

# Business Continuity Policy as of March 2022

Plan Confidence Corporation (PC) has implemented a Business Continuity Policy, our firm will update this plan whenever we have a material change to our operations, structure, business or location or to those of our third party vendors. In addition, our firm will review this BCP annually to modify it for any changes in our operations, structure, business or locations.

## *Firm Policy*

The firm's emergency contact person is Kevin Clark; he can be contacted by phone at 312-373-0772.

Our firm'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 all of the firm's books and records.

## *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 or an armed intruder. External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a tornado touch down, or a wide-scale, regional disruption. Our response to an external SBD relies more heavily on other organizations and systems.

## *Approval and Execution*

Kevin Clark, CCO is responsible for approving the plan and for conducting the required annual review. CCO, has the authority to execute this Business Continuity Policy (BCP).

## *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.

## *Office Locations*

Our firm has one office located at 4974 Oldham Rd Sarasota, Florida 34238

## **Data Backup and Recovery**

In the event that the PLAN CONFIDENCE database becomes corrupted, deleted or otherwise unable to use, the following steps will be followed:

1. The PLAN CONFIDENCE service will be temporarily turned off to users.
2. An email from [support@planconfidence.com](mailto:support@planconfidence.com) will be sent out to all PLAN CONFIDENCE users informing them of the situation along with the best estimate of when the service should be restored.
3. The PLAN CONFIDENCE database will be restored from the most recent backup.
4. The PLAN CONFIDENCE service will be tested to ensure the service is working properly prior to making the service “live”.
5. An email from [support@planconfidence.com](mailto:support@planconfidence.com) will be sent to all PLAN CONFIDENCE users informing them that the system is once again available for use.
6. All users will be instructed to send any questions or comments to [support@planconfidence.com](mailto:support@planconfidence.com) .

### *Operational Risk*

In the event of an SBD, we will immediately identify what means will permit us to communicate with our customers, employees, critical business constituents, critical banks, critical counter-parties and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options we will employ will include our website, telephone voice mail, secure email, etc. In addition, we will retrieve our key activity records as described in the section above, Data Backup and Recovery.

### *Financial and Credit Risk*

In the event of an SBD, we will determine the value and liquidity of our investments and other assets to evaluate our ability to continue to fund our operations and remain in capital compliance. We will contact our critical banks to apprise them of our financial status. If we determine that we may be unable to meet our obligations to those counter-parties or otherwise continue to fund our operations, we will request additional financing from our bank or other credit sources to fulfill our obligations to our customers and clients. If we cannot remedy a capital deficiency, we will file appropriate notices with our regulators and immediately take the appropriate steps necessary.

### *Alternative Communications between PC, Clients, Employees and Regulators*

#### A. Employees

We communicate with our employees using telephone, email, and in person communications. In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used to communicate with the other party.

#### B. Regulators

We are regulated by the U.S. Securities and Exchange Commission. We communicate with our regulators using telephone, email, fax and U.S. mail. In the event of an SBD, we will assess

which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other parties.

### **PC Managing Members' Incapacity**

If the PC Managing Member, Kevin Clark is in some way incapacitated and not able to properly manage PC client accounts portfolios, an alternate Investment Adviser chosen by Mark Reddick would step in to maintain a continuous flow of advice to clients.