

## Disaster Recovery

### Policy

As part of its fiduciary duty to its clients and as a matter of best business practices, Bay Colony Advisors, has adopted policies and procedures for disaster recovery and for continuing Bay Colony Advisors' business in the event of an emergency or a disaster. These policies are designed to allow Bay Colony Advisors to resume providing service to its clients in as short a period of time as possible. These policies are, to the extent practicable, designed to address those specific types of disasters that Bay Colony Advisors might reasonably face given its business and location.

### Background

Since the terrorist activities of 9/11/2001, all advisory firms need to establish written disaster recovery and business continuity plans for the firm's business. This will allow advisers to meet their responsibilities to clients as a fiduciary in managing client assets, among other things. It also allows a firm to meet its regulatory requirements in the event of any kind of an emergency or disaster, such as a bombing, fire, flood, earthquake, power failure or any other event that may disable the firm or prevent access to our office(s).

### Responsibility

John W. Ohl is responsible for maintaining and implementing Bay Colony Advisors' Disaster Recovery and Business Continuity Plan.

### Procedure

Bay Colony Advisors has adopted various procedures to implement the firm's policy and reviews to monitor and ensure the firm's policy is observed, implemented properly and amended or updated, as appropriate, which include the following:

The following individuals have the primary responsibility for implementation and monitoring of our Disaster Recovery Policy, and should be considered the Disaster Recovery Team: John Ohl and James Catacchio

Bay Colony Advisors is responsible for weekly computer backup of essential information onto a backup hard drive stored in a safety deposit box in the Bank of America located in Concord, MA center.

In the event of a disaster where Bay Colony Advisors would be unable to operate out of their Concord, MA office:

John Ohl will work out of his home located at 4 Meadowbrook Road, Lincoln, MA and will be accessible via his cell phone 617-785-0668.

James Catacchio will work out of his home located at 85 Old East St, Carlisle, MA and will be accessible via his cell phone 978-758-9934.

Bay Colony Advisors' disaster recovery systems will be tested at least annually by John Ohl.

Bay Colony Advisors' Disaster Recovery Plan will be reviewed periodically, and on at least an annual basis, by the Disaster Recovery Team.