



LANARK
FINANCIAL

Lanark Financial, Inc. Business Continuity Plan

To our Clients and Prospective Clients:

Lanark Financial Inc. ("Lanark Financial") is committed to protecting its employees, clients and their assets at all times, including during emergencies or significant business disruptions. Lanark Financial's Business Continuity Plan has been developed to provide a reasonable, but not absolute, assurance of business continuity in the event of a disruption to Lanark Financial's normal operations.

As part of this commitment, and in compliance with internal policies and industry regulations, Lanark Financial has developed and implemented a Business Continuity Plan (the "Plan"). This Plan identifies Lanark Financial's critical risks and documents the functional requirements needed to reestablish essential business operations. The Plan documents the actions and procedures to be followed should a significant business disruption ("SBD") occur resulting from the loss of operational facilities, critical information systems, or essential personnel. In instances by which business processes require recovery from a SBD, the Plan includes off-site recovery environments, work-area displacement arrangements, and/ or work-from-home arrangements.

Lanark Financial conducts annual disaster recovery exercises, designed to ensure computing systems and networks are built with sufficient redundancies. In addition, the Plan is tested throughout the year in an effort to ensure that Lanark Financial and its clients are provided with a recovery solution most conducive to their needs.

Lanark Financial relies on the availability, capacity, and reliability of information technology. Its computer center has a back-up/disaster recovery site that is established away from Lanark Financial's primary location. In an effort to ensure that applications are restored within a period of time acceptable to the business, applications are prioritized, and their recovery requirements are based on that prioritization. Lanark Financial has an incident management team responsible for the coordination of communication and response procedures in the event of a disruption or possible disruption to normal operations. Included in the incident management team's responsibilities is the communication of the Plan with regulatory agencies. Members of the incident management team, and its procedures and protocols, have been documented in the Plan. Material updates to this disclosure statement will be posted on Lanark Financial's website, as required by applicable law or regulation.

The Plan is confidential and proprietary in nature and is therefore not made available for public distribution.