

RISE Investment Management, LLC
Business Continuity Plan (BCP)

I. Emergency Contact Persons

Our firm's emergency contact person is: Vince DeCrow, (440) 655-8807, vince@riseinvestmentsusa.com.

The firm will provide FINRA with the contact information for its emergency contact person identified below through the FINRA Contact System (FCS).

Vince DeCrow
Principal and Chief Compliance Officer
134 N LaSalle St, STE 1760, Chicago, IL 60602
vince@riseinvestmentsusa.com
(440) 655-8807

Vince DeCrow will promptly notify FINRA of any change in this information through FCS (but no later than 30 days following the change) and will review, and if necessary, update this information within 17 business days after the end of each calendar year.

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 customers to transact business. In the event that we determine we are unable to continue our business, we will assure customers prompt access to their funds and securities.

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 relies more heavily on other organizations and systems, especially on the capabilities of our clearing firm.

B. Approval and Execution Authority

Vince DeCrow, a registered principal, is responsible for approving the plan and for conducting the required annual review. Vince DeCrow, Principal and Chief compliance Officer, has 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 our firm's Microsoft OneDrive cloud in the "Registration and Legal Docs" folder.

III. Business Description

Our firm is an independent registered investment advisor and provides financial planning and investment management services to its clients which consist of individuals, families, businesses, retirement plans, and non-profit organizations. Furthermore, we do not hold customer funds or securities. We accept and enter orders. All transactions are sent to our clearing firm, which executes our orders, compares them, allocates them, clears and settles them. Our clearing firm also custodies and maintains our customers' accounts, can grant customers access to them, and delivers funds and securities.

Our Firm was founded in 2019 in the State of Illinois and is organized as a privately held Limited Liability Company. The single principal owner of our Firm is Vincent DeCrow.

Our clearing firm is:

Charles Schwab & Co.
3000 Schwab Way
Westlake, TX 76262
(800) 435-4000 or (877) 519-1403
ASAccountManagement@schwab.com
schwab.com

Our clearing firm has a team of available contacts that are reachable using the contact information above.

IV. Office Locations

Our firm has a single office location.

RISE Investment Management, LLC
134 N LaSalle St, STE 1760
Chicago, IL 60602

Its main telephone number is (440) 655-8807. Our employees may travel to that office by means of foot, car, subway, train, bus, plane, etc. We engage in order taking and entry at this location.

V. Alternative Physical Location(s) of Employees

In the event of an SBD, we will move our staff from the affected office to:

2136 N Halsted, Apt 2F
Chicago, IL 60614

Its main telephone number is (708) 860-4112.

VI. Customers' Access to Funds and Securities

Our firm does not maintain custody of customers' funds or securities, which are maintained at our clearing firm, Charles Schwab & Co. In the event of an internal or external SBD, if telephone service is available, our registered persons will take customer orders or instructions and contact our clearing firm on their behalf, and if our Web access is available, our firm will post on our website that customers may access their funds and securities by contacting:

Vince DeCrow
Principal and Chief Compliance Officer, RISE Investment Management, LLC
(440) 655-8807
vince@riseinvestmentsusa.com

The firm will make this information available to customers through its disclosure policy.

If SIPC determines that we are unable to meet our obligations to our customers or if our liabilities exceed our assets in violation of Securities Exchange Act Rule 15c3-1, SIPC may seek to appoint a trustee to disburse our assets to customers. We will assist SIPC and the trustee by providing our books and records identifying customer accounts subject to SIPC regulation.

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

Our firm maintains its records at:

RISE Investment Management, LLC
134 N LaSalle St, STE 1760
Chicago, IL 60602

Vince DeCrow, Principal and Chief Compliance Officer, (440) 655-8807, is responsible for the maintenance of these books and records. Our firm maintains the following document types and forms that are not transmitted to our clearing firm:

- New Client Account Forms
- Client Account Information
- The Firm's Legal Documents
- The Firm's Financial Documents

Our firm maintains its back-up records at:

2136 N Halsted, Apt 2F
Chicago, IL 60614

These records are all electronic files. Vince DeCrow, Principal and Chief Compliance Officer, (440) 655-8807, is responsible for the maintenance of these back-up books and records. Our firm backs up its records by copying the records and taking them to our back-up site. We back up our records every calendar quarter.

In the event of an internal or external SBD that causes the loss of our paper records, we will physically recover them from our back-up site. If our primary site is inoperable, we will continue operations from our back-up site or an alternate location. For the loss of electronic records, we

will either physically recover the storage media or electronically recover data from our back-up site, or, if our primary site is inoperable, continue operations from our back-up site or an alternate location.

VIII. Financial and Operational Assessments

A. Operational Risk

In the event of an SBD, we will immediately identify what means will permit us to communicate with our customers, employees, critical business constituents, critical banks, critical counter-parties and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options we will employ will include *our website, telephone voice mail, or secure email*. In addition, we will retrieve our key activity records as described in the section above, Data Back-Up and Recovery.

B. Financial and Credit Risk

In the event of an SBD, we will determine the value and liquidity of our investments and other assets to evaluate our ability to continue to fund our operations and remain in capital compliance. We will contact our clearing firm, critical banks and investors to apprise them of our financial status. If we determine that we may be unable to meet our obligations to those counter-parties or otherwise continue to fund our operations, we will request additional financing from our bank or other credit sources to fulfill our obligations to our customers and clients. If we cannot remedy a capital deficiency, we will file appropriate notices with our regulators and immediately take appropriate steps, including:

- Meeting the obligations with the personal capital of Vince DeCrow, Principal and Chief Compliance Officer, (440) 655-8807.

IX. Mission Critical Systems

Our firm's "mission critical systems" are those that ensure prompt and accurate customer communication, order taking and entry, execution, comparison, allocation and settlement, delivery of funds and securities, maintenance of customer accounts, and access to client accounts. More specifically, these systems include:

A. Business Computers

We conduct the majority of our business electronically using our business computers. All other systems noted below rely on our business computers except Phone.

B. Mobile Electronic Storage Devices

Our mobile electronic storage devices house all of our Firm's electronic documents and records, including customer related documents and records.

C. Our Clearing Broker's Electronic and Computer-based Systems

Our clearing broker's online platform is used to conduct order execution, comparison, allocation and settlement, and delivery of funds and securities.

D. Email

Our Firm utilizes email for client communication and other general business operations related communications.

E. Phone

Our firm utilizes phones for client communications and other general business operations related communications.

We have primary responsibility for establishing and maintaining our business relationships with our customers and have sole responsibility for our mission critical functions of accurate customer communication, order taking and entry, and maintenance of customer accounts. Our clearing firm provides, through contract, the execution, comparison, allocation, clearance and settlement of securities transactions, access to customer accounts, and the delivery of funds and securities.

Our clearing firm contract provides that our clearing firm will maintain a business continuity plan and the capacity to execute that plan. Our clearing firm represents that it will advise us of any material changes to its plan that might affect our ability to maintain our business. In the event our clearing firm executes its plan, it represents that it will notify us of such execution and provide us equal access to services as its other customers. If we reasonably determine that our clearing firm has not or cannot put its plan in place quickly enough to meet our needs, or is otherwise unable to provide access to such services, our clearing firm represents that it will assist us in seeking services from an alternative source.

Our clearing firm represents that it backs up our records at a remote site. Our clearing firm represents that it 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. Our clearing firm has also confirmed the effectiveness of its back-up arrangements to recover from a wide scale disruption.

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, 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. Our clearing firm has the following SBD recovery time and resumption objectives: recovery time period of approximately 2 to 5 days; and resumption time of approximately 2 to 5 days.

Vince DeCrow will periodically review our clearing firm's capabilities to perform the mission critical functions the clearing firm has contracted to perform for our firm.

A. Our Firm's Mission Critical Systems

1. Customer Communication

Currently, our firm communicates with customers via telephone, email, and in-person visits by the customer. During an SBD, either internal or external, we will continue to communicate with customers through any of these methods that are available and reliable, and in addition, as communications permit, we will inform our customers when communications become available to tell them what

alternatives they have to send their orders to us. Customers will be informed of alternatives by email.

2. Order Taking

Currently, our firm receives orders from customers via telephone, email, and in-person visits by the customer. During an SBD, either internal or external, we will continue to take orders through any of these methods that are available and reliable, and in addition, as communications permit, we will inform our customers when communications become available to tell them what alternatives they have to send their orders to us. Customers will be informed of alternatives by email. If necessary, we will advise our customers to place orders directly with our clearing firm at (800) 435-4000, or (877) 519-1403, or schwab.com.

3. Order Entry

Currently, our firm enters orders by recording electronically and sending them to our clearing firm electronically. In the event of an internal SBD, we will enter and send records to our clearing firm by the fastest alternative means available, which include telephone. In the event of an external SBD, we will maintain the order in electronic or paper format and deliver the order to the clearing firm by the fastest means available when it resumes operations. In addition, during an internal SBD, we may need to refer our customers to deal directly with our clearing firm for order entry.

4. Maintenance of Customer Accounts

In addition to those services listed above in this section, we also maintain customer accounts. In the event of an internal SBD, we would provide these services as per usual via back-up records at a remote alternative location. In the event of an external SBD, we would also provide these services as per usual via back-up records at a remote alternative location.

B. Mission Critical Systems Provided by Our Clearing Firm

Our firm relies, by contract, on our clearing firm to provide execution, comparison, allocation, clearance and settlement of securities transactions, access to customer accounts, and the delivery of funds and securities.

1. Order Execution, Comparison, Allocation, Clearance, and Settlement

Our clearing firm currently executes orders through electronic and computer-based systems. In the event of an internal SBD with our clearing firm, Charles Schwab & Co., they specify they are committed to providing our clients with secure and reliable access to their accounts. Charles Schwab has a Business Continuity Plan that is intended to permit them to maintain business operations such as processing client orders and transactions, providing access to cash and securities, and providing access to information about balances and transactions in client accounts. Charles Schwab specifies that disruption of service at any of their service centers will result in calls, orders and electronic communications being re-routed to an alternative service center located in a different region of the country with a separate power grid and transportation system. An SBD in Charles Schwab's primary data center will result in a transition to systems at an alternate data center. Their data centers are each supported by backup power generators and are located in different regions of the country with different power grids and transportation networks. Charles Schwab's data centers and service centers are

located in separate and distinct regions from each other. In the event of an external SBD, Charles Schwab & Co specifies that customers may be able to access schwab.com to obtain information about the extent of the disruption and the state of Charles Schwab & Co.'s operations. Charles Schwab & Co. also anticipates that customers would continue to be able to contact them telephonically at (800) 435-4000 or (877) 519-1403.

2. Access to Customer Accounts and Delivery of Funds and Securities

Our clearing firm currently utilizes electronic and computer-based systems to provide clients with access to their accounts and for delivery of customer funds and securities. Charles Schwab has a Business Continuity Plan that is intended to permit them to maintain business operations such as processing client orders and transactions, providing access to cash and securities, and providing access to information about balances and transactions in client accounts. In the event of an internal SBD with our clearing firm, Charles Schwab & Co., they specify that disruption of service at any of their service centers will result in calls, orders and electronic communications being re-routed to an alternative service center located in a different region of the country with a separate power grid and transportation system. An SBD in Charles Schwab's primary data center will result in a transition to systems at an alternate data center. Their data centers are each supported by backup power generators and are located in different regions of the country with different power grids and transportation networks. Charles Schwab's data centers and service centers are located in separate and distinct regions from each other. In the event of an external SBD, Charles Schwab & Co our clients may be able to access schwab.com to obtain information about the extent of the disruption and the state of Charles Schwab & Co.'s operations. Charles Schwab & Co. also anticipates that customers would continue to be able to contact them telephonically at (800) 435-4000 or (877) 519-1403.

X. Alternate Communications Between the Firm and Customers, Employees, and Regulators

A. Customers

We now communicate with our customers using telephone, email, our website, and in-person visits at our firm or another location. 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

Our firm currently has a single employee, Vince DeCrow. Should we have additional employees in the future, we will 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. We will also employ a call tree so that senior management can reach all

employees quickly during an SBD. The call tree will include all staff home and office phone numbers.

The person to invoke use of the call tree is: Vince DeCrow

C. Regulators

We are currently members of the FINRA self-regulatory organization (SRO) and are also regulated by: FINRA and the State of Illinois Securities Regulator. We communicate with our regulators using telephone, email, U.S. mail, 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.

XI. Critical Business Constituents, Banks, and Counter-Parties

A. Business constituents

We have contacted our critical business constituents (businesses with which we have an ongoing commercial relationship in support of our operating activities, such as vendors providing us critical services), and determined the extent to which we can continue our business relationship with them in light of the internal or external SBD. We will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services when we need them because of a SBD to them or our firm.

B. Banks

We have contacted our banks and lenders to determine if they can continue to provide the financing that we will need in light of the internal or external SBD. The bank maintaining our operating account is: JPMorgan Chase Bank, N.A, 35 W Wacker Dr, Chicago, IL 60601, (312) 732-1000, and Casandra Henderson. If our bank is unable to provide the financing, we will seek alternative financing immediately from Wells Fargo Bank, 2289 Howard St, Evanston, IL 60202, (847) 492-0837.

C. Counter-Parties

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

XII. Regulatory Reporting

Our firm is subject to regulation by: FINRA and the State of Illinois Securities Regulator. We now file reports with our regulators electronically using email and the Internet. In the event of an SBD, we will check with the SEC, FINRA 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 communication means available to us.

FINRA
1735 K Street, NW
Washington DC, 20006

(301) 590-6500

Illinois Secretary of State Securities Department
421 E. Capitol Ave., 2nd Floor
Springfield, IL 62701
(217) 782-2256

XIII. Disclosure of Business Continuity Plan

Our written BCP disclosure statement that we provide customers at account opening is the last page of this document. We also email the disclosure statement to our customers upon request.

XIV. Updates and Annual Review

Our firm will update this plan whenever we have a material change to our operations, structure, business or location or to those of our clearing firm. In addition, our firm will review this BCP annually, in the third calendar quarter of each year, to modify it for any changes in our operations, structure, business or location or those of our clearing firm.

XV. Senior Manager Approval

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

Signed: _____

Name: Vincent DeCrow

Title: Principal and Chief Compliance Officer

Date: 01/07/2025

RISE Investment Management's Business Continuity Planning

RISE Investment Management, LLC has developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

Contacting Us – If there is a significant business disruption and you cannot contact us as you usually do at (440) 655-8807 or vince@riseinvestmentsusa.com, you should call our alternative number (708) 860-4112 or go to our website at riseinvestmentsusa.com. If you cannot access us through either of those means, you should contact our clearing firm, Charles Schwab & Co. at (800) 435-4000, (877) 519-1403, or schwab.com for instructions on how it may provide you with prompt access to funds and securities, order entries, or other trade-related cash and security transfer transactions in the event of a significant business disruption.

Our Business Continuity Plan – We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data backup and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

Our clearing firm, Charles Schwab & Co., backs up our important records in a geographically separate area. While every emergency poses unique problems based on external factors, such as time of day and the severity of the disruption, we have been advised by our clearing firm that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions. Your orders and requests for funds and securities could be delayed during this period.

Varying Disruptions – Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, 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. In a disruption to only our firm or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business within one calendar day. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area and recover and resume business within once calendar week. In either situation, we plan to continue in business, transfer operations to our clearing firm if necessary, and notify you through our website, riseinvestmentsusa.com, or our customer emergency number, (708) 860-4112, how to contact us. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer's prompt access to their funds and securities.

For more information – If you have questions about our business continuity planning, you can contact us at (440) 655-8807 or vince@riseinvestmentsusa.com.