



Contingency and Disaster Recovery Plan

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Since the timing and impact of disasters and disruptions are 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.

In preparation for an event, such as a natural disaster, terrorist activity, or other event that would partially or completely restrict access to Invicta Capital main business office, Invicta has established a disaster recovery and business continuity plan (Contingency and Disaster Recovery Plan, or CDRP). Invicta has developed an adopted a CDRP in an effort to provide an immediate and appropriate response to foreseeable emergency situations, protect firm employees, minimize disruption to client and investor services and maintain fluidity in daily operations.

Invicta's policy is to respond to a Significant Business Disruption (SBD) by safeguarding employees' lives and firm property, making financial and operational assessments to quickly recover and resume daily operations.

Invicta Capital is an introducing firm and does not perform any type of clearing or hold any client assets in custody. In the event that we determine we are unable to continue business; clients have direct access to their funds and securities.

In the event that you are unable to reach your Representative due to a SBD, you can contact the home office of Invicta at (724)553-6891 or by email at compliance@invictacapitaladvisors.com

1. Potential Threats and SBD's

Disasters and emergencies are, by their nature, difficult to predict. Nonetheless, Invicta believes it is most important that the CDRP contemplate the following internal and external situations:

- Electrical outages
- Phone system outages
- Gas or chemical leaks or attacks
- Loss of internet connectivity
- Snow or ice storms
- Fire
- Flood
- Water damage from emergency sprinkler systems
- Tornado/Hurricane/Earthquake
- Terrorist Attack
- Diminished Capacity and/or Death of Advisor

Our response to an external SBD relies more heavily on other organizations and systems, particularly the capabilities of our custodians and other investment related firms.



Contingency and Disaster Recovery Plan

2. Disaster Recovery Team and Emergency Coordinators

The implementation of the CDRP will be overseen by the President of Invicta. Invicta's President is responsible for approving the DCRP and for conducting the required annual review. Either the firm President or the CCO may implement the CDRP.

3. Identification and Assessment

If any employee becomes aware of a situation that may require implementation of the CDRP, he or she must notify either the President and/or CCO. Upon receiving notification and assessing the situation, including any imminent danger to employees or others and any threat to Invicta facilities or operations, the designated person may at their discretion implement the CDRP and should, if applicable contact emergency personnel when safe to do so.

4. Evacuation or Sheltering in place

If Invicta employees are in danger, the decision to evacuate or shelter in place will be determined by the management of the building. Employees should abide by all instructions provided by building management, in the event of an evacuation, Invicta employees will meet at the predetermined meet location away from the building.

If there is a shelter in place order, employees should move to an area of the office that offers the most protection from the threat and await further instruction from building management.

5. Alternative Work Sites

If the President of Invicta determines that the main office will be unusable for an extended period of time the firm is set up to allow its employees to work remotely until such time as the main office is deemed suitable for occupancy.

In the event that an SBD that prevents either safe travel and/or safe conditions in the backup location, Invicta employees will work from their homes.

6. Protection and Recovery of Documents

Electronic documents are backed up to servers and cloud-based secure file backup systems. Copies of critical paper documents are scanned and stored electronically. Third-party service providers also keep copies of certain documents. In the event of a disruption or disaster, the President will contact vendors as appropriate.

7. Testing and Evaluation

The President will test the DCRP to evaluate its effectiveness at least annually. The CCO, who oversees DCRP testing with the President will ensure that Invicta documents the testing and any corrective actions.



Contingency and Disaster Recovery Plan

Invicta's operations may be adversely impacted if a third-party vendor experiences a disruption. The CCO will periodically evaluate the business continuity plans of critical third-party vendors that provide time-sensitive services that are critical to Invicta's operations.

8. File Backup

All files are backed up to the server nightly. The firm has in place an online Document Storage System, Worldox, to maintain all files. Worldox is a cloud-based system with multiple back up locations, allowing the firm to access its books and records remotely via secure log in.

9. Clients' Access to Funds and Securities

Our firm does not maintain custody of clients' funds or securities, they are maintained at our custodians. Our clients have access to their accounts in the event of an SBD.

10. Data Backup and Recovery

Our firm maintains its' primary hard copy books and records at 606 Corbet Street Tarentum, PA 15084. The firm backs up data to the internal server daily, as well as the use of cloud storage for redundancy. In the event of an SBD the firm will be able to recover necessary data from the cloud back up storage.

11. Regulators

We are regulated by:

1. US Securities and Exchange Commission
2. FINRA
3. Pennsylvania Department of Insurance and Banking
4. Pennsylvania Securities Commission
5. Ohio Securities Commission

In the event of an SBD, we will assess which means of communication are still available to us and use the means closest in speed and form (written or oral) to communicate with the regulators. We file reports electronically with the regulators, in the event of an SBD, we will check with the regulator to determine which means of filing are still available to us and use the most expeditious means to file required reports.

12. Succession Planning

Invicta has required succession planning be put in place by each of their registrants, to be enacted, in the event of diminished capacity and/or death of an advisor. These plans are on record with the Chief Compliance Officer. In the event that a succession plan would need to be activated, it is the responsibility of the CCO to execute the plan and notify custodians, regulators and any additional interested parties.



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Contingency and Disaster Recovery Plan

13. Updates and Annual Review

Our firm will update this plan whenever there is a material change to the operations, structure, business or location. In addition, our firm will review the CDRP annually to ensure all aspects of the plan are current and remain applicable considering any changes to our systems throughout the year.