**Strategic Planning, Inc.**

**Business Continuity Plan**

1. Introduction

The purpose of this Business Continuity Plan (“BCP” or “Plan”) is to enable employees of Strategic Planning, Inc. (the “Adviser” or the “Firm”) to respond efficiently to an emergency situation that might cause an interruption to the Firm’s business operations. Investment advisers have a fiduciary responsibility to their clients to protect their interests in the event they are unable to provide investment advisory services. Accordingly, an investment adviser’s written policies and procedures must include a business continuity plan that is designed to avoid or minimize disruptions and to recover as rapidly and efficiently as possible from lost functionality following an event in order to continue to conduct business.

1. Firm Policy

The Adviser’s policy is to respond to significant business disruptions (“SBDs”) by (a) safeguarding Firm property, including books and records; (b) making a financial and operational assessment; (c) quickly recovering and resuming operations; and (d) allowing the Firm to transact business on behalf of our clients (“Clients”). In short, our BCP is designed to permit the Firm to resume operations as quickly as possible, given the scope and severity of the SBD.

1. Emergency Contact Person

The Firm has designated the following individual to act as the emergency contact person for the Firm:

Name/Title: Stanley Edgell, President and CCO

Mobile: 614-531-2635

E-mail: stan@stgplan.com

The Firm has also designated the emergency contact person to be the Disaster Recovery Coordinator (“DR Coordinator”). The DR Coordinator has the responsibility to make an immediate, preliminary assessment of the nature and extent of all business disruptions by assessing the following: electricity supply; condition of computer network/phones; damage to the building; environmental conditions in extreme weather; and other hazards. If the DR Coordinator determines that employees should evacuate the Firm’s office location or not report to the office location, he will make an announcement to all employees as per appropriate procedures. After ensuring the physical safety of the employees, the DR Coordinator will implement this BCP. In the event the DR Coordinator is not present, employees should make a decision as to their personal safety and the safety of their co-workers and evacuate the building if their safety is in question.

If the situation does not merit evacuation, steps should be taken to alert Firm personnel of necessary actions to facilitate ongoing operations in the face of a disruption. In this case, the DR Coordinator will determine which, if any, procedures in this BCP should be implemented.

1. Significant Business Disruptions

The Plan anticipates two kinds of SBDs: internal and external. Internal SBDs affect only the Firm’s ability to communicate and do business, such as a fire in our building. 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.

1. Approval and Execution Authority

As President and CCO of the Firm, Stanley Edgell is responsible for approving the plan and for conducting the review as part of the required annual firm-wide compliance review. Mr. Edgell has the authority to implement this BCP.

1. Access to Business Continuity Plan

Mr. Edgell will maintain copies of the BCP and the annual reviews of the BCP. An electronic copy of the current, active BCP will be maintained in the central filing system on the BCP jump drive in the “Business Continuity Plan” folder. All access persons will be provided with a paper copy of the Plan, which is to be retained at a location other than the Firm’s office.

1. Business Description

The Firm is a registered investment adviser that manages Client investment portfolios and provides financial planning services. The Firm does not maintain custody of Client funds or securities. All Client assets are maintained with an independent, unaffiliated custodian. The custodian, Charles Schwab & Co., Inc. (“Schwab”), executes and settles all trade orders. Schwab maintains Clients’ accounts, can grant Clients access to their accounts, and delivers funds and securities.

1. Office Location

As of the implementation of the current BCP, the Firm’s only office is located at 7600 Olentangy River Rd. Suite B, Columbus, Ohio 43235. The Firm’s telephone number is (614) 802-0170. All business activities take place at this location.

1. Alternate Office Location

In the event of an SBD, and if invoked by the DR Coordinator, the Firm’s employees may perform their daily activities remotely from their place of residence. Alternatively, the Firm may move its operations to the CEO’s home, located at 2077 Woodlands Place, Powell, Ohio 43065. The DR Coordinator will utilize the Call Tree at the end of this BCP to notify all employees of the time and location at which all staff will meet.

1. Office Equipment/VPN Access

In the event of an SBD, the Firm’s equipment needs can be fulfilled by utilizing one or more of the Firm’s laptops. The Firm’s server can be accessed securely by utilizing VPN Access.

1. Client Access to Funds and Securities

The Firm does not maintain custody of Clients’ funds or securities. Client accounts are maintained by Schwab, the Firm’s custodian. Schwab is an independent, third-party service provider. In the event of an SBD, the DR Coordinator will post notice on the Firm’s website that, in the event the Firm cannot be reached, Clients can access their funds and securities via Schwab’s website at www.schwab.com. For those Clients who have not consented to electronic delivery of notices, the Firm’s staff will call each Client once they have begun operations in the alternate office location. The Firm has the ability to forward the office phones to an alternate location or cell phone.

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

The Firm maintains its primary electronic copy of its books and records and electronic mail at the Firm’s office location, using an on-site server. The on-sight server stores all electronic daily communication from all office PCs on a network map. All office electronic information that is captured daily is mirrored and backed up, using the backup and cloud storage system provided by Datto, Inc., a service provider which provides business continuity and disaster recover products and services. In the event of a failure of the onsite main server, the office PCs will automatically map to the Datto backup system. The Firm’s internal files are backed up though Datto at more than one secure data center. In the event the onsite server and Datto are lost, full data recovery from a secure data center is available at all times. Off-site backup frequency is continuous by default. All data is fully encrypted during transmission off-site and while stored off-site.

The Firm’s data back-up and recovery services are provided by Team Logic IT, located at 7716 Rivers Edge Dr., Suite B, Columbus, Ohio 43235. The Team Logic IT helpdesk can be reached via email at ColumbusSupport@teamlogicit.com\_or via telephone at 614-885-4648. Team Logic IT manages the Firm’s connections to the Datto and coordinates services with the provider.

In the event of an SBD during which the Firm loses access to the server and the Datto backup server, Team Logic IT can support full system backup capabilities and provide restoration within 24 hours on individual PCs to avoid any business disruptions. Full business capabilities may also be available through any location with available web access, using secure online internet portals on company laptops.

1. **Financial and Operations Risk**
	1. Financial Risk. In the event of an SBD, the Adviser will contact Schwab to apprise Schwab of the Firm’s SBD status and new location, if applicable, as soon as practicable.
	2. Operational Risk. In the event of an SBD, the Firm will immediately identify the mode of communication that will enable us to communicate with our Clients, employees, critical service providers, banks, and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options will include our Web site, telephone, voice mail, e-mail, and in-person visits.
2. **Mission Critical Systems**

Since the Adviser does not maintain custody of its Clients’ assets and securities, the Adviser’s “mission critical systems” are limited to those that allow the Firm to communicate with its employees, Clients, service providers and regulators, monitor securities markets, promptly and accurately process securities transactions and maintain the Firm’s books and records.

1. Communication with Clients. The Firm most commonly communicates with its Clients using the telephone (landline or mobile), email and in-person visits at the Firm’s office. In the event of an SBD, the DR Coordinator 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 party. For example, if communication with the Client has been via e-mail but the internet is not available, the Client will be called on the telephone.
2. Communication with Employees. The Firm commonly communicates with its employees using the telephone (landline or mobile), email and in-person communication at the Firm’s office. In the event of an SBD, the DR Coordinator will assess which means of communication are available 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 employees. Employees will be notified by the DR Coordinator or his designee as to events and the manner in which employees are to proceed.
3. Communication with Regulator. The Firm is a state-registered investment adviser. The Firm commonly communicates with the Ohio Division of Securities using telephone (landline or mobile) or email. In the event of an SBD, the DR Coordinator will assess which means of communication are available 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 Ohio Division of Securities. If the Firm is unable to prepare regulatory filings as a result of an SBD, the Firm will contact its compliance consulting firm, Oyster Consulting, LLC (“Oyster”), to make all required filings on its behalf. The Firm’s primary contact at Oyster is Robert Tuch, who can be reached via telephone at 614-361-5365 or email at bob.tuch@oysterllc.com. The Firm’s secondary contact at Oyster is Theresa Muller, who can be reached via telephone at 540-872-8964 or email at Theresa.muller@oysterllc.com. In the event Oyster staff cannot be reached, the Firm will contact the Ohio Division of Securities at 77 South High Street, 22nd Floor, Columbus, Ohio 43215-6131, 614-644-7381, and provide the required filings.
4. Communication with Critical Service Providers, Banks and Counterparties The Adviser will contact critical service providers (businesses with which the Firm has an ongoing commercial relationship in support of its business activities) and determine the extent to which the Firm can continue conducting business with these service providers in light of an internal or external SBD. The Firm will quickly establish alternative arrangements if a service provider can no longer provide the needed services when we them because an SBD has occurred for the Firm or the service provider.

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| **Service Provider/Website** | **Address/Telephone** | **Contact/Email** |
| Oyster Consulting LLCWeb: [www.oysterllc.com](http://www.oysterllc.com)Compliance Consulting Services | 4128 Innslake DriveGlen Allen, Virginia 23060Main: (804) 965-5400 | Contact: Robert TuchMobile: (614) 361-5365Email: bob.tuch@oysterllc.comContact: Theresa MullerDirect: (804) 521-6018Mobile: (540) 872-8964Email: Theresa.muller@oysterllc.com |
| Charles Schwab Advisor ServicesCustodian  | P.O. Box 52013Phoenix, AZ 85072-2013 | Contact: Advisor ServicesDirect:  **800-647-5465**Email: [techserv.si@schwab.com](https://si2.schwabinstitutional.com/SI2/ContactUs/Compose.mvc/Compose?&&Recipient=techserv.si@schwab.com) |
| Smarsh Communications Inc.Email Archiving Service Provider | 851 SW 6th AvenuePortland, Oregon 97204 | Contact: Smarsh ArchivingDirect: 866-Smarsh1Email: support@smarsh.comWeb: [www.smarsh.com/support](http://www.smarsh.com/support) |
| Srihan Worthington Properties, LLCOffice Building Management Company |  | Contact: Bryan Basom Direct: 614-406-7178Email: drbryanbasom@gmail.com |
| Huntington Bank Banking Services | Private Banking Division41 South High streetColumbus, OH 43015 | Contact: Private Banking Direct: 1-800-543-7517  |
| Team Logic ITIT Service Provider | 7716 Rivers Edge Dr.Suite BColumbus, Ohio 43235 | Contact: Support DeskDirect: 614-885-4648Email: ColumbusSupport@teamlogicit.com |
| Datto, Inc.Data Back-up and Recovery Service Provider | 101 Merritt 7, 7th FloorNorwalk, CT 06851 | Contact: Support DeskUS Support: +1 (877) 455-6015Email: contact@datto.com |
| Citrix, Inc. Encryption Email solutions and Services  | 851 cypress Creek Rd. Fort Lauderdale, FL33309 | Contact: Support DeskUS: 800-424-8749Email: Secure@citrix.com |
| Salesforce, Inc. Client data management  | 415 Mission St.3rd FloorSan Francisco, CA94105 | Contact: SupportUS: 1-800-667-6389Live Chat at salesforce.com  |

1. Monitor Securities Markets. Currently, the Firm’s President, Stanley Edgell, is responsible for the ongoing monitoring of capital markets. In the event of an SBD, Mr. Edgell will require access to a computer or laptop to monitor market activity. Assuming the SBD is not regional in nature, this function shall continue in the alternate workplace.
2. Order Entry/Trading. Currently, Mr. Edgell or his designee can submit orders to Schwab electronically using the order entry system. In the event of an internal SBD, we will enter and send records to Schwab by the fastest alternative means available. In the event of an external SBD, we will maintain the order in electronic or paper format, and deliver the order to Schwab by the fastest means available when it resumes operations. In addition, during an internal SBD, we may need to refer our customers to deal directly with Schwab for order entry.
3. Maintain Firm’s Books and Records. As discussed above in Section 12, the Firm’s books and records are maintained electronically.
4. **Disclosure of Business Continuity Plan**

The Firm will make available in writing a summary of our BCP to Clients and service providers upon request. The summary addresses the possibility of a future SBD and how we plan to respond to events of varying scope.

1. **Updates and Annual Review**

The Firm will update this plan whenever there is a material change to our operations, structure, business or location or to those of our custodian. In addition, the CCO or his designee will review this BCP annually for needed changes related to the Firm’s operations, structure, business or location as part of the Firm’s annual compliance review process.

As part of the annual compliance review, the CCO will be responsible for training employees on the BCP, including appropriate responses to an SBD.

The CCO will be responsible for testing on an annual basis the Firm’s access to its data and network by performing a disaster recovery virtualization test with the assistance of its service provider, Team Logic IT.

17. **In the Event of the Principal’s Death**

The Firm has purchased a key man policy. The policy is for the provision of funding for the Firm’s short term expenses, in the event of Stanley Edgell’s death, while a new principal is engaged to run the Firm. In the long term, the intent will be to offer Stanley Edgell’s son, Sean Edgell, the opportunity to purchase an interest in the company. Upon Stanley Edgell’s death, the State of Ohio Division of Securities is to be notified within 24 hours by Sean Edgell. Clients are to be notified within four days by Sean Edgell.

END BCP

**CALL TREE**

**As of May, 2019**

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| --- |
| Stanley Edgell, President and CCOMobile: (614) 531-2635 |
| C:\Program Files\Microsoft Office\MEDIA\OFFICE12\Bullets\BD21298_.gif |
| Sean Edgell, Operations ManagerMobile: (614) 439-5346 |
| C:\Program Files\Microsoft Office\MEDIA\OFFICE12\Bullets\BD21298_.gif |
| Regina Bomar, Executive AssistantMobile: (614) 619-9838 |

Each employee is to call the person whose name is below his/her name.

It is imperative that you reach the next person in a timely manner. You may leave a voicemail or text if the person does not pick up the call. However, you must receive acknowledgment that the person received your message to consider the call complete.

If you do not receive verification within ten minutes, please call the next person on your list to continue the call tree.

The last person on the list is to call the first person on the list to confirm that the call tree has been completed.