

Business Continuity Plan

INTRODUCTION

The purpose of this letter is to provide you with very important information about CF&E Investments ("CF&E") Business Continuity Plan ("BCP") so that you are aware of what you need to do to in the event that our firm experiences a significant business disruption ("SBD"). As a result of our ever-changing and evolving world, it has become necessary for firms in the financial services industry to take steps to ensure their preparedness to meet customer needs and resume regular business operations in a timely manner in the event of an SBD.

There are several types of SBDs varying in severity and scope that may occur on an internal or external level. An internal SBD, such as a fire in our building, would only affect the firm's ability to conduct its normal business. An external SBD, such as an earthquake, regional power outage, or terrorist attack, would affect the operations of several firms or the financial markets as a whole.

FIRM POLICY

Our policy is to respond to an SBD in a manner that prioritises the immediate safety of our employees, preservation of the firm's property, and a quick recovery in order to meet the business needs of our clients.

ALTERNATE OFFICE LOCATION

In the event that the main office becomes inoperable, the firm will shift its operations to its designated back-up facility which is reasonably distant from the main office so as to reduce the chance that it will be affected by the same SBD, yet close enough to relocate to quickly if necessary.

BACK-UP BOOKS AND RECORDS

CF&E maintains back-ups of its client files and other internal books and records at off-site facilities. Should an SBD cause our primary records to be inaccessible or destroyed, we have procedures in place to access the back-up files and implement them promptly in order to assure the least possible impact on our clients.

KEY SYSTEMS

The firm has identified the possibility of a loss of functionality of the systems relied upon for its regular business operations in the event of an SBD. We have enumerated our key systems in our BCP, identified the individual(s) responsible for them, and developed procedures to switch to alternative systems should our primary systems be incapacitated.

POTENTIAL SBD SCENARIOS

In an effort to prepare for the variety of effects that different types of SBDs might have on CF&E, we have outlined some SBD scenarios and the corresponding actions that the firm will need to take in order to assure that the SBD has the least possible effect of the firm and our clients. We are aware that the exact ramifications of any type of SBD cannot be predicted precisely and in the event of an SBD, we will take the time to assess the firm's particular resulting situation and take the necessary steps as described in our BCP to handle the situation as effectively as is possible under the circumstances we encounter.

INTERNAL SBD

In the event that a fire consumes CF&E's main office destroying all hardware and files, after assuring the safety and well-being of our employees, the following actions will be taken:

Effect of SBD

- Personal computers, servers, and data storage hardware are destroyed
Action to be taken: Acquire new computers, transport them to alternate location, and install the necessary software obtained from off-site storage facility. Contact network service provider if necessary to re-establish technological infrastructure and web services.
- Books and records are destroyed
Action to be taken: Obtain back-up books and records from off-site facility and transport them for immediate use to the alternate location.
- Office is destroyed
Action to be taken: Relocate to the alternate location and establish operations. Once business has resumed and is fully operational, start searching for a new main office location.
- Telecommunications hardware is destroyed
Action to be taken: Contact service provider to transfer existing service to the alternate location, arrange for necessary hardware and software installations.

We estimate the resumption of business and communications channels within 1-3 days of the onset of this type of SBD.

External regional SBD

In the event that an earthquake or other natural disaster causes structural damage to our building and the buildings of some of our service providers, CF&E will make the following assessments and take the following steps:

Effect of SBD

- Building is not structurally sound
Action to be taken: All vital equipment and files will be transported to the alternate location and business will resume promptly. If the equipment and files are damaged beyond use, new equipment (as necessary) shall be obtained and the firm's back-up files shall be retrieved from its off-site storage facility(s).
- Some of our vendors are experiencing service interruptions
Action to be taken: Contact vendors to determine when they anticipate being fully operational and make arrangements for the continuance of service, if possible, in the meantime. Depending on the impact of this particular type of SBD on our third-party vendors, we estimate a range of 1-3 days for the firm to be able to resume normal business operations.

Catastrophic SBD

In the event of an SBD on the level of a terrorist attack, major natural disaster, political crisis, or other event that is of a magnitude great enough to force the close of the markets but does not physically affect CF&E, the firm will take the following steps:

Effect of SBD

- The financial markets are closed (other than normal market holidays)
Action to be taken: Communicate with clients to determine the effect of the SBD on the transaction in progress.
- There is a possibility of further SBDs resulting from the primary SBD
Action to be taken: Test the firm's procedures for handling an SBD that results in the firm's relocation. Assure that back-up systems, hardware, and files are ready to be utilised and can be set up quickly if needed.

It is virtually impossible to predict a recovery time for this category of SBD due to the scope and the myriad of ramifications on the financial services industry as a whole. We are confident that with the procedures we have in place we will be able to ensure the least possible impact on our clients as dictated by the circumstances.

SUMMARY

At CF&E we deeply value the relationships we have built with our clients and we strive to meet their changing needs in any business climate. It is not the intent of this document to assure our clients that there will be no impact on them whatsoever in the event that CF&E is affected by an SBD. Rather, we wish to convey the fact that we have developed procedures for varying types of possible SBDs which will allow us to address the effects on our firm on a variety of levels, manage those effects, and utilize our alternate arrangements in a manner that we expect will minimize client impact. In our procedures, we stress the importance of maintaining communications with our clients through as many media as possible so that we may continue to meet their needs and transact business in as smooth a fashion as is possible under whatever circumstances may have arisen.

Senior Management Approval

I have approved this Business Continuity Plan as a reliable and effectively designed plan in order to meet its obligations to a customer during a significant business disruption.

CF&E Investments Group

Name : Eddie Sai
Designation : CEO
Date : 15 August 2021