

Aberdeen Investment Management, LLC

Business Continuity Plan (BCP)

I. Emergency Contact Persons

Our firm's two emergency contact persons are:

Name	Title or Relationship to Firm¹	Mailing Address	Email Address	Phone Number	Fax Number
Russell Jennings	Vice President	8906 Mediterranean Dr. Dallas, TX 75238	Russell@aberdeeninvestment.com	214-616-1969	469-385-8806
Jeb Terry	President	4209 Edmondson Ave. Dallas, TX 75205	jbtsr@aberdeeninvestment.com	214-552-6708	469-385-8806

II. Firm Policy

Our BCP's primary objectives are to continue providing services to our customers, protect the health and safety of our employees, and fulfill our legal and regulatory obligations. In the event that we determine we are unable to continue our business we will assure customers prompt access to their funds and securities.

A. Significant Business Disruptions (SBDs)

An SBD may affect only our firm (*e.g.*, a fire in our office building or cyber event) or may be widespread affecting several firms or the operation of the securities markets (*e.g.*, a terrorist attack, a natural disaster or a pandemic). Our response will vary depending on the severity of the SBD, which may include greater reliance on other organizations and systems, especially on the capabilities of our clearing firm.

B. Plan Approval and Annual Reviews

¹ Identify second person's relationship to the firm if not a registered principal of the firm.

Russell Jennings, Vice President, a registered principal and member of senior management, is responsible for approving the plan and for conducting the required annual review.

Rule: *FINRA Rule 4370(b) and (d).*

C. Plan Location and Access

Consistent with FINRA Rule 4511 (General Requirements), our firm will maintain copies of its BCP, any modifications that have been made to the BCP and the annual reviews for inspection, and the BCP will be made available promptly upon request. The BCP is also available to all employees in the firms shared "Legal Related" file folder.

Rule: *FINRA Rule 4370(a); FINRA Rule 4511.*

III. Business Description

Our firm is a Registered Investment advisor directing investments in separately managed client owned accounts. We do not perform any type of clearing function or hold customer funds or securities. We place trades in client accounts online or over the phone with our custodians, who route and settle the trades. Our custodians also maintain our customers' accounts, can grant customers access to them, and deliver funds and securities.

Our primary custodian is RBC Clearing & Custody – P18, 60 South 6th Street, Minneapolis, MN 55402, (800) 949-0242, <https://www.rbcclearingandcustody.com/> and our contact person at that firm is Aaron Dodge, (612) 849-4735, aaron.dodge@rbc.com. The client support team can be reached at (800) 933-9946 if Aaron is unavailable.

Secondarily, we manage one account at Fidelity Investments, www.fidelity.com, (800) 343-3548. The account is supervised by the Clients' son, Taylor Sutherland (619) 232-9600 x256, who is a financial professional with Halbert Hargrove and has the relationship with Fidelity.

IV. Office Locations

Our firm has one offices located at:

Our Location Old Parkland, Oak Lawn Hall, 3879 Maple Avenue, Suite 100, Dallas, TX 75219. Its main phone number is (214) 347-9117 and the Vice President is Russell Jennings, russell@aberdeeninvestment.com, cell phone (214) 616-1969. We engage in advisory services at this location. Alternatively, we are able to work remotely from any location with an internet connection. In the event that the office is inaccessible or staff is working remotely due to an SBD, mail will be accessible at our post office box, 5600 W. Lovers Ln. Ste. 116-131, Dallas, TX 75209.

V. Alternate Physical Location(s) of Employees

If the office is unavailable or infeasible (e.g., due to the inability to employ social distancing during a pandemic), staff may temporarily work from a remote location (e.g., staff may work from home because of health and safety reasons during a pandemic). In this event, we will maintain a list of employee working locations and contact information.

The risk of cybersecurity events may be increased due to use of remote offices or telework arrangements. We will remain vigilant in our surveillance against cyber threats and take steps to reduce the risk of cyber events. These steps may include: checking that system entitlements are current and reminding associated persons of cyber risks through education and other exercises that promote heightened vigilance.

Rule: FINRA Rule 4370(c)(6).

VI. Customers' Access to Funds and Securities

Our firm does not maintain custody of customers' funds or securities. Our custodian firms RBC and Fidelity maintain custody of customers' funds or securities. If telephone or internet service is available during an SBD, our registered persons will take customer orders or instructions (including instructions to transfer customer accounts in the event our firm determines that it is unable to continue its business) and contact our clearing firm on their behalf. If registered persons are unable to service customers' orders or instructions, our firm will e-mail and call customers notifying customers that they may access their funds and securities by contacting Aaron Dodge at (612) 849-4735. Our client with an account at Fidelity will be able to deal directly with Fidelity. Clients also have online access and authority to transact in their own accounts. The firm will make this information available to customers through its disclosure policy.

Rule: FINRA Rule 4370(a).

VII. Data Back-Up and Recovery

Our firm maintains its primary or original books and records in electronic and paper form at 3879 Maple Ave, Ste 100, Dallas, TX 75219. Russell Jennings, Vice President, (214) 347-9117, is responsible for the maintenance of these books and records. Our firm exclusively maintains the following document types and forms that are not transmitted to our clearing firm: Advisory agreements, subscription documents and client suitability documents.

Our firm maintains its back-up copy of books and records in electronic form at www.Dropbox.com. Russell Jennings is responsible for the maintenance of the back-up copy of our books and records.

Our firm backs up its paper books and records by digitizing them to Dropbox. We back up our paper books and records as received. The firm has a redundant back up of its electronic books and records at Dropbox.com and our financials through Quickbooks online.

In the event of an SBD that causes the loss of our primary or original paper books and records, we will physically recover paper copies of them from our back-up websites. For the loss of our primary or original electronic books and records, we will obtain electronic copies of them from our back-up sites.

Rule: *FINRA Rule 4370(c)(1).*

VIII. Financial and Operational Assessments

A. Operational Risk

In the event of an SBD, we will identify whether there are any limitations on our ability to communicate with our customers, employees, critical business constituents, critical banks, critical counter-parties and regulators. Depending on the limitations, we will employ alternate modes of communication, including phone, email and online conferencing, to communicate with customers, employees, critical business constituents, critical banks, critical counter-parties and regulators. If registered persons are unable to service customers, our firm will send an email to customers notifying customers that they may access their funds and securities by contacting Aaron Dodge at (612) 849-4735. In addition, we will retrieve our key activity records as described in the section above, Data Back-Up and Recovery.

Rule: *FINRA Rules 4370(c)(3), (c)(4), (c)(5), (c)(7), (c)(9) and (g)(2).*

B. Financial and Credit Risk

In the event of an SBD impacting our financial position, we will determine the value and liquidity of our investments and other assets to evaluate our ability to continue to fund our operations and remain in capital compliance. We will contact our clearing firm, critical banks and investors to apprise them of our financial status. If we determine that we may be unable to meet our obligations to those counter-parties or otherwise continue to fund our operations, we will request additional financing from our bank or other credit sources to fulfill our obligations to our customers and clients. If we cannot remedy a capital deficiency, we will file appropriate notices with our regulators and immediately take appropriate steps, including winding down business operations in an orderly manner.

Rule: *FINRA Rules 4370(c)(3), (c)(8) and (g)(2).*

IX. Mission Critical Systems

Our firm'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 securities transactions, the maintenance of customer accounts, access to customer accounts and the delivery of funds and securities. More specifically, these systems include:

Mission Critical System	Function	Provider	Contact Information
RBC Wealth Station	All functions described above	RBC Capital Markets	Aaron Dodge at (612) 849-4735
Fidelity.com	All functions described above	Fidelity Investments	(800) 343-3548

Our firm establishes and maintains our business relationships with our customers and performs the mission critical functions of investment recommendations and trading. Our custodians provides through contract, the execution, allocation, clearance and settlement of securities transactions, maintenance of customer accounts, reporting, access to customer accounts and the delivery of funds and securities.

In the event that our firm's BCP is executed, our clients have direct access to their separately managed accounts.

"RBC Capital Markets, LLC (the "Firm") is committed to protecting its employees, clients and their assets at all times, including in times of emergency. As part of this commitment, and in compliance with the internal Enterprise Business Continuity Management policy and industry regulations (FINRA, NFA, et al), the Firm maintains a business continuity plan (the "Plan").

The Plan provides for sustainable operating environments during any crisis/incident or major business interruption that adversely impacts the Firm's ability to conduct business. The Plan addresses various scenarios including but not limited to a departmental disruption, building, city-wide or regional disruption, or a pandemic incident.

The planning process begins with a review of financial and operational risk, communications, continuity plan documentation and exercises. The Firm employs multiple work area recovery strategies to provide continuous support. These strategies include but are not limited to: work displacement, work load shifting, alternate physical facilities, remote access, etc.

The Firm has implemented steps to allow clients prompt access to their funds and securities in the event of a significant business disruption. The recovery time objectives for the Firm's essential business processes are determined through an annual Business Impact Analysis. These recovery objectives may be negatively affected by the unavailability of external resources and circumstances beyond the Firm's control.

The Plan is maintained in multiple locations and updated annually or whenever there is a material change to the business.

The Firm continuously tests throughout the year to improve the Plan and provide the best possible recovery solution to the Firm and its clients. Because the Firm's plan contains details of a confidential and proprietary nature it is not distributed to the public. The Plan is subject to modifications and any material changes to the statement above will be promptly posted on the Firm's websites as required by applicable law.”
<https://www.rbcclearingandcustody.com/legal/business-continuity-plan>

Russell Jennings will periodically review our clearing firm's capabilities to perform the mission critical functions the clearing firm has contracted to perform for our firm.

A. Our Firm's Mission Critical Systems

1. **Order Taking**

Infrequently, our firm receives orders from customers via phone. During an SBD, we will continue to take orders and execute them where internet connectivity is available. Customers will be informed of alternatives by phone and email. If necessary, we will advise our customers to place orders directly with our clearing firm at RBC Trade Support (833) 656-2722.

2. **Order Entry**

Currently, our firm places customer orders through RBC Wealth Station or via telephone call to the RBC trading desk.

In the event of an SBD impacting order entry, we will enter and send orders to our clearing firm by the fastest alternative means available, which include online or telephonically. In the event of our clearing firm experiences an SBD impacting order entry, we will maintain the order in electronic form and deliver the order to the clearing firm by the fastest means available when it resumes operations. In addition, our contract with the clearing firm provides that customers may be referred to the clearing firm for direct order entry.

3. **Order Execution**

RBC and Fidelity are responsible for trade execution, routing and settlement. We would seek an outside broker dealer that makes a market in our stocks to place the trade and settle with them when our custodians are able, if they agree.

B. Mission Critical Systems Provided by Our Clearing Firm

Our firm has contracted with our clearing firm to provide order execution, order allocation, customer reporting, customer account maintenance or access and delivery of funds and securities.

Rule: *FINRA Rules 4370(c)(2) and (g)(1).*

X. Alternate Communications Between the Firm and Customers, Employees and Regulators

A. Customers

In the event of an SBD, we will identify whether there are any limitations on our ability to communicate with customers. Depending on the limitations, we will employ alternate modes of communication, including phone and e-mail, to communicate with customers. When an alternate mode of communication is used we will consider any increased risk of cybersecurity events stemming from the alternate mode.

Rule: FINRA Rule 4370(c)(4) and (e).

B. Employees

In the event of an SBD, we will identify whether there are any limitations on our ability to communicate with employees. Depending on the limitations, we will employ alternate modes of communication, including phone or email, to communicate with employees. When an alternate mode of communication is used we will consider any increased risk of cybersecurity events stemming from the alternate mode.

Consistent with FINRA Rule 4511 (General Requirements), we will also employ the use of firm-wide or office-wide emails or text messages, or notifications or a call tree so that senior management can reach all employees quickly during an SBD. In addition, in the event that employees move to a back-up location or remote location for an extended period of time (e.g., due to a pandemic), we will circulate updated employee contact information within the firm to maintain service.

We also have a call tree, which includes all staff personal and office phone numbers. The person to invoke use of the call tree is: Russell Jennings

Caller	Call Recipients
<i>Jeb Terry</i>	<i>Russell Jennings</i>
<i>Russell Jennings</i>	<i>Jeb Terry</i>

Rule: FINRA Rule 4370(c)(5).

C. Regulators

We are currently members of the following self-regulatory organizations (SROs), and are also regulated by: The Texas State Securities Board and FINRA. Contact information for these regulators is below in Section XII, Regulatory Reporting.

In the event of an SBD, we will identify whether there are any limitations on our ability to communicate with regulators. Depending on the limitations, we will employ alternative modes of communication, including, phone or email, to communicate with regulators. When an alternate mode of communication is used we will consider any increased risk of cybersecurity events stemming from the alternate mode.

In the event that we have relied on any guidance or temporary regulatory relief from a regulator during an SBD, we will document our reliance.

Regulator	Guidance or Temporary Regulatory Relief and Any Condition(s)	Actions in Reliance	Date(s)

Rule: FINRA Rule 4370(c)(9).

XI. Critical Business Constituents, Banks and Counter-Parties

A. Business Constituents

In the event of an SBD related to our critical business constituents (businesses with which we have an ongoing commercial relationship in support of our operating activities, such as vendors providing us critical services), we will contact our critical business constituents and determine the extent to which we can continue our business relationship with them in light of the SBD. Our critical business constituents are:

Service/Product	Supplier's Name, Address and Phone Number	Any Alternate Supplier's Name, Address, and Phone Number
Banking	Prosperity Bank 3802 Oak Lawn, Ave, Dallas TX 75219 (214) 521-4800	
Reporting and Reconciliation	Morningstar Back Office Services 22 West Washington St. Chicago, IL 60602 (866) 215-2503	

We will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services when we need them because the business constituent is experiencing its own SBD or we are experiencing ours own.

Rule: FINRA Rule 4370(c)(7).

B. Banks

In the event of an SBD related to our financing, we will contact our banks and lenders to determine if they can continue to provide the financing. The bank maintaining our operating account is Prosperity Bank. 3802 Oak Lawn, Ave, Dallas TX 75219 (214) 521-4800.

Rule: FINRA Rule 4370(c)(7).

C. Counter-Parties

Not applicable.

Rule: FINRA Rule 4370(c)(7).

XII. Regulatory Reporting

Our firm is subject to regulation by: The Texas State Securities Board and FINRA. We fulfill our regulatory reporting obligations using electronic means and the [FINRA Gateway](#).

In the event of an SBD, we will identify whether there are any limitations on our ability to fulfill our regulatory reporting obligations. Depending on the limitations, we will employ alternate modes of communication, including phone or email, to communicate with regulators in fulfilling our regulatory reporting obligations. In the event we are unable to fulfill a regulatory reporting obligation in a timely manner we will notify our regulator at:

Regulator	Contact Person	Contact Information
FINRA	[Risk Monitoring Analyst]	833-26-FINRA
Texas SSB	Wendy Moody	wmoody@ssb.texas.gov 214-879-8072

Rule: FINRA Rule 4370(c)(8).

XIII. Disclosure of Business Continuity Plan to Customers

Attached is our written BCP disclosure statement we provide customers at account opening and as updated. We also post the disclosure statement on our website mail it to customers upon request.

Rule: FINRA Rule 4370(e).

XIV. Updates and Annual Review

Our firm will update this plan whenever we have a material change to our operations, structure, business or location or to those of our clearing firm. In addition, our firm will review this BCP annually, on December 1st, to determine whether any modification are necessary due to changes in our operations, structure, business or location or those of our clearing firm. As part of our annual review, we will conduct a firm-wide test of our BCP.

Rule: FINRA Rule 4370(b).

XV. Senior Manager Approval

I have approved this Business Continuity Plan as reasonably designed to enable our firm to meet its obligations to customers in the event of an SBD.

Rule: FINRA Rule 4370(d).

Signed:

John B. Terry

Title:

President

Date:

12-8-2021

Aberdeen Investment Management LLC's Business Continuity Planning

Aberdeen Investment Management, LLC has developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

Contacting Us – If after a significant business disruption you cannot contact us as you usually do at (214) 347-9114, (214) 347-9117, jbsr@aberdeeninvestment.com or russell@aberdeeninvestment.com, you should call our cell phone numbers: Jeb (214) 552-6708; Russell (214) 616-1969. If you cannot access us through either of those means, you should contact our clearing firm, Aaron Dodge at RBC Clearing & Custody; (612) 849-4735 <https://www.rbcclearingandcustody.com/>, for instructions on how you may transact in your account or access your assets.

Our Business Continuity Plan – 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 books and records, and allowing our customers to transact business. In short, 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; all mission critical systems; financial and operational assessments; alternate communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

Our Custodian firm, RBC Clearing and Custody, backs up our 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 clearing firm that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments in a timely fashion. Your orders and requests for funds and securities could be delayed during this period.

Varying Disruptions – Significant business disruptions can vary in their scope, such as only our firm's office, 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 the event of a significant business disruption, we have plans to move to remote locations as necessary. In either situation, we plan to continue in business, transfer operations to our clearing firm if necessary, and notify you through email or our customer emergency number, (214) 616-1969 or (214) 552-6708 how to contact us. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer's prompt access to their funds and securities.

For more information – If you have questions about our business continuity planning, you can contact us at (214) 347-9117 or russell@aberdeeninvestment.com.



Business Continuity Plan

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