

Business Continuity Plan

Background

While it is recognized it is not possible to create a plan to handle every possible eventuality, it is the intent of CCI to set up a framework to be used in the most likely of scenarios. It is also the intent that this framework provide guidance as to how to respond should an unforeseen situation occur.

CCI believes that an adviser's fiduciary obligation to its clients includes the obligation to take steps to protect the clients' interests from being placed at risk as a result of CCI's inability to provide advisory services after, for example, a natural disaster or, in the case of some smaller firms, the death of the owner or key personnel. The clients of an adviser that is engaged in the active management of their assets would ordinarily be placed at risk if the adviser ceased operations.

Business Description

CCI conducts business in equity, fixed income, and other securities; it does not hold customer funds or securities. Transactions are sent to CCI's brokerage firm, which executes its orders, compares them, allocates them, clears and settles them. CCI's custodian maintains its clients' accounts, grants clients access to them, and delivers funds and securities.

Emergency Information

Company Contact Persons

CCI's two emergency contact persons are:

Contact Name	Phone	Email	Relationship
James MM Regulinski	559-644-3195	James@carboncollective.co	CCO
Zach R Stein	(925) 268-8041	Zach@carboncollective.co	Cofounder

Support Services

In the event of an emergency, the following is a list of support services and the methods by which they may be contacted:

Emergency Services (EMS): 911

Fire Department: 510-528-5770

Police Department: 510-525-7300

Internet Service Provider: 1-800-391-3000, support@comcast.com

Data Backup Provider: support@altruist.com

Service Provider	Company Name	Contact Name	Phone	Email
Attorney	Polsinelli LLP	Rick Jordan	800.525.8970	rjordan@polsinelli.com

Alternative Company contact in case of death of Key Personnel	Ethan Batraski
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This information will be updated in the event of a material change, and CCI’s CCO will review the plan on an annual basis

Policy

CCI’s policy is to respond to a Significant Business Disruption (SBD) by safeguarding employees’ lives and Company property, making a financial and operational assessment, quickly recovering and resuming operations, protecting the Company’s books and records,

and allowing its clients to transact business.

In the event that CCI determines it is unable to continue its business, it will assure clients prompt access to their funds and securities.

Significant Business Disruptions (SBDs)

CCI's plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only CCI's ability to communicate and do business, such as a fire in its building or the death of a key member of the Company. 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.

CCI's response to an external SBD relies more heavily on other organizations and systems, such as the brokerage firm(s) and Internet Service Providers it uses.

Approval and Execution Authority

The CCO is responsible for approving the plan and for conducting the required annual review. The CCO has the authority to execute this BCP.

Plan Location and Access

CCI maintains copies of its BCP and annual reviews, and all changes that have been made. A physical copy of the BCP is stored with the company's Written Policies and Procedures Manual, which is kept in the following location: Fireproof bag in the closet of the main office. An electronic copy of this plan is stored: as a PDF file on the Company's file share system in a folder entitled "Business Continuity Plan".

Each employee is given a copy of the plan and notified of the location/file within CCI's electronic systems to which employees have access. Physical copies need to be returned upon termination of employment with the Company.

CCI's Custodian and Brokerage Firm Contacts

Brokerage:

Altruist Financial LLC
1621 Abbot Kinney Blvd Floor 2

Venice, CA 90291
(313) 509-7310
Hello@altruist.com

Custodian:

Apex Clearing Corporation
350 N. St. Paul Street, Suite 1300
Dallas, Texas 75201
214-765-1055
apexclearing.com

Office Locations

CCI's primary office address and phone number are:

524 Madison St
Albany, CA 94706
United States
925-268-8041

CCI engages in client servicing, order taking and entry at this location.

Alternative Physical Location(s) of Employees

In the event of an SBD that makes it impossible or impractical to use any or all of the company offices, CCI will move its staff from affected offices to the closest of its unaffected office locations.

If none of CCI's other office locations is available, it will move the Company operations to:

104 Bayside Pl
Bellingham, WA 98225
United States
559-644-3195

Clients' Access to Funds and Securities

CCI does not maintain custody of clients' funds or securities, which are maintained at its

brokerage firm. In the event of an internal or external SBD, if telephone service and internet service are available, CCI's investment adviser representatives (IARs) will take customers' orders or instructions from its alternative locations, phone numbers, websites or alternative email addresses and contact its brokerage firm on their behalf. If internet access is available, CCI will post on its website and Facebook, LinkedIn, and Twitter that clients may access their funds and securities by contacting it.

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

CCI maintains its primary hard copy books and records and its electronic records at its primary office.

The Company's CCO is responsible for the maintenance of these books and records. CCI maintains the following document types and forms that are not transmitted to its brokerage firm: Investment Policy Statements, Client Contracts and other related documents.

The Company backs up its electronic records monthly by online digital backup and keeps a copy on its G-Suite Cloud.

In the event of an internal or external SBD that causes the loss of its paper records, CCI will physically recover them from its back-up site(s). If its primary site is inoperable, CCI will continue operations from its back-up site or an alternate location. For the loss of electronic records, it will either physically recover the storage media or electronically recover data from its back-up site(s). If its primary site is inoperable, CCI will continue operations from its back-up site or an alternate location. CCI obtains the Business Continuity Plans of its electronic storage partners for access to its records in case of a regional event.

Operational Assessments

Operational Risk

In the event of an SBD, CCI will immediately identify what means will permit it to communicate with its clients, employees, critical business constituents, and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options CCI will employ will include its website, telephone voice mail, secure email, etc. In addition, CCI will retrieve its key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic). Employees will establish contact with the Company's Emergency Contacts and communicate key Company directives as they apply to operating the business whether it be from a new location, each employee's residence or an alternative regional location with access to a different power

grid from the principal office.

Mission Critical Systems

CCI's "mission critical systems" are those that ensure client communication, access to client accounts and trading systems. More specifically, these systems include the office computer systems.

CCI has primary responsibility for establishing and maintaining its business relationships with its clients. CCI's brokerage firm/custodian provides the execution, comparison, allocation, clearance and settlement of securities transactions as well as the maintenance of customer accounts, access to customer accounts, and the delivery of funds and securities.

CCI's brokerage firm/custodian represents that it: will maintain a business continuity plan and the capacity to execute that plan; backs up CCI's records at a remote site; and operates a back-up operating facility in a geographically separate area with the capability to conduct the same volume of business as its primary site. It has also confirmed the effectiveness of its back-up arrangements to recover from a wide scale disruption by testing.

Recovery-time objectives provide concrete goals to plan for and test against. They are not, however, hard and fast deadlines that must be met in every emergency situation, and various external factors surrounding a disruption, such as time of day, scope of disruption, and status of critical infrastructure—particularly telecommunications—can affect actual recovery times. Recovery refers to the restoration of clearing and settlement activities after a wide-scale disruption; resumption refers to the capacity to accept and process new transactions and payments after a wide-scale disruption. The recovery times for custodians are expected to be consistent with the recovery time indicated in the specific custodian's business continuity plan or other relevant documentation. However, the Company will not typically have access to the custodian's business continuity plan and recovery times will of course differ depending on the specific system affected. Please see "Custodian and Brokerage Company Contacts" above.

The Company's Mission Critical Systems

Trading

CCI uses the electronic order entry system provided by its custodian or another third party to enter trading activity and transactions. If electronic means are not available, CCI may place orders by email, in which case order tickets will still be maintained.

In the event of an internal SBD, CCI will enter and send records to its brokerage firm by the fastest alternative means available. In the event of an external SBD, CCI will maintain the order in electronic or paper format, and deliver the order to the brokerage firm by the fastest means available when it resumes operations. In addition, during an internal SBD, CCI may need to refer its clients to deal directly with its brokerage firm for order entry.

Client Account Information

CCI currently accesses client account information via its brokerage firm's website. In the event of an internal SBD, CCI would access client information via fax correspondence, alternate phone systems, etc. CCI may relocate to its alternative business location(s) if access to the brokerage firm website can be accomplished.

Alternate Communications with Clients, Employees, and Regulators

Clients

CCI now communicates with its clients using telephone, text messaging, video calling, video messaging, email, its Website, fax, and U.S. mail. In the event of an SBD, CCI will assess which means of communication are still available to it, and use the means closest in speed and form (written or oral) to the means that it has used in the past to communicate with the other party. For example, if CCI has communicated with a party by email but the Internet is unavailable, CCI will call the party on the telephone and follow up and, where, a record is needed with paper copy in the U.S. mail. In the event of an anticipated significant regional business disruption, CCI will communicate to its clients in advance how to establish contact with it and its personnel or brokerage and custodian prior to the disruptive event occurrence.

Employees

CCI now communicates with its employees using telephone, email, and in person. In the event of an SBD, CCI will assess which means of communication are still available to it, and use the means closest in speed and form (written or oral) to the means that it has used in the past to communicate with the other party. In the event of key employees being unable to perform their job functions, immediately and for any time period afterwards, CCI will delegate, if possible, those key functions to other employees.

Regulators

CCI communicates with its regulators using telephone, email, U.S. mail, and in person. In the event of an SBD, CCI will assess which means of communication are still available to it, and use the means closest in speed and form (written or oral) to the means that it has used in

the past to communicate with the other party.

Regulatory Reporting

CCI is subject to regulation by the Securities and Exchange Commission (SEC). CCI now files reports with its regulators using the IARD/CRD System. In the event of an SBD, CCI will check with the SEC to determine which means of filing are still available to it, and use the means closest in speed and form (written or oral) to its previous filing method. In the event that CCI cannot contact its regulators, it will continue to file required reports using the communication means available to it and forward those reports at the earliest opportunity.

Regulatory Contact:

San Francisco Regional Office
Marc J. Fagel, Regional Director
44 Montgomery Street, Suite 2600
San Francisco, CA 94104
(415) 705-2500

Death of Key Personnel

The following personnel are identified as “Key Personnel” without which it would be difficult or impossible to continue operating the Company and/or properly service clients:

James MM Regulinski	CCO
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If some event made it impossible for any person listed above able to continue to service the Company, CCI would implement the following succession plan:

Overview Carbon Collective Investing LLC (“Carbon Collective”; “the Company”) has created and implemented a Business Continuity Plan (“BCP”) in an effort to mitigate the effects related to unforeseen business interruptions. The BCP is designed to enable the Company to continue or resume advisory services as soon as possible in the event of an emergency or significant business disruption (“SBD”).

Communications with Customers Carbon Collective is currently able to communicate with its

customers using the telephone, email, US Mail, website, and in person. In the event of an SBD, Carbon Collective will assess which means of communication are still available and use the means closest in speed to the means used in the past.

Vendors and Counterparties Carbon Collective's BCP may need to rely upon the recovery and restoration of services provided by various critical business constituents at both its primary and alternate business locations. Carbon Collective has considered the extent to which the Company may be able to depend upon these business relationships during an SBD as a part of its decision to do business with the constituent. Where possible the Company has engaged and/or vetted alternate arrangements in order to avoid business disruptions in the case of a business constituent not being able to provide needed goods or services in an emergency.

Internal SBD

All client accounts are held by the Custodian Apex Clearing Corporation ("Apex") with account rebalancing occurring automatically through Altruist's brokerage software platform. In the event of a SBD that primarily affects the Company, due to this level of account management automation, the nearterm client experience should not be significantly impacted. Should the Company's two officers become unable to operate the Company and serve its clients, one of the company's board members and lead investor, Ethan Batraski, will find a suitable RIA firm to take on and manage the Company's accounts. Clients will be notified in writing should this occur and explicitly be given the opportunity to end their agreement with Carbon Collective, should they wish to do so. Disclosure Carbon Collective's BCP is designed to address the continued operation of the Company in the event of an emergency situation or SBD. However, all risks of business interruption cannot be eliminated and Carbon Collective cannot guarantee that systems will always be available or recoverable following an SBD. Furthermore, Carbon Collective has no control over and must rely upon the disaster recovery plans of its various critical business constituents and vendors. In the event that material changes are made to this BCP disclosure statement, Carbon Collective will make available an updated copy to all of its clients.

The information contained in this disclosure is provided by Carbon Collective for informational purposes only, and nothing contained herein shall be construed to amend, supplement or otherwise modify any of the terms and conditions set forth in any customer agreement between you and Carbon Collective.

In case of death of any key personnel, the following will assume the responsibility to make contact with the clients of the Company in the most efficient manner possible and as soon as possible to allow clients to access their accounts. If a business succession plan is to be

implemented, clients will be contacted to obtain consent prior to any assignment of their advisory management contracts with this Company to a successor firm.

Ethan Batraski	Board Member
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Updates and Annual Review

CCI will update this plan whenever it has a material change to its operations, structure, business or location or to those of its brokerage firm. In addition, CCI will review this BCP annually, to modify it for any changes in its operations, structure, business, or location or those of its brokerage firm.

Approval & Signature

Supervisor Approval

Approve the Company’s Business Continuity Plan (BCP) program by signing below.

I have approved this Business Continuity Plan as reasonably designed to enable CCI to meet its obligations to clients in the event of a Significant Business Disruption.

Signed:

Officer Name and Title:	James Regulinski CCO
<i>James Regulinski</i>	2021-06-15
Supervisor Signature	Date