



LEADING INVESTORS SINCE 1924<sup>SM</sup>

## **Disclosure to Clients in Compliance with NASD Rule 3510(e) Regarding Continuity and Contingency Plans for St. Germain Investment Management**

St. Germain has developed a Business Continuity Plan 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 do at 413-733-5111 or 800-443-7624, you should call our alternate number 860-727-9530, e-mail us at [info@stgermaininvestments.com](mailto:info@stgermaininvestments.com), or you can go to our website at [www.stgermaininvestments.com](http://www.stgermaininvestments.com). If you cannot access us through any of those means, you should contact our clearing firm, Pershing, at (888) 367-2563 or visit their website at [www.pershing.com](http://www.pershing.com) for instructions on how it may provide prompt access to your funds and securities.

**Our Business Continuity Plan** – We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees 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.

St. Germain has a Business Continuity Plan, which addresses: data back up and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, bank and custodian impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

Our clearing firm, Pershing, backs up our 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, we have been advised by our clearing firm that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments within 4 hours. Your orders and requests for funds and securities could be delayed during this period.

**Varying Disruptions** – Significant business disruptions can vary in their scope, such as damage to individual computer systems, our entire firm, the 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 an alternate site when needed. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area to recover and resume business operations. We will endeavor to continue business on behalf of our clients on that same business day during any and all events, recognizing that service may be impacted for longer periods depending upon the seriousness of the event. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer's prompt access to their funds and securities.

The recovery and business continuity plans of St. Germain are subject to modification without notice. We do not guarantee that for every event or business disruption: (1) such plans will be successfully implemented; or (2) such plans will be sufficient to avoid, deter, or mitigate the event of business disruption. In addition, because we are dependent upon outside business partners and vendors (e.g., telecommunications, exchanges, transportation, etc.), our ability to implement these plans may be impacted by any disruptions experienced by these partners or vendors.

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