

Summary of Business Continuity Plan

In the event of a Significant Business Disruption, a Business Continuity Plan has been put into effect for all Griswold employees. A “significant business disruption” describes a situation where employees are unable to access/function from their primary work location. This plan contains a description of contact, business and technical information necessary to recover from an emergency situation. A business plan coordinator will communicate to Griswold employees as to what steps to follow and determine a plan of action. The BCP plan meets the requirements of NYSE Rule 446 and NASD Rule 3510.

If after a significant business disruption you cannot contact us as you usually do at (212) 509-2100 look for information at www.nyse.com or www.griswoldco.com. If you cannot access us through either of those means, you should contact our clearing firm, Goldman, Sachs Execution and Clearing (“Goldman”) at (212) 357-6675 or at www.gs.com for instructions on how it may, to the extent practicable under the circumstances, provide prompt access to funds and securities, enter orders and process other trade-related, cash, and security transfer transactions for you in the event of a significant business disruption.

Goldman maintains a business continuity plan (the “Plan”). Consistent with regulatory requirements, Goldman provides this disclosure statement to our clients which summarizes the Plan. Clients should understand that because the Plan contains confidential details and proprietary information, it cannot be distributed outside of the firm. The Plan is reviewed annually and may be updated at any time.

Our clearing firm backs up our 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, we have been advised by our clearing firm that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and within the same business day. Your orders and requests for executions could be delayed during this period.



Chris Corrigan
Chief Compliance Officer