

Greenridge Wealth, LLC

Business Continuity Plan

Adopted: July 1, 2026

Last Reviewed: July 1, 2026

Approved By: Roberta Vassallo, Chief Compliance Officer

1. Purpose

This Business Continuity Plan ("Plan") describes how Greenridge Wealth, LLC ("the Firm") will respond to a significant business disruption ("SBD") to protect employees, safeguard client records and assets, minimize disruption to client service, and meet the Firm's obligations to clients and regulators. The Firm's Chief Compliance Officer is responsible for approving, maintaining, and testing this Plan.

Given the Firm's small size, cloud-based infrastructure, and lack of a client-facing physical office requirement, this Plan is scaled proportionately to the Firm's operations and risk profile, consistent with the Firm's obligations under its compliance program (Rule 204A-1 and general fiduciary obligations under the Texas Securities Act).

2. Firm Overview Relevant to Continuity Planning

Personnel: The Firm currently has two principals: Spencer Gareiss (Manager, CEO, and sole Investment Adviser Representative) and Roberta Vassallo (Chief Compliance Officer). The Firm does not currently have additional advisory staff.

Office: 318 North 17th Street, McAllen, Texas 78501.

Custody: The Firm does not maintain custody of client funds or securities. Client assets are held at Altruist (Altruist Financial LLC), an independent qualified custodian.

Core systems: Altruist (portfolio management/custodial platform), Google Workspace (email, documents, calendar), Slack (internal communications), DocuSign (agreement execution), and Attio (CRM).

Work location dependency: Because the Firm's core systems are cloud-based and accessible remotely, advisory operations do not depend on access to a single physical location.

3. Key Person Risk and Interim Succession Bridge

The Firm's advisory operations currently depend substantially on Spencer Gareiss as its sole Investment Adviser Representative. The Firm recognizes this single-point-of-failure risk and adopts the following interim continuity bridge, which governs pending designation of a permanent successor adviser.

A. TEMPORARY UNAVAILABILITY (SHORT-TERM ILLNESS, TRAVEL, OR INJURY)

The Chief Compliance Officer (Roberta Vassallo) will:

- Serve as the Firm's primary point of contact and manage all client and regulator communications;
- Pause discretionary trading except as necessary to honor client-directed instructions, meet settlement or margin obligations, or prevent client harm, routing any required activity to the custodian or a qualified third party;
- Maintain access to Firm systems (Google Workspace, Altruist, Attio) sufficient to service and safeguard client accounts; and
- Keep clients informed consistent with Section 6 (within one business day where client service is affected).

B. PROLONGED UNAVAILABILITY, INCAPACITY, OR DEATH

If Mr. Gareiss's unavailability is expected to be prolonged or permanent, the Chief Compliance Officer will:

- Notify all clients promptly and in writing of the disruption and their options;
- Because client assets are held at the independent qualified custodian (Altruist) and the Firm does not have custody, assist each client in either (i) transitioning to a successor adviser of the client's choosing, or (ii) continuing to self-direct the account at Altruist — in either case with no interruption to the client's direct access to their assets;
- Coordinate an orderly wind-down or transition of the Firm's advisory agreements, including any required Form ADV amendments and notice to the Texas State Securities Board; and
- Preserve the Firm's books and records in accordance with applicable recordkeeping requirements.

C. PERMANENT SUCCESSION (TO BE DESIGNATED)

The Firm will designate a permanent successor adviser and, where appropriate, enter into a written succession/transition agreement with a qualified third-party investment adviser to assume or facilitate the transition of client relationships in the event of the principal's death or long-term incapacity. Until such designation is made, the interim bridge in Sections 3.A and 3.B governs. The Firm will also register an additional Investment Adviser Representative as it grows to reduce single-point-of-failure risk. The Chief Compliance Officer will review and update this succession bridge as part of the annual review described in Section 10.

4. Significant Business Disruptions

The Plan addresses two categories of disruption:

A. Internal/Firm-only disruptions (e.g., loss of access to the McAllen office, a cybersecurity incident, loss of a key system):

- Employees will work remotely using existing cloud-based systems (Google Workspace, Altruist, Slack, Attio), which do not require physical office access.
- If a specific system is unavailable, the Firm will use the alternate communication methods described in Section 6 until service is restored.

B. External/regional disruptions (e.g., a natural disaster, regional power or telecommunications outage, or other event affecting the Rio Grande Valley area):

- Employees will relocate to any location with internet access and continue operations remotely.
- The Firm will monitor local conditions and communicate any anticipated delays to clients as described in Section 6.

5. Data Backup and Recovery

- Client records, communications, and firm documents are maintained primarily in cloud-based systems (Google Workspace, Attio, Altruist) that are hosted and backed up by their respective third-party providers, independent of the Firm's physical location.
- The Firm does not maintain primary recordkeeping on local, non-backed-up devices.
- The Chief Compliance Officer is responsible for confirming, on at least an annual basis, that the Firm's key vendors maintain adequate data backup, encryption, and disaster recovery practices.

6. Alternate Communications

With clients: In the event normal communication channels (office phone, email) are disrupted, the Firm will use personal cell phones and/or alternate email addresses on file to reach clients, and will post updates via the Firm's website (greenridgewealth.com) if the disruption is expected to affect client service for more than one (1) business day.

With employees: The Firm will use Slack and/or personal cell phones to coordinate among Firm personnel during a disruption.

With regulators: The Firm will notify the Texas State Securities Board of any significant business disruption affecting its ability to conduct advisory operations, consistent with its obligations as a state-registered investment adviser.

With custodian: The Firm will coordinate with Altruist regarding client account access and any custodian-side disruptions affecting client assets.

7. Mission-Critical Systems and Third-Party Dependencies

System	Function	Recovery Approach
Altruist	Custody, portfolio management	Cloud-hosted; managed by Altruist's own business continuity program
Google Workspace	Email, document storage, calendar	Cloud-hosted; managed by Google's infrastructure
Slack	Internal communication	Cloud-hosted
DocuSign	Client agreement execution	Cloud-hosted
Attio	CRM / client relationship records	Cloud-hosted

The Firm relies on these third-party providers' own business continuity and disaster recovery capabilities and will review vendor continuity practices as part of its annual compliance review.

8. Client Access to Funds and Securities During a Disruption

Because the Firm does not have custody of client assets, clients retain direct access to their accounts through Altruist regardless of any disruption affecting the Firm's own operations. The Firm will communicate any known custodian-side disruptions to clients promptly.

9. Regulatory Reporting Obligations

The Chief Compliance Officer is responsible for determining whether a disruption requires notification to the Texas State Securities Board or amendment of the Firm's Form ADV, and for making any required filings within applicable timeframes.

10. Annual Review and Testing

This Plan will be reviewed at least annually by the Chief Compliance Officer as part of the Firm's annual compliance review under its Written Supervisory Procedures, and updated as needed to reflect changes in the Firm's operations, personnel, office location, or key vendors. Material changes will be communicated to Firm personnel promptly.

11. Availability to Clients

A summary of this Business Continuity Plan is available to clients upon request, consistent with the Firm's general disclosure practices.

Handwritten initials

ADOPTION & APPROVAL

This Business Continuity Plan is adopted and approved by the Chief Compliance Officer of Greenridge Wealth, LLC, effective July 1, 2026.



Signature

Roberta Vassallo

Chief Compliance Officer, Greenridge Wealth, LLC

Date: 07/02/2026