

J. Mark Nickell & Co.
Business Continuation Plan Summary

JMN is committed to providing timely service to JMN clients. JMN recognizes the importance of preparing for various disaster scenarios that could hamper JMN's ability to provide investment advisory services. JMN has taken steps to provide for business contingency and continuity planning under a variety of potential scenarios. JMN continues to evaluate its operations and take the necessary actions to ensure the proper resources are available to provide for the recovery and timely resumption of critical business operations to internal business units, third-party business partners, and clients. Since the timing and impact of disasters and disruptions is unpredictable, JMN is providing you with this information on its business continuity plan.

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 clients to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as reasonable, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data backup and recovery; mission critical systems; financial and operational assessments; alternative communications with clients, employees, and regulators; alternate physical location of employees; critical providers, custodian, banks and counterparties; regulatory reporting; and alternative means to providing clients access to their accounts and funds, if JMN is unable to provide its normal services.

JMN custodian backs up 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, JMN has been advised by its approved custodian that the objective is to restore custodial operations and be able to complete existing transactions and accept new transactions and payments within a timely manner. Your orders and requests for funds and securities could be delayed during a business disruption or disaster.

JMN plans to continue in business, transfer operations to approved custodian, if necessary, and notify you through our website jmarknickell.com, or through a recorded message on (615) 371-6622 how to contact us. If you have questions about JMN's business continuity planning, you may contact JMN via email mark@jmarknickell.com or phone (615) 371-6622.