

First Palladium has established emergency preparedness plans and procedures addressing the possibility of a significant business disruption that could result from power outages, natural disasters, pandemics and other events. This business continuity plan is reviewed, updated and tested on a regular basis and provides for continuation of services in the event of a disruption. A few examples of what might occur if we were to experience a business disruption of varying magnitudes include, but is not limited to: (1) In the event of a global or local pandemic, if the local, state or federal government chooses to initiate a civil action limiting the physical movement of employees, we would activate our business continuity plan to enable employees to work remotely; (2) If telephone service became unavailable, we would re-route calls to an affiliated office or use cell phones for the duration of the outage; (3) If utility electric power were to be lost, a backup power generator is in place to support critical services, and would be operational within seconds of the power loss; and (4) In the event our home office facilities became unavailable, we would continue to provide critical services by enabling employees to work remotely and/or relocating personnel and resources to another company office. While no contingency plan can eliminate all risk of service interruption, we will assess and update the Firm's plans to mitigate all reasonable risk. Our business continuity plan is subject to modification. Any modifications to this disclosure will be promptly posted to our website (if applicable). You may at any time request an updated written copy by mail.