

Daroth Capital LLC

Business Continuity Plan

Set forth below in this Business Continuity Plan (“BCP”) are the procedures and policies established by Daroth Capital LLC (the “Firm”) to ensure the protection of its business operations and personnel in the event of a significant business disruption (“SBD”).

I. Emergency Contact Persons

Our Firm’s emergency contact person is: Peter H. Rothschild, our Firm’s Managing Member. Peter Rothschild may be contacted either by telephone at (212) 687-2500, or (917) 453-2761 or by e-mail at peter@daroth.com.

II. Firm Policy

Our Firm’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 and protecting all of our Firm’s books and records.

A. Significant Business Disruptions (SBDs)

Our Firm’s BCP anticipates three kinds of SBDs, internal, external and a pandemic. Internal SBDs affect only our Firm’s ability to communicate and do business, such as a fire in our Office (as hereinafter defined). External SBDs prevent the operation of the securities markets or a number of investment advisers, brokerage firms, banks or other financial institutions, such as a terrorist attack, a city flood, or a wide-scale, regional disruption. Our response to an external SBD relies more heavily on other organizations and systems, especially on the capabilities of banks and other financial institutions. A pandemic is a widespread, possible world-wide illness that can affect the internal and external operations of a firm. Our response to a pandemic SBD is specifically addressed in *Section IX – Pandemic*, below.

B. Approval and Execution Authority

Peter Rothschild, the Firm’s managing member is responsible for approving this BCP and for conducting the required annual review of this BCP. Peter Rothschild has the authority to execute this BCP.

C. Plan Location and Access

Our Firm will maintain copies of its BCP plan and the annual reviews thereof, together with the changes that have been made to it, for inspection. An electronic copy of our plan is located on our Firm's cloud based electronic storage.

III. Business Description

Our Firm provides financial monitoring and related services to its clients. Any activities requiring a broker-dealer are conducted through East Wind Securities, LLC (www.eastwindadvisors.com).

Our Firm does not hold either client funds or securities. Our Firm does not service any retail clients and has no client accounts. Our Firm has no relationship with a clearing firm and does not maintain any brokerage accounts with any other firm.

IV. Office Location

Main Office Location

Our Firm's office (the "Office") is located at 810 Seventh Avenue, 35th Floor, New York, NY 10022. Its main telephone number is (212) 687-2500.

V. Data Back-Up and Recovery (Hard Copy and Electronic)

Apart from our e-mail communications, more fully discussed below, our Firm maintains its electronic records in the "cloud" storage facility maintained by third party IT providers with national reputations.

VI. Financial and Operational Assessments

A. Operational Risk

In the event of an SBD, we will immediately identify what means will permit us to communicate with our clients, critical business constituents, critical banks, critical counter-parties, and regulators ("Third-Parties"). Although the effects of an SBD will determine the means of alternative communication, the following steps will be taken to determine the means to communicate with Third-Parties: Our Firm will first attempt to communicate with Third-Parties by utilizing the main business telephone lines located within our office or remote locations. In the event the telephone service has become unresponsive, we will then attempt to communicate with Third Parties via e-mail or other electronic communications.

VII. Alternate Communications Between our Firm and Clients, Employees, and Regulators

A. Clients

Our Firm now communicates with its clients using the telephone, e-mail, fax, Microsoft Teams, Zoom, overnight delivery, U.S. mail, and in-person visits at our Firm's office or at our client's locations. 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. 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 in the U.S. or other third party mail service.

VIII. Critical Business Constituents, Banks and Counter-Parties

A. Business constituents

Our Firm has contacted our critical business constituents (businesses with which we have an ongoing commercial relationship in support of our operating activities, such as vendors providing us critical services), and determined the extent to which we can continue our business relationship with them in light of the internal or external SBD. We will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services when we need them because of an SBD to them or our Firm.

IX. Pandemic

As previously stated, a pandemic is a widespread illness that can effect the internal and external operations of a firm. The primary detrimental effect of such an occurrence is an extreme decrease in staffing. The Firm has taken the following preemptive steps to prevent an extreme decrease in its staffing.

A. Designation of Influenza Manager

The Firm has designated Peter Rothschild to serve as its Influenza Manager. The Influenza Manager, together with her designated assistants, is responsible for implementing the Firm's business continuity planning concerning a pandemic.

B. Training of Staff Members

The Influenza Manager is responsible for ensuring that the Firm's staff are properly trained in its business continuity planning concerning a pandemic such as a Quarantine (noted below). In addition, the Influenza Manager and/or designated assistants will ensure that staff is trained in personal hygiene.

The following personal hygiene precautions are encouraged:

- Staff members should cover their nose and mouth when sneezing and coughing.
- Staff members should immediately dispose of used tissues.
- Staff members should frequently wash hands, especially after coughing or sneezing.
- Staff members should keep hands away from their eyes, mouth and nose.
- If required, staff members should wear face masks approved by government authorities.

X. Disclosure of Business Continuity Plan

Our Firm discloses a summary of our BCP to our clients on our Firm's website. Our 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, our 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) provides general information on our intended response. Our summary discloses the existence of back-up facilities and arrangements.

This BCP is subject to continuing modification and updated summaries will be made available on the Firm's website.

A copy of the above BCP Summary to be distributed to our Firm's clients is also annexed as Schedule "A".

XI. Updates and Annual Review

Our Firm will update this BCP whenever it has a material change to our operations, structure, business or location or to those of our critical business constituents. Senior Manager Approval

SCHEDULE "A"

BUSINESS CONTINUITY PLAN SUMMARY

Daroth Capital LLC Business Continuity Planning

Daroth Capital LLC (the "Firm") has developed a Business Continuity Plan detailing 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 by calling (212) 687-2500, our Firm's main number. If you cannot access us, you should contact **our Managing Member, Peter Rothschild at (917) 453-2761 with any questions or business requests.**

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 our Firm's books and records, and allowing us 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.

Our business continuity plan addresses: data back up and recovery; all mission critical systems; financial and operational assessments; alternative communications with clients, alternate physical location for conducting business; critical suppliers and counter-party impact.

Apart from our e-mail communications, which are maintained offsite by both a third-party and our Firm, we use "cloud based" electronic backup systems which are administered by reputable third parties and vendors..

Every emergency situation poses unique problems based on external factors, such as time of day, location and severity of the disruption.

In the event of an emergency situation preventing access to or resulting in the loss or destruction of, our main computer hardware system located in our Main Office in New York, New York, we currently anticipate that it may take approximately one business day to rebuild this system which is required to read the off-site backup tapes maintained by our a business continuity plan team.

In the event of an emergency situation which results in the loss or destruction of our file server, we estimate that it may take up to one business day to restore this system.

In a disruption to only our Firm or a building housing our Firm, we will transfer our operations to an unaffected temporary site, or to an alternate available local site(s) where we would expect to recover and resume business as soon as our affected communication systems are restored. In a

disruption affecting our business district, city, or region, we will transfer our operations to an available alternate site(s), and recover and resume business as soon as our affected communication systems are restored. In either situation, we plan to continue in business, and notify you by telephone or other available communication means about how to contact us.

For more information – If you have questions about our business continuity planning, you can contact us at:

Daroth Capital LLC
810 Seventh Avenue, 35th Floor
New York, NY 10019
e-mail: peter@daroth.com
telephone no: (212) 687-2500