



Business Continuity Disclosure Statement

Provenio Capital Management, Inc. ("Firm") is an SEC registered investment adviser firm providing advisory services to its customers. Accordingly, the Firm is furnishing this document to all clients to provide information about its efforts to ensure that the Firm's advisory business activities will not be significantly impacted as a result of an emergency or significant business disruption.

In accordance with regulatory requirements, investment adviser firms are encouraged to create and maintain a business continuity plan reasonably designed to meet its obligations to its clients or other counterparties. In accordance with these requirements, the Firm has designed a business continuity plan to address possible scenarios in efforts to minimize any service impact to our clients.

In keeping with the regulatory requirements, the business continuity plan for the Firm is designed to address key areas of concern - including but not limited to the following:

- Data back-up and recovery;
- All mission critical systems;
- Financial and operational assessments;
- Alternate means of communication between the Firm and its customers;
- Alternate means of communication between the Firm and its employees;
- Alternate physical locations of employees;
- Critical business constituent, bank, and counter-party impact;
- Regulatory reporting;
- Communications with regulators; and
- How the Firm will ensure that customers have access to their funds and securities in the event that the Firm determines it is unable to continue its business.

Since events creating business disruptions may vary in nature and scope, the Firm has anticipated scenarios in which the following are affected:

- A disruption to the Firm's primary or main office location
- A disruption to a single building in which the Firm's main office is located
- A disruption to the business district or city where the Firm's primary systems are located
- A disruption to the region where the Firm's primary systems are located

Regardless of the scope of potential disruption, the Firm intends to continue to provide service to its clients.

A Disruption to the Firm and/or Single Building

In the event that there is a significant business disruption to the firm and/or the building in which the Firm is located, the Firm has duplicative systems that will be operated from a separate back-up ("alternate") site. This disruption may be caused by physical damage, technology problems, or an inability to have personnel arrive at the office. As such, the Firm will transfer its securities operations to one or more designated alternate site(s) located in the same city or in adjoining cities that are sufficiently separated from the Firm's main operations. The alternate site will be used to restore internal operations as well as electronic access and communications as soon as key employees are relocated

Provenio Capital

4400 MacArthur Blvd., Suite 300
Newport Beach, CA 92660
proveniocal.com | office: 949-301-9060

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to the designated sites. In this process, Clients may experience a minor delay in reaching the Firm due to increased telephone calls, technology delays, or other minor difficulties arising from the transfer of operations. The Firm expects that any delay will be less than twelve (12) hours. Nevertheless, the unlikely failure of the telephone or other ancillary communication systems could result in a delay of up to twenty-four (24) hours.

A Business-District, Citywide, or Regional Disruption

In the event that there is a significant business disruption that affects the *business district* or *city* where any of the Firm's primary systems are located, the Firm will transfer operations to its designated back-up ("alternate") site located in a separate and distinct business district and city from its main operations. The alternate site will be used to restore internal operations, electronic access and communications as soon as key employees are relocated to the site.

In the event of a significant business disruption to the *region* where the Firm's primary systems are located, the Firm would intend to take advantage of any available branch or other facilities that may be located in other geographical regions to use in limited capacity to resume operations temporarily that will effectively leverage the use of technology and infrastructure to continue operations. The selected locations will be determined as sufficiently capable to operate as a designated back-up facility. In this process, clients may experience minor delays in reaching the Firm due to increased telephone calls, technology delays, or other minor difficulties arising from the transfer of operations. The Firm expects that any delay will be less than twenty-four (24) hours.

Nevertheless, please be aware that due to the unpredictability of events, there can be no assurance that service will continue without interruption in certain circumstances, such as a regional blackout, a natural disaster, or a terrorist attack. However, in the unlikely event that the Firm has determined that it cannot resume operations within a reasonable amount of time, it will provide as much advance notice as possible regarding its ongoing operations.

Please be advised that the Firm's business continuity plan is reviewed and updated on an annual basis and subject to change and modification. Customers may obtain a copy of the Firm's business continuity plan by requesting a written copy in writing. If you have any questions regarding the Firm's business continuity plan, please contact the Firm at 949-301-9069 or via email at reshma@proveniocapital.com.

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