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# APPENDIX B: BUSINESS CONTINUITY POLICY

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## Business Continuity Policy

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Please note, this policy is a high-level summary for the Firm. The business continuity plan (BCP) is an internal standalone document specifically tailored to the Firm. ARs can use this policy as a *guide* on content for their own plans.

### Overview

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This business continuity policy presents an orderly course of action for managing and, in the event of failure, restoring critical computing capability to the Firm.

### Business Description

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The partners own the Firm. The Firm is an investment management firm providing investment management services to Eligible Counterparties and Professional Clients. It also acts as principal to a small number of ARs carrying out advising and arranging activities.

### Firm Policy

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The main aims of the Firm's policy and the BCP are to respond to a business disruption event (BDE) by safeguarding members' of staff lives and Firm property, making financial and operational assessments, quickly recovering and resuming operations, providing continuity for clients and investors, protecting all of the Firm's books and records, and allowing its ARs to continue to conduct business. The Firm ensures compliance with relevant working from home regulations including provisions for virtual offices.

### Procedure for Dealing With BDE

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#### *1 Personnel*

Immediately following any BDE, a planned sequence of events begins. Key personnel will be notified and recovery teams grouped to implement the plan.

#### *2 Data Back-Up and Recovery*

Salvage operations at disaster site, whilst continuing to operate from a designated recovery site. Where necessary, new equipment will be purchased and data restored from back-ups.

#### *3 Communication With Third Parties*

In the event of a BDE, the partners will immediately identify the means by which the Firm will be able to communicate with staff, ARs, business constituents, banks, clients and investors, counterparties, and regulators. This may include the emergency services should the BDE require this.

### Preventative Measures Taken to Mitigate the Threat of BDEs

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The policy anticipates 2 kinds of BDEs – internal and external – and include fire, computer crime, theft and back-ups.

### Call Tree

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**Kevin Gallacher to contact Gillian Gallacher or vice versa. Either Kevin Gallacher or Gillian Gallacher to call/contact Emma Jones. Emma Jones to contact the rest of the Firm's team. Where relevant, the team will set about contacting the nominated senior managers of each/all ARs.**

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## Notifications

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Where relevant, the following parties should be notified in the event of a BDE affecting the Firm:

- The FCA: (+44) 20 7066 1000 (normally by the Firm's SMF16 or otherwise appropriate deputy).
- ARs – see standalone BCP.

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## Plan Location and Access

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The Firm will maintain for inspection online copies of its current policy and BCP, evidence of annual review and testing of the BCP, and any changes that have been made to it.

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## Updates and Annual Review

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The Firm will update its policy and BCP whenever there is a material change to its operations, BDE risks, structure, business, location or to any relevant regulations. In addition, the Firm will review its BCP annually and also after any BDE to identify any 'lessons learnt'.

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## Testing

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As members of staff frequently work remotely albeit to varying degrees, the BCP is continually being tested. However, at least annually the Firm will conduct a formal BCP test and document its outcomes. The findings of the test will be used to identify areas of weakness or gaps in the BCP, which will be addressed either as part of the next scheduled review or immediately, depending on the severity of the findings.