

BUSINESS CONTINUITY PLAN (BCP)

Effective Date: January 1, 2025

1. POLICY & PURPOSE

CleverAlpha Asset Management, LLC ("CleverAlpha" or the "Firm") maintains this Business Continuity Plan (BCP) to ensure the protection of client assets and the continued operation of critical business functions in the event of a Significant Business Disruption (SBD). As a digital-first ("Robo") advisor, our plan prioritizes technology resilience, data availability, and client access to funds.

2. EMERGENCY MANAGEMENT & SUCCESSION

2.1 Internal Chain of Command

In the event of an emergency, decision-making authority regarding the Firm's operations, regulatory communication, and technology response is designated as follows:

1. **Primary:** Richard Cabanes (CEO/CCO)
2. **Secondary:** Lucio Flores (CTO)

If the Primary is unreachable or incapacitated, the Secondary is fully authorized to execute this plan.

2.2 External Succession (Wind-Down)

In the event of the permanent incapacity or death of key personnel, or if the Firm is unable to continue operations, the Firm has designated a succession partner to facilitate the orderly transfer or liquidation of client accounts:

3. OFFICE & LOCATION STRATEGY

3.1 Primary & Alternate Locations

- **Primary Office:** 5155 West Rosecrans Avenue Suite 320A, Hawthorne, CA 90245
- **Alternate Location:** Due to the Firm's cloud-based infrastructure, operations can be fully run remotely from the personal residences of the CEO and CTO.
- **Hardware Independence:** The Firm does not rely on on-premise servers. Business can be conducted from any secure computer with internet access.

4. TECHNOLOGY & CRITICAL SYSTEMS

4.1 Core Infrastructure

- **Algorithm & Hosting:** The Firm's proprietary codebase and advisory engine are hosted on **AWS (Amazon Web Services)**.
- **Data Storage & Email:** Client records and communications are stored on **Google Cloud** and **Google**

Vault.

- **Recovery Time Objective (RTO):** In the event of a website outage (www.CleverAlpha.com), the Firm's objective is to restore functionality within **24 hours**.

4.2 Data Backup & Recovery

- **Frequency:** Data is backed up **continuously** via automated redundancy on Google Cloud and Amazon Web Services.
- **Restoration:** In a disaster event, data can be restored directly from these cloud instances to any secure remote terminal.

5. CLIENT ACCESS & COMMUNICATIONS

5.1 Client Trading & Funds

If the CleverAlpha interface/website is unavailable, clients retain direct access to their assets through the qualified custodian.

- **Custodian:** Charles Schwab & Co., Inc. (Schwab Alliance Portal)
- **Client Instruction:** Clients will be instructed to log in directly via the **Schwab** to view balances, place trades, or request withdrawals.

5.2 Communications Channels

- **Primary:** Email and Website announcements.
- **Emergency Contact:** If internet/email is disrupted, clients may contact the Firm via the direct business line: **310-293-7837**.

6. REGULATORY & OPERATIONAL READINESS

6.1 Critical Vendor List

The CEO and CTO maintain a shared, offline-accessible list of critical contacts, including:

- **Regulators:** SEC (Los Angeles Regional Office).
- **Vendors:** Custodial Service Team, Payments, Cloud Hosting, Books and Records and Email Operations Support.

6.2 Financial Solvency

The Firm maintains an operating cash reserve sufficient to cover at least three (3) months of fixed expenses to ensure continuity during periods where revenue collection (fee deduction) may be delayed.

7. TESTING & REVIEW

The CCO reviews and tests this BCP at least annually to ensure the contacts, technology assumptions, and succession arrangements remain valid.

Acknowledgment of BCP Review

Richard Cabanes

Chief Compliance Officer