

Capstone Wealth Management Group, LLC Business Continuity Plan (BCP)

Firm Policy

In the event of a Significant Business Disruption (SBD), the principals of Capstone Wealth Management Group (CWMG) will act accordingly to safeguard the lives of CWMG's employees, conduct a thorough and timely financial and operational assessment of CWMG, make all necessary arrangements to recover and resume business functions so as to provide adequate service to their clients, and protect CWMG's books and records. If the SBD does not allow CWMG to continue adequate business functions, we will assure our clients that they will have direct access to their funds and securities and all documents relating to their accounts through our broker/dealer, Shareholders Service Group (SSG) in San Diego, CA.

A. Significant Business Disruptions (SBDs)

Our BCP addresses two kinds of SBDs, internal and external. Internal refers to CWMG's ability to handle customer communications, and conduct normal business functions related to customer accounts. Instances of internal SBDs may include fire, earthquakes, or other type of natural disaster. External SBDs may prevent the operations of CWMG, our back office (Shareholders Service Group), our clearing provider (Pershing), and/or the securities markets overall. Instances of external SBDs may include a wide-spread natural disaster or regional disruption, a terrorist attack, or any act or course of event which cannot be explained. In the event of an external SBD, CWMG may rely on outside providers, such as our broker/dealer and/or clearing provider, for appropriate direction and response.

B. Approval and Execution Authority

Mike Conrads, Principal, is responsible for the plan's approval and the required annual review.

C. Plan Location and Access

CWMG and SSG and Pershing maintain up-to-date copies of their BCP's and conduct annual reviews. A copy of SSG's & CWMG's BCP has been delivered to the Financial Industry Regulatory Authority (FINRA) located in Washington D.C. An electronic copy of the summary is located on their websites, www.ssginstitutional.com and www.capstonewmg.com and www.pershing.com

Business Description

Capstone Wealth Management Group, LLC (CWMG) an Oregon Corporation operates as a Registered Investment Advisor with Shareholders Service Group as its Broker/Dealer. CWMG provides investment advisory services to its clients regarding asset allocation &

management, the selection of investments, retirement planning, financial planning, estate planning, life/wealth strategic planning, and client service relating to their brokerage accounts custodied at Pershing, LLC.

Shareholders Service Group, Inc (SSG) is a California Corporation which operates a broker/dealer serving independent financial advisors. It is a member of the Financial Industry Regulatory Authority (FINRA), Municipal Securities Rulemaking Board (MSRB) and the Securities Investors Protection Corporation (SIPC). Shareholders Service Group offers securities brokerage, asset custody, cash management products, and a back-office services platform dedicated solely to serve Independent Financial Advisors and their clients. It has developed online systems, specialized services, and marketing expertise to enable fee-based Independent Financial Advisors (IFAs) to manage their clients' assets in a low-cost brokerage platform.

Office Locations

Capstone Wealth Management Group is located at 404 SW Columbia St. STE 230 Bend, OR 97702. The telephone numbers are (541) 330-0266, (800) 267-5022, and the fax number is (541) 330-0254. Employees reach this location via automobile, bicycle, foot, or other methods of transportation. We engage in full business services from this location, including new account data gathering, order taking, account deposits, investment advisory services and client support. All account applications, account deposits, trade orders, and service requests with regards to client's accounts, which are custodied at Pershing, LLC, are forwarded to our broker/dealer, Shareholders Service Group or to Pershing IMS via AssetMark.

Alternative Physical Location(s) of Employees

In the event of a SBD, CWMG will move its personnel from the affected location to a location(s) not affected by the SBD. The main alternate location(s) will be the individual home offices of the principals. Principals and employees are able to log on to our clearing firm's system (NetExchange Pro) using the internet to access client data. Note: unsecure wireless connections will not be used in order to safeguard client data from unauthorized access.

Customers' Access to Funds and Securities

All customer funds and/or securities are custodied at our clearing firm, Pershing, a division of The Bank of New York. Capstone Wealth Management Group and their broker/dealer do not maintain custody of funds and/or securities at any time. In the event of internal SBD and its potential severity and length, telephone lines will be forwarded to the principal's cell phones or alternate location phone lines. Principals will have the ability to take customer orders and/or service requests and contact our broker/dealer or clearing provider on behalf of the customers. Information will also be listed on our website with

information regarding access to their funds and securities through our broker/dealer or clearing provider.

Our Broker/Dealer and back office, Shareholders Service Group (SSG), is a SIPC member, which protects securities customers of its members up to \$500,000 (including \$100,000 for claims of cash). An explanatory of SIPC is available at www.sipc.org. Additional account protection up the total value of the account is provided by private insurance carriers. Customer accounts are protected for the total net equity of the account. If SIPC determines that SSG is unable to meet its obligations to CWMG customers due to an internal SBD or a violation of Securities Exchange Act Rule 15c3-1, SIPC may proceed with a disbursement of SSG assets to customers. SSG will comply with all SIPC procedures and policies as directed.

Data Back-Up and Recovery (Hard Copy and Electronic)

CWMG maintains its primary books and records at its office location at 404 SW Columbia St. STE 230 Bend, OR 97702 with copies and originals at Shareholders Service Group at 9845 Erma Road, San Diego, CA 92131. All documents, including all account forms and items relative to the accounts, are scanned at CWMG and at SSG for electronic image storage. Hard copies of documents relative to accounts are also maintained at SSG and are available by request by CWMG. Peter Mangan, president and CEO of SSG is responsible for maintenance for all books and records at SSG and maintains back-up electronic books and records on weekly and quarterly basis at their offsite alternative location and in escrow on a quarterly basis.

Back-ups of any CWMG internal client data (excluding software) are maintained by Weston Tech, Bend, OR. Back-ups are made off-site by Weston Technologies on a daily basis and 21 days of back-ups are maintained and available for retrieval by request. Nightly incremental backups are also provided by Weston Tech, Bend, OR (in a distant geographical location using a service provided by Intronis Technologies, 332 Congress Street Boston, MA 02210). Internal client data consists of client contact information, client provided financial data, all correspondence including emails to and from clients, investment advice related documents (ie; financial and investment plans and investment advisory agreements) and detailed notes of conversations with clients which is recorded in our internal CRM program via Junxure*

Pershing, our clearing provider, also maintains daily and weekly electronic copies of all relative account documents at its office headquarters in Jersey City, New Jersey. All documents, both onsite and offsite, can be retrieved on a timely basis. In such an internal or external SBD, all records and documents, with the exception of internal CWMG client data, may be retrieved from our offsite broker/dealer and through our clearing provider.

**Currently, no Junxure data will be available off-site until our server and computers are restored, should we lose their function. Clients notes are not considered as mission critical since critical data is preserved and maintained off-site at our broker/dealer (SSG) and clearing firm (Pershing, LLC) and is accessible via many channels. If CWMG's internal server and/or computers are destroyed or damaged, the estimated*

time to restore function could be up to two weeks. New hardware would have to be ordered, shipped, set-up and software and data restored. If necessary, data may be accessed immediately from Weston Tec in an alternate form (i.e.; downloaded to an Excel spreadsheet

Alternate Recovery of Client contacts:

Should we need to contact clients, all client financial information including holdings, address, & phone numbers are available via the web on NetXPro <http://www.netxpro.com> (maintained by Pershing) and AssetBook <https://radar.assetbook.com>. A hard copy of all client addresses and phone numbers will be included in our locked emergency box and updated on a quarterly basis.

Financial and Operational Assessments

A. Operational Risk

Should a SBD take place, CWMG will take appropriate steps to ensure that effective communications will continue with employees, financial advisors, advisor clients, broker/dealer, our clearing firm, critical business providers and regulators. Communications will continue via cell phone, e-mail, voice mail messages, our web site, fax lines, and telephone lines, if applicable. All required and relevant books and records will be retrieved, if required, as described in section VII.

B. Financial and Credit Risk

Should a SDB take place, CWMG will evaluate our capital reserves to ensure our ability to meet financial obligations to fund operations and any extra expenses necessary to bring business operations back to normal.

Mission Critical Systems

A. Mission Critical Systems provided by our Broker/Dealer

1. Order Taking

Presently, CWMG sends orders to SSG via NetExchange Pro, the online account administration and trading platform offered through Pershing, our clearing provider. In the event of a SBD, either internal or external, SSG will continue to take orders from CWMG via NetExchange Pro, if available, and/or through telephone and fax lines, or any other methods as conditions permit. If necessary and if conditions permit, customers may have access with SSG, our broker/dealer or with Pershing, our clearing firm, to place orders directly when directed to do so by CWMG.

2. Order Entry

SSG, our broker/dealer uses Pershing, our clearing firm, to enter electronic orders through NetExchange Pro and to call in telephone orders through the orders desk at Pershing. Should SSG be subject to a SBD they will follow their approved business continuity plan, an electronic copy of the summary is located on their website, www.ssginstitutional.com.

3. Order Execution

As CWMG utilizes SSG via Pershing's NetExchange Pro to execute orders, please see section IX, paragraph B.

B. Mission Critical Systems Provided by Our Clearing Firm

CWMG utilizes SSG, our broker/dealer for mission critical systems in the event of an internal or external SBD. Pershing LLC, our clearing firm via communications from our broker/dealer, provides order execution, securities transfers, cash disbursements, and electronic access to and maintenance of customer accounts. Order executions will include sales of security positions held long in a customer's account, and buys of securities to close-out a short security position. Pershing will process closing security transactions upon receipt of specific written instructions which includes the customer's brokerage account number, customer name, security description including symbol or CUSIP number, and the number of shares. All orders are handled as market orders. Cash disbursements will also be processed upon receipt of the customer's name and brokerage account number along with the exact amount to be disbursed and the indicated method of disbursement. If SSG cannot be reached in the event of a SBD, Pershing may be contacted directly at (201) 413-3635 for recorded instructions, with an alternate number of (213) 624-6100, ext 500.

Alternative Communications Between the Firm and Customers, Employees, and Regulators

A. Customers

CWMG currently communicates with its customers via telephone, fax, email, and U.S. mail. Should a SBD take place, CWMG will assess these communication systems to determine the viability of such systems. CWMG will continue to use the most effective and timely communication system available so as to ensure continued communications with customers. All principals of CWMG may be reached via cell phone in the event of a SBD.

B. Employees

Current CWMG communication systems with employees include in-person, telephone and cell phone, e-mail. In the event of a SBD, CWMG will determine the viability of these communication systems so as to ensure continued communications with all employees. All employees and principals of CWMG may be reached via cell phone in the event of a SBD.

C. Regulators

CWMG does not normally communicate directly with NASD, MSRB, SIPC, & SEC regulators. Should regulators need to be reached, CWMG will do so via SSG.

Critical Business Constituents and Banks

A. Business Constituents

CWMG has contacted its critical business constituents regarding continued support of business aspects relative to these relationships. All CWMG support firms utilize web-based systems and such systems may be accessed through our alternative locations. These firms include: Weston Technology (our IT departments), SSG (our broker/dealer), Pershing (our clearing provider), AssetBook (a vendor providing portfolio reporting services), and AssetMark (providing Pershing's IMS Investment platform.). All providers provide redundant sites and back-up resources and should be able to continue providing services in the event of a SBD.

B. Banks

CWMG is self-capitalized with sufficient capital. Additional financing, in the event of an internal SBD, may be available through partners of the firm, or outside sources, including banks, such as Wells Fargo Bank (where CWMG holds its primary accounts) or established financial service firms.

Disclosure of Business Continuity Plan for CWMG and SSG

A written summary of the BCP is available on the CWMG website at www.capstonewmg.com. SSG provides a written summary of its BCP within its new account application. This written summary is also available on the SSG website at www.ssginstitutional.com. The summary provides a description of the CWMG and SSG plans in event of a SBD and the appropriate responses. Written copies of the summary of the CWMG and SSG BCP plan are available on request. The BCP is subject to change based upon current conditions and an annual review.

Updates and Annual Review

CWMG will review and update the BCP whenever material changes take place in the areas of brokerage services, administration, operations, technology services, business or locations. Review and updates will also take place in the event of changes affected by Pershing, our clearing provider and SSG, our broker/dealer. The BCP will be reviewed and updated on an annual basis each year and will reflect changes or updates in those areas mentioned previously.