
Business Continuity Plan (BCP) Summary Disclosure Statement

Invest In Vol (IIV) abides by a BCP to be able to continue conducting business in the event of a Significant Business Disruption or Disaster (SBD). As the timing and frequency of disasters and disruptions are unpredictable, IIV exercises flexibility in responding to actual events as they occur. This BCP Summary Disclosure Statement provides a summary of IIV's risk mitigation strategy in the event of an interruption to its daily business operations.

IIV's policy is to respond to an SBD by first safeguarding employee's lives and all firm property including its books and records. Then, IIV will make financial and operational assessments on best practices to first recover any necessary data and then resume operations as quickly and safely as possible.

Since a disaster might affect access to customer accounts, employees (including principals and clerical staff) are fully aware of how the plan will be maintained. IIV maintains an ordered dependency list of key employees who shall begin communicating relevant information with clients, employees, and critical counter-parties as quickly and safely as possible. IIV has identified a back-up system and key points of contact for counter-parties to participate in its resumption of business and has been in contact with the parties responsible for back-up to confirm their readiness. Periodically, a senior manager of IIV re-verifies the accuracy and completeness of this data.

The communication options IIV will employ may include email, telephone (mobile), US postal mail, and the IIV website. All mission-critical systems are backed up—a copy is stored online and accessible via any computer. Critical systems are those that are necessary to maintain the operation of the business and are defined by IIV accordingly in the BCP. In the event of an SBD, these backups will be obtained and restored as need be.



Additionally, IIV allows customers to continuously transact business throughout the process if deemed safe for employees. Importantly, IIV does not maintain custody of clients' funds or securities. Clients will receive prompt notification and access to the appropriate contact at their Custodian to access their funds. The Custodian provides systems for: access to customer accounts, delivery of funds and securities, order taking, order entry, execution, allocation, clearance, and settlement of securities transactions.

Despite efforts to create an ideal BCP be able to address an SBD, IIV acknowledges the unpredictable nature of disasters and the impossibility of anticipating every possible catastrophic scenario. IIV will act in good faith to allow the continuation of conducting business with minimum impact to clients and business partners. However, the possibility of an adverse effect to IIV operations by a third party's (beyond IIV's knowledge and control) inability to cope with the SBD cannot be totally disregarded.