Business Continuity Plan

Last updated: November 07, 2024

Background

While it is recognized it is not possible to create a plan to handle every possible eventuality, it is the intent of CCI to set up a framework to be used in the most likely of scenarios. It is also the intent that this framework provide guidance as to how to respond should an unforeseen situation occur.

CCI believes that an adviser's fiduciary obligation to its clients includes the obligation to take steps to protect the clients' interests from being placed at risk as a result of CCI's inability to provide advisory services after, for example, a natural disaster or, in the case of some smaller firms, the death of the owner or key personnel. The clients of an adviser that is engaged in the active management of their assets would **ordinarily be placed at** risk if the adviser ceased operations.

Business Description

CCI conducts business in equity, fixed income, and other securities; it does not hold customer funds or securities. Transactions are sent to CCI‘s brokerage firms, which **execute its orders, compares them,** *allocates them, clears and settles them. The client’s custodian* maintains the clients’ accounts, grants clients access to them, and delivers funds and securities.

Emergency Information

Company Contact Persons

CCI’s two emergency contact persons are:

Contact Name	Phone	Email	Relationship
James MM Regulinski	559-644-3195	James@carboncollective.co	CCO
Zach R Stein	(925) 268-8041	Zach@carboncollective.co	Cofounder

Support Services

In the event of an emergency, the following is a list of support services and the methods by which they may be contacted:

Emergency Services (EMS): 911

Fire Department: 510-528-5770

Police Department: 510-525-7300

Internet Service Provider: 1-800-391-3000, support@comcast.com

Data Backup Provider: support@altruist.com

Service Provider	Company Name	Contact Name	Phone	Email

Attorney	Polsinelli LLP	Rick Jordan	800.525.8970	rjordan@polsinelli.com

Alternative Company contact in case of death of Key Personnel	Ethan Batraski	650.464.6632

This information will be updated in the event of a material **change,** and CCI's CCO will review the plan on an annual basis

Policy

CCI's policy is to respond to a Significant Business Disruption (SBD) by safeguarding employees' lives and Company property, making a financial and operational assessment, quickly recovering **and resuming operations, protecting the Company's books and** records, and allowing its clients to transact business.

In the event that CCI determines it is unable to continue its business, it will assure clients prompt access to their funds and securities.

Significant Business Disruptions (SBDs)

CCI's plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only CCI's ability to communicate and do business, such as a fire in its building or the death of a key member of the Company. **External SBDs prevent the operation of the securities** markets or a number of firms, such as a terrorist attack, a city flood, or a wide-scale, regional **disruption.**

CCI's response to an external SBD relies more heavily on other organizations and systems, such as the brokerage firm(s) and Internet Service Providers it uses.

Approval and Execution Authority

The CCO is responsible for approving the plan and for conducting the required annual review. The CCO has the authority to execute this BCP.

Plan Location and Access

CCI maintains copies of its BCP and annual reviews, and all changes that have been made. A physical copy of the BCP is stored with the company's Written Policies and Procedures Manual, which is kept in **the following location: Fireproof bag in the closet of the main** office. An *electronic copy of this plan is stored: as a PDF file on the Company's file share* system in a folder entitled "Business Continuity Plan".

Each employee is given a copy of the plan and notified of the location/file within CCI's electronic systems to which employees have access. Physical copies need to be returned upon termination of employment with the Company.

CCI's Custodian and Brokerage Firm Contacts

CCI Personal

Brokerage/Custodian:

Altruist Financial LLC
1621 Abbot Kinney Blvd Floor 2
Venice, CA 90291

(313) 509-7310
hello@altruist.com

CCI Employer

Custody and Brokerage:

Ascensus Trust Company

1655 43rd Street South, Suite 100

Fargo, ND 58103

Charles Schwab

3000 Schwab Way
Westlake, TX 76262-8104 UNITED STATES

Mid Atlantic Trust

1251 Waterfront Pl Suite #525
Pittsburgh, PA 15222

Matrix Trust Company

717 17TH Street, Ste 1300
Denver, CO, 80202-3304

Office Locations

CCI's primary office address and phone number are:

2648 International Blvd, #115
Oakland, CA, 94601 US
925-268-8041
info@carboncollective.co
https://carboncollective.co

CCI uses this virtual location to receive mail communications but does not maintain any office space and operates online only.

Alternative Physical Location(s) of Employees

In the event of an SBD that makes it impossible or impractical for an employee to use their traditional working location, the employee may choose another secure location to conduct work activities. Most activities may be performed as usual as long as the employee has an internet **connection and uses a** VPN.

If a physical location is necessary, the Company will move the Company operations to either of the below:

524 Madison St
Albany, CA 94706
United States
925-268-8041

1120 Ellis st
Bellingham, WA 98225
United States
559-644-3195

Clients' Access to Funds and Securities

CCI does not maintain custody of clients' funds or securities, which are maintained at its qualified custodians. In the event of an internal or external SBD, if telephone service and internet service are available, CCI's investment adviser representatives (IARs) will work from an alternate secure location and notify the CCO or CIO of their location. In the event that internet service is not available, CCI may contact its broker dealers directly by phone if necessary. Custodians maintain their own business continuity programs to ensure that customers, CCI's clients, are able to access their funds and securities in the event of an emergency.

Data Back-up and Recovery (Hard Copy and Electronic)

CCI maintains its primary hard copy books and records and its electronic records at its alternative physical locations listed above.

The Company's CCO is responsible for the maintenance of these books and records. CCI maintains the following document types and forms that are not transmitted to its brokerage firms: **Client** Contracts and other related documents.

The Company backs up its electronic records monthly by online digital backup and keeps a copy on its G-Suite Cloud.

In the event of an internal or external SBD that causes the loss of its paper records, CCI will physically recover them from its back-up site(s). If its primary site is inoperable, CCI will continue operations from its back-up site or an alternate location. For the loss of electronic records, it will either physically recover the storage media or electronically recover data from its back-up site(s). If its primary site is inoperable, CCI will continue operations from its back-up site or an alternate location. CCI obtains the Business Continuity Plans of its electronic storage partners for access to its records in case of a regional event.

Operational Assessments

In the event of an SBD, CCI will immediately identify what means will permit it to communicate with its clients, employees, critical business constituents, and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options CCI will employ will include its website, telephone voice mail, secure email, etc. In addition, CCI will retrieve its key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic). Employees will establish contact with the Company's Emergency Contacts and communicate key Company directives as they apply to operating the business whether it be from a new location, each employee's residence or an alternative regional location with access to a different power grid from the principal office.

Mission Critical Systems

CCI's "mission critical systems" are those that ensure client communication, access to client accounts and trading systems. More specifically, these systems include the office computer systems.

CCI has primary responsibility for establishing and maintaining its business relationships with its clients. CCI's brokerage firms/custodians provide the execution, comparison, allocation, clearance and settlement of securities transactions as well as the maintenance of customer accounts, access to customer accounts, and the delivery of funds and securities.

CCI's brokerage firms/custodians represents that they: will maintain a business continuity plan **and the** capacity to execute that plan; backs up CCI's records at a remote site; and *operates* a back-up operating facility in a geographically separate area with the capability to conduct the same volume of business as its primary site. It has also confirmed the effectiveness of its back-up arrangements to recover from a wide scale disruption by testing.

Recovery-time objectives provide concrete goals to plan for and test against. They are not, however, hard and fast deadlines that must be met in every emergency situation, and various external factors surrounding a disruption, such as time of day, scope of disruption, and status of critical infrastructure—particularly *telecommunications—can affect actual* recovery times. Recovery refers to the restoration of clearing and settlement activities after a wide-scale disruption; resumption refers to the capacity to accept and process new transactions and payments after a wide-scale disruption. The recovery times for custodians are **expected to be consistent with the recovery time indicated in the** specific custodian's *business continuity* plan or other relevant documentation. As part of annual due diligence, CCI will request information about the disaster recovery plan and recovery expectations.

The Company's Mission Critical Systems

Trading

CCI uses the electronic order entry system provided by its custodians or another third party to enter trading activity and transactions. If electronic means are not available, CCI may place orders by email, in which case order tickets will still be maintained.

In the event of an internal SBD, CCI will enter and send records to its brokerage firm by the fastest alternative means available. In the event of an external SBD, CCI will maintain the order *in electronic or* paper format, and deliver the order to the brokerage firm by the fastest means available when it resumes operations. In addition, during an internal SBD, CCI may need to refer its clients to deal directly with its brokerage firm for order entry.

Client Account Information

CCI currently accesses client account information via its brokerage firms' websites. In the event of an internal SBD, CCI would *access client information via fax correspondence,* alternate phone systems, etc. CCI may relocate to its alternative business location(s) if access to the brokerage firm website can be accomplished.

Alternate Communications with Clients, Employees, and Regulators

Clients

CCI now communicates with its clients using the internet, telephone, text messaging, video calling, video messaging, email, its Website, its social media, fax, and U.S. mail. In the event of an SBD, CCI will assess which means of communication are still available to it, and use the means closest in speed and form

(written or oral) to the means that it has used in the past to communicate with the other party. For *example, if CCI has* communicated with a party by email but the Internet is unavailable, CCI will call the party on the telephone and follow up and, where, a record is needed with paper copy in the U.S. mail. In the event of an anticipated significant regional business disruption, CCI will **communicate to its clients in** advance how to establish contact with it and its personnel or brokerage and custodian prior to the disruptive event occurrence.

Employees

CCI now communicates with its employees using telephone, email, and in person. In the event of an SBD, CCI will assess which means of communication are still available to it, and use the means closest in speed and form (written or oral) to the means that it has used in the past to communicate with the other party. In the event of key employees being unable to perform their job functions, immediately and for any time period afterwards, CCI will delegate, if possible, those key functions to other employees.

Regulators

CCI communicates with its regulators using telephone, email, U.S. mail, and in person. In the event of an SBD, CCI will assess which means of communication are still available to it, and use the means closest in speed and form (written or oral) to the means that it has used in the past to communicate with the other party.

Regulatory Reporting

CCI is subject to regulation by the Securities and Exchange Commission (SEC). CCI now files reports with its regulators using the IARD/CRD System. In the event of an SBD, CCI will check with the SEC to determine which means of filing are still available to it, and use the *means closest in speed and form* (written or oral) to its previous filing method. In the event that CCI cannot contact its regulators, it will continue to file required reports using the communication means available to it and forward those reports at the earliest opportunity.

Regulatory Contact

San Francisco Regional Office
Monique Winkler, Regional Director
44 Montgomery Street, Suite 2600
San Francisco, CA 94104
(415) 705-2500

Death of Key Personnel

The following personnel are identified as “Key Personnel” without which it would be difficult or impossible to continue operating the Company and/or properly service clients:

James MM Regulinski	Chief Compliance Officer

Carbon Collective Investing LLC ("Carbon Collective”; "the Company”) has created and implemented a Business Continuity Plan ("BCP”) in an effort to mitigate the effects related to unforeseen business interruptions. The BCP is designed to enable the Company to continue or resume advisory services as soon as possible in the event of an emergency or significant business disruption ("SBD”).

Communications with Customers Carbon Collective is currently able to communicate with its customers using the telephone, email, US Mail, website, and in person. In the event of an SBD, Carbon Collective

will assess which means of communication are still available and use the means closest in speed to the means used in the past.

Vendors and Counterparties Carbon Collective's BCP may need to rely upon the recovery and restoration of services provided by various critical business constituents at both its primary and alternate business locations. Carbon Collective has considered the extent to which the Company may be **able to depend upon these business relationships during an** SBD as a part of its decision to do business with the constituent. Where possible the Company has engaged and/or vetted alternate arrangements in order to avoid business disruptions in the case of a business constituent not being able to provide needed goods or services in an emergency.

Internal SBD

The custodians hold all CCI Personal and CCI Business accounts. Rebalancing occurs automatically through the applicable brokerage software platform for all of these accounts. In the event of an SBD that primarily affects the Company, due to this level of account management automation, the near-term client experience should not be significantly impacted. Should the Company's two officers become unable to operate the Company and serve its clients, one of the company's board members and lead investor, Ethan Batraski, will find a suitable RIA firm to take on and manage the Company's accounts. Clients will be notified in writing should this occur and explicitly be given the opportunity to end their agreement with Carbon Collective, should they wish to do so. Disclosure Carbon Collective's BCP is designed to address the continued operation of the Company in the event of an emergency situation or SBD. However, all risks of business interruption cannot be eliminated and Carbon Collective cannot guarantee that systems will always be available or recoverable following an SBD. Furthermore, Carbon Collective has no control over and must rely upon the disaster recovery plans of its various critical business constituents and vendors. In the event that material changes are made to this BCP disclosure statement, Carbon Collective will make available an updated copy to all of its clients.

The information contained in this disclosure is provided by Carbon Collective for informational purposes only, and nothing contained herein shall be construed to amend, supplement or otherwise modify any of the terms and conditions set forth in any customer agreement between you and Carbon Collective.

In case of death of any key personnel, the following will assume the responsibility to make contact with the clients of the Company in the most efficient manner possible and as soon as possible to allow clients to access their accounts. If a business succession plan is to be implemented, clients will be contacted to obtain consent prior to any assignment of their advisory management contracts with this Company to a successor firm.

Updates and Annual Review

CCI will update this plan whenever it has a material change to its operations, structure, business or location or to those of its brokerage firm. In addition, CCI will review this BCP annually, to modify it for any changes in its operations, structure, business, or location or those of its brokerage firm.