

BCP Disclosure Statement

Robotti & Company, Incorporated is the parent (“Parent”) company of Robotti & Company, LLC, a registered broker-dealer with the Securities and Exchange Commission (“SEC”) and a member of the Financial Industry Regulatory Authority Inc. (“[FINRA](#),” and, collectively, the “**BD**”), and Robotti & Company Advisors, LLC, a registered investment adviser with the SEC (the “**IA**”). The Parent, IA, BD, and other affiliates share certain personnel, systems and office space. Accordingly, this Business Continuity Plan (the “**BCP**”) has been written for all these businesses.

The Parent, BD and the IA are sometimes collectively referred to herein as the “**Firm**” or simply “**Robotti & Company**”. The use of “we” and “our” shall relate to the Parent, BD, IA or the Firm as applicable in the context used.

The Firm has developed a Business Continuity Plan 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 (212) 986-4800, you should go to our website at www.robotti.com where we will attempt to post instructions and next steps. If you are unable to make contact with Firm personnel and have a question on how you may gain access to your funds or securities, enter orders or process other trade-related, cash and security transfer transactions regarding your BD or IA account, please refer to the table below on whom at the applicable custodian corresponding to your account you should contact.

Custodian	Contact Information
Pershing	(201) 413-3635 http://www.pershing.com/business_continuity.html

Our Business Continuity Plan – We plan to recover and resume business operations after a significant business disruption in a timely manner and respond by safeguarding our employees 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 business continuity plan is designed to permit the 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, employees, and regulators; alternate physical location of employees; 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 Clearing Firm, Pershing LLC, backs up our important records for our BD customers 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 our

Clearing Firm that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments within 4 hours. Your orders and requests for funds and securities could be delayed during this period.

Varying Disruptions – Significant business disruptions can vary in their scope, such as only the Firm, a single building housing the Firm, the business district where the 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 the Firm or a building housing the Firm, we will transfer our operations to a local site when needed and expect to recover and resume business within 48 hours. 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 as soon as possible. In either situation, we will post on our website (www.robotti.com) on how we will be proceeding and how to best contact us. If the significant business disruption is so severe that it prevents us from remaining in business, we will make every effort to provide our customer's prompt access to their funds and securities.

For more information – If you have questions about our business continuity planning, you can contact us at (212) 986-4800, email us at compliance@robotti.com, or write Robotti & Company, LLC, Attn: Compliance Department, 60 East 42nd Street, Suite 3100, New York, NY 10165