

2026 BUSINESS CONTINUITY PLAN

I. Purpose and Advisor Policy

Grosse Point Advisors ("Advisor") has adopted this Business Continuity Plan ("BCP") pursuant to the Investment Advisers Act and the rules and guidance of the U.S. Securities and Exchange Commission ("SEC") and/or the laws of the states where the Advisor is registered.

The purpose of this BCP is to define the strategies and plans that will be used by Advisor during a significant business disruption ("SBD"). An SBD includes any event or situation that significantly impacts the Advisor's ability to provide advisory services to its clients. The BCP outlines the Advisor's procedures designed to ensure that critical business functions can continue during and after an SBD and that the Advisor can resume operations as quickly as possible after an SBD. The BCP is prepared to address both internal SBDs, such as a fire in Advisor's office or the death of key personnel, and external SBDs, such as a natural disaster, public health crisis, terrorist attack, or citywide power disruption. It is also designed to address SBDs of different severities.

In the event of an SBD, it is Advisor's policy to do the following to the extent reasonable and practical under the circumstances:

- Safeguard employee lives and firm property;
- Make a financial and operational assessment;
- Promptly recover and resume operations;
- Protect the firm's books and records; and
- Communicate with its customers and allow them to transact business.

The firm is considered to have custody of funds and securities. Advisor will assist customers to access their assets at the brokers that have custody of the assets. In the case of an external SBD, Advisor's ability to react will depend heavily on access to other organizations and systems, such as the availability of electricity, telephones, Internet and transportation.

In creating this BCP, the Advisor has assumed that the firm's designated alternate office will be available, that Advisor has sufficient personnel, and that government agencies and market systems are operational during and after the SBD. If any of these assumptions are incorrect, the Advisor's business could be disrupted until matters are resolved. No contingency plan can eliminate all risk of service interruption, but Advisor will continue to assess and update its plans to mitigate all reasonable risks.

II. Plan Approval, Review, Location and Disbursement

A. Approval and Review of Plan

The below chart reflects the dates of creation and review and necessary revisions to the BCP. The BCP will be reviewed annually to determine whether any modifications are necessary in light of changes to Advisor's operations, structure, business or location or new regulatory requirements.

The Chief Compliance Officer is responsible for approving the plan and for conducting annual reviews. During the fourth quarter of each fiscal year, the Chief Compliance Officer will review the Advisor's BCP to determine whether any revisions are needed and will revise the BCP if necessary to ensure it meets the firm's needs and regulatory requirements. An updated copy of the BCP will be distributed to all of Advisor's employees within forty-eight (48) hours of any amendment.

Advisor will also test the Business Continuity Plan to identify any weaknesses and gaps at least annually. This may include testing of areas such as: accessing back-up records; hardware functions at the alternate business location; verification of current contact information and any designated duties for employees, clients and business partners; verification of vendors, service providers, software and equipment; and conforming the firm's business practices to the BCP and regulatory requirements.

Effective Date	**Description of Action**	**Name and Title of Firm Employee or Executive**
October 5, 2020	Creation of BCP	Michael Bloom, Chief Compliance Officer

B. Plan Location and Access

Advisor will maintain copies of its BCP, the annual reviews, and any revisions made to the plan at its primary office at 909 Davis St., Suite 500, Evanston, IL 6020

C. Disbursement of Plan

All employees of Advisor will review the BCP upon beginning their employment. When the BCP is updated, all employees will review the revised plan. The Advisor will periodically train all its employees on the BCP's requirements.

III. Key Personnel

Advisor's key personnel and persons responsible for executing this BCP in the event of an SBD are:

Michael Bloom

Chief Compliance Officer
(847) 550-7100
Michael@grossept.com

In the event that these key personnel die or become incapacitated or otherwise unavailable, the following person is authorized to execute this BCP and wind down the Advisor's business: Diana S. Bloom. This person has been trained on how to execute the provisions of the BCP and carry on Advisor's business and/or wind down the business.

IV. Business Description

Advisor is a registered investment advisor in the state of Illinois, with its principal office business in Evanston, Illinois. Advisor provides analysis and advice on securities by making recommendations to clients or by providing research or opinions on securities or securities markets. Advisor is compensated for providing this analysis and advice. Advisor is also authorized to execute trades in customer's accounts on their behalf.

Advisor sends all public securities transactions to executing brokers, which process and settle its orders. Advisor does not act as a broker and does not hold client funds or securities.

V. Office Location

Advisor's primary office is located at 909 Davis St., Suite 500, Evanston, IL 60201. The main telephone number is (847) 550-7100. Advisor engages in all its business activities as a registered investment advisor at the primary office.

VI. Alternative Physical Location(s) of Employees

In the event of an SBD, Advisor will move its staff from the affected office(s) to 2722 Hartzell St., Evanston, IL 60201. If Advisor cannot return to its primary office within a reasonable amount of time following the SBD, it will evaluate whether to permanently move to a new primary office location.

In the event of an SBD involving widespread lack of telecommunications, transportation, electricity, office space, fuel and water, Advisor will consider its employees' ability to work remotely during the SBD, as well as how employees may work in the absence of telephone and/or Internet access if necessary.

VII. Customer Access to Funds and Securities

Advisor does not hold customer funds or securities. Customer funds and securities are held either with Charles Schwab Corporation, 3000 Schwab Way, Westlake, TX 76262, or Interactive Brokers, One Pickwick Plaza, Greenwich, CT 06830. You can contact the corporate headquarters of Charles Schwab Corporation by phone at (800) 435-4000, and Interactive Brokers at (817) 859-5000. Customers have access to those funds and securities independent of Advisor.

In the event of an SBD, Advisor will continue to handle customer assets as it did before the SBD to the extent possible based on the availability of Schwab's or Interactive Brokers' platform.

VIII. Data Back-Up and Recovery (Hard Copy and Electronic)

Advisor maintains its primary hard copy books and records and its electronic records at 909 Davis St., Suite 500, Evanston, IL 60201. The Chief Compliance Officer is responsible for the maintenance of these primary books and records.

Advisor maintains electronic back-ups of its hard copy books and records through Microsoft. Advisor backs up its electronic records daily. The Chief Compliance Officer is responsible for the maintenance of these back-up books and records.

In the event of an SBD that causes the loss of paper records, Advisor will physically recover them from the back-up site. For the loss of electronic records, Advisor will either physically recover the storage media or electronically recover data from the back-up site.

IX. Operational and Financial Assessments in the Event of an SBD

A. Operational Risk

In the event of an SBD, Advisor will immediately assess and identify what means will permit it to communicate with customers, employees, regulators, any custodian institution(s) holding customer funds and securities, and critical business constituents and counterparties. In addition, Advisor will retrieve key activity records as described in Section VIII, above, Data Back-Up and Recovery (Hard Copy and Electronic).

B. Financial and Credit Risk

In the event of an SBD, Advisor will determine its financial ability to continue to operate and service its customers. Advisor will contact the custodian firm, clients and critical banks to apprise them of its financial status. If Advisor determines that it is unable to fund its operations, it will request additional financing from its bank or other credit sources to fulfill its obligations to customers.

X. Critical Systems

Advisor's critical systems are those that: (i) allow Advisor prompt and accurate access to client accounts and records, (ii) allow Advisor to communicate investment advice and analysis to customers, and (iii) allow Advisor to receive and transmit orders from or on behalf of customers to Interactive Brokers for execution.

Advisor has primary responsibility for establishing and maintaining business relationships with customers and transmitting orders from or on behalf of customers to

Interactive Brokers for execution. Interactive Brokers has responsibility to receive, execute, clear and settle orders from Advisor or its customers.

XI. Critical Business Constituents and Counterparties

Advisor has contacted its critical business constituents (businesses with which it has an ongoing commercial relationship in support of its operating activities, such as vendors and banks), and determined the extent to which Advisor can continue its business relationship with them in light of an SBD. Advisor will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services when needed.

Advisor has also contacted its critical counterparties, such as broker-dealers or institutional customers, to determine if Advisor will be able to carry out its transactions with them in light of an internal or external SBD. Where transactions cannot be completed, Advisor will work with its clearing firm or contact those counterparties directly to make alternative arrangements to complete transactions as soon as possible.

XII. Communication of SBD to Other Parties

In the event of an SBD, including the death or unavailability of key personnel, the persons executing this BCP will determine the persons that need to be notified about the SBD, including employees, customers, regulators, custodians, and critical business constituents. The persons who need to be notified, and how, will vary with the circumstances of the SBD.

XIII. Alternative Communications Plans

A. Customers

Advisor now communicates with customers using telephone, email, fax, U.S. mail, or in-person visits. In the event of an SBD, Advisor will assess which means of communication are still available and use the means closest in speed and form (written or oral) to the means that Advisor used in the past to communicate with the other party. For example, if Advisor has primarily communicated with a party by email, but the Internet is unavailable, Advisor will call the customer on the telephone and follow up where a record is needed with paper copy in the U.S. mail.

In the case of an expected SBD, such as a forecasted storm, Advisor will consider proactively contacting customers (for instance, by email blast) to determine whether they need to execute any transactions (e.g., fund transfer, wire instructions, closing out positions) in case of an extended outage.

B. Employees

Advisor now communicates with its employees using telephone, email, fax, U.S. mail, or in-person. In the event of an SBD, Advisor will assess which means of communication are still available and use the means closest in speed and form (written

or oral) to the means that Advisor has used in the past to communicate with the other party.

C. Regulators

Advisor is registered as an investment advisory firm with the Illinois Securities Department. Advisor communicates with its regulators using telephone, email, website, fax, or U.S. mail. In the event of an SBD, Advisor will assess which means of communication are still available, and use the means closest in speed and form (written or oral) to the means that Advisor has used in the past to communicate with the other party, including to make any necessary filings, disclosures, etc.

In the event that Advisor cannot contact its regulators, it will continue to file required reports to the extent possible using the communication means available to it.

In the event of a formal or informal inquiry made by any federal or state regulatory agency during an SBD, the Chief Compliance Officer will be responsible for receiving all calls and/or all other requests for further review.

D. Custodians

Interactive Brokers currently holds the funds and/or securities of Advisor's customers. Advisor currently communicates with these institutions using telephone, email, website, fax, or U.S. mail. In the event of an SBD, Advisor will assess which means of communication are still available and use the means closest in speed and form (written or oral) to the means that Advisor has used in the past to communicate with the custodian.

E. Critical Business Constituents, Banks and Counterparties

Advisor now communicates with its critical business constituents using telephone, email, website, fax, U.S. mail or in-person visits. In the event of an SBD, Advisor will assess which means of communication are still available and use the means closest in speed and form (written or oral) to the means that Advisor has used in the past to communicate with the other party.

XIV. Disclosure of Business Continuity Plan

Customers will receive a copy of a BCP summary disclosure statement when they open their accounts with Advisor or upon request. A copy of the BCP summary disclosure is attached to the BCP.

GROSSE POINT CAPITAL MANAGEMENT
BUSINESS CONTINUITY PLAN DISCLOSURE STATEMENT

Grosse Point Capital Management ("Advisor") has adopted a Business Continuity Plan ("BCP") pursuant to the Investment Advisers Act and the rules and guidance of the U.S. Securities and Exchange Commission ("SEC") and/or the laws of the states where the Advisor is registered. The purpose of the BCP is to define the strategies and plans that will be used by Advisor during a significant business disruption ("SBD"). The BCP is prepared to address both internal SBDs, such as a fire in Advisor's building, and external SBDs, such as a natural disaster, public health crisis, terrorist attack, or citywide power disruption.

Our Business Continuity Plan

In the event of an SBD, Advisor will safeguard employee lives and firm property. Advisor will work to re-establish the systems necessary to quickly recover and resume operations, protect Advisor's books and records and allow Advisor's customers to transact business to the extent reasonable and practical under the circumstances. Advisor's BCP addresses: alternate office locations, customer access to funds and securities, financial and operational assessments, data backup and recovery, critical systems, alternative communications with customers, employees, and regulators, and critical business constituents.

Contacting Advisor and Accessing Funds and Securities

If you cannot contact Advisor through our regular telephone number (847) 550-7100, please contact us by email at Michael@grossept.com. For questions relating directly to accessing your funds and securities, please contact Schwab Advisor Services at (877) 519-1403 or visit their website at www.advisorservices.schwab.com, or Interactive Brokers at (877) 442-2757 or visit their website at www.interactivebrokers.com.

Varying Disruptions

SBDs can vary in their scope, from only our firm's office, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. During a SBD, the Advisor will continue to do business but the ability of Advisor to fully function will be dependent on outside sources outside of its control, including the availability of electricity, telephones, Internet, transportation, and the functioning of institutions and markets worldwide. Nothing in Advisor's BCP or this disclosure statement is intended to provide a guarantee or warranty regarding the actions or performance of Advisor.

Additional Information

If you have questions about our business continuity planning, please contact us at (847) 550-7100 or Michael@grossept.com.