

Greenwich Wealth Management, LLC
Investment Adviser
Business Continuity Plan

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I. Emergency Contact Persons

Our firm's two emergency contact persons are: Michael J. Freeburg, (203) 618-0100; and Daniel J. Sullivan, (203) 618-0103.

II. Firm Policy

Our firm's policy is to respond to a Significant Business Disruption (SBD) 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, and allowing our clients to transact business. In the event that we determine we are unable to continue our business operation, this plan provides clients the appropriate contact information to access to their funds and securities through applicable custodian.

A. Significant Business Disruptions (SBDs)

Our plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only our firm's ability to communicate and do business, such as a fire in our building. External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a city flood, or a wide-scale, regional disruption. Our response to an external SBD also relies on phone and internet services as well as our custodians' systems.

B. Approval and Execution Authority

Michael J. Freeburg, Principal, or Daniel J. Sullivan are responsible for approving the plan and for conducting the required annual review. Michael J. Freeburg and Daniel J. Sullivan have the authority to execute this BCP.

C. Plan Location and Access

Our firm will maintain copies of its BCP plan and the annual reviews, and the changes that have been made to it for inspection. An electronic copy of our plan is located on www.greenwichwealth.com well as in the Policy and Procedures Manual in our ShareFile and a hard copy is kept on file.

Home Office Location

Address: 45 East Putnam Avenue
Suite 128
Greenwich, CT 06830

Main Phone: (203) 618-0100

III. Business Description

Greenwich Wealth Management, LLC is an SEC registered Investment Advisory Firm located in Greenwich, Connecticut. As a privately owned boutique firm, we develop and manage custom tailored investment portfolios without the need to promote internal products. GWM was opened in December, 2006 by founder and principal owner Michael J. Freeburg.

GWM's investment advisory services are available to high net worth individuals, families, trusts, estates, endowments, charitable organizations, corporations, and profit sharing plans. GWM charges a fixed annual fee as a percentage of assets under management when managing client assets and investment portfolios at qualified custodians.

GWM also offers third party investment managing and monitoring services. GWM will provide this service to high net worth individuals and their families, trusts, estates, corporations and profit sharing plans.

GWM provides continuous advice to clients regarding the investment of client funds based on the individual needs of the client. In initial discussions, goals and objectives based on a client's particular circumstances are established. These are then developed into a client's personal investment guidelines at which point GWM executes and manages this portfolio based on these guidelines. Securities will be selected for inclusion within the client portfolio based on factors such as the risk tolerance of the client, liquidity needs, the adequacy of portfolio diversification among markets, sectors, industries, investment objectives and tax considerations.

Clients will retain individual ownership of all securities and have the opportunity to place reasonable restrictions on the types of investments made.

Greenwich Wealth Management conducts business primarily in equities, fixed income and derivatives.

Greenwich Wealth Management does not have custody of any client funds or securities. All traded transactions are executed on custodial platforms. Our custodian maintains our clients' their individually titled accounts, and can grant full access to those accounts. We do not engage in any private placements.

Our custodians and contact information are:

Interactive Brokers, LLC
1 Pickwick Plaza
Greenwich, CT 06830
Main Phone: (203) 618-5800
Toll Free: (866) 694-2757

Charles Schwab
300 Schwab Way
Westlake, Tx 76262
Toll Free: (800-435-4000)

IV. Our Office Location is:

Greenwich Wealth Management, LLC
45 East Putnam Avenue
Suite 128
Greenwich, CT 06830

Our employees may travel to this office by means of train, bus, or vehicle. Greenwich Wealth Management transacts all of our business from this location.

V. Branch Office Location(s)

Greenwich Wealth Management, LLC maintains two branch office locations where necessary staff can be moved to in the event of an; internal, city-wide, state-wide or regional significant business disruption:

In the event of a city-wide, county-wide, state-wide or regional Significant Business Disruption we will move necessary staff to:

Address: 777 S. Flagler Drive, East Tower
Suite #1005
West Palm Beach, Florida 33401

Main Phone: (561) 822-3725

Fax: (203) 286-2025

VI. Alternative Physical Location

In the event of an internal Significant Business Disruption, we will move necessary staff to the following location:

Address: 6 Indian Knoll Place
Greenwich, CT 06831

Phone(s): (203) 625-9323
(203) 273-0801

Fax: (203) 286-2025

Alternate Location in the advent that power is out in Greenwich, CT:

Address: 97 Blue Ridge Road
Wilton, CT 06897

Main Phone: (203) 762-7757
(203) 940-1581

Fax: (203) 286-2025

VII. Client Access to Funds and Securities

Greenwich Wealth Management does not maintain custody of clients' funds or securities, Greenwich Wealth Management client funds and securities are individually titled in the clients name and custodied at Interactive Brokers or Charles Schwab. Clients always retain the ability to access their accounts and funds directly through the custodians.

Clients may access their funds and securities online at: www.InteractiveBrokers.com, or www.schwab.com or by contacting:

Interactive Brokers, LLC
1 Pickwick Plaza
Greenwich, CT 06830
Main Phone: (203) 618-5800
Toll Free: (866) 694-2757

Charles Schwab
300 Schwab Way
Westlake, TX 76262
Toll Free: (800) 435-4000

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

Greenwich Wealth Management maintains its primary hard copy books and records and its electronic records at 45 East Putnam Ave., Greenwich, CT 06830; phone (203) 618-0100. Daniel J. Sullivan is responsible for the maintenance of these books and records.

Greenwich Wealth Management maintains a backup of existing files. Compliance documentation and client contact information is kept by several means. Information is kept on ShareFile as well as our Smarsh email, social media archiving platform and other local devices.

ShareFile, is SSAE 16 audited and AES 256-bit encryption ensure the privacy of confidential files during transfer and in storage.

Smarsh provides an attestation letter upon request confirming Greenwich Wealth Management's use of their platform.

ShareFile and Smarsh provide a secure password protected method for key Greenwich Wealth Management employees to carry on necessary communication during significant business disruption.

The firm backs up its electronic records weekly.

IX. Operational Assessments

A. Operational Risk

In the event of an SBD, Greenwich Wealth Management will immediately identify by what means by which will permit us to communicate with our clients, employees and critical business constituents. Although the effect of the significant business disruption will determine the means of alternative communications, the communications options we will employ will include our telephone, voice mail and secure email.

X. Mission Critical Systems

Greenwich Wealth Management's "mission critical systems" its ability to access Interactive Brokers Trader Workstation and Account Management as well as Charles Schwab trading platform and account management. In conjunction with our ability to connect with our mission critical systems,

we will continue to communicate with our clients depending upon the availability of our primary method of communication via email, telephone, fax and in-person.

Interactive Brokers and Charles Schwab represent that they will provide Greenwich Wealth Management with a copy of their Business Continuity Plan. Interactive Brokers and Charles Schwab represent that they will advise us of any material changes to their plans that might affect our ability to maintain our business. Executive Summaries of Interactive Brokers and Charles Schwab's BCP's are attached.

Clients may access their funds and securities online at: www.InteractiveBrokers.com, or www.schwab.com or by contacting:

Interactive Brokers, LLC
1 Pickwick Plaza
Greenwich, CT 06830
Main Phone: (203) 618-5800
Toll Free: (866) 694-2757

Charles Schwab
300 Schwab Way
Westlake, TX 76262
Toll Free: (800) 435-4000

A. Our Firm's Mission Critical Systems

Greenwich Wealth Management's "mission critical systems" its ability to access Interactive Brokers Trader Workstation and Account Management as well as Charles Schwab trading platform and account management. In conjunction with our ability to connect with our mission critical systems, we will continue to communicate with our clients depending upon the availability of our primary method of communication via email, telephone, fax and in-person. These combined communications allow for order entry and order execution as well as Report management access.

B. Other Services Currently Provided to Clients

For any third party investment management monitoring services, we maintain updated contact information, as well as a summary of their BCP plan

C. Mission Critical Systems Provided by Our Custodian

Greenwich Wealth Management relies on Interactive Brokers Trader Workstation and Account Management, as well as Charles Schwab trading platform and account management for functions described above.

In the event of an Internal SBD Greenwich Wealth Management has a system in place as described throughout this document to insure the continued service of client account.

XI. Alternate Communications Between Greenwich Wealth Management, Clients, Employees and Regulators.

A. Clients

We now communicate with our clients telephonically, via email, fax U.S. mail, and in-person visits. In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party. For example, if we have

communicated with a party by email but the Internet is unavailable, we will call them on the telephone and follow up where a record is needed with paper copy in the U.S. mail.

B. Employees

We now communicate with our employees using telephone, email and in person. In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party.

C. Regulators

Greenwich Wealth Management is a Securities and Exchange Commission (SEC) Registered Investment Advisory Firm. We are currently regulated by the SEC located at 33 Arch Street, 23rd Floor, Boston, MA 02110-1424, (617) 573-8900 and the Connecticut Department of Banking (CDB) located at: 260 Constitution Plaza, Hartford, CT 06103-1800, (800) 831-7225. We communicate with the SEC and CDB via the following methods: telephonically, and via email. In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party.

XII. Regulatory Reporting

Our firm is subject to regulation by the SEC. We now file reports with our regulator electronically via the internet. In the event of an SBD, we will check with the SEC, and other regulators to determine which means of filing are still available to us, and use the means closest in speed and form (written or oral) to our previous filing method. In the event that we cannot contact our regulators, we will continue to file required reports using the communications means available to us.

XIII. Disclosure of Business Continuity Plan

Our Business Continuity Plan is available on our website. We will provide a copy of our BCP plan during the accounts opening process and thereafter upon request. We will notify our clients if there are any material changes.

Greenwich Wealth Management will update this plan whenever we have a material change to any of the relationships described herein this plan.

XIV. Senior Management Approval

I have approved this Business Continuity Plan as reasonably designed to enable our firm to meet its obligations to clients in the event of an SBD.

Michael J. Freeburg

Michael J. Freeburg – Founding Member

04/25/2024

Date

Daniel J. Sullivan

Daniel J. Sullivan – Chief Compliance Officer

04/25/2024

Date