

Waveland Capital Partners LLC's Business Continuity Planning

Waveland Capital Partners, LLC ("Waveland" or the "Firm") is providing you with this document to inform you of its ability to respond to certain business disruptions.

Contacting Us – To receive up-to-date information during a significant business disruption, clients may call the Firm's emergency telephone numbers at 760/505-4632, Steven Sunstein, or 949/500-4042, Vickie Greer, or go to our Web site at www.wavelandgroup.com.

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, conducting a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, Waveland's Business Continuity Plan is designed to permit the Firm to resume operations as quickly as possible.

Our Business Continuity Plan addresses the following: data back up and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counterparty impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business. Consistent with our business continuity plan, Waveland maintains backups of all systems and all data. Using these backups, Waveland intends to continue its business in the event of a significant business disruption. Nevertheless, there are some disruptions that may render the Firm unable to continue business. Under such circumstances, Waveland will ensure that clients will be able to access their funds and securities within a reasonable time.

NFS 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, Waveland has been advised by NFS that its objective is to restore its operations and ability to complete existing transactions and accept new transactions and payments within 24 hours. Your orders and requests for funds and securities could be delayed during this period.

Varying Disruptions – Significant business disruptions can vary in their scope, such as only the Firm, a single building housing the Firm, the business district or city where Waveland is located, or the entire region. Within each of these areas, the severity of the disruption can also vary from minimal to severe.

The following describes specific disruption events and Waveland's intended response to these corresponding general business continuation events. Clients; however, should note that these responses are subject to modification and, depending on the severity of a specific event, Waveland cannot guarantee that it will be able to follow the stated course of action. If these responses are modified, Waveland will post the updated disclosure statement on its Web site. In the alternative, clients may request that the Firm send them by mail, a copy of the updated disclosure statement by contacting the Firm as follows:

Waveland Capital Partners, Inc.
Attn: Business Continuity Planning
19800 MacArthur Blvd., Suite 650
Irvine, CA 92612

Firm-Only Business Disruption

In the event that there is a significant business disruption to the Firm's internal primary systems, Waveland will transfer its operations to a local site if necessary. In this process, clients may experience a minor delay in reaching the Firm due to increased telephone calls, technology delays, or other minor difficulties arising from the transfer of operations. Nevertheless, the unlikely failure of the telephone system could result in a delay of up to 48 hours.

A Disruption to a Single Building

This disruption may be caused by physical damage, technology problems, or an inability to have personnel arrive at the office. Because the corporate office is critical to the Firm's operations, Waveland's ability to resume business following a business disruption to a specific building depends on the building affected. If the location is non-functional, Waveland has access to duplicative systems and other processes that will be run from a separate building. The Firm expects only minimal delays from the transfer of operations. If there is a disruption to the corporate office, Waveland expects that operations could be disrupted for up to two 48 hours.

Business-District, City-Wide, or Regional Disruption

In the event that there is a significant business disruption that affects the business district, city, or region where any of the Firm's primary systems are located, Waveland will transfer its operations to a site outside of the affected area, and recover and resume business within five (5) days.

In any situation, Waveland plans to continue in business, transfer operations to NFS if necessary, and notify clients through its website, or customer emergency number, how to contact Waveland. If the significant business disruption is so severe that it prevents Waveland from remaining in business, prompt access to its clients' funds and securities is assured.

For more information – If you have questions about Waveland's business continuity planning, please contact us at 949/706-5000, ext. 204.