



Aquila Distributors LLC Business Continuity Plan

Executive Summary

**Adopted June 2013
Subject to Revision Annually
Most Recent Revision – September 2023**

This executive summary is intended to provide an overview of the Aquila Distributors LLC (“ADL”) Business Continuity Plan (“BCP”) which has also been posted to the Aquila Group of Funds (“AGOF”) website at www.aquilafunds.com. The BCP was written to address the requirements of FINRA Rule 4370. A copy of this BCP is available (free of charge) upon request.

ADL’s Office of Supervisory Jurisdiction (“OSJ”) is located at:

120 West 45th Street, Suite 3600
New York NY, 10036
(212) 697-6666/(800) 437-1020

ADL maintains no other branch locations.

ADL is a limited purpose broker dealer and serves as principal underwriter and distributor of the Aquila Group of Funds (“AGOF”). ADL conducts limited securities business in open-end domestic equity and fixed income mutual fund registered securities and does not offer any other brokerage services. ADL provides educational and wholesaling services primarily to other broker dealers and, on occasion, provides educational services regarding the Funds and certain shareholder servicing functions to the retail customers of other broker dealers while in the presence of other broker dealer registered representatives (“RRs”). ADL does not open or maintain customer accounts. ADL does not take custody of customer cash or securities. ADL is a mutual fund product wholesaler and marketing firm. The firm does not perform any type of shareholder transaction processing or clearing function for itself or others. ADL does not engage in any private placements or underwriting of securities other than shares of the AGOF. ADL RRs are prohibited from formulating or expressing personalized investment recommendations to retail customers and ADL does not have any retail customers as defined by Regulation Best Interest. ADL RRs receive periodic training on do’s and don’ts related to the inadvertent formation of investment recommendations.

ADL's emergency contact persons are:

Paul O'Brien, President of Aquila Distributors LLC

Phone (W): **(800) 811-9758**

Phone (C): **(704) 322-5007**

E-mail (W): pobrien@aquilafunds.com

Randall Fillmore, Senior Vice President & Chief Compliance Officer ("CCO")

Phone (W): **(212) 697-6666 x 7350**

Phone (C): **(917) 209-5080**

E-mail (W): rfillmore@aquilafunds.com

These emergency contact names, and respective contact information, have been submitted to FINRA and will be updated in the event of a material change. ADL's President will review the BCP annually in conjunction with the annual certification of ADL's Written Supervisory Procedures pursuant to FINRA Rule 3130. In the event of a Significant Business Disruption, as further discussed below, the President of ADL would provide business continuity coverage and be supported by the CCO. If the ADL President or CCO were unavailable, the SVP Management Reporting and Client Relationships Manager would temporarily provide operational and compliance coverage and would coordinate communications with Financial Intermediaries and ADL key service providers. In the event of an emergency, Regional Sales Managers ("RSMs" or "wholesalers") can provide backup coverage for one another when instructed to do so by the ADL President or another designated supervisory principal, provided they are appropriately licensed in the relevant state.

ADL's policy is to respond to a Significant Business Disruption ("SBD") by safeguarding the lives of its staff and firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting firm's books and records, and allowing AGOF shareholders to transact business. In the event that ADL determines that the firm is unable to continue its business, ADL will provide AGOF shareholders with prompt access to their cash and securities through direct communication with the AGOF Transfer and Shareholder Servicing Agent. ADL's plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only the firm's ability to communicate and do business, such as a fire in the building. External SBDs prevent the operation of the securities markets and affect a number of firms, such as a terrorist attack, a city flood, a wide-scale regional disruption or a potential pandemic event impacting one or more of ADL's geographical locations. ADL's response to an external SBD relies more heavily on other organizations and systems, especially on the capabilities of the transfer and shareholder servicing agent of the AGOF. It is the policy ADL to inform the appropriate regulatory agencies of any SBD's impacting mission critical functions.

BNY Mellon serves as the AGOF Transfer and Shareholder Servicing Agent and is responsible for account opening and maintenance and routine transaction processing of all orders. BNY Mellon is a global company with multiple geographically dispersed locations which provide for redundant service capabilities supporting the AGOF. The (800) number for account information/shareholder services for the AGOF at BNY Mellon is listed below. Our primary and alternate BNY Mellon contacts are also listed below.

BNY Mellon Account Information/Client Services for the AGOF

(800) 437-1000

Brian McDonald, Vice President, Transfer Agent Client Services
(Primary Contact at BNY Mellon)
BNY Mellon Investment Servicing
103 Bellevue Pkwy |
Wilmington, DE 19809
Phone: (302) 791-3203|
E-mail: brian.mcdonald@bnymellon.com

Audrey Kohart, Vice President, Transfer Agent Client Services (Alternative Contact at BNY Mellon)
BNY Mellon Investment Servicing
103 Bellevue Pkwy |
Wilmington, DE 19809
Phone: (302) 791-3168
E-mail: audrey.kohart@bnymellon.com

BNY Mellon is primarily responsible for receiving and accepting AGOF shareholder orders. If BNY Mellon has received insufficient information to process a shareholder order, ADL RRs may contact other broker dealers to help facilitate BNY Mellon's receipt of accurate and complete information with which to accept an order or in limited circumstances may contact the underlying AGOF shareholder to facilitate BNY Mellon's receipt of information. AGOF shareholders (or other broker dealers) are instructed to place orders directly with BNY Mellon. BNY Mellon executes AGOF shareholder orders, compares, allocates, clears and settles them. BNY Mellon also maintains AGOF shareholder accounts, grants shareholder access to accounts and delivers cash and securities. Shareholder access to cash and securities is generally accomplished by shareholder (or other broker dealer) contact directly with BNY Mellon. Based upon ADL's limited purpose broker dealer business model, ADL RRs do not function in an order taking or order execution capacity and do not handle or transmit shareholder cash or securities.

In the event of an SBD occurrence at ADL's OSJ location, ADL's New York based RRs may work remotely and incoming calls will be forwarded to individual ADL RRs firm issued cell phones. In addition, incoming calls could also be re-routed to geographically dispersed RSMs across the country. RSMs are located in home offices qualifying under the exclusions from the definition of a branch office.

During the period of the Pandemic, ADL and Aquila Investment Management LLC ("AIM" - Investment Adviser to the Aquila Group of Funds ("AGOF")) [collectively the "Aquila Entities"] adopted a Work From Home strategy pursuant to a separately issued Pandemic Plan which included the successful re-routing of (800-437-1020) incoming calls to firm issued cell phone numbers. The Aquila Entities currently operate under a Hybrid business model whereby Aquila Entities personnel generally work from the New York Office or other Remote Offices three days a week and work from home offices or other remote locations two days a week. When the Aquila

Entities New York Office is closed, incoming calls to the New York Office 1- 800 service (800-437-1020) are automatically re-routed to firm issued cell phone numbers.

ADL's hard copy data, books and records backup is managed by the OSJ. For long term hard copy storage, ADL uses Iron Mountain located at:

Iron Mountain
100 Harbor Drive
Jersey City, NJ 07305

ADL uses High Caliber Solutions, Inc. ("High Caliber"), an independent third-party technology consulting firm that hosts information technology platforms and provides comprehensive information technology consulting services. High Caliber currently hosts the AGOF website in their Data Center. The High Caliber Data Center is located at:

High Caliber Solutions, Inc.
One Enterprise Avenue North
Secaucus, NJ 07094

ADL backs up its electronic records on a continual basis via a redundant back-up file server, terminal server and exchange server (that handles the firm's e-mail) using the services of DATTO, a cloud based electronic communications storage and archival company. DATTO is located at:

DATTO
701 Brickell Avenue Suite 400
Miami, FL 33131

The cloud-based back-up servers at DATTO are synchronized (by High Caliber) with ADL's main servers located at ADL's OSJ. High Caliber systems allow for the real-time replication of encrypted data to the DATTO cloud-based data centers with failover and failback capability. DATTO failover and failback capabilities are periodically tested by High Caliber. Thus, if servers/data stored in ADL's primary office location becomes unavailable due to some unforeseen event, the Aquila Entities will authorize High Caliber to activate the failover and failback plans using data archived on DATTO cloud-based archival and business recovery service, enabling employees to continue to conduct business from their normal/ remote office locations. Alternately, if there were to be a physical compromise to a specific office, Aquila Entities employees could work from home or other remote locations upon activation of the DATTO failover solution.

Firm Email and text messages are also automatically replicated to Global Relay for archival and surveillance purposes. Global Relay is located as follows:

Global Relay Communications
220 Cambie Street
Vancouver BC
CANADA V6B 2M9

ADL's "mission critical systems" are those that facilitate prompt and accurate processing of securities transactions, including order taking, entry, execution, comparison, allocation, clearance and settlement of securities transactions, the maintenance of shareholder accounts, access to shareholder accounts, and the delivery of cash and securities. Each of these mission critical functions have been outsourced to BNY Mellon pursuant to a written contract with each Fund comprising the AGOF and subject to oversight by the Aquila Entities.

AGOF Fund Direct shareholders have access to monitor their account on the BNY Mellon Active Investor Portal which offers AGOF shareholders service options that may be conducted electronically. Upon enrollment, AGOF shareholders can enter (on a self-service basis) a limited number of lower risk financial transactions (exchanges to an existing fund or new fund) and certain maintenance transactions electronically through the BNY Mellon Active Investor Portal as opposed to calling into the BNY Mellon Call Center or to the BNY Mellon Voice Response Unit.

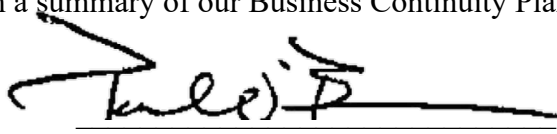
For AGOF Broker Controlled Accounts, the Broker Dealer of Record has access to monitor their client's accounts on the BNY Mellon Active Advisor Portal which offers a variety of shareholder servicing options that may be conducted electronically, as opposed to calling into the BNY Mellon Call Center or to the BNY Mellon Voice Response Unit.

BNY Mellon represents that it backs up AGOF shareholder records, with respect to each of the Funds, at one of two remote sites using Tivoli Storage Management ("TSM"). TSM performs backups over the network. Local failover recovery or disaster recovery is achieved using data replication and does not rely on TSM backup. BNY Mellon also confirms that they test all of their disaster recovery plans multiple times throughout the year with the primary data center simultaneously recovering to both back up data centers. BNY Mellon also has a documented Pandemic Plan. During the period of the COVID-19 Pandemic, BNY Mellon provided numerous written client communications related to the operational status of each line of business and initiated a series of bi-weekly conference calls to keep clients informed as to their operational status.

ADL may communicate with AGOF shareholders based upon inquiries received via the AGOF 1-800 shareholder services phone line or the AGOF shareholder inquiry e-mail box by replying by telephone, e-mail, the AGOF website, fax, United States ("U.S.") mail, or by in-person visits at the offices of other broker dealers. In the event of an SBD, ADL will assess whichever means of communication are available, and intends to use the means closest in speed and form, written or oral, to the means that have been used in the past to communicate with the other party. For example, if ADL typically communicates with a party by e-mail but if the internet is unavailable, ADL RRs will call the AGOF shareholder (or other broker dealer) on the telephone and follow up with a written record, if required, via U.S. mail.

ADL intends to employ an Emergency Calling Tree so that staff can be reached quickly during an SBD. The Calling Tree includes all staff home and office phone numbers, as well as cell phone numbers for all personnel of ADL and AIM as well as all Trustees and critical vendors associated with the AGOF.

I, as Executive Representative, have approved this (BCP) Executive Summary as reasonably designed to inform our shareholders, our broker/dealers, our contracted partners, our trustees and staff with a summary of our Business Continuity Plan.

Signed:  _____

Name: Paul O'Brien

Title: President

Date: September 18, 2023