



**Creststreet Asset Management Limited  
("Creststreet" or "CAML")**

**Business Continuity Plan ("BCP")**

**Summary**

**Introduction**

As a financial industry participant, Creststreet has a shared interest in promoting the resilience of the financial system, along with protecting its own business objectives and survivability, to ensure the continuation of economic activity and ultimately public confidence in the financial sector. Recognizing that Creststreet wants to ensure our services and products are continuously delivered without interruption, our BCP enables critical services or products to be continually delivered to our clients in the event of a disruption of any magnitude.

Creststreet recognizes that our clients rely on our systems and services, and that unexpected disruptions may occur. Creststreet has developed a Business Continuity Plan to 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. While no contingency plan can eliminate all risk of interruption, we will continually update our BCP to mitigate all reasonable risk.

**Contacting Us: Even in the event of a significant business disruption or local disaster you will still be able to contact Creststreet as you usually do at 1-416-864-6330 or 1-866-864-6330 or via email at [info@creststreet.com](mailto:info@creststreet.com), or other employee direct email.**

Please be advised that National Bank Correspondent Network and Scotia Prime Brokerage are the Custodians and RBC Dexia Investor Services is the Administrator for all Funds managed by Creststreet. Each of these parties has sufficient business continuity plans in place to mitigate reasonable risks that may impact our business. Our Business Continuity Plan endeavours to quickly respond by safeguarding our employees and property, making a financial and operational assessment, protecting the books, records and assets of our Funds and allowing Creststreet to either continue to transact business or recover and resume business operations after a disruption, regardless of the scope and severity of the disruption.

Our Business Continuity Plan addresses: telephone and email fail-over technologies, data back-up and recovery, alternate remote access sites, all mission critical systems, financial and operational assessments, critical service provider impact, alternative communications with investors, employees, and regulators and regulatory reporting.

If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our investors prompt access to their funds and securities. For more information or if you have questions about our business continuity planning, you can contact the Creststreet BCP Coordinator at 416-864-6330 or 1-866-864-6330.

The Creststreet BCP is subject to modification; an updated summary will be promptly posted on our website and investors may also obtain updated summaries by requesting a written copy by mail.

## **BCP Policy Highlights**

Creststreet's policy is to respond to a business disruption by, first and foremost safeguarding employees' lives and firm property, and subsequently by making financial and operational assessments, quickly recovering and resuming operations, protecting all of the firm's books and records, and allowing our clients to continue to transact business. Creststreet's BCP includes those appropriate procedures, staffing, tools and support arrangements necessary to meet recovery objectives and which will ensure availability and delivery of required products and services.

### **Business Impact & Risk Assessment and Prioritization**

Creststreet's BCP has identified the inherent risk of various business functions, taking into consideration the probability for occurrence and impact that a disruption to each specific business functions would result in. Business continuity and recovery resources will be allocated to the business functions with the highest priority.

### **Prevention and Mitigation**

Eliminating single-points-of-failure or identified risks greatly increase the probably of continuity. Creststreet regularly completes risk assessments to identify any changes or new risks, and look to reduce these risks or ensure they are properly supported in the event of a disruption. Planning for known risks can make the difference between maintaining continuity and enduring and recovering from disaster. Resiliency can greatly alleviate problems during emergency response and recovery programs.

### **Disruption Response & Management**

The planned reaction to and management of an event, through Creststreet's emergency or continuity response planning, provides the framework to address a disruption of any size or cause by working through a staged approach, which addresses critical business functions in order of priority, and works through the continuity process until full business functionality has been achieved, whether on-site or off-site.

### **Training, Testing and Updating**

Employee training and annual or more frequent updates of Creststreet's BCP will ensure full understanding of each employee's role and responsibilities during a disruptive event of any type or magnitude, and will ensure the smoothest possible transition to continuing critical business functions. Assessing the effectiveness of our BCP on a regular basis is vital to ensuring it is current with all critical business processes and with any new threats or risks. The testing and updating of our BCP is done at least annually, or when any new risks are identified or substantive changes to the organization take place.

### **Annual Review and Approval**

Regular review and approval by the Chief Compliance Officer and the Independent Review Committee of Creststreet occurs at least annually, or when any new risks are identified or substantive changes to the organization take place and, at least annually, all employees are required to read and certify they have read and agree to abide by the terms of the BCP.