



TRIUMPH CAPITAL MANAGEMENT

BUSINESS CONTINUITY PLAN (EXTERNAL)

A Supplement to the Firm's Compliance Manual

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I. TRIUMPH CAPITAL MANAGEMENT'S BUSINESS CONTINUITY PLAN

A. Policy

1. Pursuant to 17 CFR §275.206(4)-7(a) and FINRA Rule 4370, Triumph Capital Management ("The Firm" or "TCM") maintains a policy designed to respond to a Significant Business Disruption ("SBD") by safeguarding Employees' lives and Firm property, making financial and operational assessments, quickly recovering and resuming operations, protecting all of the Firm's books and records, and allowing TCM Clients to transact business with minimal interruption, if any.
2. If the Firm determines it cannot continue business, the Firm will assure Clients have prompt access to their funds and securities.
3. The Firm maintains two Business Continuity Plans ("BCP"), this external brochure for Clients and an internal BCP, which is more comprehensive for TCM Employees.

II. EMERGENCY CONTACTS

A. Emergency Contact Designations

1. The Firm has designated the CEO and CCO as emergency contacts in the event of a SBD. Emergency contacts are available through the information provided below.

Derek Eichenwald: Chief Executive Officer
Office Phone: (720) 399-5555
Mobile Phone: (720) 495-1317
Fax Number: (720) 399-5560
E-mail Address: DerekE@TriumphCapitalManagement.com

Brandon Drespling: Chief Compliance Officer
Office Phone: (720) 399-5555
Mobile Phone: (720) 257-8251
Fax Number: (720) 399-5560
E-mail Address: BrandonD@TriumphCapitalManagement.com

III. SIGNIFICANT BUSINESS DISRUPTIONS

A. The Firm's BCP

1. The Firm's BCP anticipates two kinds of SBDs, internal and external.
2. Internal SBDs affect only the Firm's ability to communicate and do business, such as a fire in the Firm's building.
3. External SBDs prevent the operation of the securities markets for several firms, such as a terrorist attack, a city flood, or a wide-scale regional disruption.
4. The Firm's response to an external SBD relies more heavily on other organizations and systems such as the municipal, state, and federal government.

B. BCP Plan Location and Access

1. The Firm maintains copies of its BCP, annual reviews, and changes that have been made to the BCP for regulatory inspection.
2. The Firm also maintains its external BCP on its website, TriumphCapitalManagement.com, and additionally provides its external BCP to all Clients as part of the Firm's annual Firm Deliverables.

C. Annual Review of the BCP

1. The Firm will update its BCP whenever the Firm experiences a material change to its operations, structure, business, or location.

2. In addition, the Firm reviews its BCP annually to modify it for any changes in Firm operations, structure, business, or location or those of our clearing firms.
3. The Firm's BCP is reviewed and approved by the CCO.

D. BCP Succession Plan

1. Derek Eichenwald, CEO of the Firm, maintains a succession plan which covers the Firm in the event of his accident, illness, or retirement.
2. In the event of the CEO's death, the succession plan ensures that the Firm has enough liquidity to operate effectively for a sufficient period of time.
3. The Firm strives to cross-train all Employees to ensure that no one Employee is non-replaceable.

IV. OFFICE LOCATIONS

A. Office Locations

1. TCM's headquarters is listed below as Location #1.
2. In case of a SBD at the Firm's headquarters in which business functions are inoperable, business functions are to be re-routed to Office Location #2 (2920 Vallejo Street, Denver, CO 80211) or another location which would be announced at the time of the SBD.
3. The alternate location will be utilized until either the headquarters can be restored or a new suitable office is established.

Office Location #1

1610 Wynkoop Street, Suite 550
Denver, CO 80202
(720) 399-5551

Office Location #2

2920 Vallejo Street
Denver, CO 80211
(720) 495-1317

V. CLIENT ACCESS TO FUNDS AND SECURITIES

A. Accessibility

1. The Firm does not maintain custody of Client funds or securities.
2. In the event of an internal or external SBD, Clients can still contact their representatives to place orders, the Firm's Client services personnel will take orders or instructions and contact the Clients' custodian on their behalf, and, if Firm web access is available, the Firm will post on the Firm's website that Clients may access their funds and securities by contacting the custodian through which their funds are invested directly.
3. The Firm will make this information available to Clients through its disclosure policy.

VI. DATA BACKUP AND RECOVERY (HARD COPY AND ELECTRONIC)

A. Data Backup Location

1. The Firm maintains its primary books and records at the Firm's headquarters.
2. The Firm backs up its electronic records in real time to its cloud-based servers, which are regulatory compliant.
3. The Firm's data and systems can be accessed from either location or remotely with proper access.
4. If the Firm's primary location is inoperable, the Firm will continue operations from its alternate location.

VII. OPERATIONAL AND FINANCIAL ASSESSMENTS

A. Operational Risk

1. In the event of an SBD, the Firm will immediately identify what means will permit it to communicate with its Clients, Employees, critical business constituents, critical banks, critical counterparties, and regulators.
2. Although the effects of an SBD will determine the means of alternative communication, the communications options the Firm will employ will include the Firm's website and backup phone systems, including cell phones owned by the Firm's Employees.
3. In addition, the Firm has its records electronically stored which minimize the possibility of risk or loss.

B. Financial and Credit Risk

1. In the event of an SBD, the Firm will determine the value and liquidity of its investments and other assets to evaluate its ability to continue to fund operations.
2. If the Firm determines it may be unable to meet its obligations or if it cannot remedy a capital deficiency, the Firm will file appropriate notices with its regulators, notify Clients, and immediately take any additional appropriate steps.

VIII. MISSION CRITICAL SYSTEMS

A. Mission Critical Systems

1. The Firm's mission critical systems are those that ensure prompt and accurate processing of securities transactions, including order taking, entry, execution, comparison, allocation, clearance and settlement of securities transactions, the maintenance of Client accounts, access to Client accounts, and the delivery of funds and securities.
2. Recovery-time objectives provide concrete goals to plan for and test against.
3. They are not, however, hard and fast deadlines that must be met in every emergency situation, and various external factors surrounding an SBD, such as time of day, scope of disruption, and status of critical infrastructure, particularly telecommunications, can affect actual recovery times.
 - a. Recovery refers to the restoration of clearing and settlement activities after a wide-scale SBD.
 - b. Resumption refers to the capacity to accept and process new transactions and payments after a wide-scale SBD.

IX. ALTERNATE COMMUNICATIONS BETWEEN THE FIRM AND CLIENTS, EMPLOYEES, AND REGULATORS

A. Clients

1. The Firm communicates with Clients through the Firm's Employees.
2. In the event of an SBD, the Firm will assess which means of communication are still available and use the means closest in speed and form to the means the Firm has used in the past to communicate with the other party.
 - a. For example, if the Firm has communicated with a party by e-mail but the internet is unavailable, a Firm Employee will call the other party on the telephone and follow up where a record is needed with a paper copy in the U.S. mail.

B. Employees

1. The Firm communicates with its Employees using the telephone, e-mail, and in person.
2. In the event of an SBD, the Firm will assess which means of communication are still available and use the means closest in speed and form (written or oral) to the means the Firm has used in the past to communicate with the other party.

3. The Firm will also employ a call tree so that senior management can reach all Employees quickly during an SBD.
4. The call tree includes all staff home and office phone numbers.
5. The Firm's Compliance Department will invoke the call tree. Members of the Compliance Department include:
 - a. Avery McDonnell
 - b. Brandon Drespling
 - c. Chris Nani
 - d. Derek Eichenwald
 - e. Emma Leiker
 - f. Hannah Ferguson
 - g. Megahn Nalty

C. Regulators

1. The Firm is currently registered with the SEC.
2. The Firm communicates with regulators using the telephone, e-mail, fax, U.S. mail, and in person.
3. In the event of an SBD, the Firm will assess which means of communication are still available, and use the means closest in speed and form (written or oral) to the means the Firm has used in the past to communicate with the other party.
4. Below is the identifying information for all regulatory bodies in charge of overseeing the Firm:

Securities and Exchange Commission ("SEC")
 100 F Street, NE
 Washington, DC 20549
 Office of Investor Education and Assistance
www.sec.gov
 (202) 551-6551
IARDLIVE@sec.gov

SEC's Denver Regional Office
 1961 Stout Street, Suite 1700
 Denver, CO 80294
 (303) 844-1000
denver@sec.gov

SEC Toll Free Investor Information Service:
 1-800-SEC-0330

SEC Help Line
 (202) 551-6999

FINRA can be reached during an SBD through its usual contacts, such as the District Office or direct dial number; please call FINRA's Gateway Call Center at (301) 590-6500. This number will be re-routed in the event of an SBD at FINRA's primary call center. The Firm will be able to reach an operator or receive recorded instructions. This information also will be posted on www.finra.org.

IARD Website
<http://www.iard.com/>

State of Colorado Securities Board
 Colorado Division of Securities
 1560 Broadway, Suite 900
 Denver, CO 80202
www.securities.colorado.gov
 (303) 894-2320
Dora_securitieswesbite@state.co.us

X. CRITICAL BUSINESS CONSTITUENTS, BANKS, AND COUNTERPARTIES

A. Critical Businesses Associated with the Firm

1. The Firm has contacted its critical business constituents (businesses with which the Firm has an ongoing commercial relationship in support of operating activities, such as vendors providing the Firm critical services), and determined the extent to which the Firm can continue its business relationship with its critical business constituents in light of an internal or external SBD.

2. The Firm will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services because of an SBD to them or the Firm.
3. Critical business constituents that interact with the Firm's operating accounts include:

BBVA Compass
15 20th Street S
Birmingham, Alabama 35233

TD Ameritrade
200 South 108th Avenue
Omaha, Nebraska 68154

American Express
200 Vesey Street
New York, NY 10285

4. The Firm believes that it maintains enough liquidity and access to credit to help it continue its operations during either an internal or external SBD.

B. Insurance

1. The Firm's policy is to ensure there is enough insurance coverage for any SBD that might occur.
2. The Firm reviews the insurance coverage regularly and determines the cost/benefit of limits of coverage and retention amounts.

XI. REGULATORY REPORTING

A. Reporting

1. TCM is subject to regulation by the SEC and other applicable regulatory bodies.
2. The Firm files reports with its regulators electronically using the internet.
3. In the event of an SBD, the Firm will consult with the SEC and other regulators to determine which means of filing are available, and use the means closest in speed and form (written or oral) to the Firm's previous filing method.
4. In the event the Firm cannot contact its regulators, the Firm will continue to file required reports using the communication means available to TCM.