

**New Vernon Wealth Management  
Business Continuity Plan  
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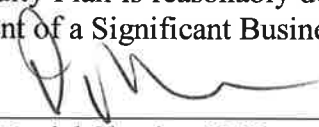
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This "Business Continuity Plan" has been created to meet the requirements described in SEC rule 206(4)-7. This Business Continuity Plan is reasonably designed to enable our firm to meet its obligations to customers in the event of a Significant Business Disruption.

Authorized Approval Signature: \_\_\_\_\_

Printed Name & Title: \_\_\_\_\_

Date: \_\_\_\_\_

  
\_\_\_\_\_  
Daniel Shapiro, CEO

\_\_\_\_\_  
11/30/15

This Plan is effective from the date approved until the date of its authorized revision, update or replacement (see below).

Date this Plan was no longer effective (date of revision, update or replacement): \_\_\_\_\_

Recordkeeping: Discard after \_\_\_\_\_ (date three years from termination of use).

## **1. Emergency Contact Persons**

New Vernon Wealth Management has designated the following individuals to act as contact persons for the firm.

### **Primary Contact**

Name, Title: Danny Shapiro, CEO, CCO

Address: 799 Central Ave. Suite 350 Highland Park, IL. 60035

Telephone Number: 847- 926-5711

Fax Number: 847-926-5701

E-mail Address: danny@sfinv.com

### **Secondary Contact:**

Name, Title: Steven A. Shapiro, VP, CIO

Address: 799 Central Ave. Suite 350 Highland Park, IL. 60035

Telephone Number: 847-926-5712

Fax Number: 847-926-5702

E-mail Address: steve@sfinv.com

### **Executive Representative:**

New Vernon Wealth Management's CEO/CCO is Daniel Shapiro.

### **Disaster Recovery Coordinator/Team:**

The Company has designated Danny Shapiro, CEO as the "Disaster Recovery Coordinator." In his absence, Steve Shapiro, Vice President will assume his responsibilities. The Company has appointed an Emergency Management Team "EMT" that will be responsible for administering and executing various sections of this plan. The EMT will follow the direction of the "Disaster Recovery Coordinator" or his designee in carrying out assigned duties. The EMT is made up of the following persons: Gary Just and Rosina Mahabeer.

The "Disaster Recovery Coordinator" has the responsibility to make an immediate preliminary assessment of the nature and extent of the disruption by assessing the following: electricity supply; condition of computer network/phones; damage to the building; HVAC in extreme weather; and other hazards.

If the Coordinator determines that personnel should evacuate the affected location, he must make an announcement to all personnel as appropriate procedures. The announcement may given via personal contact, e-mail, intercom or other methods as appropriate given the systems available and size of staff and building. This announcement should be short and concise, should calmly identify the situation and should provide instructions to employees on how to respond. This announcement should be repeated as often as necessary to avoid confusion and to ensure all

employees are aware of the situation. After ensuring the physical safety of Company personnel, the Coordinator and the EMT must then implement this BCP.

If the situation does not merit evacuation, steps should be taken to alert designated persons (the EMT) of necessary actions to facilitate ongoing operations in the face of limited disruption. In this case, the Coordinator will determine which, if any, procedures in this BCP should be implemented.

In the event, the SBD has directly affected other areas of the building but has not directly impacted the Company's office, the Coordinator will contact building security or emergency personnel for instructions on how the Company should respond and proceed accordingly.

## **2. Firm Policy**

New Vernon Wealth Management's policy is to respond to a Significant Business Disruption (SBD) by safeguarding employees' lives and firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of the firm's books and records, and allowing our customers to transact business. In the event that we determine we are unable to continue our business, we will assure customers prompt access to their funds and securities.

### **Significant Business Disruptions (SBDs):**

New Vernon Wealth Management's plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only the Company's ability to communicate and do business, such as a fire or loss electrical power in the office or building.

External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a natural disaster, or another event that causes a wide-scale, regional disruption in essential services. The Company's response to an external SBD will rely more heavily on other organizations and systems, especially on the capabilities of the clearing firm, the issue sponsors, federal emergency authorities, local officials and utility companies.

### **Approval and Execution Authority:**

Daniel Shapiro, CEO/CCO, a registered principal, is responsible for approving the plan and for conducting the required annual review.

Steven Shapiro, Vice President, in addition to Daniel Shapiro *has* the authority to execute this BCP.

### **Plan Location and Access:**

New Vernon Wealth Management will maintain copies of its BCP plan, a record of the firm's annual reviews, and the changes that have been made to the BCP for inspection by regulators. A hard copy of the Company's Plan is located in its main business location and may be accessed by contacting Danny Shapiro at (847) 926-5711 or [danny@sfinv.com](mailto:danny@sfinv.com). An electronic copy of the Company's plan is located internally on in L:\FirmCompliance\BCP.

### **3. Business Description**

New Vernon Wealth Management is an SEC registered investment adviser that succeeded to the investment advisory business of SF Investments, Inc. New Vernon Wealth Management acts as a discretionary investment adviser to numerous investment accounts maintained by its advisory clients. The main securities purchased for client accounts include equities, fixed income, ETF's, and closed end funds. Furthermore, the Company does not hold customer funds or securities.

New Vernon Wealth Management's affiliated broker/Dealer, SF Investments, Inc. accepts and enters orders. All transactions are sent to SF Investments, Inc.'s clearing firm, which executes compares, allocates, clears and settles them. The clearing firm also maintains our customers' accounts, can grant customers access to them, and delivers funds and securities.

The SF Investments Inc.'s clearing firm is Pershing LLC, a subsidiary of The Bank of New York Mellon Corporation. The mailing address for Pershing is One Pershing Plaza, Jersey City, New Jersey 07399 and their web address is [www.pershing.com](http://www.pershing.com).

### **4. Office Locations**

The Company or its registered personnel currently operate from the following locations:

<b>Type of Location, Registered or Unregistered</b>	<b>Address and Main Phone Number</b>	<b>Located in a Personal Residence? (Y or N)</b>	<b>Means of Transportation Employees Use to Reach Office</b>	<b>Mission Critical Systems Taking Place at Office</b>
Home Office – registered	799 Central Ave. Suite 350 Highland Park, IL. 60035	No	Car, train, bus	Order taking, entry, execution comparison, access to customer accounts

#### **Alternative Physical Location(s) of Employees:**

New Vernon Wealth Management has no other office locations, therefore, in accordance with this requirement; members of the Company's staff will relocate to 845 Kimballwood, Highland Park, IL 60035 (Personal residents of Steven Shapiro)

### **5. Customers' Access to Funds and Securities**

New Vernon Wealth Management does not maintain custody of customers' funds or securities. Customer accounts are serviced by our introducing broker, SF Investments, Inc. and maintained at their clearing firm, Pershing, LLC.

In the event of a SBD:

1. If telephone service is available, our registered persons will take customer orders or instructions and contact our clearing firm on their behalf, and
2. If Internet access is available, we will post a notice on our website, [www.newvernonwealth.com](http://www.newvernonwealth.com), which includes procedures for customers to use in contacting the clearing firm directly to access their funds and securities or to place orders.
3. If telephone service and internet access are unavailable, customers can receive information on how to request funds and securities by visiting the Pershing website, [www.pershing.com](http://www.pershing.com), under the "Customer Support" section. Customers can also call (201) 413-3635 for recorded instructions.

The Company will make this and additional information regarding accessing funds and/or securities available to customers through our disclosure policy (below).

## **6. Data Back-Up and Recovery (Hard Copy and Electronic)**

New Vernon Wealth Management maintains its primary books and records in hard copy and electronic format at 799 Central Ave. Suite 350 Highland Park, IL. 60035, Gary Just, CFO/FINOP, 847-926-5724 is responsible for the maintenance of these books and records.

New Vernon Wealth Management and SF Investments, Inc. maintains the following document types and forms that are not transmitted to the clearing firm: New account forms, contracts, invoices, bank statements and checks.

### **Back-up of Paper Records:**

New Vernon Wealth Management copies its paper records monthly and the back-up copies are maintained at 799 Central Ave. Suite 350 Highland Park, IL. 60035. Gary Just, FINOP, 847 926 5724 is responsible for the maintenance of these back-up books and records.

Because the Company does not hold customer funds, an internal or external SBD affecting Company's office should not pose a threat to customer records or financial holdings. While the Company may lose access to some or all FINRA or SEC required records in an external SBD, or may permanently lose some or all such records in an internal SBD (such as a fire), we believe our customers would not suffer as a result.

### **Back-up of electronic records:**

The firm has a Business Disaster Recovery (BDR) appliance that holds 2 TB of storage. The appliance sits on premise and records hourly snapshot images of the servers. The application is capable of restoring single files like any file based backup system. However, if a single production server were to fail, the appliance can mount and boot a virtual image of the server from the latest backup. A server failover procedure can take anywhere from 20 minutes to 60 minutes depending on the server.

On a nightly basis, the BDR appliance will replicate to another BDR in the cloud. This serves as business continuity in the event that the primary office is unavailable due to third party utility

failure (power, internet, etc.) or a local disaster (fire, flood, weather, etc.). When the cloud BDR is in service, computers with internet connection will connect to the remote network using a VPN. At that point, those computers will have access to the servers in the cloud environment, similar to when you work remotely.

The BDR on premise is capable of up to 90 days of data retention, due to the amount of storage it holds.

## **7. Financial and Operational Assessments**

### **Operational Risk:**

In the event of an SBD, New Vernon Wealth Management will immediately identify any methods available that will permit personnel to communicate with customers, other employees, critical business constituents, critical banks, critical counter-parties, and regulators.

Although the effects of an SBD will determine the means of alternative communication, the communications options the Company may employ will include Website, cell/smart phone telephone voice mail and secure e-mail. In addition, New Vernon Wealth Management will retrieve key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic).

### **Financial and Credit Risk:**

In the event of an SBD, New Vernon Wealth Management's CFO will determine the value and liquidity of its investments and other assets to evaluate the Company's ability to continue to fund its operations and remain in capital compliance.

New Vernon Wealth Management will contact its clearing firm, critical banks, and investors to apprise them of the Company's financial status. If the Company determines that it may be unable to meet its obligations to those counter-parties or otherwise continue to fund its operations, New Vernon Wealth Management will request additional financing from our bank or other credit sources to fulfill its obligations to our customers and clients. If New Vernon Wealth Management cannot remedy a capital deficiency, the FINOP will file appropriate notices with applicable regulators and immediately take appropriate steps, including contacting the SEC immediately and ceasing business until a business plan is executed to reduce expenses and infuse additional capital.

In the event there is suspension or termination of the Company's business, the Company will attempt to notify customers regarding the situation and provide them with instructions for accessing their funds or securities, if applicable, for verifying transactions in process or for conducting future business. Notification will be based on the circumstances and in a form permitted by regulatory authorities. The form of notification may include telephone calls, letters or a posting on the Company's website.

## **8. Mission Critical Systems**

### **Internal Mission Critical Systems**

New Vernon Wealth Management's "mission critical systems" are those that ensure prompt and accurate processing of securities transactions, including order taking, entry, the maintenance of customer accounts, and access to customer accounts.

The Company has primary responsibility for establishing and maintaining business relationships with customers and has sole responsibility for the Company's mission critical functions of order taking and entry.

#### **Order Taking**

Currently, the Company receives orders from customers via telephone. During an SBD, we will continue to take orders through any methods that are available and reliable.

The Company will inform our customers what alternatives they have to send their orders to us in the event traditional methods are interrupted. Customers will be informed of alternatives by disclosure information provided when a new business relationship is established and by calls from personal cell phones, through email messages or via a notification posted on the Company's website or any other means available.

#### **Order Entry/Submission**

Currently, New Vernon Wealth Management enters submits orders by recording them on paper and/or electronically and sending them to our clearing firm electronically and by telephone.

In the event of an internal SBD, the Company will send orders to its clearing firm by the fastest alternative means available, which may include alternative telephone facilities, including cell phones; smart phone access to Pershing's trading system; messenger or courier; or external e-mail connections.

In addition, during an internal SBD, the Company may refer customers directly to the clearing firm for placing orders.

In the event of an external SBD, the Company will maintain the order in electronic or paper format, and deliver the order to the clearing firm product or issuer by the fastest means available when it resumes operations.

#### **Order Execution**

The Company does not execute orders. All orders are executed through the Company's clearing firm. See below for information on the clearing firm's mission critical systems.

### **Mission Critical Systems Provided by Our Clearing Firm**

New Vernon Wealth Management's affiliated introducing broker, SF Investments Inc., uses Pershing LLC as its clearing firm. Pershing LLC provides, through contract, the execution,

comparison, allocation, clearance and settlement of securities transactions, the maintenance of customer accounts, access to customer accounts, and the delivery of funds and securities.

SF investments Inc.'s clearing agreement, or addendum thereto, provides that the clearing firm will maintain a business continuity plan and the capacity to execute that plan. Pershing will provide New Vernon Wealth Management with an executive summary of its plan upon request.

### **Summary of Pershing's Business Continuity Plan:**

To address interruptions to Pershing's normal course of business, Pershing maintains a business continuity plan, which includes geographically dispersed data center and alternative processing facilities. The plan is annually reviewed and updated as necessary.

The plan outlines the actions Pershing will take in the event of a building, city or regional incident, including:

- Continuous processing support by personnel located in unaffected facilities
- Relocating technology or operational personnel to alternative regional facilities
- Switching technology data processing to an alternative regional data center

All Pershing operational facilities are equipped for resumption of business and are tested. Regarding all circumstances within Pershing's control, Pershing's recovery time objective for business is four (4) hours depending upon the availability of external resources.

In the event that your firm experiences a significant business interruption, you may contact Pershing directly to process limited trade-related transactions, cash disbursements and security transfers. Instructions to Pershing must be in writing and transmitted via facsimile to (201) 413-5368 or by postal service as follows:

Pershing LLC  
P.O. Box 2065  
Jersey City, New Jersey 07303-2065

For additional information about how to request funds and securities when your firm cannot be contacted due to a significant business interruption, please select the Business Continuity and Other Disclosures link at the bottom of the home page on the Pershing website at [pershing.com](http://pershing.com). You may also call (201) 413-3635 for recorded instructions.

If you cannot access the instructions from the above website or telephone number, you may call (213 624-6100, extension 500, an alternative Pershing number for recorded instructions.



## **9. Alternate Communications Between the Firm and Customers, Employees, and Regulators**

### **Customers**

The Company currently communicates with our customers using the telephone and U.S. mail.

In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the customer. For example, if we have communicated with a party by e-mail but the Internet is unavailable, we will call them on the telephone and follow up where a record is needed with paper copy via U.S. mail.

### **Employees**

The Company currently communicates with its employees using the telephone, cell phones, e-mail, and in person. In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party.

The Company will also employ a call tree so that senior management can reach all employees quickly during an SBD, if telephone service is available. The Disaster Recovery Coordinator and/or Emergency Management Team will be responsible for invoking the call tree. The call tree will include all staff home and office phone numbers.

Caller	Call Recipients
Daniel Shapiro	Gary Just, Steve Shapiro, Nate Shapiro, Marty Youmaran, Magnitech (Tim Pabich), Dee Dee Silverstein, Steve Virgili, Rosina Mahabeer, Mansoor Zakaria, Rachit Tibrewala, and Peter Riskind

### **Regulators**

The Company is currently an SEC registered investment adviser and notice files in the following states: CA, CT, FL, IL, NH, NJ, NY, & TX.

New Vernon Wealth Management communicates with applicable regulators using the telephone, e-mail, U.S. mail, and in person.

In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party.

## 10. Critical Business Constituents, Banks, and Counter-Parties

### Business constituents

New Vernon Wealth Management has contacted our critical business constituents (businesses with which the Company has an ongoing commercial relationship in support of its operating activities, such as vendors providing critical services), and determined the extent to which the Company can continue its business relationship with these businesses in light of the internal or external SBD. The Company has entered into a supplemental contract with certain critical business constituents to provide such services. The alternative suppliers are disclosed below.

Our major suppliers are:

Business Constituent	Address, Phone Number	Alternative Supplier	Address, Phone Number
Pershing LLC	1 Pershing Plaza Jersey City, NJ 07399	None	
Bloomberg	499 Park Ave., New York, NY 10022, (212) 318-2540	Thomson Reuters	717 Office Parkway Creve Coeur, MO 63141 (314) 468-2516
Thomson Reuters	717 Office Parkway Creve Coeur, MO 63141 (314) 468-2516	Bloomberg	499 Park Ave New York, NY 10022 (212) 318-2540
Magnitech Solutions	700 Commerce Dr. Oak Brook, IL 60523 (847) 282-3060	None	
AT&T	(800) 727-2273 Land (888) 613-6330 T1 (877) 722-3755 DSL	None	

### Banks

New Vernon Wealth Management has contacted its banks and lenders to determine if they can continue to provide the financing that the Company may need in light of the internal or external SBD. The Company's accounts are currently with the following institutions:

<b>Types of account (i.e. checking, savings, PAIB, escrow)</b>	<b>Name of Financial Institution</b>	<b>Address of Financial Institution</b>	<b>Telephone Number</b>	<b>Contact Name</b>
Checking	JP Mogan Chase	21 South Clark Street Chicago, IL 60603	877 576 2736	Jaime Del Toro Jermain Jackson
Various accounts	Pershing LLC	1 Pershing Plaza Jersey City NJ		

If our banks and other lenders are unable to provide the financing, we will seek alternative financing immediately.

### **Counter-Parties**

New Vernon Wealth Management has contacted our critical counter-parties, such as other broker-dealers, to determine if we will be able to carry out our transactions with them in light of the internal or external SBD. Where the transactions cannot be completed, we will work with our clearing firm or contact those counter-parties directly to make alternative arrangements to complete those transactions as soon as possible.

## **11. Regulatory Reporting**

New Vernon Wealth Management is subject to regulation by the SEC.

The Company currently files reports with our regulators using paper copies in the U.S. mail, and electronically using fax, e-mail, and the Internet. In the event of an SBD, we will check with the SEC and other regulators to determine which means of filing are still available to us, and use the means closest in speed and form (written or oral) to our previous filing method. In the event that we cannot contact our regulators, we will continue to file required reports using the communication means available to us.

The Company's current regulators can be reached as follows:

SEC Midwest Region:

Address: 175 W. Jackson Blvd., Suite 900, Chicago, IL 60604

Phone: (312) 353-7390

E-mail: [chicago@sec.gov](mailto:chicago@sec.gov)

SEC Headquarters :

Address : 100 F Street, NE

Washington, DC 20549

Phone : (202) 942-8088

E-mail : [publicinfo@sec.gov](mailto:publicinfo@sec.gov)

## **12. Disclosure of Business Continuity Plan**

The Company will disclose in writing a summary of our BCP to customers at account opening or at the time a business relationship is established. The Company will notify customers in writing when material changes are made to the Plan that may affect their business relationship with the Company. The Company will also post the summary on our Web site and mail it to customers upon request.

The summary addresses the possibility of a future SBD and how we plan to respond to events of varying scope. In addressing the events of varying scope, the summary:

1. Provides specific scenarios of varying severity (e.g., a firm-only business disruption, a disruption to a single building, a disruption to a business district, a city-wide business disruption, and a regional disruption);
2. States whether we plan to continue business during that scenario and, if so, our planned recovery time; and
3. Provide general information on our intended response.

Our summary also discloses the existence of back-up facilities and arrangements. A copy of the Company's disclosure statement is included at the back of this Plan.

## **13. Updates and Annual Review**

The Company will update this plan whenever there is a material change to its operations, structure, business or location or to those of the clearing firm.

The Company's BCP will be reviewed and modified, if necessary, at least annually, but no later than within 12 months of the date on which this Plan was put into effect or previously reviewed, to take into account any changes in the Company's operations, structure, business, or location or those of our clearing firm.

## **Customer Disclosure Statement New Vernon Wealth Management**

The Company's plan takes into account two kinds Significant Business Disruptions (SBDs), internal and external. Internal SBDs affect only the Company's ability to communicate and do business, such as a fire or loss electrical power in the office or building.

External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a natural disaster, or another event that causes a wide-scale, regional disruption in essential services.

**Contact information:** Any questions regarding the Company's Business Continuity Plans should be addressed to: Dan Shapiro, 799 Central Ave. Suite 350 Highland Park, IL. 60035; (847) 926-5700.

**Internal SBDs:** In the event of a disruption in the Company's business operations due an internal SBD, the Company will attempt to continue to conduct business as usual by utilizing alternative communication methods (if available), such as the Internet, smart/cell phones, etc., or by moving its operations to an alternative location.

**External SBDs:** In the event of a disruption in the Company's business operations due to an external SBD, the Company will attempt to continue to conduct business as usual by moving its operations to an alternative location outside the effected area, if possible, or by providing customers with alternative arrangements.

The Company will resume normal business operations as soon as it is able to do so, based on the type and the extent of the disrupting event.

**Communications:** In the event you are unable to reach the Company, customers should proceed as follows:

1. Attempt to contact the Company at the following alternate telephone number:
2. (847) 433-2675 (ATT Emergency Land Line) or
3. (847) 767-6021, 6025, 6026, 6028 or (847) 945-7978 (Emergency Cell Phones)

All critical records related to the Company's business operations are backed-up weekly and stored in a secure offsite location. These back-up files can be used to restore Company systems to ensure that business can be back to normal as quickly as possible after the disruption.

The Company's clearing firm, Pershing, LLC, maintains a business continuity plan in the event of a SBD. For more information on their plan, visit their website at [www.pershing.com](http://www.pershing.com)