

Revolution Capital, Inc. Business Continuity Plan & Procedures

In order to ensure the functioning of critical business in the event of an emergency, Revolution Capital operates as follows:

1. Data back-up and recovery

All necessary client data, including written notes and electronic communications must be maintained in digital form. All such data and images must be uploaded by advisors to our archive services within 48 hours of creation or procurement unless archiving is automatically managed by our service provider. We have contracted with Microsoft Business Services as an email provider and electronic image archiving. We have contracted with WealthBox to provide CRM services and Right Capital to provide financial planning software. All three firms store and back up client data in a manner compliant with state and federal regulations; all three maintain equipment in geographically separate Class A Data Centers, encrypt and back up all data within our Revolution Capital account.

2. Critical Systems

In addition to archiving services provided by Microsoft, Revolution Capital contracts with the following Custodians to maintain client accounts: Altruist, Goldman Sachs Custody Solutions, TD Ameritrade and Shareholder Services Group. Each custodian has in place business continuity procedures necessary for the quick resumption of regular business following an emergency.

Revolution Capital advisors provide every asset management client with the name and contact information of the custodian with which the client's accounts are held. In the event of an emergency, clients may directly access their accounts via the custodian.

3. Alternative Communications With Clients & Regulators

Clients and Regulators may reach Revolution Capital via the firm's telephone business line or through the mailing address and email contact provided on our website at <http://revolutioncapital.net>. Clients are also provided with their advisor's direct phone number. In the event of an emergency, Revolution Capital will post updates regarding the firm's status and alternative contact information on the website and will contact clients as swiftly as possible.

4. Death or Emergency Affecting an Advisor

The firm ensures that all senior advisors have access to all client custodial accounts, data archive accounts and other critical services. In the event that an advisor is rendered incapable of conducting business for any reason, the remaining advisor/s in the firm will directly contact that advisor's clients as swiftly as possible. At that time, clients will be notified of the expected duration of the emergency and alternatives for continuing to access service through the firm and/or for accessing accounts directly through the custodian.

The firm will also notify regulators and custodians with whom the advisor is listed as soon as possible.

5. Emergency Affecting a Service Provider

In the event that a custodian, internet provider, archive provider or other critical service provider is rendered unable to function in an emergency, Revolution Capital will intervene as swiftly as possible to secure data and identify an alternative provider. Any client affected by this event will be notified directly by Revolution Capital of the status of his or accounts and data and of steps being taken to resolve the situation.