



## **Business Continuity Plan**

Our Business Continuity Plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption. Our business continuity plan addresses: data backup and recovery; mission critical systems; financial and operational assessments; alternative communications with clients, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our clients' prompt access to their funds and securities if we are unable to continue our business.

We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's records, and enabling our clients to transact business as quickly as possible.

NAMCOA® - Naples Asset Management Company®, LLC ("NAMCOA") is a Registered Investment Advisor (RIA) that may use one or more of the following custodians:

- LPL Financial,
- SEI Trust Company,
- Goldman Sachs,
- Pershing,
- Equity Advisor Solutions, and
- Interactive Brokers

All custodians back up 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 custodians that their objective is to restore their own operations and be able to complete existing transactions and accept new transactions and payments within several hours. Your transactions and requests for funds and securities could be delayed during this period.

### **Varying Disruptions**

Significant business disruptions can vary in their scope, such as a single building housing our firm, the business area where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or the building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business within several hours. In a disruption affecting our business area, city, or region, we will transfer our operations to a site outside of the affected area and recover and resume business within one business day. In either situation, we plan to continue business, transfer operations to another location if necessary, and notify you through our web site [www.namcoa.com](http://www.namcoa.com) or via regular mail.

If the business disruption is so severe that it prevents us from remaining in business, we will assure our clients' prompt access to their funds and securities. If you have an account through one of our custodians, you may contact them directly. If your account is held directly with a mutual fund, insurance or other investment company, you may call the company directly.

Our Business Continuity Plan is reviewed annually to ensure that it accounts for business and regulatory changes, technology, operations, structure, or location. The plan is subject to modification and upgrading by our firm.

### **For more information**

If you have questions about our Business Continuity Plan, you can contact us by email at [support@namcoa.com](mailto:support@namcoa.com) or by completing the contact form in our website.