Business Continuity Plan Disclosure Statement

The Firm developed a Business Continuity Plan ("BCP") detailing how our firm will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions are unpredictable, our firm has an obligation to prepare for unforeseen events as they occur. Our BCP is designed to permit our firm to resume operations in a reasonable amount of time at a secure remote location, given the scope and severity of a major event.

If a business disruption affects only our firm or a specific building within our firm, we will transfer our operations to a local worksite. In a disruption affecting our business district, city, or region, we will transfer our operations to an alternate worksite outside of the affected area. In either situation, we plan to continue conducting business and notify our investors how to contact us through a voice message reached via our main phone number.

To accommodate our recovery time objective, telephone service will continue and normal work processes will resume at the alternate worksite. Recovery times may vary depending on the nature and severity of the disruption; however, our recovery time objective for mission critical operations is 0-72 hours. If the significant business disruption is so severe that it prevents us from conducting business, we will update our voice message and/or website.

At a minimum, the Firm business continuity plan is reviewed and updated on an annual basis. Additionally, our primary internal and external application providers periodically conduct testing of their own back-up capabilities to ensure that, in the event of an emergency or significant business disruption, they will be able to provide us with the critical information and applications we need to continue or promptly resume our business. Our business continuity plan is designed to allow us to continue to provide the quality service you have come to expect from the Firm.



1077 Celestial St. | Cincinnati, Ohio 45202 513-371-5533



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