

Business Continuity Plan

Client Disclosure Document

Purpose

The purpose of this notice is to provide you with very important information about KippsDeSanto & Company's ("KippsDeSanto & Co." the "Firm") 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").

KippsDeSanto & Co. is committed to providing our customers with a high level of service and secure and reliable access to our personnel during any circumstance. Our BCP is designed to help ensure that we are able to continue to provide service to you, continue our business operations and that you will be able to reach us with little or no disruption regardless of any unplanned business interruption of varying scope and magnitude.

Recovery Strategies and Plans

KippsDeSanto & Co. has taken steps to provide for business continuity planning under a variety of potential scenarios. We have recovery services and providers to address the immediate response to an incident and the management of the situation from the time the incident occurs until the matter is resolved. Our Business Continuity Plans are tested and evaluated routinely to ensure we have the appropriate plans in place and resources to support the plan in line with best practices. Examples of the various scenarios our plans address include:

Technology Disruption

KippsDeSanto & Co. has plans in place to address the recovery of technology systems. We use cloud based software and technology whose data centers are geographically separated and out of region on different power grids and supported by backup generators. This design ensures that if one of their locations suffers a disruption in service, our critical systems will be available to continue to provide service.

Single Building or Regional Disruption

KippsDeSanto & Co. has an office location that supports our customers and business operations. During a business disrupting event to the building, a business district, city, or our region where we conduct business we will rely on access to our remote systems allowing our personnel to continue to conduct business with minimal interruption. Our planning strategies includes having personnel work remotely from their residences, as the need arises.

Pandemic or Workforce Reduction

KippsDeSanto & Co. has plans in place to continue business during a reduction in our workforce, including a pandemic event. Our plan is a multi-tiered action plan based on the World Health Organization (WHO) and Federal Government Response phases with triggering events for each phase. As the threat of a pandemic becomes greater and a new phase is triggered, we will assess our plans and determine the appropriate course of action.

Conclusion

Although KippsDeSanto & Co. has taken aggressive steps to provide for business continuity, no BCP can eliminate all risk or delay resulting from an unplanned business interruption or disruption in service. The success of our business continuity plan includes dependencies on the remote working access being available, that we have sufficient personnel, and that external organizations, such as government agencies, our nation's critical infrastructure and market systems, are operational. If any of these dependencies fails to recover in a timely manner, our business could be disrupted until matters are resolved. In the unlikely event that KippsDeSanto & Co. has determined that it cannot resume operations within a reasonable amount of time, it will provide as much advance notice as possible regarding its ongoing operations.

KippsDeSanto & Co. conducts regular assessments, updates and testing of our plans to ensure that we have taken the steps necessary to protect the service to our customers. Any updates to our general plan will be reflected in this statement. Alternatively, you may obtain an updated BCP summary by requesting a written copy by mail to the address below.

Send your request to KippsDeSanto & Co., Attn: Business Continuity, 8000 Towers Crescent Drive, Suite 1200, Tysons Corner, VA 22182