

# Program Statement

## **Recovery Program**

Stark & Roth, Inc. and its affiliated investment managers (collectively, “Stark”), established a business continuity and disaster recovery program (the “Program”) that seeks to protect Stark personnel and the assets of Stark’s clients, the private investment funds and separately managed accounts for which Stark provides investment management services, and the investors who invest therein. The Program is intended to reasonably address disruptions of varying scales to Stark’s normal business operations at Stark’s critical facilities.

The Program focuses primarily upon critical risks and strategic threats to Stark’s principal office location in St. Francis, Wisconsin, although the Program is global in scope. Each Stark department has developed and maintains a recovery analysis document for its mission critical functions, identifying some or all of the following items, as applicable: risks to the department, functional requirements needed to perform core functions including needed equipment, needed system applications, the location of vital records, needed regulatory reports, key personnel who will work from alternate office locations as part of the first response team, personnel who will work from home through secure remote access connections and key counterparties.

## **Protecting Stark Personnel**

The Program seeks to protect Stark’s personnel to allow for the continued (i) management of Stark’s clients’ assets; (ii) interaction with counterparties for purposes that include but are not limited to financing, reconciliation and confirmation; (iii) communication with regulators; (iv) coordination of fund share purchases and redemptions; and (v) communication with investors. To ensure that Stark personnel are safe and that they can continue to work productively for Stark’s clients, the Program seeks to: (i) protect Stark personnel by directing them to safe locations in the event of a significant disruption; (ii) address a reduction in workforce (including investment management personnel) caused by injury, death, or illness; (iii) leverage our global geographic offices to relocate personnel to another Stark office, including those outside the U.S. if needed; (iv) relocate certain critical business units to designated and tested business recovery sites which have redundant systems; and (v) permit certain personnel to work from home.

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# Program Statement continued

## **Business Recovery**

In the event of a significant business disruption, Stark's Program begins with (i) properly communicating to applicable Stark personnel that a disruption in business occurred; (ii) enforcing written response procedures to ensure the movement of Stark personnel to safe locations, including communicating with local authorities as necessary; and (iii) implementing rapid response procedures to permit certain personnel to assess the scale of the disruption, to escalate concerns, and to make informed decisions. To permit thoughtful, orderly management of a crisis, Stark has (i) assessed its system redundancies; (ii) established a call tree to permit communication between employees; (iii) established procedures to move personnel to safe locations; (iv) established certain tests of the Program to permit for the study of the Program's effectiveness and to permit for improvement of the Program; (v) made the Program available to all personnel (Stark requires personnel to travel with the written portion of the Program which is applicable to her/him); and (vi) periodically trained personnel on the Program's procedures.

Stark recognizes that assessing foreseeable disruptions and maintaining the Program requires periodic monitoring and testing, reassessment of strategies, risks, and threats (including financial, system, operational, and human capital risks), updating of business plans, and reviews of deployed technology.

## **System Infrastructure and Data Recovery**

Stark has established and maintains recovery requirements for its networks, market-data feeds, systems and applications based upon each system's level of criticality to Stark's operations. Stark's Information Technology Department has established and maintains redundancy protocols to support recovery of certain critical systems and data, including establishing servers at additional office locations that are geographically separated from Stark's principal office. Data is regularly backed-up to other locations. Additionally, backup generators are in place and tested at Stark's principal office location.

## **Questions**

Stark designed the Business Continuity and Disaster Recovery Program to reasonably address the prioritized risks and threats specific to Stark, emphasizing those posed to Stark's primary office in St. Francis, Wisconsin. Recognizing that all contingencies, risks, and threats cannot be reasonably identified, Stark is committed to modifying and improving the Program, as needed.

Please contact us at (414) 294-7000 if you have questions about Stark's business continuity and disaster recovery initiatives.