

Axiom Capital Management's Business Continuity Planning Disclosure Statement

Axiom Capital Management 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 is 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 after a significant business disruption, you cannot contact us as you usually do at 800-292-9192, or 212-521-3800 you should call our alternative number at 866-457-7568, or go to our web site at www.axiomcapital.com. If you cannot access us through either of those means, you should contact our clearing firm for instructions on how it may provide prompt access to funds and securities, enter liquidating transactions only, cash, and security transfer transactions. Our clearing firm is National Financial Services, Inc. (“NFS”) and can be reached at **(800) 877-2410**, or online at <https://clearingcustody.fidelity.com/app/home>. If either of these contacts is unavailable an alternate contact person at NFS is Mike Burke and can be reached at **(617) 563-9211**.

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.

Every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption. Our business continuity plan addresses: data back up 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. Your orders to buy and sell securities and requests for funds and securities could be delayed during this period.

Our clearing firm, NFS, also has a Business Continuity Plan that covers the back-up of customer records and recovery time of mission critical systems. Please refer to their website at:

https://clearingcustody.fidelity.com/app/item/RD_13569_19417/notice-of-business-continuity-plans.html

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 a local site when needed and expect to recover and resume business within the same 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 by the next business day. In either situation, we plan to continue in business, or if necessary allow NFS to accept your instructions limited to liquidating transactions only, cash, and security transfer transactions, and notify you through our web site www.axiomcapital.com or our customer emergency number at, 212-521-3800 or NFS at **(800) 877-2410**. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer’s prompt access to their funds and securities.

For more information – If you have questions about our business continuity planning, you can contact us at 212-521-3800.