PSI Capital Management
PARADIGM SHIFT INVESTING

Disaster Recovery Plan:

June 8, 2026

A. An emergency can be declared by any of the four (4) partners of PSI Capital Management (“PSICM”).
B. The CCO will be responsible for maintaining a list of employees and advisory representatives’ contact information; however, all personnel will have access to make notification easier and more efficient.
C. In the case where the main office is destroyed or no longer usable, all employees will be in contact with one another via phone to formulate a plan of action.
D. Notification of the emergency to our custodial firm, Charles Schwab & Co., Inc. will occur as soon as reasonably possible. All employees and advisory representatives are required to have the custodian’s number outside of the office. The Securities and Exchange Commission will also be notified. The partners will be responsible for contacting them.
E. If necessary, recovery of client information will occur through 12:34 MicroTechnologies, Inc., which maintains offsite backup of all PSICM systems and data. Client customer information also maintained by Charles Schwab & Co., Inc.
F. Communications with and notification to clients of the situation will occur with the use of letters, e-mails and phone calls.
G. PSICM, as a Registered Investment Advisor, is strictly advisory. Therefore, no security mission critical systems are necessary.
H. There is no impact due to business constituents, banks or counter-party impact.
I. If any office is destroyed, business will be conducted from another PSI office, or, if necessary, the personal residences of the owners until satisfactory replacement is located. Each owner lives sufficiently away from the office.
J. Cloud access is adequate for all employees to access client data for continuation conducting business remotely.
K. Phone systems have a contingency plan in place wherein employees can use a set remotely utilizing the web-based Intulse App.
L. In the case of the death or disability of one of the owners, owners will notify clients and take responsibility for deceased owner’s clients. Being a small firm, all partners are somewhat involved in all relationships.
M. This plan will be reviewed annually and approved by the owners.