

Business Continuity Plan Disclosure

ST Invest LLC

Overview

ST Invest, LLC (“the firm”) has created and implemented a Business Continuity Plan (“BCP”) in an effort to mitigate the effects related to unforeseen business interruptions. The BCP is designed to enable the Firm to continue or resume trading operations as soon as possible in the event of an emergency or significant business disruption (“SBD”).

Communications and Locations of Employees During a Disruption

In the event of an SBD, the firm will communicate with its employees in several different ways. The Firm will employ a calling tree, which would be implemented by management in the event of an SBD. Recovery time for most of the applications is expected to range from immediate to 24 hours.

Communications with Customers

The firm is currently able to communicate with its customers using the telephone, email, fax, U.S. Mail, and in person. In the event of an SBD, the firm will assess which means of communication are still available and use the means closest in speed to the means used in the past. Additionally, if all traditional means of communication are not available, the firm will post emergency contact information and instructions on its web site regarding access to the firm representatives.

Books & Records

The firm maintains its hard-copy books and records and electronic records primarily at its Main Office and back-up books and records at alternate locations. If records are lost as the result of a business disruption or for any other reason, the firm has the means to physically recover data from both physical and electronic back-up locations.

Vendors and Counterparties

The firm’s BCP may need to rely upon the recovery and restoration of services provided by various critical business constituents at both its primary and alternate business locations. The firm has considered the extent to which the Firm may be able to depend upon these business relationships during an SBD as a part of its decision to do business with the constituent. Where possible the Firm has engaged and/or vetted alternate arrangements in order to avoid business disruptions in the case of a business constituent not being able to provide needed goods or services in an emergency.

Disclosure

The firm’s BCP is designed to address the continued operation of the firm in the event of an emergency situation or SBD. However, all risks of business interruption cannot be eliminated and ST cannot guarantee that systems will always be available or recoverable following an SBD. Furthermore, ST has no control over and must rely upon the disaster recovery plans

of its various critical business constituents and vendors. In the event that material changes are made to this BCP, the firm will send an updated copy to all of its clients.

The information contained in this disclosure is provided by the firm for informational purposes only, and nothing contained herein shall be construed to amend, supplement or otherwise modify any of the terms and conditions set forth in any customer agreement between you and ST Invest LLC.

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