

Winebrenner Capital Management LLC's  
Business Continuity Planning Disclosure Statement

Winebrenner Capital Management, LLC (WCM) has developed a Business Continuity Plan (BCP) describing how WCM will respond to events that significantly disrupt WCM's business. Since the timing and impact of disasters and disruptions are unpredictable, WCM will have to be flexible in responding to actual events as they occur. With that in mind, WCM is providing you with this information on our BCP.

**Contacting Us** – If after a significant business disruption you cannot contact WCM as you usually do at (502) 671-0015, or [earl@wcmria.com](mailto:earl@wcmria.com), you should go to WCM's website at [www.wcmria.com](http://www.wcmria.com), Facebook page at <https://www.facebook.com/Winebrenner-Capital-Management-431825250294604/>, Twitter page at <https://twitter.com/WinebrennerCap>, or LinkedIn page at <https://www.linkedin.com/in/winebrenner-capital-management-9858a992>. If you cannot access WCM through either of those means, you should contact WCM's custodians, SA Stone Wealth Management at (800) 292-2411, TD Ameritrade at (800) 431-3500, or Charles Schwab & Co, Inc. at (877) 774-3892, for instructions on how you may have prompt access to your funds and securities or enter orders and process other trade-related transfer transactions.

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

WCM's BCP 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 WCM's customers prompt access to their funds and securities if WCM is unable to continue business.

WCM's custodians, back up WCM's important records in a geographically separate area. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, WCM has been advised by WCM's custodians that their objective is to restore their own operations and be able to complete existing transactions and accept new transactions and payments within a timely manner. 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 effecting only WCM, the single building housing WCM, the business district where WCM is located, the city where WCM is 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 WCM or the building housing WCM, WCM will transfer operations to a local site when needed and recover and resume business as soon as possible. In a disruption affecting WCM's business district, city, or region, WCM will transfer operations to a site outside of the affected area and recover and resume business as soon as possible. In either situation, WCM plans to continue business, transfer operations to WCM's custodian if necessary, and notify you through WCM's website or social media pages indicated above. If the significant business disruption is so severe that it prevents WCM from remaining in business, WCM will assure its customers prompt access to their funds and securities.

**For more information** – If you have questions about WCM's BCP, you can contact WCM at (502) 671-0015.