

Demeter Advisory Group, LLC (“Demeter Group”) Business Continuity Plan

Demeter Group places a high priority on protecting the interests of our clients in the event of a business disruption. This summary of our Business Continuity Plan describes how we will respond to any event that causes a significant disruption of our business.

Demeter Group’s policy is to respond to a business disruption by safeguarding employees’ lives and firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of the firm’s books and records, communicating with our business constituents and regulators, and allowing our customers to transact business. Our plan addresses all areas affected by a business disruption and is designed to enable the firm to recover and restore business operations as rapidly as possible.

Our plan anticipates two kinds of potential disruptions, internal and external. Internal disruptions, such as a fire in our building, affect only Demeter Group’s ability to communicate and do business. External disruptions, such as a terrorist attack, a city flood, or a wide-scale, regional disruption, prevent the operation of the securities markets or a number of firms. Our response to an external disruption relies more heavily on other organizations and systems.

If the firm is unable to conduct business from its normal office location, the firm has arranged to have its personnel and operations relocated to a designated off-site backup facility. In a disruption to only the firm or its building, personnel and operations will be transferred to a local site as needed. In a disruption affecting the firm’s business district, city, or region, personnel and operations will be transferred to an alternative site outside of the affected areas.

Demeter Group maintains its primary hard copy records and electronic records at its office in San Francisco, and maintains back-up records in electronic form at an alternative site. In the event of a disruption that causes the loss of our primary records, or which interrupts our access to the records, we will access records from the firm’s alternative site. Operations will be conducted from the alternative site until such time as normal operations can resume at our primary site. In the event of a disruption, we plan to immediately notify clients how to contact us through our website www.demetergroup.net and main telephone number (415) 632-4400.

Demeter Group provides its clients with a written Business Continuity Plan disclosure statement at account opening and annually and will mail the plan upon request. A new disclosure is provided in the event the plan is updated. If you have questions regarding our plan, you may contact us at our website address or at the phone number listed above.