



REGULATORY DISCLOSURES

BUSINESS CONTINUITY PLAN (BCP) SUMMARY DISCLOSURE

Overview

Centenium Advisors, LLC (“Centenium,” the “Firm”) has created and implemented a Business Continuity Plan (“BCP”) in an effort to mitigate the effects related to unforeseen business interruptions, whether these disruptions are local to the Firm, its immediate locale, or more regional. This BCP is designed to enable the Firm to continue or resume operations in the event of an emergency or Significant Business Disruption (“SBD”).

Communications and Location of Employees During A Disruption

In the event of a SBD, Centenium will communicate with its employees in several different ways. The Firm will employ principally a calling tree, which would be implemented by management in the event of an SBD. The BCP also addresses the relocation of staff to alternative back-up locations, which would be available with adequate communications equipment in order for representatives and principals to be able to run the Firm’s business for an interim period of time. Management will make proprietary decisions based upon the severity of an SBD as to the most efficient and effective use of the Firm’s local and more widespread backup capabilities. Recovery time for most of the essential applications and relocation to the alternate location is expected to range from immediate to between 24 and 48 hours.

Communications with Clients

Centenium is currently able to communicate with its clients using the telephone, email, fax, U.S. mail, messenger services, and in person. In the event of an SBD, Centenium will assess which means of communication are still available and use the means closest in speed to communications used in the past. Additionally, if all traditional means of communication are not available, Centenium will, if possible, post emergency contact information and instructions on its web site (www.centeniumadv.com) regarding access to Centenium and its representatives.

Disclosure

Centenium’s BCP is designed to address the continued operation of the Firm in the event of an emergency situation or SBD. However, all risks of business interruption cannot be eliminated and Centenium cannot guarantee that systems will always be available or recoverable following an SBD. If possible, Centenium will attempt to continue business operations in the event of an SBD. Furthermore, Centenium has no control over and must rely upon the disaster recovery plans of its various critical business constituents and vendors. The complete BCP is available upon request.

ANTI-MONEY LAUNDERING PROCEDURES

To help the government fight the funding of terrorism and money laundering activities, Federal law requires us to obtain, verify and record information that identifies each person or company to whom we provide financial services. This means that when you begin doing business with us, we will ask for information that will allow us to identify you. We may also request documentation concerning the legal formation of your company.

SIPC NOTICE

The role of the Securities Investor Protection Corporation (SIPC) is to return funds and securities to investors if the broker-dealer holding these assets becomes insolvent. Although Centenium Advisors does not maintain customer accounts or hold any customer funds, you may obtain more information about SIPC, including the SIPC brochure, at SIPC’s web site at: www.sipc.org; or, by calling them at (202) 371-8300.

PRIVACY POLICY

Although Centenium does not hold or maintain customer accounts, the Firm and its employees strongly believe in protecting confidentiality and the security of any personal information it collects. Our employees are instructed to protect the confidentiality of information and are required to comply with our established policies. Non-public information may be disclosed in some cases to respond to inquiries to fulfill legal and/or regulatory requirements. We do not, however, make any disclosures of information to other companies, which may want to sell products or services to our clients’ investors.

Centenium Advisors LLC’s commitment to protecting your privacy has always been our policy. We will continue to safeguard your privacy and the confidentiality of the information you provide to us.

If you have any questions, please do not hesitate to contact us.