



BUSINESS CONTINUITY & SUCCESSION PLAN

January 2024

BUSINESS CONTINUITY PLAN

I. Purpose and Advisor Policy

Meridiana MFO LLC (“Advisor”) has adopted this Business Continuity Plan (“BCP”) pursuant to the Investment Advisers Act and the rules and guidance of the U.S. Securities and Exchange Commission (“SEC”) and the laws of the States of Florida.

The purpose of this BCP is to define the strategies and plans that will be used by Advisor during a significant business disruption (“SBD”). An SBD includes any event or situation that significantly impacts the Advisor’s ability to provide advisory services to its clients. The BCP outlines the Advisor’s procedures designed to ensure that critical business functions can continue during and after an SBD and that the Advisor can resume operations as quickly as possible after an SBD. The BCP is prepared to address both internal SBDs, such as a fire in Advisor’s building or the death of key personnel, and external SBDs, such as a natural disaster, terrorist attack, or citywide power disruption. It is also designed to address SBDs of different severities.

In the event of an SBD, it is Advisor’s policy to do the following to the extent reasonable and practical under the circumstances:

- Safeguard employee lives and firm property.
- Make a financial and operational assessment.
- Promptly recover and resume operations.
- Protect the firm’s books and records; and
- Communicate with its customers and allow them to transact business.

Although the firm does not maintain custody of customer assets, in the event of an SBD, Advisor will assist customers to access their assets at the brokers that have custody of the assets and access to the general partners who manage direct investments in private equity funds. In the case of an external SBD, Advisor’s ability to react will depend heavily on access to other organizations and systems, such as the availability of electricity, telephones, Internet, and transportation.

In creating this BCP, the Advisor has assumed that the firm’s designated alternate office will be available, that Advisor has sufficient personnel, and that government agencies and market systems are operational during and after the SBD. If any of these assumptions are incorrect, the Advisor’s business could be disrupted until matters are resolved. No contingency plan can eliminate all risk of service interruption, but Advisor will continue to assess and update its plans to mitigate all reasonable risks.

II. Plan Approval, Review, Location and Disbursement

A. Approval and Review of Plan

The below chart reflects the dates of creation and review and necessary revisions to the BCP. The BCP will be reviewed annually to determine whether any modifications are

necessary in light of changes to Advisor’s operations, structure, business or location or new regulatory requirements.

Ariadna Tomas, as CCO of the Advisor, is responsible for approving the plan and for conducting annual reviews. During the first quarter of each fiscal year, Enrique Carrillo will review the Advisor’s BCP to determine whether any revisions are needed, and will revise the BCP if necessary, to ensure it meets the firm’s needs and regulatory requirements. An updated copy of the BCP will be distributed to all of Advisor’s employees as soon as possible, after each amendment.

Advisor will also test the Business Continuity Plan to identify any weaknesses and gaps at least annually. This may include testing of areas such as: accessing back-up records; hardware functions at the alternate business location; verification of current contact information and any designated duties for employees, clients, and business partners; verification of vendors, service providers, software and equipment; and conforming the firm’s business practices to the BCP and regulatory requirements.

Effective Date	Description of Action	Name and Title of Firm Employee or Executive
Dec 2019	Initial draft for review	Juan Carlos Riera / CCO
Dec 2020	Annual Review - COVID	Juan Carlos Riera / CCO
Aug 2021	Annual Review	Juan Carlos Riera / CCO
Jan 2023	Annual Review	Ariadna Tomas / CCO – JC Riera / ICS
Jan 2024	Annual Review	Ariadna Tomas / CCO – JC Riera / ICS

B. Plan Location and Access

Advisor will maintain copies of its BCP, the annual reviews, and any revisions made to the plan. An electronic copy of Advisor’s BCP is located on Smart-RIA in the CCO/Management/Policies folder. Each employee should keep a physical copy of the BCP at their physical location.

C. Disbursement of Plan

All employees of Advisor will review the BCP upon beginning their employment. When the BCP is updated, all employees will review the revised plan. The Advisor will periodically train all its employees on the BCP’s requirements.

III. Key Personnel and Succession Plan

Advisor’s key personnel and persons responsible for executing this BCP in the event of an SBD are:

1. Ariadna Tomas / CCO
2. Enrique Carrillo / Director

In the event that these key personnel die or become incapacitated or otherwise unavailable, the following persons are authorized to execute this BCP and carry-on Advisor's business and/or wind down the business:

1. Juan Carlos Riera – Compliance Consultant (ICS)
2. Albert Rovira – Portfolio Manager
3. Andres Obregón – Partner (as board member representative)

These persons have been trained on how to execute the provisions of the BCP and carry-on Advisor's business and/or wind down the business. Enrique Carrillo has power of attorney to act on behalf of Advisor with third parties, including custodian institutions, banks, and regulators.

In case of Enrique Carrillo's death or unavailability, the shareholders agreement signed on February 2nd, 2024, designed as deputy manager to Albert Rovira (CRD #7768750). He would have plenty capacity to manage the relationship with all the clients, custodies, and regulators. Additionally, the IT administrator would be Sebastian Gonzalez from Dcode (sebastian.gonzalez@dinamicandorra.com).

IV. Business Description

Advisor is an SEC-registered advisor that provides investment advisory services. Advisor provides analysis and advice on securities by making direct or indirect recommendations to clients or by providing research or opinions on securities or securities markets. Advisor is compensated for providing this analysis and advice. Advisor services high net worth families and individuals. Advisor does not act as a broker and does not hold client funds or securities.

V. Office Location

Advisor's primary office is located at 2600 S. Douglas Rd, Suite 908, Coral Gables, Florida 33134. The main telephone number is (305) 448-0014 and the contact E-mail: compliance@meridiana-mfo.com.

VI. Alternative Physical Location(s) of Employees

In the event of an SBD, Advisor will move its staff from the affected office(s) to an alternate location TBD. The main telephone number at the alternate location is TBD.¹ If

¹ *Note: Advisor should consider having an alternate location far enough away from its primary location that it would not be affected by the same SBD if the SBD is a citywide or regional event such as a hurricane. If that is not feasible, Advisor should consider having a system in place to allow remote access to office records and/or files from a server that is not in the same region or use cloud technology to ensure uninterrupted access to records.*

Advisor cannot return to its primary office within a reasonable amount of time following the SBD, it will evaluate whether to permanently move to a new primary office location.

In the event of an SBD involving widespread lack of telecommunications, transportation, electricity, office space, fuel and water, Advisor will consider its employees' ability to work remotely during the SBD, as well as how employees may work in the absence of telephone and/or Internet access if necessary. All employees of Meridiana have plenty capacity to access to the different files, records, and tools remotely, so they have flexibility to maintain the business as usual in any case or SBD.

Currently, Advisor engages in client interactions, portfolio management, order entry, keeping of books and records, supervision, and compliance, etc. at an alternate location in the Principality of Andorra (Avda. Meritxell 76, 1º 3ª, Andorra la Vella, Andorra AD500. Telf. +376 606411). This location serves as an alternate location for other services in case of an SBD in our primary location.

VII. Customer Access to Funds and Securities

Advisor does not hold customer funds or securities. Customer funds and securities are held with different custodians, including Banco Santander, JP Morgan, Morgan Stanley, and Bank of America Merrill Lynch.

Customers have access to those funds and securities independent of Advisor. The business continuity plan of for each custodian is available at their respective web site. In the event of an SBD, Advisor will continue to handle customer assets as it did before the SBD to the extent possible based on the availability of the custodian institution's platform.²

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

Advisor maintains its primary hard copy books and records and its electronic records at Avda. Meritxell 76, 1º 3ª, Andorra la Vella, Andorra AD500. Ariadna Tomas is responsible for the maintenance of these primary books and records. Advisor maintains the following document types and forms that are not transmitted to the custodian institution:

- Client Profile
- KYC
- Due Diligence
- Investment Advisory Agreements
- Copies of IDs

Advisor maintains its back-up copy books and records with OneDrive (SharePoint), Smart-RIA, Global Relay (emails back-up), Vox Smart (WhatsApp back-up) and Mastro. Enrique

² *Note: In the event of an SBD, reliance on a single telecommunications service provider could prevent Advisor from performing its obligations. Advisor should consider contracting with multiple carriers in order to have a backup carrier to maintain telephone, email, and fax services.*

Carrillo is responsible for the maintenance of these back-up books and records. Records are backed up continuously by the service providers.

In the event of an SBD that causes the loss of records, Advisor will physically recover them from the different back-up sites. For the loss of electronic records, Advisor will either physically recover the storage media or electronically recover data from the back-up site.

IX. Operational and Financial Assessments in the Event of an SBD

A. Operational Risk

In the event of an SBD, Advisor will immediately assess and identify what means will permit it to communicate with customers, employees, regulators, any custodian institution(s) holding customer funds and securities, and critical business constituents and counterparties. Although the impact of an SBD will determine the means of alternative communication, Advisor may employ website, telephone voice mail, secure email, etc. In addition, Advisor will retrieve key activity records as described in Section VIII, above, Data Back-Up and Recovery (Hard Copy and Electronic).

B. Financial and Credit Risk

In the event of an SBD, Advisor will determine its financial ability to continue to operate and service its customers. Advisor will contact the custodian firm, clients, and critical banks to apprise them of its financial status. If Advisor determines that it is unable to fund its operations, it will request additional financing from its bank or other credit sources to fulfill its obligations to customers. Meridiana board members has defined that the equity should be at least the annual costs from operations.

X. Critical Systems

Advisor's critical systems are those that: (i) allow Advisor prompt and accurate access to client accounts and records, (ii) allow Advisor to communicate investment advice and analysis to customers, and (iii) allow Advisor to receive and transmit orders from or on behalf of customers to custodian institutions for execution.

Advisor has primary responsibility for establishing and maintaining business relationships with customers and transmitting orders from or on behalf of customers to custodian institutions for execution. Custodian institutions have responsibility to receive, execute, clear and settle orders from Advisor or its customers.

Advisor has received and reviewed a copy of the business continuity plan for each custodian institution. Next, there is a list of the principal custodians with a link to their BCP:

- Bank of America Merrill Lynch:
<https://about.bankofamerica.com/content/dam/consumer/cov-assets/pdf/business-continuity.pdf>
- Morgan Stanley:
<https://www.morganstanley.com/institutional-sales/mset-regulatory-communications/business-continuity-planning-information>

- Banco Santander:
<https://www.santander cib.com/sancap/business-continuity-plan-disclosure>
- JP Morgan:
https://www.jpmorgan.com/content/dam/jpm/global/disclosures/by-business/JPMSI_Business_Continuity_Plan.pdf
- UBS:
<https://www.ubs.com/global/en/legal/country/usa/business-continuity.html>
- Alex Brown:
<https://www.raymondjames.com/legal-disclosures/business-continuity-planning-disclosure-statement>
- Bony:
<https://www.bnymellon.com/content/dam/bnymellon/documents/pdf/disclaimers/bny-mellon-capital-markets-llc-business-continuity-planning-disclosure.pdf>

XI. Critical Business Constituents, Banks, and Counterparties

Advisor will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services when needed. Advisor's critical business constituents include: Mastro, International Compliance Solutions, Global Relay, Vox Smart among others.

The bank maintaining Advisor's operating account is JPMorgan.

XII. Communication of SBD to Other Parties

In the event of an SBD, including the death or unavailability of key personnel, the persons executing this BCP will determine the persons that need to be notified about the SBD, including employees, customers, regulators, custodians, and critical business constituents. The persons who need to be notified, and how, will vary with the circumstances of the SBD.

During an SBD, Advisor will ensure, to the extent possible, that its website reflects the firm's operational status and contact information. Advisor may place status messages on its website indicating to customers, for instance, the nature of the SBD or the status of its services to customers.

XIII. Alternative Communications Plans

A. Customers

Advisor now communicates with customers using [telephone, email, website, fax, U.S. mail, in-person visits, etc.]. In the event of an SBD, Advisor will assess which means of communication are still available and use the means closest in speed and form (written or oral) to the means that Advisor used in the past to communicate with the other party. For example, if Advisor has primarily communicated with a party by email, but the Internet is unavailable, Advisor will call the customer on the telephone and follow up where a record is needed with paper copy in the U.S. mail.

In the case of an expected SBD, such as a forecasted storm, Advisor will consider proactively contacting customers (for instance, by email blast) to determine whether they need to execute any transactions (e.g., fund transfer, wire instructions, closing out positions) in case of an extended outage.

B. Employees

Advisor now communicates with its employees using [telephone, email, website, fax, U.S. mail, in-person visits, etc.]. In the event of an SBD, Advisor will assess which means of communication are still available and use the means closest in speed and form (written or oral) to the means that Advisor has used in the past to communicate with the other party.

Advisor may also employ a call tree so that senior management can reach all employees quickly during an SBD if email and cellular phones (including texting) is not available. The call tree includes all staff home, office and cell phone numbers. In creating the call tree, Advisor has identified persons who live near each other and may reach each other in person. The person to invoke use of the call tree is: Enrique Carrillo.

Caller	Call recipients
Enrique Carrillo	Juan Carlos Riera, Ariadna Tomas, María Grau
Ariadna Tomas	Geraldine Quiroga, Albert Rovira
Juan Carlos Riera	Julio Cesar Canas, Mauricio De Stefano

C. Regulators

Advisor is currently registered as an investment advisory firm with the State of Florida. Advisor currently reports to the following regulators: US Securities & Exchange Commission (“SEC”). Advisor communicates with its regulators using telephone, email, , U.S. mail, and in-person visits, etc. In the event of an SBD, Advisor will assess which means of communication are still available, and use the means closest in speed and form (written or oral) to the means that Advisor has used in the past to communicate with the other party, including to make any necessary filings, disclosures, etc.

In the event that Advisor cannot contact its regulators, it will continue to file required reports to the extent possible using the communication means available to it. Advisor’s primary persons of contact with its regulators is the following: Juan Carlos Riera, International Compliance Solutions LLC, 2600 S. Douglas Rd, Suite 908, Coral Gables, Florida 33134. Phone +1(305) 448-0014. In the event of an SBD, Mr. Riera will be responsible for ensuring that the Advisor has access to the Investment Adviser Registration Depository (IARD) system, the electronic filing system that facilitates investment advisor registration, and that all appropriate Form ADV filings, including annual and interim amendments, are made and maintained.

In the event of a formal or informal inquiry made by any federal or state regulatory agency during an SBD, Mr. Riera will be responsible for receiving all calls and/or all other requests for further review.

D. Custodians

Merrill Lynch, UBS AG, JP Morgan Securities, JP Morgan Suisse, Andbank, Morgan Stanley, Lombard Odier, Alex Brown, EFG , BONY and Banco Santander Internacional currently hold the funds and/or securities of Advisor's customers. Advisor currently communicates with these institutions using [telephone, email, website, fax, U.S. mail, in-person visits, etc.]. In the event of an SBD, Advisor will assess which means of communication are still available and use the means closest in speed and form (written or oral) to the means that Advisor has used in the past to communicate with the custodian[s].

E. Critical Business Constituents, Banks, and Counterparties

Advisor now communicates with its critical business constituents using telephone, email, website, and in-person visits. In the event of an SBD, Advisor will assess which means of communication are still available and use the means closest in speed and form (written or oral) to the means that Advisor has used in the past to communicate with the other party.

XIV. Disclosure of Business Continuity Plan

Advisor will post a BCP Notice on its website located at www.meridiana-mfo.com and will mail it to customers upon request.

BUSINESS CONTINUITY PLAN DISCLOSURE STATEMENT

MERIDIANA MFO LLC (“Advisor”) has adopted a Business Continuity Plan (“BCP”) pursuant to the Investment Advisers Act and the rules and guidance of the U.S. Securities and Exchange Commission (“SEC”) and/or the laws of the State of Florida, where the Advisor is located. The purpose of the BCP is to define the strategies and plans that will be used by Advisor during a significant business disruption (“SBD”). The BCP is prepared to address both internal SBDs, such as a fire in Advisor’s building, and external SBDs, such as a natural disaster, terrorist attack, or citywide power disruption.

Our Business Continuity Plan

In the event of an SBD, Advisor will safeguard employee lives and firm property. Advisor will work to re-establish the systems necessary to quickly recover and resume operations, protect Advisor’s books and records and allow Advisor’s customers to transact business to the extent reasonable and practical under the circumstances. Advisor’s BCP addresses: alternate office locations, customer access to funds and securities, financial and operational assessments, data backup and recovery, critical systems, alternative communications with customers, employees, and regulators, and critical business constituents.

Contacting Advisor and Accessing Funds and Securities

If you are not able to contact Advisor through our regular telephone (305) 203-4816, please contact us at our alternate number 305 448-0014. For questions relating directly to accessing your funds and securities, please contact your custodian institution at the number provided on your monthly statement or custodian’s website.

Varying Disruptions

SBDs can vary in their scope, from only our firm to 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 intend to transfer our operations to a local site when needed and expect to recover and resume business within a four-hour time period. In a disruption affecting our business district, city, or region, we intend to transfer our operations to a site outside the affected area and recover and resume business within a 24-hour time period. In either situation, we plan to continue in business. However, the ability of Advisor to fully function is dependent on outside sources outside of its control, including the availability of electricity, telephones, Internet, transportation, and the functioning of institutions and markets worldwide. Nothing in Advisor’s BCP or this disclosure statement is intended to provide a guarantee or warranty regarding the actions or performance of Advisor.

Additional Information

If you have questions about our business continuity planning, please contact us at information@meridiana-mfo.com.