



BUSINESS CONTINUITY PLAN

The purpose of this business continuity plan (BCP) is to enable all employees, with assistance from others, to meet emergencies with maximum efficiency and, thereby, ensure the quick recovery and resumption of operations. The plan will be activated after any disaster such as an earthquake, tornado, fire, flood, water damage, explosion, loss of utilities, or any other Significant Business Disruptions (SBDs) requiring emergency procedures that results in a major interruption of normal business operations.

1. Significant Business Disruptions (SBDs)

Advisor's plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only Advisor's ability to communicate and do business, such as a fire in Advisor's place of business. 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.

2. Approval and Execution Authority

The CCO is responsible for approving the plan and for conducting the review as part of the Advisor's required annual compliance review. The CCO has the authority to execute this BCP.

3. Plan Access

Advisor will maintain copies of its BCP plan and the annual reviews, and the changes that have been made to it for inspection. An electronic copy of this plan is located on [INSERT SERVER NAME] in the [INSERT SITE/FOLDER NAME]

4. Business Description

[FIRM] is an investment advisory and financial planning firm that conducts business in equity, fixed income, funds and other securities. Advisor does not custody customer funds or securities. All client assets are sent to Advisor's custodian(s) which execute(s) orders, compares them, allocates them, clears and settles them. Advisor's custodian(s) also maintains its customers' accounts, can grant customers access to them, and delivers funds and securities. Advisor services only retail and institutional customers. Advisor does not engage in any private placements.

Advisor's custodian(s) is/are [INSERT NAME, ADDRESS, PHONE, EMAIL, WEBSITE] and Advisor's contact person(s) at that the custodian(s) is/are [INSERT FIRM PHONE AND EMAIL]. Advisor's custodian(s) has/have also given Advisor the following alternative contact in the event it cannot be reached:

[INSERT FIRM NAME, ADDRESS, PHONE, EMAIL, WEBSITE]

Office Location

Advisor's office is located at 5 Centerpointe Drive, Suite 400, Lake Oswego, Oregon 97035. Its main telephone number is 503-214-6534. Advisor engages in securities order-taking and entry at this location.

Alternative Physical Location(s) of Employees

In the event of an SBD, Advisor will move staff from affected offices to the closest unaffected office locations. If none of Advisor's other office locations is available to receive those staff, they will be moved to [INSERT LOCATION]. Its main telephone number is [INSERT PHONE].

Customers' Access to Funds and Securities

As stated above, Advisor does not maintain custody of customers' funds or securities, which are maintained at Advisor's custodian(s), [INSERT CUSTODIAN(S)]. In the event of an internal or external SBD, if telephone service is available, employees will take customer orders or instructions regarding customer accounts on an as needed basis.

Data Back-Up and Recovery of Electronic Records

Advisor backs up its electronic records in real-time and maintains its records at [INSERT ADDRESS]. [INSERT FIRM NAME, TITLE, PHONE] is responsible for the maintenance of these books and records.

In the event of an internal or external SBD that causes the loss of electronic records, Advisor will electronically recover them from the primary backup site. If the primary backup site is inaccessible, Advisor's backup provider, [INSERT NAME], maintains several alternative backup sites that will be accessible.

5. Financial and Operational Assessments

5.1. Operational Risk

In the event of an SBD, Advisor will immediately identify what means will allow communication with its customers, employees, key business relationships, and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options Advisor will employ will include [INSERT EXAMPLES: MOBILE AND LANDLINE PHONE, VOICEMAIL, SECURE MAIL, ETC.].

5.2. Financial and Credit Risk

In the event of an SBD, Advisor will determine the value and liquidity of its investments and other assets to evaluate its ability to continue to fund its operations. If Advisor determines that it may be unable to meet its obligations to those counter-parties or otherwise continue to fund its operations, Advisor will request additional financing from its bank or other credit sources to fulfill obligations to customers and clients. If Advisor cannot remedy a capital deficiency, it will file appropriate notices with its regulators and take appropriate steps.

5.3. Key Systems

Advisor's "key systems" are those that ensure prompt and accurate processing of securities transactions, including order taking, entry, execution, comparison, allocation, clearance and settlement, maintenance of customer accounts, access to customer accounts, and the delivery of funds and securities.

6. Custodial Firm Responsibilities

Advisor's custodian provides, through contract, the execution, comparison, allocation, clearance and settlement of securities transactions, the maintenance of customer accounts, access to customer accounts, and the delivery of funds and securities.

Advisor's contract with its custodian provides that the custodian will maintain a business continuity plan and the capacity to execute that plan. Advisor's custodian represents that it will inform Advisor of any material changes to its plan that might affect Advisor's ability to maintain its business. In the event Advisor's custodian executes its plan, it represents that it will notify Advisor of such execution and provides Advisor equal access to services as its

other customers. If Advisor reasonably determines that its custodian has not or cannot put its plan in place quickly enough to meet Advisor's needs, or is otherwise unable to provide access to such services, Advisor's custodian represents that it will assist Advisor in seeking services from an alternative source.

Advisor's custodian represents that it backs up records at a remote site and that it operates a back-up operating facility in a geographically separate area with the capability to conduct the same volume of business as its primary site. Advisor's custodian has also confirmed the effectiveness of its back-up arrangements to recover from a wide scale disruption by testing.

Recovery-time and resumption 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 key 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. Advisor's custodian has appropriate SBD recovery time and resumption objectives.

7. Advisor Responsibilities

7.1. Order Entry

Currently, Advisor enters orders by recording them and electronically or telephonically sending them to its custodian.

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

7.2. Alternate Communications between Advisor and Customers, Employees, and Regulators

7.2.1. Customers

Advisor communicates with its customers using the telephone, email, fax, postal mail, private courier, and in-person visits at Advisor's place of business or at the other's location. In the event of an SBD, Advisor will assess which means of communication are still available, and use the communication vehicle that offers the most speed and reliability at the time. For example, if Advisor has communicated with a party by email but the Internet is unavailable, Advisor may contact the party via telephone and follow up, if a physical record or document is required, with a physical document sent via postal mail or by private courier.

7.2.2. Employees

Advisor currently communicates with employees using the telephone, email, and in-person. In the event of an SBD, Advisor will assess which means of communication are still available, and use the communication vehicle that offers the most speed and reliability at the time. Advisor will also employ a "call tree" [INSERT DEFINITION] such that senior management may communicate with all employees quickly during an SBD. The call tree will include all employees' office, mobile, home and emergency contact telephone numbers.

7.2.3. Key Business Relationships

Advisor has surveyed its key business relationships (businesses with which Advisor has an ongoing commercial relationship in support of operating activities, such as vendors providing essential services),

and determined the most effective method of communication should an SBD occur. Advisor will quickly establish alternative arrangements if a business constituent can no longer provide the required goods or services necessary. Advisor's major suppliers are:

[INSERT SUPPLIER'S NAME, ADDRESS, PHONE & ANY ALTERNATIVE'S NAME, ADDRESS, PHONE]

Advisor has contacted its banks and lenders to determine whether they can continue to provide the financing that needed in light of an internal or external SBD. The bank maintaining Advisor's operating account is: [INSERT BANK NAME, ADDRESS, PHONE AND CONTACT PERSON]. If Advisor's banks and other lenders are unable to provide the financing, Advisor will seek alternative financing immediately from [INSERT ALTERNATE BANK/LENDER NAME, ADDRESS, PHONE AND CONTACT PERSON].

8. Updates and Annual Review

Advisor will update this plan whenever there is a material change to its operations, structure, business or location or when there are similar material changes at Advisor's clearing firm. In addition, Advisor will review this BCP annually as part of Advisor's annual compliance review and modify it for any material changes. As part of the annual compliance review Advisor will review and train employees on the BCP and appropriate response(s) to SBDs.