

Winebrenner Capital Management LLC **Business Continuation Plan Summary**

Winebrenner Capital Management, LLC is committed to providing timely service to the Company's clients. WCM recognizes the importance of preparing for various disaster scenarios that could hamper the Company's ability to provide investment advisory services. WCM has taken steps to provide for business contingency and continuity planning under a variety of potential scenarios. We continue to evaluate its operations and take the necessary actions to ensure the proper resources are available to provide for the recovery and timely resumption of critical business operations to internal business units, third-party business partners, and clients. Since the timing and impact of disasters and disruptions is unpredictable, WCM is providing you with this information on its business continuity plan.

Contacting Us – If after a significant business disruption you cannot contact us as you usually do at (502) 671-0015 or clients@wcmria.com, you should go to our website at www.wcmria.com. If you cannot access us through either of those means, you should contact our custodians for instructions on how you may have prompt access to your funds and securities, enter orders and process other trade-related, cash and security transfer transactions. Our custodians are Charles Schwab & Co., Inc. at (877) 774-3892, StoneX Wealth Management at (800) 292-2411, and Nationwide at (866) 667-0564.

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 clients to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as reasonable, given the scope and severity of the significant business disruption. Our business continuity plan addresses: data backup and recovery; mission critical systems; financial and operational assessments; alternative communications with clients, employees, and regulators; alternate physical location of employees; critical providers, custodians, banks and counterparties; regulatory reporting; and alternative means to providing clients access to their accounts and funds, if we are unable to provide its normal services.

Our custodians back up 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, we have been advised by our custodians that the objective is to restore custodial 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 a business disruption or disaster.

Varying Disruptions – Significant business disruptions can vary in their scope. For example, only our primary office location could be impacted, the entire business district where our primary office is located, the city where we are located, or the whole region as in the case of a pandemic. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our primary office location, we will transfer operations to a local site or remotely, when needed, and recover and resume business as soon as possible. In a disruption affecting a business district, city, or region, we will transfer our operations to a site outside of the affected area or remotely and recover and resume business as soon as possible. In either situation, we plan to continue in business, transfer operations to approved custodians, if necessary, and notify you through our website (www.wcmria.com) or our social media pages how to contact us. You can visit our 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/company/winebrenner-capital-management-llc>. If the significant business disruption is so severe that it prevents us from remaining in business, we will work with its approved custodians to provide clients with access to their accounts and funds.

For more information – If you have questions about WCM's business continuity planning, you may contact WCM at (502) 671-0015.

