BlackBay Capital Advisors, LLC

Business Continuity/Disaster Recovery Plan

In light of recent events, the financial services industry has devoted increased attention to issues relating to disaster recovery and business continuity plans. The Company believes that disaster recovery and business continuity issues are of utmost importance and have taken a proactive approach to ensure that the Company has an adequate disaster recovery plan in place. The need for the Company to provide services to our customers in the event of a business disruption is vital, as is the importance that third-parties can contact the Company personnel in the event of an emergency.

Accordingly, the Company has implemented the following plan, to ensure business continuity in the event of a disaster or business interruption.

Backup Facilities

In the event the Company's main office becomes unavailable to conduct operations, the Company has designated the following backup facility, located in a separate geographical location, where firm personnel can resume business activities:

Address: 1511 Locust Unit 803 Telephone: 314-436-8811 Address: St. Louis, MO 63103

The Company Main Filing System (Junxure) is on a cloud system which can be accessed from any location in the event of an emergency. Further, Charles Schwab, Profunds, Guggenheim, and Ameritas have data storage of our client information at a backup facility if we need essential documentation.

A listing of customer contact information, including names, phone numbers, and electronic mail addresses are maintained on our Cloud Junxure system.

In the event the plan is updated or modified, the Company will ensure that the edited plan is distributed to key employees and that all other employees are notified of changes to the plan.

Implementation of Disaster Recovery/Business Continuity Plan

In the event of a business disruption, the Company shall notify all of its customers of the disruption to the company's operations as soon as practically possible.

Annual Testing

The Company will test its disaster recovery/business continuity plan on an annual basis. The Company will maintain written evidence that the plan was tested.

Third Party Contact Information

(I.E. vendors, banks, order routers, data providers, utilities)

Mercantile Bank: 217-224-8686 Ameren: 800-755-5000 AT&T: 800-727-2100

Employee Contact Telephone Numbers Todd Butterfield 217-577-5188 Karrie Butterfield 217-257-5438

Emergency Contact Information

Local Police Department: 217-277-2200 Local Fire Department: 217-656-3231