

Hubble Investments LLC Business Continuity Plan

[FINRA Rule 3510, Notices to Members 06-74 and 04-37]

Hubble Investments LLC (“Hubble Investments”) has developed a Business Continuity Plan to provide procedures for response and recovery in the event of a significant business disruption. The purpose of the Plan is to identify responsible personnel in the event of a disaster; safeguard employees' lives and firm property; evaluate the situation and initiate appropriate action; recover and resume operations to allow continuation of business; provide customers with access to their funds and Securities; and protect books and records. The Plan was developed considering the types of business conducted, systems critical to support business, and geographic dispersion of offices and personnel.

Types of Business Conducted

Offering of Securities via Private Placements

Office Location

Hubble Investments has only one office which is located at 755 Sansome Street, Suite 400, San Francisco, CA 94111

Designation of Responsibilities

The following is a list of those responsible for Hubble Investments' Business Continuity Plan.

Responsibility	Names or Titles
Maintain and update Plan	Swati Chaturvedi, Principal
Approve Plan and Plan revisions; conduct annual review	Swati Chaturvedi, Principal
Annual testing of Plan	Swati Chaturvedi, Principal
Implementation of Plan when a disruption occurs	Swati Chaturvedi, Principal
Quarterly review of Emergency Contact Persons and report changes to regulators	Swati Chaturvedi, Principal
Maintain and distribute Emergency Contact List	Swati Chaturvedi, Principal
Maintain and update Books and Records Chart	Swati Chaturvedi, Principal
Provide Plan information to customers:	Swati Chaturvedi, Principal
<ul style="list-style-type: none"> ● At time of account opening ● Upon request 	

Post Plan disclosure on Hubble Investments' web site and update, as required Swati Chaturvedi, Principal

Review critical third party assurances or disaster plans or plan summaries: Swati Chaturvedi, Principal

- At initial engagement of third party
- Annually when Hubble Investments' Plan is reviewed

Retention and Location of The Plan

Copies of the current and prior versions of the Business Continuity Plan are retained as follows. Copies are dated as of the effective date of the version of the Plan.

- A current hard copy is retained by Compliance with a record of the senior manager's approval.
- An electronic copy is retained at Hubble Investments (755 Sansome Street, Suite 400, San Francisco, CA 94111).
- Prior versions (including approvals) are retained by Compliance.

Significant Business Disruption (SBDs): Implementation of The Plan

The Plan has been designed to be implemented in the event of a disaster that results in a significant business disruption. Whether all or only parts of the Plan are implemented depends on the nature of the disruption. Generally, a significant business disruption would include:

- Destruction of Hubble Investments' offices or facilities, whether by natural causes or by other means
- Loss of life or major injuries to personnel in an office location that disables that office's ability to conduct business
- Disruption of service from a critical service provider
- Disruption of service due to wide-ranging regional outages such as a power outage

1.1.1 Emergency Response Team

Hubble Investments has designated an Emergency Response Team that is responsible for implementing necessary procedures included in this Plan. The Response Team's action will depend on the nature and scope of the disruption. The "first responder" has the primary responsibility for taking action, and the "secondary responder" acts as a back-up in the event the first responder is unable to act. Where feasible, the two responders are located in different office locations.

Action	First Responder / Location	Secondary Responder / Location
Contact emergency services such as police, fire department	Swati Chaturvedi Principal Main Office	Lisheng Wang Reg. Representative Main Office
Establish off-site command center and notify employees	Swati Chaturvedi	Lisheng Wang
Contact employees regarding Plan initiatives	Swati Chaturvedi	Lisheng Wang
For affected offices, evaluate business disruption and transfer employees and business operations to other locations	Swati Chaturvedi	Lisheng Wang
Appoint individuals to manage business areas where needed	Swati Chaturvedi	Lisheng Wang
Assess financial and operations capabilities	Swati Chaturvedi	Lisheng Wang
Determine financial and credit risk and contact banks and other counter-parties, if necessary, to secure financing to continue operations	Swati Chaturvedi	Lisheng Wang
Notify regulators in the event of a capital deficiency	Swati Chaturvedi	Lisheng Wang
Interface with SIPC if liquidation of business is initiated	Swati Chaturvedi	Lisheng Wang
Contact critical service providers	Swati Chaturvedi	Lisheng Wang
Transfer mission critical functions that are disrupted	Swati Chaturvedi	Lisheng Wang
Initiate alternative customer communications systems or procedures	Swati Chaturvedi	Lisheng Wang
Notify customers regarding alternative access to funds and Securities	Swati Chaturvedi	Lisheng Wang

Recover back-up records when primary records are destroyed or inaccessible	Swati Chaturvedi	Lisheng Wang
Contact regulators and notify them of contact persons and recovery plans	Swati Chaturvedi	Lisheng Wang

Emergency Contact List

Hubble Investments has established an Emergency Contact List that includes the names, phone numbers (cell and landlines), e-mail addresses, and other contact information for individuals critical to Hubble Investments' business including key employees, key vendors or service providers, regulators, insurance carriers, banks, attorneys, and other key contacts. A copy of the List is provided to each member of the Response Team and other key personnel. This list will be reviewed and updated on at least an annual basis.

The Emergency Contact List is attached to this plan as Appendix A.

Alternative Business Locations

In the event employees can no longer conduct business at one of Hubble Investments' office locations, the following actions may be taken:

- Transfer employees to the closest unaffected personal home office and notify personnel
- Transfer critical systems to another office or a backup firm or system
- Transfer business operations to a different broker-dealer or other entity

Data Backup and Recovery

Hubble Investments maintains its books and records solely in electronic format via G Suite provided by Google.

In the event of an internal or external significant business disruption that causes the loss of Hubble Investments' records (whether hard copy or electronic records), back-up records will be recovered from G Suite.

Mission Critical Systems

Mission critical systems are systems that are necessary to ensure prompt and accurate processing of Securities transactions including order taking, entry, execution, comparison, allocation, clearance and settlement, maintaining customer accounts, and providing access to customer funds and Securities.

The Mission Critical Systems chart (Appendix B to the Plan) identifies systems (or generally describes procedures) that are critical to the operation of Hubble Investments'

business; identifies third parties that provide those systems; and potential alternate procedures or systems for handling these critical functions in the case of a disruption.

Financial and Operational Assessments

The following describes procedures for assessing changes in operational, financial, and credit risk exposures in the event of a significant business disruption.

Operational Risk

In the event of a significant business disruption, alternative systems will be implemented to communicate with customers, employees, critical business constituents (banks, counter-parties, *etc.*), regulators, and other key parties depending on the nature and impact of the disruption. Communication systems are described in the section *Alternative Communications*.

Financial and Credit Risk

In the event of a significant business disruption, Hubble Investments' financial status will be evaluated to determine the need for additional financing or identify capital deficiencies including the following:

- Review the impact of the disruption on Hubble Investments' ability to conduct business
- Identify inability to satisfy obligations with counter-parties
- Contact banks or other counter-parties to secure needed additional financing
- Notify regulators of capital deficiencies
- Reduce or cease business as may be required due to capital deficiencies or inability to conduct business
- Transfer business to other financial institutions until Hubble Investments may resume conducting business

Alternative Communications

Hubble Investments may use a wide range of communication systems to communicate with its customers, employees, counter-parties, and regulators including telephone; mail; fax; e-mail; and personal meetings. Procedures for instituting alternative communications in the event of a significant business disruption include the following, depending on the nature of the disruption:

- Identify the most expedient remaining means of communication
- Notify employees if an off-site command center has been activated
- Notify employees of alternative communication systems to be used
- Transfer communications to another firm

Determination of what communication system will be used depends on the nature of the disruption and which communication systems (electronic mail, telephone calls, *etc.*) are functional and the availability of personnel in the event telephone contact is necessary.

Between Customers and the Firm

In the event of a significant business disruption that disables communications systems, alternative system procedures will be implemented, including the following:

- Identify the most expedient remaining means of communication
- Notify employees regarding how to contact customers
- Contact customers about how to enter orders, how to access accounts and account assets, and other alternative business operations

Between The Firm and Its Employees

In addition to the above, Hubble Investments has developed a system to enable senior management to contact employees in the event of an emergency. The system may include, depending on geographic dispersion of employees:

- A central list of all personnel and their contact information

Between the Firm and Regulators

Communications with regulators will be conducted using the most expedient available communication system. The designated Response Team person will contact regulators regarding any major business disruption and plans for continuing business.

The Firm's current regulators are:

FINRA District 1 Office
 100 Pine Street
 Suite 1800
 San Francisco, CA 94111
 (415) 217-1100
 Fax: (301) 527-4800

SEC San Francisco Regional Office
 44 Montgomery Street, Suite 2800
 San Francisco, CA 94104
 Phone: 415-705-2500

State of California
 1515 K Street
 Suite 200
 Sacramento, CA 95814-4052
 (866) 275-2677

Business Constituent, Bank, and Counter-Party Impact

This section describes business continuity procedures regarding third parties that are critical to the conduct of Hubble Investments business. In most instances, contracts with critical third parties will include assurances regarding the third party's disaster recovery

plans. A disruption impacting Hubble Investments' ability to conduct business may occur either at Hubble Investments itself or at the third party.

The Business Constituent, Bank, And Counter-Party chart (Appendix C to the Plan) identifies key parties and potential alternatives in the event of a disruption.

Business Constituents

- Determine whether the third party is able to continue providing critical services.
- If not, identify and contact an alternate third party to provide services.

Banks and Other Financial Institutions

The Firm's bank is: Bank of America, N.A.

- Determine whether the bank is able to continue providing financial information

Critical Counter-Parties

- Determine whether transactions may be completed with counter-parties.
- If not, contact counter-party directly to make alternative arrangements to complete transactions.

Other Obligations to Customers

Accepting Customer Business

In the event Hubble Investments' systems for accepting customer business are disrupted, alternative systems will be communicated to customers and to employees including, where appropriate:

- Accepting requests by telephone or other alternative means

Prompt Access to Funds and Securities

Hubble Investments does not handle customer funds or securities.

SIPC Liquidation

In the event SIPC liquidation of Hubble Investments' business is required, designated personnel will work with the SIPC-appointed trustee to wind down Hubble Investments' operations.

Disclosure of Business Continuity Plan

[FINRA Rule 3510(e)]

Information about Hubble Investments' Business Continuity Plan is provided to customers as follows:

- At the time of account opening
- On Hubble Investments' website

- Upon request, by mail

The following is the text of the Business Continuity Disclosure Form:

Hubble Investments LLC

Business Continuity Planning

Hubble Investments Capital Markets has developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

Contacting Us – If after a significant business disruption you cannot contact us as you usually do at 877-642-1938, you should call our alternative number 617-955-6008.

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, making a financial and operational assessment, protecting the firm’s books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: 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 counter-party impact; regulatory reporting.

Customer data (investors and startups) is stored in the following locations:

- Our application database (hosted on Heroku, a subsidiary of Salesforce)
- Salesforce (for customer correspondence records)
- Amazon S3 (documents uploaded by our customers, and database backups)
- Docusign (documents digitally signed by our customers)
- Full archival copies of our application database are automatically made nightly, weekly and monthly at Heroku, and copies of these backups are transferred periodically to Amazon S3.
- Docusign documents are only generated when an investor commitment is in progress. Once completed, these documents are also backed up on Amazon S3.

For personally identifiable information regarding investors, the application database stores current values, with historical values retained in backups. For every investment there will be a permanent and immutable copy of the information that was valid at that time.

Varying Disruptions – Significant business disruptions can vary in their scope, such as only our firm, 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 will transfer our operations to a local site when needed and expect to recover and resume business within a 24-hour period. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area, and recover and resume business within 48 hours.

For more information – If you have questions about our business continuity planning, you can contact us 415-935-0554.

Emergency Contact Information

[FINRA Rule 3520]

Hubble Investments has provided FINRA with the names of two emergency contact persons who are registered and are members of senior management.

Emergency contact information will be promptly updated, when necessary. The FINRA Executive Representative (or other designated employee) will review the contact information within 17 business days of the end of each calendar year and will retain a written record of the review. If the Executive Representative delegates this responsibility, a written memorandum designating another employee will be provided to Compliance, where it will be retained with the current Plan. The annual review of the Plan will include verification that only the Executive Representative or delegate is conducting the review and updates.

The emergency contacts are:

Swati Chaturvedi, (415) 935-0554, Swati@propelx.com, registered principal of Firm
Lisheng Wang, (415) 578-0160, lisheng@propelx.com, registered representative of Firm

1.1.1 Education of Employees

The Business Continuity Plan is communicated to employees as follows:

- A summary is included in the Written Supervisory Procedures chapter *GENERAL EMPLOYEE POLICIES* in the section *Emergency Business Recovery Procedures* and is provided to all employees.
- A current copy of the Plan is provided to the Emergency Response Team and key employees with responsibilities for aspects of the Plan.
- The most recent Emergency Contact List is provided to key employees.

1.1.2 Updating, Annual Review, and Testing

The Plan will be reviewed on at least an annual basis and revised as needed. Each revision will be approved by the designated senior manager and copies of the revised Plan distributed to the Emergency Response Team and key employees. Some material events require updating the Plan when they occur, including:

- Material changes to Hubble Investments' business

- A change in Hubble Investments' main office location
- Added office locations
- A change in a major service provider

When the Plan is reviewed, the procedures and accompanying lists and charts will be reviewed and updated as needed including the:

- Plan itself
- Emergency Response Team list
- Emergency Contact List (Appendix A)
- Mission Critical Systems chart (Appendix B)
- Business Constituent, Bank, and Counterparty chart (Appendix C)
- Any other charts or information related to the Plan

A written record of the annual review including the date reviewed and name and signature of the reviewer will be retained by Compliance.

Senior Manager Approval

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

Signed: _____

Title: _____

Date: _____