

DT Investment Advisors has developed a CDRP 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 617-340-5313 or email DDalzell@dalzelltrading.com, you should call our alternative number 617-340-5314, or go to our website at DTInvestmentAdvisors.com. If you cannot access us through either of those means, you should contact our custodian for instructions on how you may enter orders and process other trade-related, cash and security transfer transactions.

Our CDRP – We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our Advisory Persons 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 plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data backup and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, Advisory Persons, and regulators; alternate physical location of Advisory Persons; 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.

Our IT Services firm, InfoHedge Technologies LLC, archives and backs up our computer hardware and applications in a geographically separate area. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, we have been advised by InfoHedge that during a "Critical Event", InfoHedge shall respond during business hours within 5 minutes from receiving the report and update DT Investment Advisors on the problem every hour thereafter. InfoHedge shall respond during non-business hours within one hour from receiving the report and update DT Investment Advisors every two hours thereafter. Your orders and requests for trading and market related information could be delayed during this period.

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 two business days. 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 within two business days. In either situation, we plan to continue in business, transfer operations to our clearing firm if necessary, and notify you how to contact us through our website, DTInvestmentAdvisors.com or our back-up customer emergency number, (508) 808-3104. If the significant business disruption is so severe that it prevents us from remaining in business, customer's prompt access to their funds and securities through their prime brokers and custodians.

**For more information** – If you have questions about our business continuity planning, you can contact us at 250 E. Beaver Ave., Suite 772, State College, PA 16801. Its main telephone number is 617-340-5313. (June 2021)