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**Cover Page**

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**Business Continuity Plan for:**

**VII Peaks Capital, LLC**

**4 Orinda Way, Suite 125-A**

**Orinda, CA 94563**

**415-983-0127**

**[info@viipeakscapital.com](mailto:info@viipeakscapital.com)**

**Updated - August 2017**

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## Introduction

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### **Summary**

The Investment Advisers Act of 1940, as amended (the "Advisers Act"), imposes a fiduciary duty upon registered investment advisers to act in the best interest of their clients. As part of that fiduciary duty, it is critical for VII Peaks Capital, LLC (the "Firm") to be able to provide continuous, uninterrupted services to our clients. Any inability to provide services for an extended period of time could have a severe economic impact on us and our clients.

### **Objectives**

The primary objective of this Business Continuity Plan (the "Plan") is, in the event of a business interruption, to: (a) minimize the impact of the interruption; (b) sustain a minimally acceptable level of service for an extended period of time; and (c) return to normal business activities as quickly as possible (the implementation of the foregoing, referred to as a "Disaster Recovery Operation"). Should the business interruption be severe, the restoration period before we are able to return to normal operations could be extensive.

It is very important that each employee knows what their responsibilities are if we should suffer a business interruption. Therefore, all employees are required to read this Plan and be familiar with their responsibilities and assignments. To support this Plan, we will maintain written and well-documented operational policies and procedures that define acceptable processes, such as alternative facilities, backup of data files, server configurations, and workstation configurations. We will also maintain current inventory lists, software license information or contact lists, as supporting documentation to this Plan.

This Plan will address our response in the event of any loss of our:

- Physical Facilities;
- Operational Capabilities; and/or
- Key Personnel.

### **Responsibilities**

The Emergency Response Team (the "Team") is collectively responsible for serving as a primary resource in furtherance of this Plan. In the event of a Disaster Recovery Operation, or at such other times as the Team Leader may request from time-to-time, Team members may be required to carry out the responsibilities delegated by the Team Leader. Each member of the Team and any standing responsibilities are listed on Exhibit A of this Plan.

The Emergency Response Team Leader is responsible for: (a) updating all areas of this Plan, as needed (except for contact information); (b) (i) specifically designating certain information in the Plan as "restricted" and subject to limited

distribution due to its sensitive nature, (ii) identifying the Team Members or others that may need access to all or part of such information, and (iii) disclosing the location of or means by which such information can be accessed; (c) overseeing the routine responsibilities of the Team Administrator; and (d) coordinating a Disaster Recovery Operation, if necessary. The Team Leader is identified on Exhibit A and the list of "restricted information" and persons authorized to receive such information is set forth on Exhibit I.

The Emergency Response Team Administrator is responsible for: (a) updating this Plan as directed by the Team Leader; (b) maintaining the contact information set forth on the attached exhibits; (c) disseminating the Plan to all employees, as it is updated and collecting from each employee an appropriate acknowledgement; and (d) distributing an updated employee directory to each member of the Team so that employees may be contacted during the implementation of any part of this Plan. The Team Administrator is set forth on Exhibit A.

Other Team members are respectively responsible for specific areas of this Plan as identified herein. Team members are additionally responsible for carrying out other aspects of this Plan as directed by the Team Leader.

Each employee shall maintain a copy of this Plan in their office and at their home. Additionally, employees may be called upon to serve on the Team or to take action under this Plan.

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## Physical Facilities

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In the event that we are prevented from accessing our offices or using vital equipment we will take steps to ensure that the performance of our services remains, to the best of our abilities, uninterrupted. We may be prevented from accessing our offices or using vital equipment (collectively, "physical facilities") due to events such as fire, explosion, evacuation, flood, inclement weather, full or partial loss of power, vandalism, theft, or sabotage, among others.

### **Notification of Disaster**

The first employee to determine that there is an apparent loss of our physical facilities should attempt to perform an immediate assessment and, to the extent necessary, contact emergency services. Immediately thereafter, that employee should call a member of the Team in the order in which they are listed on Exhibit A to this Plan. The employee shall continue to attempt to contact a member of the Team until they speak with someone able to give the staff instructions consistent with this Plan.

The first Team member advised of a disaster shall be appointed as the Team Leader on an interim basis until such time as they are relieved of their duties by the actual Team Leader. The acting Team Leader shall contact all other members of the Team to notify them that a loss has occurred and that a Disaster Recovery Operation is underway.

If, for any reason, an employee is unable to reach at least one member of the Team, they should contact the Auxiliary Disaster Response Coordinator listed on Exhibit A. The Auxiliary Disaster Response Coordinator has agreed to serve as our contact clearinghouse in the event that we are unable to contact any member of the Team and use their best efforts in carrying out their duties to implement this Plan. The Auxiliary Disaster Response Coordinator shall then serve as the acting Team Leader until such time as another member of the Team is appointed to serve in that capacity.

### **Implementation of the Disaster Recovery Operation**

The acting Team Leader shall attempt to contact each employee to advise them that a Disaster Recovery Operation is underway. Alternatively, the acting Team Leader may delegate the responsibility to other members of the Team. Employees should be advised of a time and location to report.

If employees have not been contacted with instructions, they should attempt to contact a member of the Team as set forth on Exhibit A. If no member of the Team is available, employees should contact the Auxiliary Coordinator. Unless directed otherwise, employees should report to the office where they regularly work. If reporting to your regular office is impractical or dangerous under the

circumstances, employees should immediately report to our Primary Contingent Office Facility listed on Exhibit B for further instructions.

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## Operational Capabilities

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We are committed to protecting the firm against any loss of operational capabilities. We are primarily concerned about any loss of our:

1. data and information resources;
2. communications capabilities;
3. utility services;
4. ability to receive essential services provided by vendors and service providers;
5. financial resources

### **Data and Information Resources**

We will back up the computer data that we deem necessary on a regular basis to ensure availability of that data in the event of a systems failure. We will thereafter maintain backup copies of that data at an off-site location listed on Exhibit C.

We may identify certain documents that we maintain in hard copy as "mission critical" on Exhibit C. These documents shall be copied and stored in the off-site facility listed on Exhibit C. Depending upon the frequency of changes to these documents, we will take steps to ensure that off-site copies of these mission critical documents remain as up-to-date as is reasonably possible.

Once a non-routine loss of data or information resources is detected by any employee, it should be immediately reported to the Emergency Response Team Data Coordinator. If the Team Data Coordinator is unavailable, employees should report the loss or interruption to another available member of the Team who shall serve as acting Team Data Coordinator until the actual Team Data Coordinator can be apprised of the situation. The Team Data Coordinator will assess the loss of data and information resources and report their assessment to the Team Leader. Due to the immeasurable number of circumstances that must be considered in the event of a loss, the Team Leader will assess the situation, consult with appropriate personnel, and take appropriate action, including making a determination to initiate a Disaster Recovery Operation. In the event that the Team Leader declares a Disaster Recovery Operation is underway, the Team Data Coordinator will direct the data restoration procedures set forth on Exhibit C at the location determined by the Team Leader.

Our computer resources are protected by a unique password furnished to each employee. Employees are prohibited from sharing their password with anyone, including other employees. A description of the measures we undertake to protect our data and information resources are set forth on Exhibit C.

Our offices remain open during the business hours disclosed on our Form ADV. During that time, all data and information is monitored by employees and accessed only on a need-to-know basis. Outside of business hours, we lock all doors and windows to our offices to ensure that only authorized personnel have access after-hours. Our privacy policies and procedures describe additional steps that we have taken to safeguard sensitive client information.

We will immediately request the return of all access devices (i.e. keys, cards, mobile communications devices, etc.) from employees who have been terminated or otherwise separated from the firm. To the extent that we are unsuccessful at securing the return of these devices, we will take reasonable steps to change the device which may include locks, passwords or other forms of authentication.

### **Communications Capabilities**

Communicating by telephone (including our facsimile) is critical to our ongoing business operations. Any failure of our telephones presents a business interruption that must be dealt with immediately. Exhibit D of this Plan sets forth both short-term and intermediate-term contingency plans in the event we are unable to communicate by our primary telephone facilities. The vendor(s) required for us to effectively use our telephones along with our contingency plans are also set forth on Exhibit D.

We use the internet and e-mail as an integral part of our operations. However, many of the functions ordinarily performed over the internet and by e-mail can be temporarily performed by telephone, if available. Exhibit D of this Plan sets forth both short-term and intermediate-term contingency plans in the event we are unable to use internet and/or e-mail via our standard means. The vendor(s) required for us to use the internet or e-mail along with our contingency plans are set forth on Exhibit D.

### **Utility Services**

We rely upon several utilities to deliver resources essential to our successful operation. Any failure of our utilities presents a business interruption that must be dealt with immediately. We have identified our utility providers on Exhibit E to this Plan. Except for routine service interruptions, any failure by of our essential service providers should be reported to the Team Leader. There are an immeasurable number of circumstances that should be considered in the event of an interruption such as its geographic scope, its estimated duration, and our ability to conduct operations despite the interruption. Therefore, the Team Leader will assess the situation, consult with appropriate personnel, and take action as appropriate under the circumstances.

**Other Essential Service Providers**

There are several other service providers whom we deem essential to the successful operation of this firm. We have identified these service providers on Exhibit F to this Plan. Except for routine service interruptions, any failure by of our essential service providers should be reported to the Team Leader. Due to the immeasurable amount of circumstances that must be considered in the event of an interruption, the Team Leader will assess the situation, consult with appropriate personnel, and take action as appropriate under the circumstances.

Certain essential service providers must be contacted immediately in the event of a Disaster Recovery Operation. Once a Disaster Recovery Operation is underway, the Emergency Response Team Service Provider Liaison will ensure that each of the firm's essential service providers that may be affected by a loss or interruption, are notified. Essential service providers will be provided with sufficient information to continue to conduct business with us on an interim basis until we are able to resume normal business operations.

**Financial Resources**

We maintain a close watch on all of our financial accounts by monitoring them on an ongoing basis. On at least a monthly basis, we reconcile each account to ensure that there are no financial resources which are unaccounted for. We have identified each of our financial accounts on Exhibit G to this Plan.

We shall maintain insurance coverage as we deem necessary to protect the firm under certain circumstances. To the extent that any portion of our business is covered by insurance, it shall be referenced in Exhibit G.

We have appointed a Financial Coordinator to the Emergency Response Team as set forth on Exhibit A. The Team Financial Coordinator shall be vested with the authority to conduct day-to-day financial affairs of the firm including check-writing authority. In the event of a Disaster Recovery Operation, the Team Financial Coordinator shall coordinate the use of cash reserves and available lines of credit to fund the Disaster Recovery Operation. Additionally, the Team Financial Coordinator shall facilitate notification and use of any protections provided by insurance. The financial resources available to the Team Financial Coordinator are referenced in Exhibit G. The Team Financial Coordinator shall not, under any circumstances or for any period of time, use any client funds or securities for our operations.

**Key Personnel**

While every one of our employees is important to us, we recognize that certain individuals are "key personnel" for purposes of the ongoing business interests of this firm. In the event of an unforeseen loss of any of our key personnel, we must ensure that the objectives of this Plan, and therefore, our fiduciary duty to our

clients, are met. Specifically, we must: (a) minimize the impact of the interruption; (b) sustain a minimally acceptable level of service for an extended period of time; and (c) return to normal business activities as quickly as possible.

Our key personnel have been identified on Exhibit H to this Plan. Each of our key personnel has been assigned an interim successor to cover their position on an immediate and temporary basis in the event of an unexpected loss. Additionally, we have taken steps independent of this Plan to ensure our long-term continuity after the loss of one of our key personnel. These additional steps have been documented in Exhibit H to this Plan.

To make certain that all employees have accurate and relevant information regarding the loss and succession of any key personnel, the Team Leader shall be responsible for informing our employees of any situation if we deem it necessary. Employees will generally be advised of the personnel loss and the interim successor that will be covering their responsibilities on an immediate and temporary basis.

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## General Matters

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### **Distribution**

This Plan and each revision will be distributed to all employees. Upon receipt of a revised Plan, employees should destroy any prior versions in their possession. Initially and annually, all employees will acknowledge their receipt and understanding of the Plan and agree to abide by the Plan and participate in its facilitation to the extent requested by the Emergency Response Team Leader. The initial acknowledgement can be found on Exhibit J and the annual acknowledgement on Exhibit K. The Emergency Response Team Administrator will keep a record of all employee acknowledgements.

### **Training**

Each employee will be provided with adequate training about this Plan. Training will be provided initially and, thereafter, at least annually in a method directed by the Team.

### **External Communications**

Once a Disaster Recovery Operation is underway, the Emergency Response Team Client Liaison will ensure that each of the firm's clients that may be affected by a loss or interruption are contacted. Clients will be provided with sufficient information to allay their concerns, and to the extent necessary, continue to conduct business with us on an interim basis until we are able to resume normal business operations.

To the extent necessary, the Emergency Response Team Regulatory Liaison shall contact each of the regulators (including self-regulatory organizations) with which we maintain registrations, licenses notice filings, and/or membership to advise them of the Disaster Recovery Operation. Additionally, where necessary, the Team Regulatory Liaison should immediately arrange to amend our Form ADV and any other documents that need to reflect these material changes, and file any such documents with any appropriate regulators.

### **Authorization**

Members of the Emergency Response Team and their designees shall be granted the appropriate authority to direct and instruct the vendors and service providers as necessary to ensure the continued use or restoration of our operational capabilities. Such authority may be in the form of a limited power-of-attorney or other written authorization.

### **Expenses**

We shall reimburse our employees for all expenses incurred when taking any reasonable actions in connection with this Plan. Employees are required to

maintain records of each expense along with the business justification and submit them to us in a timely manner once normal operations have resumed.

### **Third Party Delegation**

We may delegate to a non-affiliated third party vendor, the responsibility to implement certain portions of this Plan. We will ensure that any third party's responsibilities will be consistent with this Plan, and/or any other applicable policies and procedures. In all cases, however, the ultimate responsibility for implementation of this Plan lies with the Emergency Response Team.

### **Recordkeeping**

We will maintain the following documents under this Plan along with our books and records:

1. A copy of each version of this Plan, as adopted;
2. A copy of any supporting documents required for implementation of this Plan including, but not limited to, all exhibits as amended or executed; and
3. A copy of any documentation created as a result of the implementation of any part of this Plan (i.e. Disaster Recovery Operation).

All records must be retained for at least five years from the end of the last calendar year when last used, the first two of which must be on-site at an office identified on our Form ADV.

### **Plan Evaluation and Periodic Testing**

This Plan shall be maintained by the Team Leader in conjunction with the Team Administrator. This Plan is intended to serve as a living document and should be reviewed periodically and revised as necessary to address changes in our business operations or circumstances otherwise material to our business. Such review should be performed as necessary but in no event less than annually. At least annually, the Emergency Response Team shall meet and review this Plan to ensure that it continues to meet its objectives. The Team Administrator shall maintain minutes to memorialize the meetings of the Team, including the annual meetings in a form similar to that attached as Exhibit L.

On a periodic basis, but at least prior to each annual meeting of the Team, the Team Leader must identify areas of the Plan that pose potential vulnerabilities to the firm and conduct testing in these selected areas. Subsequent to the testing period, the Team Leader shall prepare a report describing the areas that were tested and the results of the tests. This report shall be presented to the Team on or before each annual meeting of the Team.

During its annual meeting, the Team shall make recommendations to the Team Leader on proposed updates and revisions to the Plan. The Team Leader shall

perform a formal review of the Plan and integrate any necessary revisions and updates based upon the prior testing, the recommendations of the Team and the formal review. From time-to-time, the Team Leader may make other changes to the Plan where appropriate.

**Disclosures**

A general description of the protections contemplated by this Plan may be made available to clients and other interested parties solely at our discretion. Due to the sensitive nature of specific information contained in this Plan, however, it shall be disclosed as we deem necessary to our employees, attorneys, regulators, and such other parties who are subject to a duty of confidentiality, whether by contract, regulation, or professional code of conduct.

**Exceptions**

We may choose to deviate from the actions prescribed in this Plan in certain situations such as: (1) where such actions would be impractical given unforeseen circumstances; (2) where we deem that another action would be more favorable to the best interests of our clients; (3) where the prescribed action would place the personal safety of our employees at risk; (4) where the prescribed action would cause us to violate permanent or temporary laws, rules, regulations, or orders that apply to us; and/or (5) any situation where, in our sole judgment, the prescribed action would not be in our clients' best interests. In situations where we deviate from the actions prescribed in this Plan, the Team Administrator will document the deviation and include the reason. This documentation will be presented to the Team at their next meeting so they may determine if the deviation was a limited circumstance or if this Plan should be revised to accommodate the deviation in the future.

**Inquiries**

Any questions regarding this Plan should be directed to the Team Leader, or any individual they may designate to respond to such inquiries.

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**Exhibit A: Emergency Response Team Directory**


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<b><u>Position</u></b>	<b><u>Name</u></b>	<b><u>Home Address</u></b>	<b><u>Telephones</u></b>
Team Leader	Rudy Galera	204 Dorchester Lane, Alamo, CA 94507	925-708-0275 (Mobile) 925-933-3262 (Landline)
Regulatory Liaison, Team Administrator	Michelle MacDonald	61 Pixley St., San Francisco, CA 94123	415-298-7897 (Mobile) 415-563-5703 (Landline)
Client Liaison	Stephen Fitzgerald Shea	137 Camino Posada, Walnut Creek, CA 94595	925-286-3954
Service Provider Liaison	Rudy Galera	204 Dorchester Lane, Alamo, CA 94507	925-708-0275 (Mobile) 925-933-3262 (Landline)
Data Coordinator	Rudy Galera	204 Dorchester Lane, Alamo, CA 94507	925-708-0275 (Mobile) 925-933-3262 (Landline)
Financial Coordinator Auxiliary (Service and Data)	Gurpreet Singh Chandhoke	128 Angela Ave, Alamo, CA 94507	415-699-3144
Auxiliary Coordinator (Financial)	Stephen Fitzgerald Shea	137 Camino Posada, Walnut Creek, CA 94595	925-286-3954
Team Member	Marit Winborne	3160 Oak Rd Apt 316 Walnut Creek, CA 94597	808-895-1450 (Mobile)
Team Member	Alex Drake	163 Virginia Hills Dr Apt #2 Martinez, CA 94553	707-508-7739 (Mobile)

Team Member	Nicola Pavlov	2028 Highland Dr Concord, CA 94520	925-300-8694 (Mobile)
Team Member	Garima Kakani	9560 Oviedo St San Diego, CA 92129	480-286-0552 (Mobile)

**Exhibit B: Contingent Office Facilities Directory**

<u>Priority</u>	<u>Description</u>	<u>Address</u>	<u>Telephone</u>
Primary	Residence, Stephen Fitzgerald Shea	137 Camino Posada, Walnut Creek, CA 94595	925-286-3954
Directions: San Francisco/Oakland Bay Bridge to 580E to 24E to Mt. Diablo Blvd. to Boulevard Way to Flora Ave. to Warren Rd. to Camino Posada			
Secondary	Residence, Rudy Galera	204 Dorchester Lane, Alamo, CA 94507	925-708-0275 (Mobile) 925-933-3262 (Landline)
Directions: San Francisco/Oakland Bay Bridge to 580E to 24E to 680 South to Livorna Rd (East) to Stonegate Development to Dorchester Lane.			

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## Exhibit C: Safeguarding Data and Resources

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**We have implemented the following procedures to safeguard our data:**

Individuals responsible for regular data backup procedures: All employees are required to save business critical documents to our cloud file system, ShareFile.

Method of electronic data backup (i.e. tape, optical disc, off-site server, etc.): ShareFile is a third-party cloud service that allows all employees to back-up documents etc. to a secure cloud based file.

Frequency and scope (e.g. full, incremental, etc.) of backup procedure: Documents are uploaded to ShareFile as needed or when new document(s) is created.

Mission critical hard copy documents and the frequency and location of off-site backup: Documents are uploaded to ShareFile as needed or when new document(s) is created.

Procedure for initiating data restoration (including electronic and hard copy):  
Electronic: Documents in ShareFile are accessible 24/7 to all authorized employees.

Acceptable format of passwords and the frequency in which passwords are required to be changed: Passwords are required to be change every 3 months.

Description of the overall file structure of electronic data: Files are segregated by fund, entity or department.

If remote access of data is permissible, description of the capabilities and limitations on access and use: Remote access to physical desktop PCs is permitted; however, it's not necessary since all business documents reside in our ShareFile Cloud service.

Mission-critical hard copy documents and the method and frequency for maintaining off-site copies: Documents are uploaded to ShareFile as needed or when new document(s) is created.

### Exhibit D: Communications Directory and Contingency Plan

Service	Company	Address	Telephone
Alarm Systems	Bay Alarm	www.bayalarm.com 60 Berry Drive Pacheco, CA 94553	800-610-1000 Service: 800-470-1000
Consultant/Technician	Alpha Omega Networks: Chris Wong	7091 N. Mariposa Ct. Dublin, CA 94568	(925) 413-3821 cwong@ao-networks.net
Physical Office	Pine Grove, LLC Skepner Dev. Co.	Richard Segol 4 Orinda Way, Ste 180-C Orinda, CA 94563	925-969-1936, ext 203 <a href="mailto:richard@skepdev.com">richard@skepdev.com</a>
Phone & Long Distance Service	Fastmetrics	1 Hallidie Plaza, #838 San Francisco, CA 94102	(888) 944-0447
Data/Internet	Fastmetrics	1 Hallidie Plaza, #838 San Francisco, CA 94102 Main: 415-778-5100	415-778-5103 <a href="mailto:support@fastmetrics.com">support@fastmetrics.com</a> After hours: 415-778-5102

#### Contingency Plan

We have implemented the following short-term and intermediate-term contingency plans in the event we are unable to communicate by our primary telephone facilities:

**IF** our telephones are not functioning for **less than one (1) business day:**  
**THEN** employees will be encouraged to use their cellular phones for outgoing calls.

**IF** our telephones are not functioning for **more than one (1) business day:**  
**THEN** the Emergency Response Team Leader shall assess the situation and determine an appropriate response including instructing our local telephone provider to forward all incoming calls to a designated alternate location such as one or more of our contingent office facilities or designated employee cellular telephones.

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**Exhibit D: Internet & E-mail Service Directory**


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<b>Service</b>	<b>Company</b>	<b>Address</b>	<b>Telephone</b>
Web Site Host	Go-Daddy	14455 N. Hayden Rd., #219, Scottsdale, AZ	480-505-8800
Web Site Designer	Manny Ramirez	2165 Ponet Dr. Los Angeles, CA 90068	213-700-0227
E-mail Host	AppRiver	850-932-5338 1101 Gulf Breeze Pkwy Gulf Breeze, FL 32561	850-932-5338
Email Archive	Global Relay	866-484-6630 New York, Vancouver, Chicago	866-484-6630
Network/IT Consultant	Alpha Omega Networks: Chris Wong	7091 N. Mariposa Ct., Dublin, CA 94568	925-413-3821  cwong@ao-networks.net

### **Contingency Plan**

We have implemented the following short-term and intermediate-term contingency plans in the event we are unable to use the internet or e-mail:

**IF** our internet and /or e-mail facilities are not functioning **for 2hrs:**

**THEN** employees will use telephones as an alternative means of communication.

**IF** our internet and /or e-mail facilities are not functioning **for one (1) business day:**

**THEN** employees may work from their homes.

**IF** our internet and /or e-mail facilities are not functioning **for two (2) or more business days:**

**THEN** the Emergency Response Team Leader shall assess the situation and determine an appropriate response including the use one or more of our contingent office facilities or arranging for an alternate vendor to deliver services.

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**Exhibit E: Utility Services Directory**


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<b>Service</b>	<b>Company</b>	<b>Address</b>	<b>Telephone</b>
Electric	Pine Grove, LLC Skepner Dev. Co.	Richard Segol 4 Orinda Way, Ste 180-C Orinda, CA 94563	925-969-1936,ext 203 <a href="mailto:richard@skepdev.com">richard@skepdev.com</a>
Water	Pine Grove, LLC Skepner Dev. Co.	Richard Segol 4 Orinda Way, Ste 180-C Orinda, CA 94563	925-969-1936,ext 203 <a href="mailto:richard@skepdev.com">richard@skepdev.com</a>
Garbage	Pine Grove, LLC Skepner Dev. Co.	Richard Segol 4 Orinda Way, Ste 180-C Orinda, CA 94563	925-969-1936,ext 203 <a href="mailto:richard@skepdev.com">richard@skepdev.com</a>
Gas	Pine Grove, LLC Skepner Dev. Co.	Richard Segol 4 Orinda Way, Ste 180-C Orinda, CA 94563	925-969-1936,ext 203 <a href="mailto:richard@skepdev.com">richard@skepdev.com</a>

**Exhibit F: Other Essential Service Providers Directory**

Service	Company	Address	Telephone
Attorney (for BDC)	Investment Law Group, Bob Mottern	1230 Peachtree Street, NE Suite 2445 Atlanta,GA 30309	404-607-6933
Attorney (Interval Fund)	Winston & Strawn, LLP Jay Gould Michael Wu	101 California St San Francisco, CA	415-591-1575 415-591-6818
Attorney (general legal)	Aguilar Legal Christopher Aguilar	21 Columbus Ave, Room 225 San Francisco, CA 94111	415-439-0110
Compliance Consultants	Emily Silva Cipperman Compliance Services	480 East Swedesford Road Suite 300 Wayne, PA	610-256-1235 (mobile) 610-687-5340 (office)
Accountant	OUM-Brad Weisert	465 California St., Ste 700 San Francisco, CA 94104	415-796-6640 415-434-3744

**Exhibit G: Financial and Insurance Resources**

**Financial Service Directory**

<b>Account Type</b>	<b>Institution</b>	<b>Address</b>	<b>Telephone</b>
Trading & Custody	First Republic Bank	111 Pine Street, SF, CA 94111	Mason McCabe: 415-364-4680 Mervin Chun: 415-364-2315
Trading & Custody	Morgan Stanley	101 California St, 7th Floor, San Francisco CA 94111	Kristi Prince: 415-693-7263 Brian McAdams: 415-693-6490 Joe Huhn: 415-693-6314
Custody & Fund Administration	US Bancorp	Milwaukee, WI and Boston, MA	Alyssa Matenaer: 414-765-6286 Abby Hintz: 414-765-6345 David Slavet: 617-603-6520 Lucas Tomachek: 414-765-6272
Transfer Agent Services	Phoenix American Financial Services, Inc.	2401 Kerner Blvd San Rafael, CA 94901	Tiffany Hunter: 415-223-1716 Fax: 415-485-4553 Email: VIIPeaksServiceTeam@p hxa.com



**Exhibit H: Succession and Continuity Directives for Key Personnel**

**Short-term Succession**

Name	Position	Name of Interim Successor
Gurpreet Singh Chandhoke	Managing Partner & CIO	Stephen Fitzgerald Shea
Stephen Fitzgerald Shea	Managing Partner	Gurpreet Singh Chandhoke
Rudolph Galera	COO	Gurpreet Chandhoke

**Long-term Continuity Plans**

We have additionally implemented the following long-term plans to ensure the continuity of the firm in the event of a loss of key personnel:

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**Exhibit I: Restricted Information Log**

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<b>Document</b>	<b>Distribution Restricted To</b>
N/A	

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**Exhibit J: Employee Initial Acknowledgement  
of Receipt**

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I, \_\_\_\_\_ (name), as \_\_\_\_\_

(title), acknowledge that I have received, read, understand, and agree to abide by, the Business Continuity Plan of [Legal Adviser Name] (the "Plan"), and participate in its facilitation to the extent requested by the Emergency Response Team Leader. I have received adequate training on this Plan, however, should I have any questions regarding the Plan, including its application, I will immediately address them with a member of the Emergency Response Team.

Date: \_\_\_\_\_ By: \_\_\_\_\_

*Employee Signature*

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**Exhibit K: Employee Annual Acknowledgement**

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I, \_\_\_\_\_ (*name*), as \_\_\_\_\_

(*title*), acknowledge that I have received, read, understand, and agree to abide by, the Business Continuity Plan of [Legal Adviser Name] (the "Plan"), and participate in its facilitation to the extent requested by the Emergency Response Team Leader. I have received adequate training on this Plan, however, should I have any questions regarding the Plan, including its application, I will immediately address them with a member of the Emergency Response Team.

Date: \_\_\_\_\_ By: \_\_\_\_\_

*Employee Signature*

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**Exhibit L: Meeting Minutes of the Emergency Response Team**

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A meeting of the Emergency Response Team (the "Team") of VII Peaks Capital was held on XXXXX at the firm's principal place of business.

The following members of the Team were present:

Name: Gurpreet Chandhoke	Title: Managing Member
Name: Stephen Shea	Title: Managing Member
Name: Rudy Galera	Title: COO
Name: Michelle Kleier	Title: CFO/BDC
Name: Marit Winborne	Title: Operations Associate
Name: Alex Drake	Title: Analyst
Name: Nicola Pavlov	Title: Analyst
Name: Garima Kakani	Title: Senior Analyst
Name:	Title:

On motion duly made, seconded and carried, Emergency Response Team Leader was chosen as chairperson of the meeting and the Emergency Response Team Administrator was chosen as secretary.

**Testing**

The Team acknowledges that specific areas of the firm's Contingency Plan were tested by the Team Leader and the report(s) documenting the results of such tests are attached to these minutes.

**Meeting Summary**

Rudy Galera, Team Leader and Michelle Kleier, Team Administrator, co-chaired the meeting. All employees of the Orinda Office of VII Peaks Capital attended the meeting and all VII Peaks Employees had previously read through the BCP and provided employee annual acknowledgement's to the Team Administrator.

The purpose of the meeting was to discuss the plan and identify the most likely threat to the company. Either a fire or major earthquake, are the most likely situations where the office would be inaccessible and the Business Continuity Plan would need to be implemented. Given that our files are stored in the Cloud and our transfer agent, custodian and trading

**Resolved**, that after considering all of the objectives cited in our Business Continuity Plan (the "Plan") dated \_\_\_\_\_ (date of most recent plan adoption) and tests of the forgoing areas, the Team directs the Emergency Response Team Leader to update and/or revise the Plan to address the following areas:

	<b>Area</b>	<b>Issue(s)</b>
1.		
2.		
3.		
4.		
5.		
6.		
7.		
8.		
9.		

**Updates and Revisions**

Following the update and/or revisions to the Plan, the Team Administrator is directed to distribute updated copies of the Plan to all firm employees and collect from the employees an acknowledgement of their receipt, understanding, and agreement to abide by the Plan and participate in its facilitation to the extent requested by the Emergency Response Team Leader.

**Training**

The Team has approved and directs the Team Leader to develop and distribute a training program to all employees covering the following areas:  
There being no further or other business to come before the meeting, on motion duly made, seconded, and carried, the meeting was adjourned.

**Date:** \_\_\_\_\_ **By:** \_\_\_\_\_  
*Emergency Response Team Administrator*

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**Exhibit M: Training Agenda and Log**

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The following topics will be addressed as part of the Business Continuity Plan (the "Plan") training program:

1. An explanation of the legal and regulatory requirements for the firm to maintain a Business Continuity Plan to satisfy the firm's fiduciary obligation to its clients;
2. The importance of the Plan to the economic viability of the firm and its clients;
3. Introduction of the Emergency Response Team members and their respective roles within the Team;
4. Overview of the Plan and what it calls for in the event of a disaster or other business interruption;
5. Each employee's responsibility regarding the implementation of the Plan in the event of a disaster or other business interruption; and
6. Any other issues deemed appropriate by the Emergency Response Team.

<b>Date(s) of Training</b>	<b>Training Log Training Provided By</b>	<b>Format of Training</b>
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