



AthenaInvest Advisors LLC

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Business Continuity Plan (External)

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Athena has implemented and maintains a comprehensive Business Continuity Plan to ensure ongoing operations in the event of a natural or man-made disaster or business interruption. This plan is focused on restoring all necessary systems to normal function as effectively as possible following an unexpected event that impacts normal business operations.

Athena's Business Continuity Plan is reviewed and tested regularly to ensure completeness and efficacy. The plan covers the following broad areas:

- Exercising Fiduciary Responsibility
- Protecting Client Data
- Complete and Swift Recovery Operations
- Regulatory Compliance
- Ensuring Clear Roles, Responsibilities, and Organizational Stability
- Disruptions & Recovery

Athena has plans in place to recover and resume normal business operations in the case of significant business disruptions, including a total loss of tangible assets at the firm's primary business location. The recovery plan provides for alternate physical location of employees, alternative client, employee, and regulator communications, and protection of client and mission-critical data.

Data Protection

Athena has designed and implemented a robust data infrastructure to ensure redundancy and security of all client and mission-critical data. All sensitive Athena data are encrypted, backed-up to multiple devices and geographic locations, and secured with best-practice operational procedures. Backup and recovery are tested regularly to ensure proper functionality.