

## [Business Continuity Plan Summary](#)

This [Business Continuity Plan "Summary"](#) is for AboveRock LLC ("Adviser") for the year 2019.

### Emergency Contact Person

Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani  
Phone +1 904 535 2860

E-Mail Address: [bvsn\(at\)aboverock\(period\).com](mailto:bvsn(at)aboverock(period).com)

### Note

At the present time, only Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani is the emergency contact person who is an Executive Member Of Senior Management. He is also the Advisor of the Firm.

### Firm Policy

The Firm's policy is to respond to a significant business disruption by safeguarding Associates' lives and Firm property, making a financial and operational assessment, protecting all of the Firm's books and records, quickly recovering and resuming operations. In the event that Adviser determines it is unable to continue its business, Adviser will contact Firm's Clients directly via a letter stating such a significant change in business continuity and shall strive to work hand-in-hand with them, ensuring that their account-related matters are addressed promptly.

### Types of Disasters, Significant Business Disruption Events (List not all-inclusive)

Fire,  
Flood,  
Tornado,  
Hurricane,  
Electrical black-out or power outage,  
Domestic (national, regional or local) act(s) of civil or communal unrest,  
Terrorism, including, but not limited to, chemical, biological and/or technological attacks,  
Theft and/or vandalism,  
Pandemic (Ex: H1N1/Swine Flu outbreak).

### Impact

The impact from any of the aforementioned events could be significant and, in certain cases, potentially catastrophic. Adviser could lose files which include Client (confidential, non-public, critical) information, be unable to access or utilize the office, may not have working phone lines, may not be able to conduct the Firm's business, may have damaged or destroyed computer systems and may not immediately be able to contact Clients, custodians, service providers and/or other vendors.

### Data Backup & Recovery (Paper &/Or Hard Copy & Electronic)

Adviser's Books & Records are accessible at the Firm's principal business location. Backup data is stored at a remote location. The Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani is responsible for the maintenance of these Books and Records.

Recovery-time objectives provide concrete goals to plan for and test against. They are not, however, hard and fast deadlines that must be met in every emergency situation, and various external factors surrounding a disruption such as time of day, scope of disruption and status of critical infrastructure, telecommunications in particular, can affect actual recovery times.

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Recovery refers to the restoration of clearing and settlement activities after a wide-scale disruption;

Resumption refers to the capacity to accept and process new transactions and payments after a wide-scale disruption.

Adviser has the following significant business disruption recovery time and resumption objectives:

Recovery time period of in 4 to 6 hours,  
Resumption time during the same business day.

Custodians represent that they have the following significant business disruption recovery time and resumption objectives:

Recovery time period of in 4 hours,  
Resumption time during the same business day.

## [Alternative Physical Location\(s\) for Adviser Representatives & Staff](#)

Location 1: In the event of a significant business disruption which is internal, Broker will move the Firm's Associates from the affected office location to the [Jacksonville Public Library's Highlands Regional Location](#) at 1826 Dunn Avenue, Jacksonville, Florida 32218. The library's main telephone number is 904 757 7702 & the site address is:

<http://www.jaxpubliclibrary.org>.

Adviser has assured this institution that Broker will conduct operations in a professional manner from the institution's member &/or community visitor area with Broker and each of the Associates utilizing their own computers and mobile devices so as to not place any additional technology, administrative and operational burden and/or intrusion upon said institution and systems except to have the library provide the Firm and Adviser's staff with a physical location.

Location 2: In the event of a significant business disruption which is internal, Adviser will move the Firm's Associates from the affected office location to the [Jacksonville Public Library's Southeast Regional Location](#) at 10599 Deerwood Park Boulevard, Jacksonville, Florida 32256. The library's main telephone number is 904 996 0325 & the site address is: <http://www.jaxpubliclibrary.org>.

Adviser has assured this institution that Adviser will conduct operations in a professional manner from the institution's member &/or community visitor area with Adviser and each of the Associates utilizing their own computers and mobile devices so as to not place any additional technology, administrative and operational burden and/or intrusion upon said institution and systems except to have the library provide the Firm and Broker's staff with a physical location.

If neither the primary business location nor the alternative locations are deemed to be safe to continue operations, AboveRock LLC shall strive to begin operations from a safe location as soon as possible.

## [Client Access to Funds and Securities](#)

Adviser does not maintain Custody of Client funds or securities. Adviser will promptly contact the appropriate Custodian(s) to ensure that Client funds and securities continue to be available to Clients in the event of a significant business disruption. Adviser will also provide the appropriate information regarding Clients' ability to access their accounts on Adviser's public site @ [www.aboverock.com](http://www.aboverock.com).

## [Mission Critical Systems](#)

Adviser's "Mission Critical Systems" are those that ensure prompt and accurate processing of securities transactions including order taking, entry, execution, comparison, allocation, clearance and settlement of

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securities transactions, maintenance of Client accounts, access to Client accounts, and delivery of funds and securities.

Adviser has the primary responsibility for establishing and maintaining business relationships with the Firm's Clients and has sole responsibility for Adviser's mission critical functions of order taking, entry and execution. Custodians with which Adviser has entered into Agreements for services provide, through Contract, the execution, allocation, clearance and settlement of securities transactions, maintenance of Client accounts, access to Client accounts, and delivery of funds and securities.

Adviser's relationships provide that custodians the Firm utilizes will maintain a business continuity plan and the capacity to execute that plan. Custodians represent that they will inform Adviser of any material changes to their plans that might affect Adviser's ability to conduct the Firm's business and often present an executive summary of their respective plans (included as part of their respective new account documents, among others). In an event they execute any of their plans, they represent that they will notify us of such execution and provide us equal access to services as their other customers. If they reasonably determine that they have not or cannot put their plan in place quickly enough to meet Adviser's needs, or are otherwise unable to provide access to such services, Custodians represent that they will assist Adviser in seeking services from an alternative source.

Custodians represent that they back up our records at their location and/or a remote site, as applicable. They further represent that they operate a back-up operating facility in a geographically separate area with the capability to conduct the same volume of business as their primary site. They assure us that they have confirmed the effectiveness of their back-up arrangements to recover from a wide scale disruption by testing and they have confirmed that they test their back-up arrangements at pre-determined time periods, no less frequently than annually.

Recovery-time objectives provide concrete goals to plan for and test against. They are not, however, hard and fast deadlines that must be met in every emergency situation, and various external factors surrounding a disruption such as time of day, scope of disruption and status of critical infrastructure, telecommunications in particular, can affect actual recovery times.

Recovery refers to the restoration of Clearing and Settlement activities after a wide-scale disruption.

Resumption refers to the capacity to accept and process new transactions and payments after a wide-scale disruption.

### Adviser has the following significant business disruption recovery time and resumption objectives:

Recovery time period of in 4 to 6 hours,  
Resumption time during the same business day.

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Recovery time period of in 4 hours,  
Resumption time during the same business day.

## [Adviser's Mission Critical Systems](#)

### Order Taking

Adviser does not receive trading or buy/sell orders from Clients since Adviser governs, supervises, administers & manages Client accounts on a discretionary basis. When deemed necessary by the Founder,

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Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani on behalf of the Adviser, the Firm will Clients ask Clients to place orders directly with the Custodian who has Custody of their funds and securities.

### Order Entry

Adviser enters orders with respect to Client accounts by recording them on paper & electronically, and sending them to Shareholders Service Group, the Custodian, electronically via NetX360, an application module which resides on Adviser's system(s) available to Adviser via the Firm's Adviser relationship & affiliation with Shareholders Service Group, & Pershing.

In the event of an internal significant business disruption, Adviser shall enter and send order records to Custodian(s) by the fastest alternative means available. Such means include a mobile phone or the NetX360 application accessible via a secure online web browser.

In the event of an external significant business disruption, Adviser will maintain the order in paper or electronic format, and deliver the order to the Custodian by the fastest means available when Adviser &/or the Custodian resume their respective operations.

### Order Execution

Adviser executes orders via the NetX360 application module on Adviser's systems & via a secure online browser as described above, the telephone and/or via a fax.

In the event of an internal or an external significant business disruption, Adviser would, as noted on Page 2, move the Firm's representatives and staff to the member &/or community visitor area at the Jacksonville Public Library's [Highlands Regional](#) or the [Southeast Regional](#) locations to conduct the Firm's business.

In the event of an external significant business disruption, Adviser will maintain the order in paper or electronic format, and deliver the order to the Custodian by the fastest means available when Adviser &/or the Custodian resume their respective operations.

If neither the primary business location nor the alternative locations are deemed to be safe to continue the Firm's work, AboveRock LLC shall strive to begin Adviser's work from a safe location as soon as possible.

### [Mission Critical Systems Provided By Custodians](#)

Adviser relies on Custodians to provide order execution, order comparison, order allocation, and the maintenance of Customer accounts, delivery of funds and securities, and access to Customer accounts.

### [Updates and Annual Review](#)

The Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani shall update this Business Continuity Plan "[Summary](#)" on behalf of AboveRock LLC, the Adviser Firm, to disclose any founded, purposed, relevant, meaningful & professionally significant change(s) to, or in, AboveRock LLC's operations, structure, business, or location, or to, **YET IN HONOR WITH RESPECT TO ETERNAL LAW & ANCHORING PRINCIPLES**, honor, respect, understand, ask, inquire, seek clarity and to abide by any of the world-renowned regulatory bureaucracies' requirements.

The Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani, on behalf of AboveRock LLC (aka "The Adviser Firm" &/Or "The Adviser"), will review & update this Business Continuity Plan "[Summary](#)" as he deems necessary, or annually on or about the 15th of December.

### The Founder, Owner, President & Chief Compliance Officer's Approval

I have approved this Business Continuity Plan Summary for the year 2019 as reasonably designed to enable me, the human being, the human person, to govern AboveRock LLC & the Firm's work including, but not limited to, meeting the Adviser's duties and obligations to Clients, to one or more world-renowned regulatory bureaucracies, and any individual, a human being, a human person, yet only after such an individual, a human being, a human person, and, on behalf of an entity when applicable, has expressly, in writing and signed in ink by hand by that individual, human being, human person, establishing the need, relevance, context, basis, belief & reason in clear and understandable language, words and terms, has provided the appropriate information including a phone number and other contact information with supporting documentation and evidence to me, the Founder, Owner, President & Qualifying Broker of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani, also a human being, also a human person, for my review to then have me, the human being, the human person, on behalf of the Adviser, review, consider, then provide an appropriate response.

My initials here together with my signature, date & time in ink and by my hand by me, the human being, the human person when recorded and filed with the Firm's documents by me, the human being, the human person, shall complete this Business Continuity Plan Summary.



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Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani  
SAMBBVSVSNJAR  
Founder, Owner, President & Chief Compliance Officer  
AboveRock LLC – A Registered Investment Adviser

Date & Time

October 7, 2018

Please direct all inquiries to:

Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani  
The Founder, Owner, President & Chief Compliance Officer  
AboveRock LLC – A Registered Investment Adviser  
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