



*Middleton Dickinson*  
Capital Management LLC  
Investment Advisor

## Business Continuity Plan – Customer Disclosure

Middleton Dickinson Capital Management LLC (“MDCap”) has developed a Business Continuity Plan (“BCP”) 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 have to 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 would at 630.232.2755, you should call our alternative emergency numbers 630.624.3184 or 815.437.2327 or 630.450.3184 or go to our website at [www.mdcap.net](http://www.mdcap.net). If you cannot access us through those means, you should contact your custodian firm for instructions on how they may provide prompt access to funds and securities, enter orders and process other trade-related, cash and security transfer transactions for you.

**Our Business Continuity Plan** – We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our associates 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 (“SBD”).

### Our BCP addresses:

- data back up and recovery
- all mission critical systems
- financial and operations assessments
- alternative communications with customers, associates, and regulators
- alternate physical location of associates
- 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

Your custodian firm backs up your 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, your custodian firm has its objective to restore its own operations and be able to complete existing transactions and accept new transactions and payments as soon as possible. Your orders and requests for funds and securities could be delayed during this period.

**Varying Disruptions** – Significant business disruptions (“SBD”) can vary in their scope, such as only our firm, a single building housing our firm, the business district 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 a building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business within 2 hours. In a disruption affecting our business district, city or region, we will transfer our operations to a site outside the affected area, and recover and resume business within 24 hours. In either situation, we plan to continue in business, transfer operations to your custodial firm if necessary, and notify you through our web site [www.mdcap.net](http://www.mdcap.net) or our alternate emergency number (voice message), how to contact us. If the SBD is so severe that it prevents us from remaining in business, we will assure our customer’s have prompt access to their funds and securities.

If you wish to receive more information or contact a firm representative, please call 630.232.2755 or email [tom@mdcap.net](mailto:tom@mdcap.net) or [debra@mdcap.net](mailto:debra@mdcap.net) or [t.dickinson@bloomberg.net](mailto:t.dickinson@bloomberg.net).