

Business Continuity Planning of Chapin Davis, Inc.

This policy is effective as of February 1, 2025

Chapin Davis has developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions are 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 there is a significant business disruption and you are not able to contact your Financial Professional you can contact the Firm by phone at:

- Baltimore, MD office (410) 435-3200 or (800) 222-3246
- Bala Cynwyd, PA office (267) 748-2300 or (833) 276-0990
- Customers associated with all other office locations should call either the Baltimore or Bala Cynwyd offices for assistance.

Brokerage and/or Advisory accounts customers with Chapin Davis can contact our clearing firm, First Clearing, LLC at (877) 496-3223 or check their website (www.firstclearing.com) for instructions on how the clearing firm can assist them if they are not able to contact us at any of the office numbers listed above or the number they have for their Financial Professional. First Clearing will be able to help with account matters such as access to funds and securities, entering orders, and processing other trade-related, cash and security transfer transactions

Direct Mutual Fund accounts customers with Chapin Davis listed as the broker of record can contact the mutual fund family at the number listed on their statement if they are not able to contact us at any of the office numbers listed above or the number they have for their Financial Professional. The fund family will be able to help with matters such as share balance inquires, share purchase and redemption, and transfer requests.

Please note that direct mutual fund customers do not have accounts with our clearing firm, First Clearing LLC, and they will not be able to assist them during a business disruption.

Customers can also check our website (www.chapindavis.com) for information or announcements regarding potential business disruptions.

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 customers 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 backup and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

Our clearing firm, First Clearing LLC, backs up our important brokerage and advisory account records in a geographically separate area. While every situation poses unique problems based on external factors, such as time of day and the severity of the disruption, we have been advised by our clearing firm that it reviews the recovery time and resumption time periods for all mission critical systems. Making sure that any type of disruption does not unduly impact their introducing firms, such as Chapin Davis, or our clients. As all situations are different, your orders and requests for funds and securities could be delayed during this period.

Varying Disruptions – Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or a building housing our firm, we will transfer our operations to another site when needed and expect to recover and resume business within a business day. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area and recover and resume business within a reasonable time conveyed via available methods. In either situation, we plan to continue in business, transfer operations to our clearing firm if necessary, and notify you through our website, www.chapindavis.com on how best to contact the firm. 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.

Direct Mutual Fund customer accounts are not affected by a business disruption that only impacts Chapin Davis or any of our offices. This is because direct mutual funds customers have their accounts held directly with the mutual fund family managing the mutual fund.

For more information – If you have questions about our business continuity planning, you can contact us at (410) 435-3200 or compliance@chapindavis.com.