



BUSINESS CONTINUITY PLAN

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In accordance with FINRA Rule 4370, the following document summarizes the business continuity plan ("BCP") developed and implemented for member firm Enverra Capital, LLC ("Enverra" or the "Firm").

1 EMERGENCY CONTACT PERSONS

Our Firm's two emergency contact persons are:

Primary: Alexander Karmazin
Finance & Operations Director
Phone: 631-901-6167
Email: akarmazin@enverra.com

Alternate: Gen. Wesley K. Clark (ret.)
Chief Executive Officer
Phone: 202-352-1022
Email: wclark@enverra.com

These names will be updated in the event of a material change and the Firm will review them periodically and make changes when necessary. Updated information will be posted to the FINRA contact information system promptly.

2 FIRM POLICY

Our Firm's policy is to respond to a Significant Business Disruption ("SBD") by safeguarding employees' lives and Firm property, making financial and operational assessments, quickly recovering and resuming operations, protecting all of the Firm's books and records, and continuing to address our clients' needs. In the event that we determine we are unable to continue our business, we will assure that clients have prompt access to all information held by the Firm relating to relevant banking transactions.

2.1 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 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, a pandemic or other wide-scale, regional disruption. Our response to an external SBD relies more heavily on other organizations and systems.

2.2 APPROVAL AND EXECUTION AUTHORITY

Alex Karmazin, Finance and Operations Director of the Firm, is responsible for approving the plan and for conducting the required annual review. Mr. Karmazin has the authority to execute this BCP.

2.3 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 this plan is located in the Firm's compliance files, which are stored securely and remotely through the cloud data sharing and backup service provided by Google Drive [www.google.com/drive] and archived by Vault America [www.vaultamerica.com]. In addition, Richard Chase, our Chief Compliance Officer, also maintains copies of this plan.

3 BUSINESS DESCRIPTION

The Firm's business activities are limited to providing financial advisory services related to mergers and acquisitions and private placements of equity and debt securities. The Firm's parent company, Enverra Partners LLC ("Enverra Partners"), is a strategic consulting company focused on market entry and business development as well as political and governmental affairs advisory services. Additional services include strategic partner identification, market research and company due diligence. Enverra Partners also specializes in identifying potential investments and merger and acquisition opportunities in diverse industry sectors, including the energy, resources, real estate and infrastructure sectors. Enverra Partners' relationship with the Firm is such that it is able to utilize its expertise to provide market intelligence for the Firm and identify and refer leads to the Firm for mergers & acquisitions and/or capital formation opportunities. In the case of such referrals, the Firm is solely responsible for negotiating engagements, managing and executing all transactions and associated regulatory and compliance matters.

Enverra does not perform any type of clearing function for itself or others. Furthermore, the Firm does not hold customer funds or securities and does not accept and/or enter orders.



4 OFFICE LOCATIONS

Enverra has one office that is located at 2101 L Street, N.W., Suite 800, Washington, D.C. 20037. Its main telephone number is 202-429-1844. Employees may travel to the office by car or on foot.

5 ALTERNATIVE PHYSICAL LOCATION(S) OF EMPLOYEES

In the event of an SBD, the Firm will move all staff to available office space within a ten-mile radius of the current office. Alternatively, employees may temporarily work from home.

6 CUSTOMERS ACCESS TO FUNDS AND SECURITIES

Enverra does not engage in trading activities and does not take custody of customer assets or accept funds or assets (including currency) from its clients in connection with its advisory activities. Therefore, the Firm does not have an issue with respect to customer account access.

7 DATA BACK-UP AND RECOVERY

Enverra maintains its primary books and records electronically in accordance with the provisions of SEC Rule 17a-4. Alex Karmazin is responsible for the maintenance of these books and records.

Enverra's books and records include mission critical documents, such as engagement letters with clients, contracts, agreements, due diligence work papers, financial records and other engagement files. All such documents received in hard copy are immediately scanned to PDF form and uploaded to the Firm's remote data back-up and file-sharing service provided by Box.com. All employees are given secure access to the Box.com system with individual access permissions controlled by the Firm administrator.

On a daily basis, the files hosted on Box.com are automatically backed up and archived through Box.com's FINRA compliant file archiving system. Box.com provides off-site, data encrypted storage of electronic files. Its servers are hosted in redundant facilities and automatically backed up.

The Firm's emails are backed-up and archived electronically by third-party provider, Smarsh, Inc. [www.smarsh.com].

In the event of an internal or external SBD that causes the loss of our paper records, we will recover them from our digital archives stored on Box.com Smarsh. Our use of Box.com and Smarsh limits our exposure to the loss of electronic records such that damage or loss of an individual employee's computer will not affect our ability to immediately recover. Finally, if our primary office is inoperable, we will continue operations from an alternate location in close proximity or associated persons may work from home.

8 FINANCIAL AND OPERATIONAL ASSESSMENTS

8.1 OPERATIONAL RISK:

In the event of an SBD, we will immediately identify the methods that will permit us best to communicate with our clients, employees, critical business constituents, and regulators. Although the effects of an SBD will determine the means of alternative communication, the options we will employ will include alternative land-based telephone systems, cellular phones, and e-mail. In addition, we will retrieve our key activity records as described in the Section 7 (Data Back-Up and Recovery) above.

8.2 FINANCIAL AND CREDIT RISK

In the event of an SBD, we will determine the value and liquidity of our assets in order to evaluate our ability to continue to fund our operations and remain in capital compliance. The Firm operates out of leased facilities, has made very modest capital outlays for physical equipment, and does not custody customer funds or securities or maintain a Firm securities inventory. As a result, even a major SBD should not have a material impact on the Firm's capital or financial capabilities. Nevertheless, in the event of an SBD, we will contact our critical banks to apprise them of our financial status as warranted. If we cannot remedy a capital deficiency, we will file appropriate notices with our regulators and immediately take appropriate steps.



9 MISSION CRITICAL SYSTEMS

The Firm's "mission critical systems" typically are those that ensure prompt and accurate processing of securities transactions. Because Enverra does not process securities transactions for customers, the Firm does not have such "mission critical systems" as defined. We have a primary responsibility for establishing and maintaining our business relationships with our clients. We do not take custody of customer funds or securities or accept orders.

The Firm generally communicates with clients via telephone and e-mail. During an SBD, either internal or external, we will continue to communicate with clients by available means of telephone, e-mail or Internet.

10 ALTERNATE COMMUNICATIONS WITH CLIENTS, EMPLOYEES, AND REGULATORS

10.1 CLIENTS

Enverra currently communicates with its clients using telephone, e-mail, fax, mail, delivery or courier services, and through face-to-face meetings at our office or at another location. In the event of an SBD, we will assess which means of communication are still available to us and use the means (written or oral) most closely associated with those that we have used to communicate with those parties in the past. For example, if we have traditionally communicated with a party via e-mail but the Internet is not available, we will instead call them and, in the case where written records are necessary, follow up with paper copies in the mail or other courier service.

10.2 EMPLOYEES AND INDEPENDENT CONTRACTORS

Enverra presently communicates with employees and independent contractors via telephone, e-mail, and in-person meetings. In the event of an SBD, the Firm will assess which means of communication are still available, and use the means most closely associated with those used in the past to communicate with them.

10.3 REGULATORS

Enverra is currently registered with the following SRO and government agencies: FINRA, SEC and the District of Columbia. We communicate with our regulators using telephone, e-mail, fax, mail, delivery and courier services, and in-person meetings. In the event of an SBD, the Firm will assess which means of communication are still available, and use the means most closely associated with those used in the past to communicate with the other party.

11 CRITICAL BUSINESS CONSTITUENTS, BANKS, AND COUNTER-PARTIES

11.1 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 business constituents include:

- | | |
|------------------------------|--|
| • Commercial Banking: | Bank of America |
| • Compliance | Elin Cherry, Elinphant, LLC |
| • FinOp Services: | Jeannette Gaston, Rubicon Consulting Group |
| • Telephone and Internet: | WUN Systems LLC |
| • Cloud-based file sharing | Google Drive, Box.com |
| • Data back-up and archiving | Smarsh, Box.com |

In the event the Firm's critical business constituents change, we will update its BCP at that time.

11.2 BANKS

We do not rely on bank financing to maintain the Firm's required capital base. Enverra's primary checking account is maintained by JPMorgan Chase Bank and the following local branch:



JPMorgan Chase Bank
3140 M St NW
Washington DC 20007
Phone: 678.995.2448
Contact: David G Berry

11.3 COUNTER-PARTIES

As an advisory firm, we do not rely on counter-parties, such as other broker-dealers or institutional customers, to carry out our transactions.

12 REGULATORY REPORTING

Enverra is subject to regulation by FINRA, the SEC and the District of Columbia. The Firm files reports with regulators using paper copies in the mail, and electronically using fax, email, and the Internet. In the event of a SBD, the Firm will check with FINRA, the SEC and other regulators to determine which means of filing are still available, and use the means most closely associated 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. Our FINRA coordinator is:

John Pursley
John.Pursley@finra.org
(404) 760-8818

13 DISCLOSURE OF BUSINESS CONTINUITY PLAN

Enverra discloses a summary of its BCP to clients in writing upon request. The summary addresses the possibility of a future SBD and how the Firm plans to respond to events of varying scope. In addressing events of varying nature, the summary (i) provides specific scenarios of varying severity (e.g., a firm-only business disruption, a disruption to a single building, a disruption to a business district, a city-wide business disruption, and a regional disruption); (ii) indicates whether we plan to continue business in certain geographies during those scenarios and, if not, our anticipated recovery time; and (iii) offers general information on our intended responses to SBDs. Our summary discloses the existence of data back-up and recovery arrangements.

14 UPDATES AND ANNUAL REVIEW

The Firm will update this plan whenever we have a material change to our operations, structure, business or location. In addition, our Firm will review this BCP annually to modify it for any changes in operations, structure or other business functions.

15 MANAGEMENT APPROVAL

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

Signed: DocuSigned by:
Alex Karmazin
Name: Alex Karmazin
Title: Finance & Operations Director
Date: July 26, 2022