



## Business Continuity Plan

Stralem maintains a Business Continuity Plan on how we will respond to events that could significantly disrupt our business. Due to the fact that the timing and impact of potential disasters and disruptions is unpredictable, we recognize the need for flexibility 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 are unable to contact us as you usually do at (212) 888-8123, you should try to contact us through our website at [www.stralem.com](http://www.stralem.com). If you are unable to access us through either of those means, you should contact your custodian directly. If your account is custodied at our prime broker, Pershing LLC, with Pershing Advisor Solutions, LLC as introducing broker (collectively “Pershing”), you can contact them directly at (201) 413-3635 or (213) 624-6100, extension 500 or by fax at (201) 413-5368 or at their website at <https://www.pershing.com/disclosures> for instructions on how limited trade-related transactions, cash disbursements, and security transfers may be processed.

Should a significant business disruption occur, we plan to respond quickly and resume business operations by safeguarding our employees and property, conducting rapid financial and operational assessments, protecting the firm’s books and records, and implementing emergency measures to allow our customers to transact business. Our business continuity plan addresses: data backup and recovery; all mission-critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical suppliers, bank, and regulatory reporting; and ensuring our customers prompt access to their funds and securities if we are unable to continue our business.

**Our Business Continuity Plan** – Our business continuity solution includes ongoing replication of all critical firm data to a secure external location. This provides secure access to all of Stralem’s data in a ready-to-use, web-enabled format and is accessible from anywhere in the world, allowing Stralem’s employees to be geographically dispersed and continue business in the event of a crisis. Our goal is to allow for rapid “recovery” from natural or man-made disasters with the ability to focus on our 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.

Pershing backs up our customer records (for accounts custodied at Pershing) in a geographically separate area. While every emergency situation poses unique issues based on external factors, such as time of day and the severity of the disruption, we have been advised by Pershing that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments within four hours. This recovery objective may be negatively affected by the unavailability of external resources and circumstances beyond Pershing’s control, and it is possible that your transactions could be delayed during this period.

**Varying Disruptions** – Significant business disruptions can vary in their scope, such as affecting just our firm; a single building housing our firm; the business district where our firm is located; the city where we are located; or the entire region. Within each of these situations, the severity of the disruption can also vary, from minimal to severe. In a disruption that affects just our firm or a building housing our firm, we will transfer our operations to a local site, when needed, and expect to recover and resume business within four hours. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area and expect to recover and resume business within four hours. This recovery objective may be negatively affected by the unavailability of external resources and circumstances beyond our control, and it is possible that your orders and requests for funds and securities could be delayed during this period. In either situation, we plan to continue in business, transferring operations to an alternate site if necessary, and will post information on how to contact us on our website at [www.stralem.com](http://www.stralem.com) or by telephone at (212) 888-8123. If the significant business disruption is so severe that it prevents us from remaining in business, we will ensure our customers prompt access to their funds and securities.

**For more information** – If you have questions about our business continuity planning, you can contact us at (212) 888-8123, or toll-free at (866) 455-1007.