Business Continuity Planning

NXG Investment Management (the Firm) has adopted a business continuity plan (BCP), which is reasonably designed to respond to various events that could potentially disrupt our normal business operations. The BCP defines critical functions and the dependencies (including staff, technology and other resources) necessary to complete these critical functions.

The Firm has adopted policies and procedures to ensure that critical data and systems are replicated in multiple locations. Data replication plans are designed to minimize business disruptions in the event of a failure of any one data location. In addition, employees are able to access all of the Firm's systems in the remotely through secure protocols. Critical systems and access are tested regularly.

In the event of a disaster declaration, the Firm has designated individuals responsible for managing the incident to ensure the safety and security of its employees and the continuation of critical functions. Critical functions are monitored throughout the disaster until normal operations are resumed.