

# GAINESWOOD INVESTMENT MANAGEMENT, INC.

## Business Continuity Planning Disclosure Statement

Gaineswood Investment Management, Inc., has developed a business continuity plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

**Contacting Us** – If after a significant business disruption you cannot contact us as you usually do at (410) 764-3500 or via fax at (410) 318-5049 or via email, you should call our alternative number (443) 621-9000 or go to our web site at [www.gaineswood.com](http://www.gaineswood.com). If you cannot access us through either of those means, you should contact your custodian for instructions on how they may provide prompt access to funds and securities.

### Separate Accounts:

TD Ameritrade Institutional: 11218 John Galt Boulevard, Suite 300, Omaha, NE 68137, Tel: (888) 871-9007 Option #2, or (410)-413-2134, [www.tdainstitutional.com](http://www.tdainstitutional.com)

The Bank of New York Mellon: 200 Park Avenue, 54<sup>th</sup> Floor, New York, NY 10166, Tel: (212)-922-8123 or (212) 922-4540, [www.bnymellon.com](http://www.bnymellon.com)

### Marlmont Fund:

BTIG: 825 Third Avenue, 7<sup>th</sup> Floor, New York, NY 10022, Tel: (212) 593-7510 or (415) 248-2200, [www.btig.com](http://www.btig.com)

### *Fund Administrator:*

Fleming Financial: 102 Powell Avenue, Bel Air, MD 21014, Tel: (410) 803-9215

**Our Business Continuity Plan** – We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our clients to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data back up and recovery; all mission critical systems; financial and operational assessments; alternative communications with clients, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our clients prompt access to their funds and securities if we are unable to continue our business.

Each custodian backs up important records in a geographically separate area. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, our custodians have advised us that their objective is to restore their own operations and be able to complete existing transactions and accept new transactions and payments as quickly as possible. Your orders and requests for funds and securities could be delayed during this period.

**Varying Disruptions** – Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or a building housing our firm, we will transfer our operations to a local site, when needed, and expect to recover and resume business within 4-12 hours. In a

disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area, and recover and resume business within 24 hours. In either situation, we plan to continue in business, transfer operations to our custodians if necessary, and notify you of how to contact us through our website [www.gaineswood.com](http://www.gaineswood.com). If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our client's prompt access to their funds and securities.

**For more information** – If you have questions about our business continuity planning, you can contact us at (410) 764-3500.