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**GROESBECK**  
Investment Management Corporation

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**Grosbeck Investment Management Corporation**

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**Our Business Continuity Plan (BCP)** – We plan to quickly recover and resume operations after a significant business disruption and respond by safeguarding our employees and property, protecting the firm's books and records, and allowing our customers to continue their normal business activities. Our BCP is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the business disruption. Our first priority will always be our customers/business partners.

**Our BCP addresses the following:**

***Data back up and recovery:*** Grosbeck Investment Management Corp. data management resources and IT support are provided by Pragmatix a full service information technology consulting company, located in Elmsford, NY. Pragmatix furnishes Grosbeck a virtual server environment, which comprises a Microsoft small business server co-located at an IBM eBusiness Hosting Center facility in Jersey City, NJ. The server space has the necessary wiring and power distribution to provide continuous running time of the equipment in addition to proper heating, ventilation, air conditioning, and fire suppression, and backup power. All communication between Grosbeck and the IBM data facility is through a secure encrypted site to site VPN tunnel. Data stored on the virtual server is backed up to a separate data vault also located in the Jersey City facility. Data is further backed up to a

secondary data center in Stamford, CT. All backup data is encrypted. The server and all PC's are protected by firewall/system monitoring; anti-virus/anti spyware software, spam filters, Cisco VPN / Firewall, and IBM Managed Security Services network intrusion prevention and vulnerability scanning services.

Groesbeck maintains an offsite network-ready laptop computer. Portfolio administrator employees have Checkfree APL enabled on their home computers. Checkfree APL is also enabled on the off-site laptop. Our e-mail service is accessible over the Internet allowing all employees the ability to communicate with each other, customers, sponsors and all necessary business partners. In the event our offices are unavailable, Groesbeck employees will be able to work out of their homes with access to Checkfree APL and Groesbeckim.com email. The offsite laptop, which has a wireless USB modem for Internet connectivity, will also be utilized and can be used at any facility, temporary office or household as necessary during the outage.

***Pragmatix Services:*** Pragmatix provides full server and desktop monitoring, which includes user policy enforcement, file system management, software license reporting, backup monitoring, patch management and anti-virus/anti-spyware scanning. Log monitoring for network intrusion and ongoing monitoring, management, and updates to firewalls are provided. Pragmatix provides 24x7 proactive monitoring of all servers and network components under their management. It uses a combination of server based tools and external agent software installed on the desktops and laptop to ensure all machines are protected and software updated.

***Communications with customers, employees, and regulators:*** We will have email, phone and fax forwarded to an alternate location to continue business as usual.

Internal Communication will be started by Ted Groesbeck, who will call all employees and inform them of the situation and the steps to be taken. (See Internal Operations Disaster Recovery Plan)