

CASTLETON PARTNERS, LLC

Business Continuity and Disaster Recovery Plan

Castleton Partners, LLC has adopted Castleton Partners, LLC Business Continuity and Disaster Recovery Plan to ensure it can safely and promptly resume business operations in case of an emergency or disaster. Castleton has hired Two River Technology Group to deliver IT support and implement our technology infrastructure, primarily delivered through OS33.

OS33 provides an integrated Cloud Computing Solution that integrates software application and data hosting, information technology management, provisioning, integration and support services.

Two River Technology Group, LLC, an OS33 Delivery Partner, will provide information technology support and consulting services that are integrated with the OS33 Cloud Computing Solution, including user support and professional services, data migration services, network management and on premise services, among others.

OS33 licenses the OS33 Portal, a web-based software application service, which, among other things, enables access, use and control of licensed software applications and end user electronic data via a web-based portal over a wide area network.

Two River Technology Group will be the intermediary between Castleton and the OS33 Support Team. Both Two River Technology Group and OS33 are fully monitored and managed 24x7.

The key features of the Castleton Partners, LLC Plan include:

1. Backup/Disaster Recovery and Business Continuity System Description
2. Alternate communication resources;
3. Business continuity teams;
4. Re-establishing contact with clients;
5. Communication with employees;
6. Distribution of the plan to all employees and service providers;
7. Employee Training;
8. Periodic plan review and testing

An overview of each of the key features of Castleton Partners, LLC's BCP is provided below.

1. Backup/Disaster Recovery and Business Continuity System Description

- A. Services Provided

- Castleton utilizes the highest Disaster Recovery configuration available - a mirror instance of our specific server and storage infrastructure at a secondary Data Center. All servers are configured, live and running in both data centers and production-ready. Data replication of all systems is continuous between the two sites. In the event of a data center disaster, Return to Operations (RTO) is immediate for file and email, and within 4 hours for other applications depending on complexity and failover procedures. Testing includes one staged failover per year; additional testing as needed.
- Key Features of the configuration: Immediate recovery for email and file; Continuous data replication between sites; Fully independent and redundant servers in both data centers; Servers maintained in an online ready state for fastest recovery; Full Return to Operations in less than four hours
- Hot failover; servers are deployed, configured, tested with data synchronized and production-ready.

B. Recovery Time Objective (RTO)

- Under 4 Hour Return to Operations (RTO)

In the event of an emergency, activities associated with internal portfolio management, trading and operational support will all proceed under the supervision of Castleton Partners, LLC's BCP Critical Staff.

2. Alternate Communication Resources

Castleton Partners, LLC employees are required to maintain cell phones at all times so that they can be contacted and/or provide aid in the event of an emergency.

Castleton Partners, LLC has established a policy that all employees will both call and email the Chief Compliance Officer in the event of an emergency.

3. Business Continuity Teams

Castleton Partners, LLC has established an Incident Management Team (the "IMT") composed of the Chief Executive Officer and Chief Compliance Officer. The IMT determines what action to take during an emergency situation. If the IMT decides to activate the BCP, it continues to assess the situation throughout implementation.

Castleton Partners, LLC has also established an IT Disaster Recovery Team consisting of the Chief Compliance Officer and the Director of Client Services. The IT Disaster Recovery Team provides direction, supervision, and management on disaster recovery plan functions and works with Two River Technology Group to restore technology services and infrastructure during a disaster.

4. Reestablishing Contact with Clients

Castleton Partners, LLC has established a procedure through which all clients receive a communication via broadcast email, fax or telephone messages notifying them of the situation, providing information regarding the status of operations and providing information on how to contact Castleton Partners, LLC. If clients are notified via fax or email, a member of Senior Management will also telephone each client to ensure that each client has received notification and information on reestablishing contact.

Also, in the event of an emergency or upon activation of the Castleton Partners, LLC BCP, all clients are provided with an emergency statement outlining the situation and the status of the company. Castleton Partners, LLC legal staff is consulted prior to distribution of the statement.

5. Communication with Employees

Castleton Partners, LLC requires staff members to be equipped with cell phones. All cellular telephone numbers are managed and maintained in the Employee Directory, accessible via the OS33 Portal.

During an emergency, if required, staff members with Bloomberg licenses will access and connect to Bloomberg Anywhere® using a B-Unit—a device designed to ensure the identity of a Bloomberg Anywhere® user when logging on. The device will allow for secure access to a user's Bloomberg Professional® service account from any internet connected device.

During an emergency, all staff members will remotely access and connect to Envestnet | Tamarac Advisor Xi, which houses Castleton's cloud-based portfolio management system and customer relationship management system, to notify clients of the circumstances related to the emergency.

6. Distribution of the Plan to all Employees and Service Providers

In addition to being familiar with the BCP and understanding the applicable roles and responsibilities, Castleton Partners, LLC requires that all staff members are vigilant regarding potential threats to the business and report any unusual conditions.

7. Employee Training

All Castleton Partners, LLC staff members are responsible for:

- Reading and understanding the Castleton Partners, LLC BCP;
- Keeping a current copy of the Castleton Partners, LLC BCP at home and at frequently used alternate locations;
- Maintaining a copy of the employee call tree; and emergency phone numbers

- Knowing where to report in the event of an emergency or disaster;
- Updating changes in home/cell numbers to the Employee Directory; and
- Familiarity with all aspects of the Castleton Partners, LLC BCP as it may relate to his/her specified role.

Each person within the Castleton Partners, LLC organization plays an essential role in the BCP and in the firm's ability to respond to an adverse condition or disaster. All staff members are provided with a checklist of key tasks to be performed in an emergency and the roles played by all parties.

Castleton Partners, LLC has created and trained Recovery Teams that are responsible for responding during an IT disaster and has designated team leaders within each recovery team that are responsible for notifying other members of the team.

8. Periodic Review of the Plan and Testing of the Plan

Due to the critical nature of the Castleton Partners, LLC BCP, Castleton Partners, LLC engages in periodic reviews. All revisions are tracked and reviewed and all review dates are recorded and announced. For IT related issues, the integrity of backups is checked as they occur and are tested for recovery on a monthly basis.

Adopted: October 15, 2015

Updated: August 3, 2016

Last tested: March 14, 2017