



Business Continuity Plan

Ebert Capital Management Inc. (ECM) has adopted a Business Continuity Plan with accordance to current regulations. The primary reason for our Business Continuity Plan is to establish procedures in response to events that could potentially cause significant disruption to ECM's daily operations.

Our firm plans to quickly recover and resume normal operations after a cessation of business. ECM shall respond by safeguarding our employees and property, making financial and operational evaluations, protecting client and company records, and allowing our clients to execute business transactions.

Our Business Continuity Plan addresses all critical organization systems and functions including: financial and operational assessments; data back-up and recovery; alternative communications with our clients, employees, and regulators; alternate physical location of employees; regulatory reporting; and assuring our clients prompt access to their funds and securities in the event of a complete business termination.

This Business Continuity Plan identifies five general levels of potential risk:

Level 1- This level involves a loss of electronic systems including: a power outage or a virus attack that disrupts computer systems. Under this scenario, portfolio management and trading functions will use backup equipment and systems located at ECM's principal office in Eureka, CA. The recovery time objective is approximately 12 hours. Should the event create a longer disruption, the procedures in the level 2 will be executed.

Level 2-This level involves loss of electronic systems, as well as a temporary loss of access or use of hard copies of company data and office facilities due to natural disasters (i.e. earthquake, flood or fire). In this event a notification procedure is in place to contact appropriate ECM personnel, service providers and clients. Depending on the extent of the loss, ECM may move necessary and critical operations, including: trading, telecommunications, legal/compliance functions and systems from its principal office in Eureka, CA to a recovery site located approximately 5 miles from ECM's Eureka headquarters. The recovery site is equipped with general office supplies such as a computer, telephone, fax and copier/printer. Procedures have also been developed with the goal of recovering critical data that may have been lost at ECM's principal office due to the disaster. The recovery time objective is approximately 24-36 hours.

Level 3-This level involves a loss of electronic systems, hard copies of records and office facilities in events such as a major fire or earthquake. Under this scenario, ECM will respond similar to Level 2 except that a move to the recovery sited is more likely than a Level 2 event. The recovery time objective is approximately 24-48 hours.

Level 4-This level involves loss of electronic systems, hard copies of records and office facilities, and expertise in events such as a fatal fire or earthquake. Under this scenario, ECM will respond similar to a

Level 2 event except that a move to the recovery site located in Eureka, CA is more definitive. The recovery time objective is approximately 3-5 days.

Total Disaster Scenario- In the event that ECM and its employees will no longer be able to perform any duty – whether at its principal office in Eureka, CA or the recovery site located nearby - due to a wide scale disaster, ECM's recovery site will assume the operational responsibilities of its principal office in Eureka, CA. The recovery time objective is approximately 1 week.

It is the intention of ECM to continue to conduct business during each of the aforementioned scenarios to the extent possible.

If after a significant business disruption you cannot contact us as you usually do at 707-407-3813, we will provide an alternative number or you can go to our web site at www.ebertcapital.com and contact us by email. If you cannot access us through either of those means, you should contact directly the custodian that holds your funds (Trust Company of America, www.trustamerica.com). All information about contacting the custodian is on your latest account statement. Your custodian will be able to provide you with prompt access to your accounts.

This Business Continuity Plan is intended to be continually evolving as systems change and potential new scenarios arise and become credible threats. The Business Continuity Plan is subject to modification. For the latest version of it, please visit our website: www.ebertcapital.com or request a written copy by mail.

Ebert Capital Management Inc.
530 F St.
Eureka, CA 95501
Phone: 707-407-3813
Fax: 855-407-3815