servers at:

DR Facility
1500 Spring Garden Street
Philadelphia, PA

4. Evacuation Plan

In the event of a SBD that necessitates an office closure and/or evacuation, employees will follow the evacuation guidelines set by building management. All evacuated employees will meet at the Starbucks at 655 Lexington Avenue (on the corner of 55th and Lexington Avenue)

5. Alternate Physical Location of Employees

In the event of a SBD that necessitates an office closure and/or evacuation, employees will utilize employee residences as alternate physical work locations. All employees either have PC's or laptops set up at home that are used for remote access. Currently each employee can access the Piton network (including all applications) from home via VPN.

Piton's current critical business processes can all be supported effectively by a distributed workforce with access to the Public Internet and standard telecommunications services (e.g. residential telephone service, mobile phone service).

Given Piton's ability to maintain business activity with a distributed workforce model, centralized alternate physical workspace is currently not a requirement. In the event of an extended outage of Piton facilities, Piton management will evaluate the procurement of alternate physical workspace on a case-by-case basis for use on either a temporary or long term basis.

6. Communications Plan

In the event of a SBD, Piton will communicate with employees via a predetermined Communications Tree. This Communications Tree includes several alternate means of communication including mobile phone numbers, home phone numbers and personal email addresses.

Additionally, in the event of an SBD, all Piton employees will attend a morning conference call at 8:30 am, Monday through Friday. The information for this conference bridge is as follows:

Conference Dial-In Number: 712-775-7031
Participant Access Code: 136-215
Host PIN: 9756
Conference Provider: freeconferencecall.com

All employees have a listing of cellphone and home phone information electronically and in hard copy at home. Jim Slattery and Willa Sheridan each have a listing of contact

information for all significant providers in hard copy and electronic format at their homes.

In the event of an SBD, Piton will contact clients via telephone or e-mail if available.

7. Hard Copy Data Backup & Recovery

Important documents are scanned and saved on Piton's file server. Local encrypted backups are made every fifteen minutes using zero impact snapshot technology. In addition to the backups stored on the local backup device, every night the device transmits encrypted backup data to Proactive's SSAE16 certified Sungard data center in Philadelphia, PA via an encrypted tunnel where they are kept indefinitely.

8. Technology Overview

8.1 Description of Current State of Piton's Technology

8.1.1 Headquarters Office

Piton has two physical servers at their main office:

PITON-ESX01, which houses the following virtual servers:

PITON-NY-FS01 is their file server

PITON-NY-UTIL01 is their utility server

PITON-NY-BDR01 is their backup server

Piton has one server at their DR facility:

PITON-PA-FS01 is their backup file server

Piton has redundant internet connections at their main office – Cogent and Lighttower

Piton has redundant internet connections at their DR facility – Cogent and Sungard

8.1.2 Email & Messaging

Piton uses Intermedia to host their email and spam filtering. They are on an Exchange 2013 environment. In the event of an outage, email can be accessed via a web console.

Email is also archived for compliance purposes by Global Relay. All incoming and outgoing messages are archived.

8.1.3 Server Restoration & Remote Access

Users can access the Piton network remotely through the use of a Cisco VPN.

Files are replicated in real time to an off site server at a disaster recovery site at Sungard in Philadelphia PA. In the event of server or site failure, failover to the disaster recovery server is instantaneous. The DR site can be accessed remotely from any PC through a browser based SSL VPN.

8.1.4 Cybersecurity & Recovery

In the event of a cybersecurity incident that compromises company data (e.g, Cryptolocker), Piton can quickly and easily recover from complete server image snapshots taken every 15 minutes. Should the primary network become compromised Piton can operate from disaster recovery systems.

8.1.5 Telecommunications

Piton is using a hosted phone system provided by Tel-Networks. In the event of a SBD, phone numbers can easily be forwarded to mobile phones.

9. Updates & Annual Review

Piton will update this plan whenever there are changes to operations, business structure or location. In addition, the CFO will review this BCP annually to modify it for any changes in operations, business structure or location.

9.1 Annual Testing of Plan

Management executes the content of this business continuity plan on an annual basis, reviewing the results of that test to be able to update the plan accordingly and factor in improvements.

The annual test will consist of internet failover, file sever failover and/or DR portal (DFS).

These annual tests provide employees with opportunities to better familiarize themselves with the business continuity plan and contribute their feedback towards its improvement.

10. Senior Manager Approval

I have approved this Business Continuity Plan as reasonably designed to enable our firm to meet its obligations to our counterparties in the event of an SBD.

Signed: _____

Title: _____

Date: _____