



Reinhardt Partners, Inc.
Registered Investment Advisor

Disaster Recovery & Contingency Plan

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Reinhardt Partners, Inc.'s (Reinhardt Partners) emergency response plans are designed to ensure the safety of its employees, the continuity of client service, data and systems, and to protect clients' assets and assets of the company. Reinhardt Partners performs ongoing assessments to mitigate all reasonable risks to Reinhardt Partners facilities and systems.

The firm's current business interruption plans are designed to adequately protect our clients' assets and service requirements, as well as the firm's business interests. The firm's emergency response plans and strategies are continually revisited to adjust to the dynamic nature of our business and our clients' needs.

In the event Reinhardt Partners experiences a business interruption, information regarding the status of the recovery can be found on our web site, www.reinhardt-partnersinc.com or by calling (262) 241-2020 for voicemail updates.

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Introduction

Summary

The Investment Adviser Act of 1940, as amended (the “advisor Act”), imposes a fiduciary duty upon registered investment advisors to act in the best interest of their clients. As part of that fiduciary duty, it is critical for Reinhart Partners, Inc. (Reinhart Partners) to be able to provide continuous, uninterrupted services to our clients. Any inability to provide services for an extended period of time could have a severe economic impact on us and our clients.

Objectives

The primary objective of this Disaster Recovery and Contingency Plan (the “Plan”) is, in the event of a business interruption, to: (a) minimize the impact of the interruption; (b) sustain a minimally acceptable level of service for an extended period of time; and (c) return to normal business activities as quickly as possible (the implementation of the foregoing, referred to as a “Disaster Recovery Operation”). Should the business interruption be severe, the restoration period before we are able to return to normal operations could be extensive.

It is very important that each employee knows what their responsibilities are if we should suffer a business interruption. Therefore, all employees are required to read this Plan and be familiar with their responsibilities and assignments. To support this Plan, Reinhart Partners will maintain written and well-documented operational policies and procedures that define acceptable processes, such as alternative facilities, backup of data files, server configurations, and workstation configurations. We will also maintain current inventory lists, software license information or contact lists, as supporting documentation to this Plan.

This Plan will address our response in the event of any loss of our:

Physical Facilities
Operational Capabilities; and/or
Key Personnel.

Responsibilities

The Emergency Response Team (the “Team”) is collectively responsible for serving as a primary resource in furtherance of this Plan. In the event of a Disaster Recovery Operation, or at such other times as the Team Leader may request from time-to-time, Team members may be required to carry out the responsibilities delegated by the Team Leader. Each member of the Team and any standing responsibilities are listed on Exhibit A of this Plan.

The Emergency Response Team Leader is responsible for: (a) updating all areas of this Plan, as needed (except for contact information); (b) (i) specifically designating certain information in the Plan as “restricted” and subject to limited distribution due to its sensitive nature, (ii) identifying the Team Members or others that may need access to all or part of such information, and (iii) disclosing the location of or means by which such information can be accessed; (c) overseeing the routine responsibilities of the Team Administrator; and (d) coordinating a Disaster Recovery Operation, if necessary.

The Emergency Response Team Administrator is responsible for: (a) updating this Plan as directed by the Team Leader; (b) maintaining the contact information set forth on the attached exhibits; (c) disseminating the Plan to all employees, as it is updated, and collecting from each employee an appropriate acknowledgement; and (d) distributing an updated employee directory (Exhibit B) to each member of the Team so that employees may be contacted during the implementation of any part of this Plan. The Team Administrator is set forth on Exhibit A.

Other Team members are respectively responsible for specific areas of this Plan as identified herein. Team members are additionally responsible for carrying out other aspects of this Plan as directed by the Team Leader.

Each employee shall maintain a copy of this Plan in their office and at their home. Additionally, employees may be called upon to serve on the Team or take action under this Plan.

Chapter 1 - Physical Facilities

In the event that we are prevented from accessing our offices or using vital equipment, we will take steps to ensure that the performance of our services remains, to the best of our abilities, uninterrupted. We may be prevented from accessing our offices or using vital equipment (collectively, “physical facilities”) due to events such as fire, explosion, evacuation, flood, inclement weather, full or partial loss of power, vandalism, theft, or sabotage, among others.

Notification of Disaster

The first employee to determine that there is an apparent loss of our physical facilities should attempt to perform an immediate assessment and, to the extent necessary, contact emergency services. Immediately thereafter, that employee should call a member of the Team in the order in which they are listed on Exhibit A of this Plan. The employee shall continue to attempt to contact a member of the Team until they speak with someone able to give the staff instructions consistent with this Plan.

The first Team member advised of a disaster shall be appointed as the Team Leader on an interim basis until such time as they are relieved of their duties by the actual Team Leader. The acting Team Leader shall contact all other members of the Team to notify them that a loss has occurred and that a Disaster Recovery Operation is underway.

If, for any reason, an employee is unable to reach at least one member of the Team, they should contact the Auxiliary Disaster Response Coordinator listed on Exhibit A. The Auxiliary Disaster Response Coordinator has agreed to serve as our contact clearinghouse in the event that we are unable to contact any member of the Team and use their best efforts in carrying out their duties to implement this Plan. The Auxiliary Disaster Response Coordinator shall then serve as the acting Team Leader until such time as another member of the Team is appointed to serve in that capacity.

Implementation of the Disaster Recovery Operation

The acting Team Leader shall attempt to contact each employee to advise them that a Disaster Recovery Operation is underway. Alternatively, the acting Team Leader may delegate the responsibility to other members of the Team. Employees should be advised of a time and location to report. If employees have not been contacted with instructions, they should attempt to contact a member of the Team as set forth in Exhibit A. If no member of the Team is available, employees should contact the Auxiliary Coordinator. Unless directed otherwise, employees should report to the office where they regularly work. If reporting to your regular office is impractical or dangerous under the circumstance, employees should immediately report to our Primary Contingent Office Facility listed on Exhibit C for further instructions.

Chapter 2 - Operational Capabilities

Reinhart Partners is committed to protecting the firm against any loss of operational capabilities. We are primarily concerned about any loss of our:

- data and information resources;
- communications capabilities;
- utility services;
- ability to receive essential services provided by vendors and service providers;
- and
- financial resources.

Data and Information Resources

We will back up the computer data that we deem necessary on a regular basis to ensure availability of that data in the event of a systems failure. We will thereafter maintain backup copies of that data at an off-site location.

Once a non-routine loss of data or information resources is detected by any employee, it should be immediately reported to the Emergency Response Team Data Coordinator. If the Team Data Coordinator is unavailable, employees should report the loss or interruption to another available member of the Team who shall serve as acting Team Data Coordinator until the actual Team Data Coordinator can be apprised of the situation. The Team Data Coordinator will assess the loss of data and information resources and report their assessment to the Team Leader. Due to the immeasurable number of circumstances that must be considered in the event of a loss, the Team Leader will assess the situation, consult with appropriate personnel, and take appropriate action, including making a determination to initiate a Disaster Recovery Operation. In the event that the Team Leader declares a Disaster Recovery Operation is underway, the Team Data Coordinator will direct the data restoration procedures set forth on Exhibit D at the location determined by the Team Leader.

Reinhart Partners offices will remain open during the business hours disclosed on our Form ADV. During that time, all data and information will be monitored by employees and accessed only on a need-to-know basis. Outside of business hours, we will lock all doors and windows to our offices to ensure that only authorized personnel will have access after normal business hours. Our privacy policies and procedures describe additional steps that we have taken to safeguard sensitive client information.

We will immediately request the return of all keys from employees who have been terminated or otherwise separated from the firm. To the extent that we are unsuccessful in the securing the return of keys, we will take reasonable steps to change locks.

Communication Capabilities

Communicating by telephone (including our facsimile) is critical to Reinhart Partners ongoing business operations. Any failure of our telephones presents a business interruption that must be dealt with immediately. Exhibit E of this Plan sets forth both short-term and intermediate-term contingency plans in the event we are unable to communicate by our primary telephone facilities. The vendor(s) required for us to effectively use our telephones, along with our contingency plans, are also set forth on Exhibit E.

We use the Internet and e-mail as integral parts of our operations. However, many of the functions ordinarily performed over the Internet and by e-mail can be temporarily performed by telephone, if available. Exhibit E of this Plan sets forth both short-term and intermediate-term contingency plans in the event we are unable to use the Internet and/or e-mail via our standard means. The vendor(s) required for us to use the Internet or e-mail, along with our contingency plans, are set forth on Exhibit E.

Utility Services

Reinhart Partners relies upon several utilities to deliver resources essential to its successful operation. Any failure of our utilities presents a business interruption that must be dealt with immediately. We have identified our utility providers on Exhibit F of this Plan. Except for routine service interruptions, any failure by our essential service providers should be reported to the Team Leader. There are an immeasurable number of circumstances that should be considered in the event of an interruption such as its geographic scope, its estimated duration, and our ability to conduct operations despite the interruption. Therefore, the Team Leader will assess the situation, consult with appropriate personnel, and take action as appropriate under the circumstances.

Other Essential Service Providers

There are several other service providers whom Reinhart Partners deems essential to the successful operation of this firm. We have identified these service providers on Exhibit G of this Plan. Except for routine service interruptions, any failure of our essential service providers should be reported to the Team Leader. Due to the immeasurable amount of circumstances that must be considered in the event of an interruption, the Team Leader will assess the situation, consult with appropriate personnel, and take action as appropriate under the circumstances.

Certain essential service providers must be contacted immediately in the event of a Disaster Recovery Operation. Once a Disaster Recovery Operation is underway, the Emergency Response Team Service Provider Liaison will ensure that each of the firm's essential service providers will be provided with sufficient information to continue to conduct business with us on an interim basis until we are able to resume normal business operations.

Financial Resources

Reinhart Partners monitors all of its financials on an ongoing basis. On at least a monthly basis, we reconcile each account to ensure that there are no financial resources that are unaccounted for. We have identified each of our financial accounts on Exhibit H of this Plan.

Reinhart Partners shall maintain insurance coverage as it deems necessary to protect the firm under certain circumstances. To the extent that any portion of our business is covered by insurance, it shall be referenced in Exhibit I.

We have appointed a Financial Coordinator to the Emergency Response Team as set forth on Exhibit A. The team Financial Coordinator shall be vested with the authority to conduct day-to-day financial affairs of the firm including check-writing authority. In the event of a disaster Recovery Operation, the Team Financial Coordinator shall coordinate the use of cash reserves and available lines of credit to fund the Disaster Recovery Operation. Additionally, the Team Financial Coordinator shall facilitate notification and use of any protections provided by insurance. The financial resources available to the Team Financial Coordinator are referenced in Exhibit H. The Team Financial Coordinator shall not, under any circumstances or for any period of time, use any client funds or securities for our operations.

Chapter 3 - Key Personnel

While every one of our employees is important to us, we recognize that certain individuals are “key personnel” for purposes of the ongoing business interests of this firm. In the event of an unforeseen loss of any of our key personnel, we must ensure that the objectives of this Plan, and therefore, our fiduciary duty to our clients, are met. Specifically, we must: (a) minimize the impact of the interruption; (b) sustain a minimally acceptable level of service for an extended period of time; and (c) return to normal business activities as quickly as possible.

Our key personnel have been identified on Exhibit J of this Plan. Each of our key personnel has been assigned an interim successor to cover their position on an immediate and temporary basis in the event of an unexpected loss. Additionally, we have taken steps independent of this Plan to ensure our long-term continuity after the loss of one our key personnel. These additional steps have been documented in Exhibit J of this Plan.

To make certain that all employees have accurate and relevant information regarding the loss and succession of any key personnel, the Team Leader shall be responsible for informing our employees of any situation if we deem it necessary. Employees will generally be advised of the personnel loss and the interim successor that will be covering their responsibilities on an immediate and temporary basis.

Chapter 4 - General Matters

Distribution

This Plan and each revision will be distributed to all employees. Upon receipt of a revised Plan, employees should destroy any prior versions in their possession. Initially and annually, all employees will acknowledge their receipt and understanding of the Plan, agree to abide by the Plan and participate in its facilitation to the extent requested by the Emergency Response Team Leader.

Training

Each employee will be provided with adequate training about this Plan. Training will be provided initially and, thereafter, at least annually in a method directed by the Team.

External Communications

Once a Disaster Recovery Operation is underway, the Emergency Response Team Client Liaison will ensure that each of the firm's clients that may be affected by a loss or interruption are contacted. Clients will be provided with sufficient information to allay their concerns, and to the extent necessary, continue to conduct business with us on an interim basis until we are able to resume normal business operations.

To the extent necessary, the Emergency Response Team Regulatory Liaison shall contact each of the regulators (including self-regulatory organizations) with whom we maintain registrations, licenses, notice filings, and/or membership to advise them of the Disaster Recovery Operation. Additionally, where necessary, the Team Regulatory Liaison should immediately arrange to amend our Form ADV and any other documents that need to reflect these material changes, and file any such documents with any appropriate regulators.

Authorization

Members of the Emergency Response Team and their designees shall be granted the appropriate authority to direct and instruct the vendors and service providers as necessary to ensure the continued use or restoration of our operational capabilities.

Expenses

We shall reimburse our employees for all expenses incurred when taking any reasonable actions in connection with this Plan. Employees are required to maintain records of each expense along with the business justification and submit them to us in a timely manner once normal operations have resumed.

Third-Party Delegation

We may delegate to a non-affiliated third-party vendor, the responsibility to implement certain portions of this Plan. We will ensure that any third-party's responsibilities will be consistent with this Plan, and /or any other applicable policies and procedures. In all cases, however, the ultimate responsibility for implementation of this Plan lies with the Emergency Response Team.

Record Keeping

We will maintain the following documents under this Plan along with our books and records:

- A copy of each version of this Plan, as adopted;
- A copy of any supporting documents required for implementation of this Plan including, but not limited to, all exhibits as amended or executed; and
- A copy of any documentation created as a result of the implementation of any part of this Plan (i.e., Disaster Recovery Operation).

Plan Evaluation and Periodic Testing

This Plan shall be maintained by the Team Leader in conjunction with the Team Administrator. This Plan is intended to serve as a living document and should be reviewed periodically and revised as necessary to address changes in our business operations or circumstances otherwise material to our business. Such review should be performed as necessary but in no event less than annually. At least annually, the Emergency Response Team shall meet and review this Plan to ensure that it continues to meet its objectives.

During its annual meeting, the Team shall make recommendations to the Team Leader on proposed updates and revisions to the Plan. The Team Leader shall perform a formal review of the Plan and integrate any necessary revisions and updates based upon the prior testing, the recommendations of the Team and formal review. From time-to-time, the Team Leader may make other changes to the Plan where appropriate.

Disclosures

A general description of the protections contemplated by this Plan may be made available to clients and other interested parties solely at our discretion. Due to the sensitive nature of specific information contained in this Plan, however, it shall be disclosed as we deem necessary to our employees, attorneys, regulators, and such other parties who are subject to a duty of confidentiality, whether by contract, regulation, or professional code of conduct.

Exceptions

We may choose to deviate from the actions prescribed in this Plan in certain situations such as: (1) where such actions would be impractical given unforeseen circumstances; (2) where we deem that another action would be more favorable to the best interests of our clients; (3) where the prescribed action would place the personal safety of our employees at risk; (4) where the prescribed action would cause us to violate permanent or temporary laws, rules, regulations, or orders that apply to us; and/or (5) any situation where, in our sole judgment, the prescribed action would not be in our clients' best interest. In situations where we deviate from the actions prescribed in this Plan, the Team Administrator will document the deviation and include the reason. This documentation will be presented to the Team at their next meeting so they may determine if the deviation was a limited circumstance or if this Plan should be revised to accommodate the deviation in the future.

Inquiries

Any questions regarding this Plan should be directed to the Team Leader, or any individual they may designate to respond to such inquiries.