

Business Continuity Plan Summary Disclosure Statement

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Octo Capital, LLC

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If you have any questions about the contents of this Business Continuity Plan Summary Disclosure Statement, please contact us at (248) 731-7729 or by email at **dshub@octo-capital.com**. The information in this document has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Octo Capital is a Registered Investment Adviser. Registration as an investment adviser does not imply a certain level of skill or training. Additional information about Octo Capital is also available on the SEC's website at www.adviserinfo.sec.gov.

Business Continuity Plan Disclosure Statement

Octo Capital, LLC (or the “Firm”) has adopted a Business Continuity Plan (“BCP”) pursuant to the Investment Advisers Act of 1940, as amended (the “Advisers Act”) and the rules and guidance (the “Rules”) of the United States Securities and Exchange Commission (“SEC”) and/or the laws of the states where the Octo Capital, LLC is registered as a Registered Investment Adviser. The purpose of the BCP is to define the strategies and plans that the Firm will use during a significant business disruption (“SBD”). The BCP is prepared to address both internal SBDs, such as a fire in the Firm’s building, and external SBDs, such as a natural disaster, terrorist attack, or citywide power disruption.

Our Business Continuity Plan

In the event of an SBD, Octo Capital, LLC will safeguard employee lives and the Firm’s property. Octo Capital, LLC will work to re-establish the systems necessary to recover and resume operations quickly, protect the Firm’s books and records, and allow Octo Capital’s customers to transact business to the extent reasonable and practical under the circumstances. Octo Capital’s BCP addresses alternate office locations, customer access to funds and securities, financial and operational assessments, data backup and recovery, critical systems, and alternative communications with customers, employees, regulators, and critical business constituents.

Contacting Advisor and Accessing Funds and Securities

If you are not able to contact Octo Capital through the Firm’s regular telephone number at 248-731-7729, please contact us via email at dshub@octo-capital.com. For questions relating directly to accessing funds and securities in your account, please contact Schwab Advisor Services, a division of Charles Schwab & Co., Inc., at 800-515-2157. Website: schwaballiance.com. Address: 1945 Northwestern Drive, El Paso, TX, 79912

Varying Disruptions

SBDs can vary in their scope, from only our Firm to a single building housing our Firm, the business district where Octo Capital 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 Octo Capital’s operations, the Firm intends to transfer its operations to a local site when needed and expects to recover and resume business within a short time period. In a disruption affecting Octo Capital’s business district, city, or region, the Firm intends to transfer our operations to a site outside the affected area and recover and resume business within a short time period. In either situation, the Firm plans to continue in business. However, Octo Capital’s ability to fully function depends on outside sources that may be outside of the Firm’s control, including the availability of electricity, telephones, Internet, transportation, and the functioning of institutions and markets worldwide. Nothing in Octo Capital’s BCP or this disclosure statement is intended to provide a guarantee or warranty regarding the actions or performance of Octo Capital, LLC.

Additional Information

If you have questions about Octo Capital’s business continuity planning, please contact us at 248-731-7729.