



TRITON

INVESTMENTS

*Triton Investments, LLC
Written Business Continuity Plan
Effective Date: August 23th, 2023*

Business Continuity Plan

Background

While it is recognized it is not possible to create a plan to handle every possible eventuality, it is the intent of TIL to set up a framework to be used in the most likely of scenarios. It is also the intent that this framework provide guidance as to how to respond should an unforeseen situation occur.

TIL believes that an adviser's fiduciary obligation to its clients includes the obligation to take steps to protect the clients' interests from being placed at risk as a result of TIL's inability to provide advisory services after, for example, a natural disaster or, in the case of some smaller firms, the death of the owner or key personnel. The clients of an adviser that is engaged in the active management of their assets would ordinarily be placed at risk if the adviser ceased operations.

Business Description

TIL conducts business in equity, fixed income, and other securities; it does not hold customer funds or securities. Transactions are sent to TIL's brokerage firm, which executes its orders, compares them, allocates them, clears and settles them. TIL's custodian maintains its clients' accounts, grants clients access to them, and delivers funds and securities.

Emergency Information

Firm Contact Persons

TIL's three emergency contact persons are:

Contact Name	Phone	Email	Relationship
Charles M Coleman	(701) 425-2016	charlescoleman@tritoninvestments.net	Chief Compliance Officer
William R Sherwin	(701) 202-7360	w.sherwin@tritoninvestments.net	Investment Advisor Representative
Patrick T Schmitz	(701) 425-9290	p.schmitz@tritoninvestments.net	Investment Advisor Representative

Support Services

In the event of an emergency, the following is a list of support services and the methods by which they may be contacted:

Emergency Services (EMS): (701) 222-6727

Fire Department: (701) 258-5792

Police Department: (701) 223-1212

Internet Service Provider: (800) 888-1300

Data Backup Provider:

- Advyzon: (844) 265-6148 or support@yhlsoft.com
- Charles Schwab: (877) 519-1403 or at their “Contact Us” webpage at: <https://www.schwab.com/contact-us>

Alternative firm contact in case of death of Key Personnel	William R Sherwin
	Patrick T Schmitz

This information will be updated in the event of a material change, and TIL’s CCO will review the plan on an annual basis.

Firm Policy

TIL’s policy is to respond to a Significant Business Disruption (SBD) by safeguarding employees’ lives and firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting the firm’s books and records, and allowing its clients to transact business.

In the event that TIL determines it is unable to continue its business, it will assure clients prompt access to their funds and securities.

Significant Business Disruptions (SBDs)

TIL’s plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only TIL’s ability to communicate and do business, such as a fire in its building or the death of a key member of the firm. External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a city flood, or a wide-scale, regional disruption.

TIL’s response to an external SBD relies more heavily on other organizations and systems, such as the brokerage firm(s) and Internet Service Providers it uses.

Approval and Execution Authority

The CCO is responsible for approving the plan and for conducting the required annual review. The CCO has the authority to execute this BCP.

Plan Location and Access

TIL maintains copies of its BCP and annual reviews, and all changes that have been made. An electronic copy of the BCP is stored with the company's "Business Continuity Plan" folder, which is kept in the following locations: Seagate Backup Hard Drive and EasyStore Hard Drive. Another electronic copy of this plan is stored: As a PDF file on the firm's Google Drive.

Each employee is given a copy of the plan and notified of the location/file within TIL's electronic systems to which employees have access. Physical copies need to be returned upon termination of employment with the firm.

TIL's Custodian and Brokerage Firm Contacts

Email via Charles Schwab website: <https://www.schwab.com/secure/asset?cmsid=CONTACTUS-INTL-1>

Call: 800-654-2593

We're available by phone Monday through Friday: 9:00 a.m. to 9:00 p.m. ET

For trading inquiries, please call 888-245-6864

For Retirement Services, please call 877-229-2884

Fax: 720-785-8888

Regular Mail:

Charles Schwab & Co., Inc.
El Paso Operation Center
P.O. Box 982600 El Paso, TX 79998

Overnight Mail:

Charles Schwab & Co., Inc.
El Paso Operation Center
1945 Northwestern Drive El Paso, TX 79912

Hours of Operation: Monday through Friday: 9:00 a.m. to 9:00 p.m. ET

Office Locations

TIL's office address and phone numbers are:

9025 Apple Creek Road
Bismarck, ND 58504
UNITED STATES
701-425-2016
(primary)

711 Quincy St. NE
Minneapolis, MN 55413
UNITED STATES
701-425-9290
(secondary)

315 Linden Ln
Bismarck, ND 58503
UNITED STATES
701-202-7360
(secondary)

TIL engages in client servicing, order taking and entry at these locations.

Alternative Physical Location(s) of Employees

In the event of an SBD that makes it impossible or impractical to use any or all of the company offices, TIL will move its staff from affected offices to the closest of its unaffected office locations.

Clients' Access to Funds and Securities

TIL does not maintain custody of clients' funds or securities, which are maintained at its brokerage firm. In the event of an internal or external SBD, if telephone service and internet service are available, TIL's investment adviser representatives (IARs) will take customers' orders or instructions from its alternative locations, phone numbers, websites or alternative email addresses and contact its brokerage firm on their behalf.

Data Back-Up and Recovery (Electronic)

TIL maintains its primary electronic copy of books and records and its redundant electronic records at its primary office.

The firm's CCO is responsible for the maintenance of these books and records. TIL maintains the following document types and forms that may or may not be transmitted to its brokerage firm: Investment Policy Statements, Client Contracts and other related documents.

The firm backs up its electronic records by storing them in the firm's Google Drive and Docupace accounts, respectively. Furthermore, the records are also backed up on an external hard drive connected to the CCOs computer.

For the loss of electronic records, it will either physically recover the storage media or electronically recover data from its back-up site(s). If its primary site is inoperable, TIL will continue operations from its back-up site or an alternate location. TIL obtains the Business Continuity Plans of its electronic storage partners for access to its records in case of a regional event.

Operational Assessments

Operational Risk

In the event of an SBD, TIL will immediately identify what means will permit it to communicate with its clients, employees, critical business constituents, and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options TIL will employ will include its website, telephone voice mail, secure e-mail, etc. In addition, TIL will retrieve its key activity records as described in the section above, Data Back-Up and Recovery (Electronic). Employees will establish contact with the firm's Emergency Contacts and communicate key firm directives as they apply to operating the business whether it be from a new location, each employee's residence or an alternative regional location with access to a different power grid from the principal office.

Mission Critical Systems

TIL's "mission critical systems" are those that ensure client communication, access to client accounts and trading systems. More specifically, these systems include the office computer systems.

TIL has primary responsibility for establishing and maintaining its business relationships with its clients. TIL's brokerage firm/custodian provides the execution, comparison, allocation, clearance and settlement of securities transactions as well as the maintenance of customer accounts, access to customer accounts, and the delivery of funds and securities.

TIL's brokerage firm/custodian represents that it: will maintain a business continuity plan and the capacity to execute that plan; backs up TIL's records at a remote site; and operates a back-up operating facility in a geographically separate area with the capability to conduct the same volume of business as its primary site. It has also confirmed the effectiveness of its back-up arrangements to recover from a wide scale disruption by testing.

Recovery-time objectives provide concrete goals to plan for and test against. They are not, however, hard and fast deadlines that must be met in every emergency situation, and various external factors surrounding a disruption, such as time of day, scope of disruption, and status of critical infrastructure—particularly telecommunications—can affect actual recovery times. Recovery refers to the restoration of clearing and settlement activities after a wide-scale disruption; resumption refers to the capacity to accept and process new transactions and payments after a wide-scale disruption. The recovery times for custodians are expected to be consistent with the recovery time indicated in the specific custodian's business continuity plan or other relevant documentation. However, the firm will not typically have access to the custodian's business continuity plan and recovery times will of course differ depending on the specific system affected. Please see "Custodian and Brokerage Firm Contacts" above.

The Firm's Mission Critical Systems

Trading

TIL uses the electronic order entry system provided by its custodian or another third party to enter trading activity and transactions. If electronic means are not available, TIL may place orders by fax or telephone, in which case order tickets will still be maintained.

In the event of an internal SBD, TIL will enter and send records to its brokerage firm by the fastest alternative means available. In the event of an external SBD, TIL will maintain the order in electronic or paper format, and deliver the order to the brokerage firm by the fastest means available when it resumes operations. In addition, during an internal SBD, TIL may need to refer its clients to deal directly with its brokerage firm for order entry.

Client Account Information

TIL currently accesses client account information via its brokerage firm's website. In the event of an internal SBD, TIL would access client information via fax correspondence, alternate phone systems, etc. TIL may relocate to its alternative business location(s) if access to the brokerage firm website can be accomplished.

Alternate Communications with Clients, Employees, and Regulators

Clients

TIL now communicates with its clients using the telephone, e-mail, its Website, fax, U.S. mail, and in person visits at TIL's or at the other's location. In the event of an SBD, TIL will assess which means of communication are still available to it, and use the means closest in speed and form (written or oral) to the means that it has used in the past to communicate with the other party. For example, if TIL has communicated with a party by e-mail but the Internet is unavailable, TIL will call the party on the telephone and follow up and where a record is needed with paper copy in the U.S. mail. In the event of an anticipated significant regional business disruption, TIL will communicate to its clients in advance how to establish contact with it and its personnel or brokerage and custodian prior to the disruptive event occurrence.

Employees

TIL now communicates with its employees using the telephone, e-mail, and in person. In the event of an SBD, TIL will assess which means of communication are still available to it, and use the means closest in speed and form (written or oral) to the means that it has used in the past to communicate with the other party. In the event of key employees being unable to perform their job functions, immediately and for any time period afterwards, TIL will delegate, if possible, those key functions to other employees.

Regulators

TIL communicates with its regulators using the telephone, e-mail, fax, U.S. mail, and in person. In the event of an SBD, TIL will assess which means of communication are still available to it, and use the means closest in speed and form (written or oral) to the means that it has used in the past to communicate with the other party.

Pandemics, Epidemics, & Outbreaks

TIL recognizes that pandemics, epidemics, and other types of outbreaks constitute business disruptions of a special nature. These situations impact not only TIL as a company, but also its personnel, clients, and vendors. Accordingly, TIL intends to implement the following procedures during such a situation.

General Business Operations

Promptly, and then intermittently thereafter, TIL will conduct a high-level assessment of the situation's impact on business and operations. Specifically, TIL will identify and address:

- any weaknesses or unforeseen issues
- any inability to conduct essential operations or operate essential systems
- any inability to monitor third party vendors

Information Security & Remote Operations

TIL will also alert personnel to the increase likelihood of phishing attempts and client impersonation schemes related to the situation. For example, bad actors may target individual staff members with requests for wire transfers posing as a client, emails related to state or federal work from home updates, changes to healthcare benefits, changes in information security policy related to working from home, software required to install on computers in order to work from home, the latest epidemic statistics, or even discounted offers on items in short supply. Accordingly, the firm will refer personnel to TIL security best practices and ensure that those practices are up to date.

If necessary, TIL will also conduct training for its personnel to address (i) potential information security issues commonly associated with remote work and (ii) the importance of protecting non-public client information at all times. In particular, advisory personnel are instructed to:

- access the internet only from secure WiFi connections or via a virtual private network ("VPN")
- avoid using public WiFi networks, which are vulnerable to exploitation
- store any sensitive, non-public information on non-company devices only after taking the proper security protections and obtaining authorization

If having personnel work remotely, then TIL will also:

- catalogue systems that cannot be accessed remotely, if any
- shut down non-essential hardware (e.g., computers)
- lock its physical storage (e.g., file cabinets) and all office access

- check in with building management, if applicable, to determine current security at the facility
- require that firm personnel continue following advertising guidelines for applicable communications
- ensure electronic cataloging of communication is still taking place
- continue to document all interactions with clients, regardless of the medium of interaction
- update TIL's business continuity plan as needed

Third Party Vendors

If appropriate, TIL will endeavor to discuss with vendors the following:

- the vendor's business continuity efforts
- the vendor's disaster recovery plans
- the vendor's reliance on, and communications to date with, the vendor's vendors

Company Personnel

If appropriate, TIL will limit or altogether avoid in-person meeting with clients and advisory personnel and allow or require (as appropriate) personnel to work remotely. Any personnel that is limited in their ability to work remotely, will immediately inform their supervisor. Limitations include but are not limited to:

- Inadequate hardware, software, or other systems
- Need to perform caregiving services for children or other persons
- Physical incapacity

If essential personnel are limited in their ability to work remotely, then the firm will determine if alternate or temporary personnel are available to perform necessary functions. Additionally, TIL will conduct check-ins with advisory personnel no less than weekly regarding remote work conditions.

Regulatory Reporting

TIL is subject to regulation by the state of North Dakota and other jurisdictions as applicable. TIL now files reports with its regulators using the IARD/CRD System. In the event of an SBD, TIL will check with the state of North Dakota and other jurisdictions as applicable to determine which means of filing are still available to it, and use the means closest in speed and form (written or oral) to its previous filing method. In the event that TIL cannot contact its regulators, it will continue to file required reports using the communication means available to it and forward those reports at the earliest opportunity.

Regulatory Contact:

ND Securities Department
State Capitol, 5th Floor
600 East Boulevard Avenue

Bismarck, ND 58505-0510
(701) 328-2910
(701) 328-2946

Death of Key Personnel

The following personnel are identified as “Key Personnel” without which it would be difficult or impossible to continue operating the firm and/or properly service clients:

Charles M Coleman

Chief Compliance Officer

If some event made it impossible for any person listed above able to continue to service the firm, TIL would implement the following succession plan:

Triton has a ten to twelve year partnership plan for employees in advisory, operations, and investments. At such time, an equity split will occur between the employee and the owners of the firm. The new partners will then be responsible for all client services and operations. If no partners are willing or capable or continuing business operation, TIL will have to cease business activity and operations.

In case of death of any key personnel, the following individuals will assume the responsibility to make contact with the clients of the firm in the most efficient manner possible and as soon as possible to allow clients to access their accounts. If a business succession plan is to be implemented, clients will be contacted to obtain consent prior to any assignment of their advisory management contracts with this firm to a successor firm.

Patrick T Schmitz

Investment Advisor Representative

William R Sherwin

Investment Advisor Representative

Updates and Annual Review

TIL will update this plan whenever it has a material change to its operations, structure, business or location or to those of its brokerage firm. In addition, TIL will review this BCP annually, to modify it for any changes in its operations, structure, business, or location or those of its brokerage firm.

Approval & Signature

Supervisor Approval

Approve the firm’s Business Continuity Plan (BCP) program by signing below.

I have approved this Business Continuity Plan as reasonably designed to enable TIL to meet its obligations to clients in the event of a Significant Business Disruption.

Signed:

Officer Name and Title	Charles M Coleman, Chief Executive Officer	
	DocuSigned by: <i>Charles Coleman</i>	08-23-2023
	Supervisor Signature 6D307AE33CD3495...	Date

Chief Compliance Officer Appointment (Exhibit 1)

The person herein named “Chief Compliance Officer” is stated to be competent and knowledgeable regarding the Advisers Act or applicable state rule or regulation and is empowered with full responsibility and authority to develop and enforce appropriate policies and procedures for the firm. The compliance officer has a position of sufficient seniority and authority within the organization to compel others to adhere to the Business Continuity Plan.

Chief Compliance Officer	Date Responsibility Assumed	Annual Review Completed	Employee Training	Disaster Day Testing:	Business Continuity Plan Updates:	Updates Notes:	
Charles M Coleman	6/20/2018	N/A	12/13/2018	N/A	08/14/2018		
					01/11/2019		
						05/07/2019	
						08/15/2019	
						12/31/2019	
						03/31/2019	
						04/15/2020	
						05/07/2020	
		08/15/2019	08/16/2019		05/02/2019	05/20/2020	Email of persons updated Added Chief Compliance Officer Appointment and Table Access Person List Attached MyRIACompliance Log Attached for Reference
						07/14/2020	Added Data Contact Information for Advyzon, TD Ameritrade, and DocuPace
						08/11/2020	Fixed section title that had incorrect style

		08/11/2020	08/11/2020	07/14/2020	12/08/2020	Will Sherwin's relationship to the firm updated (page 2) DocuPace was deleted as data backup (pg. 3) Will's address included in secondary office (pg. 5) Burnt Boat Drive location removed (pg. 5) William Sherwin added to list of access persons (pg. 13)
		09/12/2021	03/15/2021	07/20/2021	09/12/2021	Update only to the annual review
		12/19/2022	10/20/2022	06/23/2022	12/19/2022	Wording on transmission of documents to custodian changed (pg. 8)
		08/23/2023		06/21/2023	08/23/2023	Custodian information update to Charles Schwab on Pages 3&4

List of Access Persons (Exhibit 2)

Access Person: Any of TIL's supervised persons who have access to non-public information regarding any client's purchase or sale of securities, or information regarding the portfolio holdings of any reportable fund, or who is involved in making securities recommendations to clients, or who has access to such recommendations that are non-public.

The following employee(s) will manage non-public information:

Name	Title
Charles Mark Coleman	CEO
Patrick Thomas Schmitz	IAR
William Raymond Sherwin	IAR

MyRIACompliance Example Log

5/18/2020

MyRIACompliance Compliance Log

Triton Investments, LLC

MyRIACompliance Compliance Log on 05/18/2020

Q3 2020 Compliance Activities

Registration Changes

FIRM REGISTRATIONS

There are no Firm Registration Status updates to show for this period.

INDIVIDUAL REGISTRATIONS

There are no Individual Registration Status updates to show for this period.

ADV CHANGES

There are no closed Change Requests to show for this period.

* Date Case Closed

Risk Assessment

2020 Risk Assessment

Not Complete

Compliance Calendar

DEADLINE ACTIVITIES

There are no completed Deadline Activities to show for this period.

EXPECTED ACTIVITIES

There are no completed Expected Activities to show for this period.

RIA EDUCATION

There are no completed RIA Education activities to show for this period.

CUSTOM ACTIVITIES

There are no completed Custom Activities to show for this period.

Marketing & Document Review

There are no completed Marketing & Document Reviews to show for this period.

* Date Review Initiated

Attestation Documents

There are no uploaded Attestation Documents to show for this period.

* Date Archived

Reviews & Submissions

There are no completed Attestation Activities to show for this period.

Dismissed Reviews & Submissions

There are no dismissed activities to show for this period.

Activity Requests

There are no completed activities to show for this period.

Employee Reports

There are no reports to show for this period.

Trade Monitoring

HOLDINGS

There are no Holdings Reports to show for this period.

TRANSACTIONS

There are no Transactions for this period.

ACCOUNTS

There are no Accounts Reports to show for this period.

Custom Checklists

There are no archived checklists to display for this period.

Cybersecurity - Vendor Due Diligence

Subscribed Vendor Document Reviews

There are no reviewed subscribed vendor documents to show for this period.

Other Vendor Document Reviews

There are no reviewed other vendor documents to show for this period.

Cybersecurity - Employee & Systems Inventory Confirmations

Cyber Employees Confirmation

There are no cyber employee confirmations for this period.

Technology NPI/Users Confirmation

There are no completed Attestation Activities to show for this period.

Dismissed Reviews & Submissions

There are no dismissed activities to show for this period.

Activity Requests

There are no completed activities to show for this period.

Employee Reports

There are no reports to show for this period.

Trade Monitoring

HOLDINGS

There are no Holdings Reports to show for this period.

TRANSACTIONS

There are no Transactions for this period.

ACCOUNTS

There are no Accounts Reports to show for this period.

Custom Checklists

There are no archived checklists to display for this period.

Cybersecurity - Vendor Due Diligence

Subscribed Vendor Document Reviews

There are no reviewed subscribed vendor documents to show for this period.

Other Vendor Document Reviews

There are no reviewed other vendor documents to show for this period.

Cybersecurity - Employee & Systems Inventory Confirmations

Cyber Employees Confirmation

There are no cyber employee confirmations for this period.

Technology NPI/Users Confirmation

Certificate Of Completion

Envelope Id: 58B5A1F091324960A89F5DC7D980BEF9	Status: Completed
Subject: Complete with DocuSign: Triton's Business Continuity Plan .pdf	
Source Envelope:	
Document Pages: 17	Signatures: 1
Certificate Pages: 1	Initials: 0
AutoNav: Disabled	Envelope Originator:
Envelopeld Stamping: Disabled	Charles Coleman
Time Zone: (UTC-06:00) Central Time (US & Canada)	200 S 108th Ave
	Omaha, NE 68154-2631
	charlescoleman@TritonInvestments.net
	IP Address: 69.84.71.190

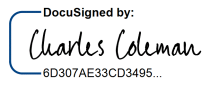
Record Tracking

Status: Original	Holder: Charles Coleman	Location: DocuSign
8/23/2023 12:14:19 AM	charlescoleman@TritonInvestments.net	

Signer Events

Charles Coleman
charlescoleman@TritonInvestments.net
Managing Partner
Triton Investments, LLC
Security Level: Email, Account Authentication (None)

Signature

DocuSigned by:

6D307AE33CD3495...
Signature Adoption: Pre-selected Style
Using IP Address: 69.84.71.190

Timestamp

Sent: 8/23/2023 12:14:33 AM
Viewed: 8/23/2023 12:14:37 AM
Signed: 8/23/2023 12:14:59 AM
Freeform Signing

Electronic Record and Signature Disclosure:
Not Offered via DocuSign

In Person Signer Events	Signature	Timestamp
Editor Delivery Events	Status	Timestamp
Agent Delivery Events	Status	Timestamp
Intermediary Delivery Events	Status	Timestamp
Certified Delivery Events	Status	Timestamp
Carbon Copy Events	Status	Timestamp
Witness Events	Signature	Timestamp
Notary Events	Signature	Timestamp
Envelope Summary Events	Status	Timestamps
Envelope Sent	Hashed/Encrypted	8/23/2023 12:14:33 AM
Certified Delivered	Security Checked	8/23/2023 12:14:37 AM
Signing Complete	Security Checked	8/23/2023 12:14:59 AM
Completed	Security Checked	8/23/2023 12:14:59 AM
Payment Events	Status	Timestamps