

Business Continuity Plan

Background

While it is recognized it is not possible to create a plan to handle every possible eventuality, it is the intent of Miraberg to set up a framework to be used in the most likely of scenarios. It is also the intent that this framework provides guidance as to how to respond should an unforeseen situation occur.

Miraberg believes that an adviser's fiduciary obligation to its clients includes the obligation to take steps to protect the clients' interests from being placed at risk as a result of Miraberg 's inability to provide advisory services after, for example, a natural disaster or, in the case of some smaller firms, the death of the owner or key personnel. The clients of an adviser that is engaged in the active management of their assets would ordinarily be placed at risk if the adviser ceased operations.

Business Description

Miraberg conducts business in equity, fixed income, and other securities; it does not hold customer funds or securities. Transactions are sent to Miraberg 's brokerage firm, which executes its orders, compares them, allocates them, clears and settles them. Miraberg 's custodian maintains its clients' accounts, grants clients access to them, and delivers funds and securities.

Emergency Information

Firm Contact Persons

Miraberg 's emergency contact persons are:

Contact Name	Phone	Email	Relationship
Youssry Henien	(954)326-2323	youssry.henien@miraberg.com	Founding member
Nella Zelensky	(646)477-7515	nzelensky@mira berg.com	CCO

Support Services

In the event of an emergency, the following is a list of support services and the methods by which they may be contacted:

Emergency Services (EMS): call 911

Fire Department: call the local Fire Department in your local geographical area

Police Department: call the local Policy Department in your local geographical area

Internet Service Provider: contact your local internet service provider

Data Backup Provider: Itegria +1 (212) 327-1533 support@itegria.com

Alternative firm contact in case of death of Key Personnel	Nella Zelensky
Alternative firm contact in case of death of Key Personnel	Youssry Henien

This information will be updated in the event of a material change, and Miraberg 's CCO will review the plan on an annual basis.

Firm Policy

Miraberg '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 the firm's books and records, and allowing its clients to transact business.

In the event that Miraberg determines it is unable to continue its business, it will assure clients prompt access to their funds and securities.

Significant Business Disruptions (SBDs)

Miraberg 's plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only Miraberg 's ability to communicate and do business, such as a fire in its building or the death of a key member of the firm. External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a city flood, or a wide-scale, regional disruption.

Miraberg 's response to an external SBD relies more heavily on other organizations and systems, such as the brokerage firm(s) and Internet Service Providers it uses.

Pandemics, Epidemics, & Outbreaks

Miraberg recognizes that pandemics, epidemics, and other types of outbreaks constitute business disruptions of a special nature. These situations impact not only Miraberg as a company, but also its personnel, clients, and vendors. Accordingly, Miraberg intends to implement the following procedures during such a situation.

General Business Operations

Promptly, and then intermittently thereafter, Miraberg will conduct a high-level assessment of the situation's impact on business and operations. Specifically, Miraberg will identify and address:

- any weaknesses or unforeseen issues
- any inability to conduct essential operations or operate essential systems
- any inability to monitor third party vendors

Information Security & Remote Operations

Miraberg will also alert personnel to the increase likelihood of phishing attempts and client impersonation schemes related to the situation. For example, bad actors may target individual staff members with requests for wire transfers posing as a client, emails related to state or federal work from home updates, changes to healthcare benefits, changes in information security policy related to working from home, software required to install on computers in order to work from home, the latest epidemic statistics, or even discounted offers on items in short supply. Accordingly, the firm will refer personnel to Miraberg's cybersecurity best practices and ensure that those practices are up to date.

If necessary, Miraberg will also conduct training for its personnel to address (i) potential information security issues commonly associated with remote work and (ii) the importance of protecting non-public client information at all times. In particular, advisory personnel are instructed to:

- access the internet only from secure WiFi connections or via a virtual private network ("VPN"); access any business-related applications through virtual desktop (VDI).
- avoid using public WiFi networks, which are vulnerable to exploitation.
- store any sensitive, non-public information on the VDI or only after taking the proper security protections and obtaining authorization from either CCO or CISO.

If having personnel work remotely, then Miraberg will also:

- catalogue systems that cannot be accessed remotely, if any
- shut down non-essential hardware (e.g., computers)
- lock its physical storage (e.g., file cabinets) and all office access (if applicable)
- check in with building management, if applicable, to determine current security at the facility
- require that firm personnel continue following advertising guidelines for applicable communications
- ensure electronic cataloguing of communication is still taking place
- continue to document all interactions with clients, regardless of the medium of interaction
- update Miraberg's business continuity plan as needed

Third Party Vendors

If appropriate, Miraberg will endeavor to discuss with vendors the following:

- the vendor's business continuity efforts
- the vendor's disaster recovery plans
- the vendor's reliance on, and communications to date with, the vendor's vendors

Company Personnel

If appropriate, Miraberg will limit or altogether avoid in-person meeting with clients and advisory personnel and allow or require (as appropriate) personnel to work remotely. Any personnel that is limited in their ability to work remotely, will immediately inform their supervisor. Limitations include but are not limited to:

- Inadequate hardware, software, or other systems
- Need to perform caregiving services for children or other persons
- Physical incapacity

If essential personnel are limited in their ability to work remotely, then the firm will determine if alternate or temporary personnel are available to perform necessary functions. Additionally, Miraberg will conduct check-ins with advisory personnel no less than weekly regarding remote work conditions.

Approval and Execution Authority

The CCO is responsible for approving the plan and for conducting the required annual review. The CCO has the authority to execute this BCP.

Plan Location and Access

Miraberg maintains copies of its BCP and annual reviews, and all changes that have been made. A physical copy of the BCP is stored with the company's Written Policies and Procedures Manual, which is kept by the CCO. An electronic copy of this plan is posted on our Website.

Each employee is given a copy of the plan (in electronic and/or physical format) and notified of the location/file within Miraberg's electronic systems to which employees have access. Physical copies need to be returned upon termination of employment with the firm.

Custodian and Brokerage Firm Contacts

Charles Schwab & Co., Inc. Advisor Services
450 Newport Center Dr. Suite, #410
Newport Beach, CA 92660
(877) 687-4085

Office Locations

Miraberg 's primary office address and phone number are:

325 Chestnut Street Suite 883 157
Philadelphia, PA 19106
United States
954-326-2323

At present time, Miraberg does not engages in client servicing, order taking, and entry at this location.

Alternative Physical Location(s)/Remote Operations

In the event of an SBD that makes it impossible or impractical to use any or all of the company offices and/or alternative locations (if any), Miraberg will conduct firm operations remotely.

Clients' Access to Funds and Securities

Miraberg does not maintain custody of clients' funds or securities, which are maintained at its brokerage firm. In the event of an internal or external SBD, if telephone service and internet service are available, Miraberg 's investment adviser representatives (IARs) will take customers' orders or instructions from its alternative locations, phone numbers, websites or alternative email addresses and contact its brokerage firm on their behalf. If internet access is available, Miraberg will post on LinkedIn that clients may access their funds and securities by contacting it.

Data Back-Up and Recovery (Electronic Copy)

Miraberg maintains its electronic copy of books and records on the cloud at Amazon WorkDocs. The firm does not maintain the hard copy of books and records. The firm backs up its electronic records daily by online digital backup and keeps a copy at Amazon Web Services.

The firm's CCO is responsible for the maintenance of these books and records. Miraberg maintains the following document types and forms that are not transmitted to its brokerage firm: Investment Policy Statements, Client Contracts and other related documents.

If in the event of an internal or external SBD, the firm's primary site is inoperable, Miraberg will continue operations from its back-up site or an alternate location. For the loss of electronic records, it will electronically recover data from its back-up site(s). Miraberg obtains the Business Continuity Plans of its electronic storage partners for access to its records in case of a regional event.

Operational Assessments

Operational Risk

In the event of an SBD, Miraberg will immediately identify what means will permit it to communicate with its clients, employees, critical business constituents, and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options Miraberg will employ will include its website, telephone voice mail, secure email, etc. In addition, Miraberg will retrieve its key activity records as described in the section above, Data Back-Up and Recovery (Electronic Copy). Employees will establish contact with the firm's Emergency Contacts and communicate key firm directives as they apply to operating the business whether it be from a new location, each employee's residence or an alternative regional location with access to a different power grid from the principal office.

Mission Critical Systems

Miraberg's "mission critical systems" are those that ensure client communication, access to client accounts and trading systems. More specifically, these systems include the office computer systems.

Miraberg has primary responsibility for establishing and maintaining its business relationships with its clients. Miraberg's brokerage firms/custodians provide the execution, comparison, allocation, clearance and settlement of securities transactions as well as the maintenance of customer accounts, access to customer accounts, and the delivery of funds and securities.

Miraberg's brokerage firm/custodian contracts provide that the brokerage firms/custodians will maintain business continuity plans and the capacity to execute those plans.

Miraberg's brokerage firms/custodians represent that they back up Miraberg's records at remote sites. Miraberg's brokerage firms/custodians represent that they operate back-up operating facilities in geographically separate areas with the capabilities to conduct the same volume of business as their primary sites. They have also confirmed the effectiveness of their back-up arrangements to recover from a wide scale disruption by testing.

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. The recovery times for custodians are expected to be consistent with the recovery time indicated in the specific custodian's business continuity plan or other relevant documentation. However, the firm will not typically have access to the custodian's business continuity plan and recovery times will of course differ depending on the specific system affected. Please see "Custodian and Brokerage Firm Contacts" above.

The Firm's Mission Critical Systems

Trading

Miraberg uses the electronic order entry system provided by its custodian or another third party to enter trading activity and transactions. If electronic means are not available, Miraberg may place orders by fax or telephone, in which case order tickets will still be maintained.

In the event of an internal SBD, Miraberg will enter and send records to its brokerage firm by the fastest alternative means available. In the event of an external SBD, Miraberg will maintain the order in electronic or paper format and deliver the order to the brokerage firm by the fastest means available when it resumes operations. In addition, during an internal SBD, Miraberg may need to refer its clients to deal directly with its brokerage firm for order entry.

Client Account Information

Miraberg currently accesses client account information via its brokerage firm's website. In the event of an internal SBD, Miraberg would access client information via fax correspondence, alternate phone systems, etc. Miraberg may relocate to its alternative business location(s) if access to the brokerage firm website can be accomplished.

Alternate Communications with Clients, Employees, and Regulators

Clients

Miraberg now communicates with its clients using the telephone, email, its Website, fax, U.S. mail, and in person visits at Miraberg 's or at the other's location. In the event of an SBD, Miraberg will assess which means of communication are still available to it, and use the means closest in speed and form (written or oral) to the means that it has used in the past to communicate with the other party. For example, if Miraberg has communicated with a party by email but the Internet is unavailable, Miraberg will call the party on the telephone and follow up and where a record is needed with paper copy in the U.S. mail. In the event of an anticipated significant regional business disruption, Miraberg will communicate to its clients in advance how to establish contact with it and its personnel or brokerage and custodian prior to the disruptive event occurrence.

Employees

Miraberg now communicates with its employees using the telephone, email, and in person. In the event of an SBD, Miraberg will assess which means of communication are still available to it, and use the means closest in speed and form (written or oral) to the means that it has used in the past to communicate with the other party. In the event of key employees being unable to perform their job functions, immediately and for any time period afterwards, Miraberg will delegate, if possible, those key functions to other employees.

Regulators

Miraberg communicates with its regulators using the telephone, email, fax, U.S. mail, and in person. In the event of an SBD, Miraberg will assess which means of communication are still available to it, and use the means closest in speed and form (written or oral) to the means that it has used in the past to communicate with the other party.

Regulatory Reporting

Miraberg is subject to regulation by the state of Pennsylvania and other jurisdictions as applicable. Miraberg now files the reports with its regulators using the IARD System. In the event of an SBD, Miraberg will check with the state of Pennsylvania and other jurisdictions as applicable to determine which means of filing are still available to it, and use the means closest in speed and form (written or oral) to its previous filing method. In the event that Miraberg cannot contact its regulators, it will continue to file required reports using the communication means available to it and forward those reports at the earliest opportunity.

Regulatory Contact:

Pennsylvania Securities Commission
17 N Second Street, Suite 1300
Harrisburg, PA 17101
(717) 787-8061

Death of Key Personnel

At present time, Miraberg does not have “Key Personnel” without which it would be difficult or impossible to continue operating the firm and/or properly service clients.

If some event made it impossible for any future key personnel to continue to service the firm, Miraberg would implement the following succession plan:

Miraberg is managed by the founding member and compliance is supervised by Nella Zelensky. If the firm incur a loss of key personnel, our goal will be to find a suitable replacement on a timely manner and continue the operation.

In case of death of any key personnel, the following will assume the responsibility to contact the clients of the firm in the most efficient manner possible and as soon as possible to allow clients to access their accounts. If a business succession plan is to be implemented, clients will be contacted to obtain consent prior to any assignment of their advisory management contracts with this firm to a successor firm.

Nella Zelensky	CCO
Yousry Henien	Founding member

Updates and Annual Review

Miraberg will update this plan whenever it has a material change to its operations, structure, business or location or to those of its brokerage firm. In addition, Miraberg will review this BCP annually, to modify it for any changes in its operations, structure, business, or location or those of its brokerage firm.

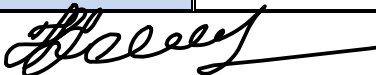
Approval & Signature

Supervisor Approval

Approve the firm's Business Continuity Plan (BCP) program by signing below.

I have approved this Business Continuity Plan as reasonably designed to enable Miraberg to meet its obligations to clients in the event of a Significant Business Disruption.

Signed:

Officer Name and Title:	Nella Zelensky, CCO
	02/15/2023
Supervisor Signature	Date