



Bache Capital Management, Inc. Business Continuity Plan (BCP)

I. Emergency Contact Persons

Our firm's emergency contact person is:

- a. Daniel E. Nagy, 310-850-3868, dan@apexuscapital.com, President & Chief Investment Officer
 - a. Bache Capital Management, Inc. 321 19th Street, Santa Monica, CA 90402

II. Firm Policy

Our firm's policy is to respond to a Significant Business Disruption (SBD) by safeguarding employees' lives and firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of the firm's books and records, and allowing our customers to transact business. In the event that we determine we are unable to continue our business, we will assure customers prompt access to their funds and securities.

A. Significant Business Disruptions (SBDs)

Our plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only our firm's ability to communicate and do business, such as a fire or power outage in our building. External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a city flood, an earthquake, or a wide-scale, regional disruption. Our response to an external SBD relies more heavily on other organizations and systems, especially on the capabilities of our custodian firm.

B. Approval and Execution Authority

Daniel E Nagy, President & Chief Investment Officer, a registered principal, is responsible for approving the plan and for conducting the required annual review. Daniel E Nagy, President & Chief Investment Officer has the authority to execute this BCP.

C. Plan Location and Access

Our firm will maintain copies of its BCP plan and the annual reviews, and the changes that have been made to it for inspection. An electronic copy of our plan is located on our website at www.bachecapital.com in the "Business Continuity Plan" folder containing the file "Bache Capital Management Inc BCP 2022".

III. Business Description

Our firm conducts business in investment advisory service, primarily in fixed income securities. Our firm is a client of our custodian and does not perform any type of clearing function for itself or others. Furthermore, we do not hold customer funds or securities. We manage client accounts. All transaction orders are sent to our custodian firm, Charles Schwab & Co., Inc with fixed income orders sent primarily to our affiliated broker dealer, Apexus Capital LLC. Charles Schwab & Co., Inc allocates them according to our instructions, clears and settles them. Our custodian firm also maintains our customers' accounts, grants customers access to them, including in-person access at their offices and online access and delivers funds and securities. Our firm services retail and customers and institutional customers. We do not engage in any private placements.

Our custodian firm is:

Charles Schwab & Co., Inc.

2423 E Lincoln Dr.
Phoenix, AZ 85016

Our contact at the custodian firm is:

Schwab Alliance Customer Service

800-515-2157
Website: www.schwab.com

IV. Office Locations

Our firm has one office.

Our office is located at:

321 19th Street
Santa Monica, CA 90402

Our main telephone number is: 310-850-3868

Our employees may travel to that office by means of foot, car, bus, metro-rail or taxi,

We engage in investment advisor services, including investment management and investment consultations with entry at this location.

V. Alternative Physical Location(s) of Employees

In the event of an SBD, we will move our staff from the affected office to:

315 19th Street
Santa Monica, CA 90402

We will collaborate with our IT vendor for systems business continuity:

Nagy Software Works

Its main contact is: Michael B. Nagy,

Email address: nagysoftwareworks@gmail.com

Its main telephone number is 818-606-6152.

VI. Customers' Access to Funds and Securities

Our firm does not maintain custody of customers' funds or securities, which are maintained at our custodian firm, Charles Schwab & Co., Inc. In the event of an internal or external SBD, if telephone service is available, our registered persons will take customer orders or instructions and contact our custodian firm on their behalf, and if our Web access is available, our firm will post on our website that customers may access their funds and securities by contacting Schwab Alliance Client Services at Charles Schwab & Co, Inc 800-515-2157, www.schwab.com. The firm will make this information available to customers through its disclosure policy.

VII. Advisory fees waived for periods of operations disruption

No clients will be charged advisory fees for periods where clients are not receiving advisory services. Client fees are charged in arrears, so there are no prepaid fees that would need to be refunded after such a period of no advisory services. Client fees are charged only upon Bache Capital Management Inc calculating the fees and submitting them to Charles Schwab with instructions to charge them to the client accounts. Should a period occur where clients are not receiving advisory services, Bache Capital Management Inc will adjust the fee calculation to take such period into account and will not submit fee instructions to Charles Schwab for such periods.

VIII. Immediate Notification in the Event of Termination of Operations

Clients and the custodian of client assets, Charles Schwab, will be immediately notified in the event of death or incapacitation of your investment advisor, Daniel Nagy, or in the event of the inability of Bache Capital Management Inc to continue operations. In the event of such circumstances, the software vendor for Bache Capital Management, Inc., Nagy Software Works, will immediately notify the custodian Charles Schwab, providing them the master account numbers so Schwab may immediately reach out to all clients with appropriate information so they will have the same access to their funds and securities as previously. This provision also serves as the succession plan designed to ensure administration of client accounts by Charles Schwab in the event of the death or incapacitation of your investment advisor, Daniel Nagy.

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

Our firm maintains its primary hard copy books and records and its electronic records at 321 19th Street, Santa Monica, CA 90402. Daniel Nagy, President & Chief Investment Officer phone – 310-850 3868 email – dan@apexuscapital.com is responsible for the maintenance of these books and records. Our firm maintains the following document types and forms that are not transmitted to our custodian firm:

- Disclosure and Suitability Documents
- Correspondence Records
- Banking Statements and Records
- Ledgers (or other records) reflecting all assets and liabilities, income and expense, bills receivable or payable, and capital accounts
- Monies borrowed and monies loaned (together with a record of the collateral therefor and any substitution in such collateral)
- Records pertaining to any registered person of the Firm

- Originals of all communications received and copies of all communications sent (and any approvals thereof) relating to the Firm's business.
- All written agreements (or copies thereof) entered into by the Firm relating to its business, including agreements with respect to any account.
- Each compliance, supervisory and procedures manual, including any updates, modifications, and revisions to the manual, describing the policies and practices of the Firm.
- Records of the Firm of each person who, without delay can explain the types of records at the Firm's office and the information contained in those records.

Documents and records in electronic/digital are retained through the Retention Management Service provided by Box.com, a SEA rule 17a-4 compliant cloud-based data storage and back-up provider.

- Stored on non-erasable media
- Duplicates stored separate from originals
- Maintained for term required as per FINRA rules
- Indexed to catalog documents, copy has a copy of the index.
- Maintains an "undersigned" third party that has access to the records and is filed with FINRA
- Provides access to regulators regardless of cooperation, or the lack thereof, of the Firm.

Records of electronic written communications (i.e. emails, texts, instant messaging) are retained through the Compliance Archiving Services of Global Relay, who provides cloud-based data storage and back up.

Our firm maintains its back-up of hard copy books and records at Box.com. These records are scanned and are retained digitally through the Retention Management Service provided by Box.com. Daniel Nagy, President & Chief Investment Officer phone 310-850-3868 is responsible for the scanning, indexing and uploading of these back-up books and records. We back up our records every day. Back-up of hard copy books and records will be retained either through the Retention Management Service provided by Box.com, a SEA rule 17a-4 compliant cloud-based data storage and back-up provider or by the Firm on DVD-ROM or CD-ROM or BD-ROM at the Firm's back-up site at 321 19th Street, Santa Monica, CA 90402.

The Firm backs up its electronic records continuously by synching throughout the day the Firm's electronic records folder to the Retention Management Service provided by Box.com, a SEA rule 17a-4 compliant cloud-based storage and back up provider. Back-up of electronic records will be retained either through the Retention Management Service provided by Box.com, a SEA rule 17a-4 compliant cloud-based data storage and back-up provider or by the Firm on DVD-ROM or CD-ROM or BD-ROM at the Firm's back-up site at 321 19th Street, Santa Monica, CA 90402.

In the event of an internal or external SBD that causes the loss of our paper records, we will physically recover them from our back-up site. If our primary site is inoperable, we will continue operations from our back-up site or an alternate location. For the loss of electronic records, we will either physically recover the storage media or electronically recover data from our back-up site, or, if our primary site is inoperable, continue operations from our back-up site or an alternate location.

IX. Financial and Operational Assessments

A. Operational Risk

In the event of an SBD, we will immediately identify what means will permit us to communicate with our customers, employees, critical business constituents, critical banks, critical counter-parties, regulators and the custodian of client assets. Although the effects of an SBD will determine the means of alternative communication, the communications options we will employ will include our website, telephone voice mail and secure email.

B. Financial and Credit Risk

In the event of an SBD, we will determine the value and liquidity of our investments and other assets to evaluate our ability to continue to fund our operations and remain in capital compliance. We will contact our custodian firm, critical banks and investors to apprise them of our financial status. If we determine that we may be unable to meet our obligations to those counter-parties or otherwise continue to fund our operations, we will request additional financing from our bank or other credit sources to fulfill our obligations to our customers and clients. If we cannot remedy a capital deficiency, we will file appropriate notices with our regulators and immediately take appropriate steps, including:

1. Limit and/or reduce firm investment positions, if any.
2. Verify customer funds are properly maintained at our custodian firm.
3. Suspend making distributions to firm senior management.
4. Suspend making dividends to the firm's sole owner, Daniel Nagy.

X. Mission Critical Systems

Our firm's "mission critical systems" are those that ensure prompt and accurate processing of securities transactions, including order entry, execution allocations, and monitoring of settlement of securities transactions, the maintenance of customer accounts, access to customer accounts and the monitoring of delivery of funds and securities.

We have primary responsibility for establishing and maintaining our business relationships with our customers and have sole responsibility for our mission critical functions of order entry and order allocation. Our custodian firm provides, through contract, the comparison, allocation, clearance and settlement of securities transactions, maintenance of customer accounts, access to customer accounts and the delivery of funds and securities.

Our custodian firm contract provides that our custodian firm will maintain a business continuity plan and the capacity to execute that plan. Our custodian firm represents that it will advise us of any material changes to its plan that might affect our ability to maintain our business [and has presented us with an executive summary of its plan, which is attached. In the event our custodian firm executes its plan, it represents that it will notify us of such execution and provide us equal access to services as its other customers. If we reasonably determine that our custodian firm has not or cannot put its plan in place quickly enough to meet our needs, or is otherwise unable to provide access to such services, our custodian firm represents that it will assist us in seeking services from an alternative source.

Recovery-time objectives provide concrete goals to plan for and test against. They are not, however, hard and fast deadlines that must be met in every emergency situation, and various external factors surrounding a disruption, such as time of day, scope of disruption and status of critical infrastructure—particularly telecommunications—can affect actual recovery times. Recovery refers to the restoration of clearing and settlement activities after a wide-scale disruption; resumption refers to the capacity to accept and process new transactions and payments after a wide-scale disruption.

Daniel Nagy will periodically review our custodian firm's capabilities to perform the mission critical functions the clearing firm has contracted to perform for our firm.

A. Our Firm's Mission Critical Systems

1. Order Placing

Currently, our firm takes customer orders via telephone, email or online, and we may be contacted via the contact page on our website at www.bachecapital.com. During an SBD, either internal or external, we will continue to place orders with the custodian of client assets through any of these methods that are available and reliable, and in addition, as communications permit, we will inform our customers when communications become available to tell them what alternatives they have to send their orders to us. Customers will be informed of alternatives by via telephone, email or our, website at www.bachecapital.com. If necessary, we will advise our customers to place orders directly with our custodian firm at:

Charles Schwab & Co., Inc.
2423 E Lincoln Dr.
Phoenix, AZ 85016

Our contact at the custodian firm is:

Schwab Alliance Customer Service
800-515-2157
Website: www.schwab.com

2. Order Entry

Currently, our firm enters orders by recording them on paper or electronically or sending them to our custodian firm electronically or telephonically. Alternatively, we place customer orders through Google email or Bloomberg.

In the event of an internal SBD, we will enter and send records to our custodian firm by the fastest alternative means available, which include secure email, Box.com and/or personal messenger. In the event of an external SBD, we will maintain the order in electronic or paper format, and deliver the order to the custodian firm by the fastest means available when it resumes operations. In addition, during an internal SBD, we may need to refer our customers to deal directly with our custodian firm for order entry.

3. Order Execution

We currently monitor order executions by Bloomberg messaging and telephonically. In the event of an internal SBD, we would monitor order executions by relocating trading to the Firm's alternate physical location site at 315 19th Street, Santa Monica, CA 90402 while collaborating for systems continuity with our IT vendor - Nagy Software Works. Phone 310-606-6152. We would also relocate Bloomberg messaging by utilizing the services of Bloomberg Anywhere, which allows the Firm to immediately relocate access to Bloomberg's full range of services at any time at any location.

B. Mission Critical Systems Provided by Our Clearing Firm

Our firm relies, by contract, on our custodian firm to provide order comparison, order allocation, customer account confirms, statements and maintenance and/or access and delivery of funds and securities.

XI. Alternate Communications between the Firm and Customers, Employees, and Regulators

A. Customers

We now communicate with our customers using telephone, email, our website, fax, overnight document delivery, U.S. mail and in-person visits at our firm or another location. In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party. For example, if we have communicated with a party by email but the Internet is unavailable, we will call them on the telephone and follow up where a record is needed with paper copy in an overnight package or the U.S. mail.

B. Employees

We currently have no employees other than Daniel Nagy. When we do have other employees, we will communicate with our employees using telephone, email, secure website provided by our clearing firm or Box.com and in-person. In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party. We will also employ a call tree so that senior management can reach all employees quickly during an SBD. The call tree includes all staff home and office phone numbers. We have identified persons, noted below, who live near each other and may reach each other in person:

The person to invoke use of the call tree is: Daniel Nagy

Caller	Call Recipients
Daniel Nagy	<i>Office manager, trading assistant</i>

C. Regulators

We are currently members of the following self-regulatory organizations (SROs), and are also regulated by California Department of Financial Protection and Innovation, FINRA the SEC. We communicate with our regulators using telephone, email, fax, overnight document delivery service, U.S. mail and in person. In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party.

XII. Critical Business Constituents, Banks, and Counter-Parties

A. Business constituents

We have contacted our critical business constituents (businesses with which we have an ongoing commercial relationship in support of our operating activities, such as vendors providing us critical services), and determined the extent to which we can continue our business relationship with them in light of the internal or external SBD. We will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services when we need them because of an SBD to them or our firm. Our major suppliers are:

B. Banks

We have contacted our banks and lenders to determine if they can continue to provide the financing that we will need in light of the internal or external SBD. The bank maintaining our operating account is:

Charles Schwab & Co., Inc.
2423 E Lincoln Dr.
Phoenix, AZ 85016

Our contact at the custodian firm is:

Schwab Alliance Customer Service

800-515-2157
Website: www.schwab.com

If our banks and other lenders are unable to provide the financing, we will seek alternative financing immediately from:

Matador Community Credit Union
20045 Prairie Street
Chatsworth, CA 91311
Phone: 818-993-6328

C. Counterparties

We have contacted our critical counterparties, such as other broker-dealers or institutional customers, to determine if we will be able to carry out our transactions with them in light of the internal or external SBD. Where the transactions cannot be completed, we will work with our custodian firm or contact those counterparties directly to make alternative arrangements to complete those transactions as soon as possible.

XIII. Regulatory Reporting

Our firm is subject to regulation by: California Department of Financial Protection and Innovation, FINRA, and the SEC. We now file reports with our regulators using paper copies in the U.S. mail, and electronically using fax, email and the Internet. In the event of an SBD, we will check with the DFIP, SEC, FINRA and other regulators to determine which means of filing are still available to us, and use the means closest in speed and form (written or oral) to our previous filing method. In the event that we cannot contact our regulators, we will continue to file required reports using the communication means available to us.

The California Department of Financial Protection and Innovation (DFPI)
Office of the Ombuds
2101 Arena Boulevard
Sacramento, CA 95834
Phone: 866-275-2677
Ask.DFPI@dfpi.ca.gov

FINRA
9509 Key West Avenue
Rockville, MD 20850
Contact: Eartha Baynard

Phone: 240-386-4219
Email: earth.baynard@finra.org
Website: www.finra.org

SEC
Securities and Exchange Commission
Washington, DC 20549
Charlene Dudley
Office of Compliance
Phone: 202-551-5804
Email: dudleyc@sec.gov
Website: www.sec.gov

XIV. Continuity or Termination of Operations

The operation of Bache Capital Management, Inc may be terminated if its facilities, infrastructure and/or the services upon which it relies are not available or are not reliable. Critical issues include: personnel safety, environmental safety, physical security, cyber security and ability to communicate and conduct normal business activities. Should such circumstances arise, Bache Capital Management, Inc may terminate operations until its facilities, infrastructure and the services upon which it relies are available, sustainable and reliable such that continuity of operations may be maintained.

XV. Disclosure of Business Continuity Plan

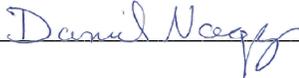
Attached is our written BCP disclosure statement we provide customers at account opening and upon substantive changes to the BCP. We also post the disclosure statement on our website and mail it to customers upon request.

XVI. Updates and Annual Review

Our firm will update our BCP whenever we have a material change to our operations, structure, business or location or to those of our custodian firm or bank(s). In addition, our firm will review this BCP annually, on July 1, and modify it for any changes in our operations, structure, business or location or those of our custodian firm or banks.

XVII. Senior Manager Approval

I have approved this Business Continuity Plan as reasonably designed to enable our firm to meet its obligations to customers in the event of an SBD.

Signed:  Date: 6/5/2025

Title: President & Chief Investment Officer

Bache Capital Management Inc. Business Continuity Planning

Bache Capital Management Inc. has developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible and proactive in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

Contacting Us – If after a significant business disruption, or in the event that Bache Capital Management Inc determines that it is unable to continue operations, or in the event of the death or incapacitation of your investment advisor, Daniel Nagy, you may be unable to contact us as you usually do at phone 310-850-3868 or email: dan@apexuscapital.com, or by going to our website at www.bachecapital.com. If you cannot access us through either of those means, you should contact our custodian firm, Charles Schwab & Co., Inc. at 800-515-2157 website: www.schwab.com for instructions on how it may provide for your customer needs in the event of such significant business disruption; for example, provide you with prompt access to the funds and securities in your account(s), enter orders for you, process other trade-related activities or cash and security transfer transactions for your account(s).

Our Business Continuity Plan – We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to sustain or resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data backup and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, regulators and the custodian of client assets; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

Our custodian firm, Charles Schwab & Co., Inc. backs up our important records in a geographically separate area. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, we have been advised by our custodian firm that its objective is to restore its own operations, and clients will be able to view their account information, complete existing transactions and accept new transactions and payments within 48 hours, using their web based application over the internet, and be able to contact professional staff who will be relocated to predetermined alternate sites. Any delay to your orders and requests for funds and/or securities will be kept to a minimum during such periods.

Varying Disruptions – Significant business disruptions can vary in their scope, such as only our firm, 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 will transfer our operations to a local site when needed and expect to recover and resume business. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area, and recover and resume business as soon as possible. In either situation, we plan to continue in business, transfer operations to our custodian firm if necessary, and notify you through our website www.bachecapital.com or our customer emergency number at 310-850-3868 on how to contact us. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer's prompt access to their funds and securities through our custodian firm, Charles Schwab & Co., Inc.

For more information – If you have questions about our business continuity planning, you can contact us at phone: 310-850-3868 or email: dan@apexuscapital.com.