

PERKINS FUND MARKETING
BUSINESS CONTINUITY PLAN

March 2019

Perkins Fund Marketing, LLC (the “Firm” or “PFM”) has developed and adopted this Business Continuity Plan (“BCP”) in an effort to provide an immediate and appropriate response to foreseeable emergency situations, protect employees and minimize disruptions to client and customer services. All employees are required to familiarize themselves with the guidelines of this BCP so that they are able to respond effectively to a business disruption and are encouraged to keep a hard copy of this BCP readily available. An electronic copy of the BCP is located in the Firm’s shared drive. Please direct any questions or concerns about the BCP to the Chief Compliance Officer (“CCO”) of the Firm, Gilman C Perkins at 203-418-2000; Cperkins@pfm-llc.com. For purposes of the administration of this BCP, Mr. Gilman C. Perkins, Managing Partner, shall be considered the “Primary Emergency Coordinator”.

1. Potential Business Disruptions

Disasters and emergencies and other significant business disruptions (collectively, “Business Disruptions”) are, by their nature, difficult to predict. Examples of such disruptions include fire, flood and other severe water damage, hurricane, snow and ice storm, tornado, hurricane earthquake, electrical outage, gas leak, terrorist attack, and burglary. Business Disruptions may result in either physical damage to the Firm’s systems and /or physical office space, or merely an inability for employees to access the physical office space. In the event that PFM is unable to continue its day-to-day business, PFM will advise customers. PFM does not execute securities transactions for customers nor have custody of customer funds or securities.

2. Disaster Recovery Team

Following a Business Disruption, implementation of this BCP shall be overseen by Gilman C. Perkins, or, if he is indisposed, by Dan Glusker, (the “Alternate Emergency Coordinator”), as set forth in Annex A (the Primary Emergency Coordinator, together with the Alternate Emergency Coordinator, are herein referred to as the “Emergency Coordinators”). In the event of a Business Disruption, the Emergency Coordinators can be contacted using the information on Annex A. During a prolonged emergency, the Emergency Coordinator should also seek to involve one or more employees to assist or assume the role of Emergency Coordinator, if appropriate.

Initial Response Procedure

Identification and Assessment of Business Disruption:

If an employee becomes aware of a situation that may require implementation of the BCP, he or she must notify the Emergency Coordinators. If appropriate, the Emergency Coordinators shall call 911 or the applicable emergency service authorities as soon as it is safe to do so.

Evacuation or Sheltering-in-Place:

If a Business Disruption occurs during business hours, the Emergency Coordinators shall assess whether or not on-site employees are in danger and, if so, determine whether to evacuate the building or shelter-in-place in coordination with the building management and the relevant authorities. The Emergency Coordinators will notify all on-site employees of the situation.

If the Emergency Coordinator calls for an evacuation, employees should meet at the evacuation location 2575 North St. Fairfield Ct 06824. If that location is unsafe, then employees should go to a safe location and contact the Emergency Coordinators, who will circulate a Firm-wide e-mail regarding a safe location.

If it is safer to shelter-in-place, then employees should move to an area of the building that offers the most protection from the threat of danger and await further instruction.

Office Locations:

PFM's Office of Supervisory Jurisdiction ("OSJ") and principal office is located at 107 John Street, Southport, CT 06890. Employees may travel to the principal office by means of foot, car, train and bus.

Alternate Work Sites:

In the event of a significant business disruption at the Firm's principal office located at 107 John Street, Southport, CT 06890, the Emergency Coordinators will instruct all PFM employees to work remotely or work from the alternate office location which is located at 2575 North St, Fairfield, CT 06824.

Electronic Communications and Data Systems Assessment:

In the event of a Business Disruption, the Emergency Coordinators or a delegate shall coordinate with one or more of the IT provider representatives (set forth in in Annex A) who shall report on the functionality of the Firm's electronic communications and data systems. The Firm's Email Communications System is hosted by a cloud-based third-party service provider and is expected to function remotely in the event of a Business Disruption.

3. Contact Procedures

Contacting Employees:

In the event of a prolonged Business Disruption, the Emergency Coordinators will oversee the Firm's efforts to contact all employees. If the Firm's email system is operable, the Emergency Coordinator should endeavor to send a firm-wide email to all employees both to their Firm email account as well as to an alternate personal email account to notify the group of the occurrence of and relevant circumstances surrounding the Business Disruption (such as the Firm's operational condition, the functionality of communications and data systems and instructions as to whether employees should continue to work remotely or return to the office). Following such email communication, or if the email system is inoperable, the Emergency Coordinators shall endeavor to contact appropriate supervisors via phone, who should in turn contact each of their direct and indirect reports.

Below is a “call tree” so that management can reach all employees during a significant business disruption:

Caller	Call Recipients
Gilman C. Perkins	Lisa Holzwarth, Kevin Cunningham, Doug Newsome
Dan Glusker	Linda Champagne, Maria Daldegan, Doug Steinscheider, Alex Maloney

Contacting Clients/Customers:

The Firm will maintain communication with clients in accordance with usual practice during a Business Disruption by whatever means practical under the circumstances, after assessing the means of communication available to the Firm. For example, if PFM has 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. mail.

Contacting Critical Business Constituents, Banks, and Counter-Parties:

To the extent reasonably necessary, the Emergency Coordinator or a designee shall contact the Firm’s critical business constituents, banks and counter-parties, as identified on Annex B, as soon as reasonably practicable following a Business Disruption to determine whether they have also experienced a Business Disruption, and if so, the extent to which the Firm can continue its business relationship with them.

The Firm will quickly establish, as reasonably practicable, alternative arrangements for the goods or services provided by any critical business constituent, bank or counterparty that can no longer provide the needed goods or services due to a Business Disruption. For example, if PFM’s banks and other lenders are unable to provide the financing, we will seek alternative financing immediately from such other bank as the Executive Principal shall determine.

Alternate Communication between the Firm and Self-Regulatory Organizations:

The Firm is subject to regulation by the U.S. Securities and Exchange Commission (“SEC”), Financial Industry Regulatory Authority (“FINRA”), National Futures Association (“NFA”) and Municipal Securities Rulemaking Board (“MSRB”).

In the event of a material Business Disruption that will affect the Firm’s ability to continue to provide services to clients, the Firm will communicate with the SEC, FINRA, NFA and MSRB by whatever means practical under the circumstances, after assessing the means of communication available to the Firm.

Financial and Credit Risk:

Following a Business Disruption, the Firm will determine the value and liquidity of its assets to evaluate its ability to continue to fund its operations and remain in capital compliance.

If the Firm determines that it may be unable to meet its obligations to counter-parties or otherwise continue to fund its operations, the Firm will request additional financing from its bank or other credit sources to fulfill its obligations.

If the Firm cannot remedy a capital deficiency, it will file appropriate notices with the regulators with which it is registered, inform relevant counterparties and service providers of such notice given to those regulators, and immediately take remedial action to restore capital of the Firm.

4. Protection and Recovery of Firm Data

PFM maintains its primary hard copy books and records and its electronic records at its Principal Office. Gilman C. Perkins is responsible for the maintenance of these books and records, which include without limitation: customer files, personnel files, correspondence files, complaint files, seminars, speeches and interview files, regulatory inspection and inquiry files, compliance files and registration files.

The Firm currently maintains its back-up hard copy and electronic books and records at 2575 North St, Fairfield, CT 06824. Paper records are backed up by scanning and saving them to optical drives in WORM format and taking them to an off-site location. We back up our records daily on cloud and optical disk drives, which are taken and stored off-site as needed, as determined by the Gilman C. Perkins. All books and records that can be stored electronically will be stored daily via cloud backup and quarterly via optical disk drives. Additionally, Firm Servers are imaged daily and copied monthly.

In the event of a significant business disruption that causes the loss of paper records, PFM will physically recover the lost files from the back-up site. If the Principal Office is inoperable, the Firm will continue operations from the back-up site or an alternate location.

For the loss of electronic records, PFM will either physically recover the storage media or electronically recover data from the back-up site, or, if our Principal Office is inoperable, continue operations from our back-up site or an alternate location.

5. Regulatory Reporting

The Firm is subject to regulation by the SEC, FINRA, NFA, MSRB and various State Regulators. The Firm generally files reports with regulators via US Mail, fax, email, and electronic filing. In the event of a Business Disruption, the Firm will check with the applicable regulators to determine which means of filing are still available to the Firm and utilize the means closest in speed and form (written or oral) to the Firm's previous filing method. In the event that the regulators cannot be contacted, the Firm will continue to file required reports using the communication means available.

PFM's regulatory contact information is FINRA Regulation, Inc., District 11, 99 High Street, Suite 900, Boston, Massachusetts 02110.

6. Customer Access to Funds and Securities

PFM does not maintain custody of customer funds or securities. Currently, PFM engages in the introduction and marketing of private limited partnership interests, including hedge funds, fund-of-funds and private equity funds. The Firm does not execute orders on behalf of customers.

If SIPC determines that the Firm is unable to meet obligations to our customers or if the Firm's liabilities exceed assets in violation of Securities Exchange Act Rule 15c3-1, SIPC may seek to appoint a trustee to disburse our assets to customers. PFM will assist SIPC and the trustee by providing our books and records identifying customer accounts subject to SIPC regulation.

7. BCP Disclosure

The Firm will provide a summary of this BCP to its critical business constituents, upon request by such parties and at the discretion of the CCO. This summary will describe how the Firm's BCP addresses the possibility of an internal or external Business Disruption, and the procedures the Firm will employ to respond to such a Business Disruption.

The BCP will be mailed to customers upon request or can be accessed on the Firm's website, www.perkinsfundmarketing.com. A copy of PFM's Disclosure Statement is available under Annex D.

8. Testing, Review and Training

The Firm will review and test this BCP annually and modify it for any changes in operations, structure, business or location. The Firm will also update this BCP in the event of any material changes to the terms or the termination of an agreement between the Firm and a critical business constituent, bank or service provider.

In the event of a material change, the Firm will promptly update its emergency contact information in the manner prescribed by NASD Rule 1160. Pursuant to NASD Rule 1160, the Firm will update, via the FINRA Contact System, designated contact information promptly upon any material change (but no later than 30 days following the change) and verify such information within 17 business days after the end of each calendar year.

The Firm shall conduct periodic testing of the BCP to evaluate whether all day-to-day functions can be performed regardless of staff location, and the effectiveness of the BCP in a failover scenario. The Firm will maintain a record of the testing performed, when it is conducted and the results of the testing.

The Firm shall distribute the BCP to employees and conduct training on the BCP on at least an annual basis to familiarize all personnel with the procedures and their established roles.

Senior Management Approval:

I have approved this BCP as reasonably designed to enable our firm to meet its obligations to customers in the event of an SBD. This BCP will be distributed to each employee and signed to attest to a complete understanding of the firms BCP.

Signed:

A handwritten signature in black ink, appearing to read "John C. [unclear]", written in a cursive style.

Title: Managing Partner

Date: March 11, 2019

Annex A - Emergency Coordinator Contact Information

Name and Role	Telephone	Email
Gilman C. Perkins <i>Primary Emergency Coordinator</i>	Phone: (203) 418-2000	cperkins@pfm-llc.com
Dan Glusker <i>Alternate Emergency Coordinator</i>	Phone: (203) 418-2023	Dglusker@pfm-llc.com

Annex B - Professional Services & Support

Perkins Fund Marketing

Name	Role	Contact Information
Doug Steinschneider	Chief Technology Officer	203.258.1991 Doug@dcsgroupllc.com

Annex C - Operational Services & Support

Perkins Fund Marketing

Product / Service	Vendor	Contact Information

Annex D – Disclosure Statement

Perkins Fund Marketing

Since September 11, 2001, the financial community has developed new processes, procedures and regulations to improve the resiliency of the financial markets, provide clearer security for clients' assets and reaffirm confidence in the ability to mitigate and/or respond to momentous events.

FINRA Members are required to implement a Business Continuity Plan and to communicate the information to their clients. PFM has taken the appropriate steps to enable us to continue operations in the event of a business disruption and to comply with all financial market rules and regulations. PFM's 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: i) data backup and recovery; ii) all mission critical systems; iii) financial and operational assessments; iv) alternative communications with customers, employees, and regulators; v) alternate physical location of employees; vi) critical supplier, contractor, bank and counter-party impact; and vi) regulatory reporting.

To ensure that PFM can continue to function as a broker-dealer and to service our clients following a significant business disruption event, the following steps have been implemented:

- A fully-operable back-up facility has been developed. This capability can be activated should a crisis event cause a loss of key services that support our operations;
- PFM periodically backs up all books and records and maintain such files at a back-up facility; and
- PFM equipped our back-up office with sufficient communications and other equipment so that we can maintain reasonable communications with our clients, vendors, and regulators, both domestically and internationally.