

Business Continuity Plan Disclosure Statement

Spring Ocean Capital LLC (“Advisor”) has adopted a Business Continuity Plan (“BCP”) pursuant to the Investment Advisers Act and the rules and guidance of the U.S. Securities and Exchange Commission (“SEC”) and/or the laws of the states where the Advisor is registered. The purpose of the BCP is to define the strategies and plans that will be used by Advisor during a significant business disruption (“SBD”). The BCP is prepared to address both internal SBDs, such as a fire in Advisor’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, Advisor will safeguard employee lives and firm property. Advisor will work to re-establish the systems necessary to quickly recover and resume operations, protect Advisor’s books and records and allow Advisor’s customers to transact business to the extent reasonable and practical under the circumstances.

Contacting Advisor and Accessing Funds and Securities

Our regular telephone number 888-560-6709. Please check website for any updated alternate number. For questions relating directly to accessing your funds and securities, please contact Interactive Brokers LLC at 1-888-442-2757.

Varying Disruptions

SBDs can vary in their scope, from only our firm to a single building housing our firm, the business district where our firm 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 our firm, we intend to transfer our operations to a local site when needed and expect to recover and resume business within a four-hour time period. In a disruption affecting our business district, city, or region, we intend to transfer our operations to a site outside the affected area, and recover and resume business within a 24-hour time period. In either situation, we plan to continue in business. However, the ability of Advisor to fully function is dependent on outside sources outside of its control, including the availability of electricity, telephones, Internet, transportation, and the functioning of institutions and markets worldwide. Nothing in Advisor’s BCP or this disclosure statement is intended to provide a guarantee or warranty regarding the actions or performance of Advisor.

Additional Information

If you have questions about our business continuity planning, please contact us at 888-560-6709 or by email hwei@springOceanCapital.com