

GenWealth Financial Advisors

**Branch Office  
Business Continuity Plan (BCP)  
2026**

## GenWealth Financial Advisors

# Branch Office Business Continuity Plan Quick Reference Plan Summary 2026

### Backup Location/ Satellite Office

In the event of a SBD at one of the office locations, associates will either work from one of the other branch locations (Section V) or work from home for a short period of time.

### Call Tree

- 1) John Shrewsbury/Janet Walker 501-541-5136/501-247-1642  
john@getreadyforthe future.com/janet@getreadyforthe future.com
- 2) Robert Russo/Jessica Sexton 704-499-9702/980-318-5425  
rrusso@iaaria.com/js Sexton@iaaria.com
- 3) LPL Financial --- 800-877-7210

### Service Technician Emergency Contacts: Bryant Location: 4756 Bryant Parkway, Alexander, AR 72002

- ☐ Electrician: Jeff Cunningham, Independent Contractor, 501-326-0991
  - Power/current outage website: Entergy, <https://www.energy.com/>
- ☐ IT / Internet Service Provider: AT&T, Kayla Farmer, [kayla@getreadyforthe future.com](mailto:kayla@getreadyforthe future.com)
- ☐ Telecommunications: Nextiva, Kayla Farmer
- ☐ 501-653-7355
- ☐ Plumber: 3gen Plumbing, 501-232-6770
- Website Administrator: Sean Shrewsbury, 501-217-8031, [sean@getreadyforthe future.com](mailto:sean@getreadyforthe future.com)

### Data Backup and Recovery

LPL stores Books and Records for Corporate RIA and brokerage. If you are a Hybrid office, you are accountable to store your branch's Books and Records.

*Documents or records lost or damaged? (See Attachment C)*

- ☐ All lists of paper documents/records impacted, damaged or lost must be submitted to LPL Financial through the Compliance Service Center at 1-844-610-0009.  
Electronic copies are kept at LPL Financial.

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## **I. Business Continuity Plan Introduction**

This business continuity plan documents the response and recovery activities for GenWealth Financial Advisors, which conducts business in products that are available through LPL Financial's platform. The purpose of this guidance and template is to document the plan for the recovery of our critical business functions and systems in the event of an unplanned significant business disruption.

## **II. Emergency Contact Persons**

LPL Financial provides FINRA with the contact information for two (2) emergency contact persons to fulfill this requirement for all branch office locations under LPL Financial. These 2 emergency contact persons are registered principals for LPL Financial. LPL Financial maintains compliance by updating this information upon any material change and reviewing the information quarterly to ensure it is current.

Rule: FINRA Rule 4370(f); NASD Rule 1160.

## **III. Branch Policy**

Our branch's policy is to respond to a Significant Business Disruption (SBD) by safeguarding employees' lives and our property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of our branch's books and records, and allowing our customers to transact business. In the event that we determine we are unable to continue our business, we will direct our customers to the LPL Financial service center at (800) 558-7567 for emergency assistance and access to their funds.

### **a. Significant Business Disruptions (SBDs)**

Our plan anticipates two kinds of SBDs, internal and external. Internal SBDs impact only our branch'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 branches, such as a terrorist attack, a city flood, or a wide-scale, regional disruption. Our response to an external SBD relies more heavily on other organizations and systems, especially on our primary service provider, LPL Financial.

### **b. Approval and Execution Authority (On-site Manager/Advisor)**

John Shrewsbury, Managing Partner is accountable to review and approve the plan annually at a minimum or sooner if significant organization or operational changes occur.

John Shrewsbury, Managing Partner has the authority to declare activation of this BCP and execute response and recovery activities.

### **c. Plan Location and Access**

Management of this branch will maintain both hard and soft copies of its BCP plan and the annual reviews, and the changes that have been made to it for inspection. An electronic copy of our plan is located on: BOX>Compliance>BCP Plan. Additionally, hard copies of the most current plan are distributed to the BCP approver, the Manager, and other branch members responsible for executing response and recovery activities.

Rule: FINRA Rule 4370(b), (d) and (e).

#### **IV. Business Description**

*Our offices conduct business in: mutual funds, variable annuities, alternative investments, equity, and fixed income. We accept, enter orders, and service retail customers.*

LPL Financial performs all clearing functions and holds customer funds or securities on our behalf. All transactions are sent to LPL Financial, which executes our orders, compares them, allocates them, clears and settles them. LPL Financial also maintains our customers' accounts, can grant customers access to them, and delivers funds and securities.

LPL Financial is located at:

| <b>Boston</b>          | <b>Carolinas (Fort Mill)</b> | <b>San Diego</b>     |
|------------------------|------------------------------|----------------------|
| LPL Financial          | LPL Financial                | LPL Financial        |
| 75 State St            | 1055 LPL Way                 | 4707 Executive Drive |
| 24 <sup>th</sup> Floor | Ft. Mill, SC 29715           | San Diego, CA 92121  |
| Boston, MA 02108       |                              |                      |

Our contact number for LPL Financial is: (800) 877-7210

#### **V. Office Locations**

*Our office locations for GenWealth Financial Advisors are:*

4756 Bryant Parkway, Alexander AR 72002 501-653-7355

1152 Markham Street, Suite 2, Conway, AR 72032 / 501-205-7000

900 S. Shackleford Rd., Suite 605 Little Rock, AR 72211 / 501-217-8031

301 N. Washington, Ste 101 El Dorado, AR 71730 / 870-875-1210

998 Shady Grove, Suite E Hot Springs, AR 71901 / 501-547-8000

1000 Chinaberry Dr., Suite 304 Bossier, LA 71111 / 318-741-5881

#### **VI. Alternative Physical Location(s) of Employees**

In the event of an SBD, we will move our staff from impacted office(s) to the closest of our non-impacted office location(s). If none of our other office locations are available to receive those staff, they will be instructed to work from home.

Rule: *FINRA Rule 4370(c)(6)*

## **VII. Customers' Access to Funds and Securities**

LPL Financial maintains custody of customers' funds or securities on our behalf. In the event of an internal or external SBD, if telephone service is available, our registered persons will take customer orders or instructions and contact LPL Financial on their behalf, and if our Web access is available, our branch will post on our website that customers may access their funds and securities by contacting LPL Financial at: (800) 558-7567.

If the Securities Investor Protection Corporation (SIPC) determines that we are unable to meet our obligations to our customers or if our liabilities exceed our assets in violation of Securities Exchange Act Rule 15c3-1, SIPC may seek to appoint a trustee to disburse our assets to customers. We will assist SIPC and the trustee by providing our books and records identifying customer accounts subject to SIPC regulation.

Rules: *FINRA Rule 4370(a); Securities Exchange Act Rule 15c3-1; see also 15 U.S.C. § 78eee.*

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

### **FINRA Guidance on Books and Records Maintained at the Impacted Locations**

*Members that maintained books and records at the impacted locations should make every effort to retrieve or back-up such records. If any such records were permanently destroyed, a list of the types of books and records required to be maintained pursuant to NASD Rule 4510 and SEA Rules 17a-3 and 17a-4 must be prepared. The list should include the time periods impacted, but need not include records that can be recreated from an electronic database or that can be retrieved otherwise from a service bureau, backup records storage facility, etc. All such lists must be submitted to LPL Financial through the Compliance Service Center at 1-(844) 610-0009.*

LPL stores Books and Records for Corporate RIA and brokerage.

If you have damage to your records:

1. Do not destroy the records until instructed it is ok to do so.
2. Inventory the damaged paper records using the damaged records log in Attachment B of this plan.

*HYBRID OFFICE ONLY TO FILL IN FOLLOWING SECTION:*

If you are a Hybrid office, it is your responsibility to record & document Books and Records here:

Our branch maintains its primary hard copy books and records at:  
LPL Financial 1055 LPL Way Ft. Mill, SC 29715

Our branch maintains its primary electronic records at:  
LPL Financial 1055 LPL Way Ft. Mill, SC 29715

LPL Financial is responsible for the maintenance of these books and records. Our branches do not maintain documents and forms. They are transmitted to LPL Financial:

Our branch maintains backup hard copy books and records at:  
GenWealth Financial Advisors – All locations  
Responsible Party: GenWealth Financial Advisors

Our branch backs up electronic records at:  
GenWealth Financial Advisors – All locations –  
Sharepoint Responsible Party: GenWealth Financial  
Advisors Backup Frequency: Every 4 Hours  
The document types and forms that are backed up are: pdf, jpeg, Word, Excel, PowerPoint, Video

We back up electronic records every 4 hours through our Sharepoint system and copies are kept at Sharepoint cloud.

In the event of an internal or external SBD that causes the loss of our paper records, we will physically recover them from our back-up site. If our primary site is inoperable, we will continue operations from our back-up site or an alternate location. For the loss of electronic records, we will either physically recover the storage media or electronically recover data from our back-up site, or, if our primary site is inoperable, continue operations from our back-up site or an alternate location.

*Rule: FINRA Rule 4370(c)(1).*

## **IX. Financial and Operational Assessments**

### **a. Operational Risk**

In the event of an SBD, we will immediately leverage all alternate communication modalities (landline, cell phone, email, fax, web announcement, and etcetera) available that will permit us to communicate with our customers, employees, critical business constituents, critical banks, critical counter-parties and regulators. In addition, we will retrieve our key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic). If needed, we will direct customers to LPL Financial at: (800)-558-7567.

Rules: *FINRA Rules 4370(c)(3), (c)(4), (c)(5), (c)(7), (c)(9 & (g)(2)).*

### **b. 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 LPL Financial, critical banks and investors 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.

Rules: *FINRA Rules 4370(c)(3), (c)(8) & (g)(2).*

## **X. Mission Critical Systems**

“Mission critical systems” are those that ensure prompt and accurate processing of securities transactions, including order taking, entry, 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.

We have primary responsibility for establishing and maintaining our business relationships with our customers and have sole responsibility for our mission critical functions of order taking, entry and execution]. LPL Financial provides the execution, comparison, allocation, clearance and settlement of securities transactions, maintenance of customer accounts, access to customer accounts and the delivery of funds and securities.

### **a. Our Branch’s Mission Critical Systems**

#### **Order Taking**

Currently, we receive orders from customers via telephone, or in person. During an SBD, either internal or external, we will continue to take orders through any of these methods that are available and reliable, and in addition, as communications permit, we will inform our customers when communications become available to tell them what alternatives they have to send their orders to us. If customers are unable to reach the branch to place trades, they can contact LPL Financial’s Service Center at (800)-558-7567.

**Order Entry**

We enter orders by recording them on paper and sending them to LPL Financial telephonically, or electronically through LPL Financial's ClientWorks platform.

**Internal:**

In the event of an internal SBD, we will contact LPL Financial by the fastest means available and/or refer our clients to work directly with LPL Financial for order entry.

**External:**

In the event of an external SBD that does not impact LPL Financial, we will keep the order in the appropriate format and deliver back to LPL in proper format. For external SBDs that impact LPL Financial, LPL Financial's ClientWorks platform is expected to recover within 4 hours or less per their internal Recovery Time Objective.

**Order Execution**

LPL Financial executes orders on our behalf. LPL Financial's Fort Mill and San Diego offices serve as primary locations for Trade Execution. Each office serves as reciprocal backup for the other. LPL Financial has documented and tested internal business continuity and disaster recovery plans in place to provide for a fail-over between the two sites.

a. Mission Critical Systems Provided by LPL Financial

Our branch relies on LPL Financial to provide order execution, order comparison, order allocation, customer account maintenance and/or access and delivery of funds and securities.

LPL Financial backs up our data at a remote site. LPL Financial's Fort Mill and San Diego offices serve as primary locations for mission-critical processing, including: Operations, Trade Execution and Processing, and the Service Center. Each office serves as a reciprocal backup for the other. LPL Financial has documented and tested internal business continuity and disaster recovery plans in place to provide for a fail-over between the two sites.

Rules: *FINRA Rules 3510(c)(2) & (g)(1).*

**XI. Alternate Communications between the Firm and Customers, Employees, and Regulators**

a. Customers

We communicate with our customers using the telephone, email, our website, fax, U.S. mail and in-person visits at our office or another location. In the event of an SBD, we will assess which means of communication are still available to us.

We will use whatever means of communication available including email, phone, our website or updating our voicemail to instruct our clients to contact the **LPL Financial client line, (800)-558-7567**, if we are unable to transact business for them due to power or network outages.

Rule: *FINRA Rule 4370(c)(4).*

b. Employees

We now communicate with our employees using telephone, email, and in person. 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 party. We will also employ a call tree so that senior management can reach all employees quickly during an SBD. The call tree includes all staff home and office phone numbers. We have identified persons, noted below, who live near each other and may reach each other in person:

The person to invoke use of the call tree is John Shrewsbury

| Caller                 | Call Recipients                                                                                                                                                                             |
|------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>John Shrewsbury</i> | Robert Russo/Jessica Sexton<br>704-499-9702/980-318-5425                                                                                                                                    |
| <i>Janet Walker</i>    | Kimmy James, Shannon Wood, Mona Khairi, Sean Shrewsbury, Scott Inman, Alisha Bailey<br>Kylee Lamberger, Troy Johnson, Peggy Evans                                                           |
| <i>Kimmy James</i>     | Anna Olive, Brittney Ritchie, Carmen Griffin, Chanel Hicks, Chris Stone, Ebonie Strickland, Faith Young, Kelli Conley, Bethany Walker, Evan Teer                                            |
| Mona Khairi            | Kayla Farmer, Lexie Newburn, , Rachel Todd, Teresa Arrigo, Chad Roller, Bryce Potter, Georgia Stuart, Peyton Hill, Denise Garner, Shauna Brown                                              |
| Sean Shrewsbury        | Abby Shrewsbury, Casey Cochran, Roman Greathouse, Brian Helms, Kateleen Crotchett, Candy Stover, Angela Spencer, Lisa Price, Krystal Rowlett                                                |
| Alisha Bailey          | Alec Daril, Candice Stanley, Charlie Skinner, Joel Newburn, Tim Key, Jacob Grice, Brandon Barber, Hailey Hirschy, Jason Marshall, Maraye Tudor, Alissa Bauman, Adam Burke, Dustin Dandurand |

Rule: FINRA Rule 4370(c)(5).

c. Regulators

We communicate with our regulators using telephone, email, fax, U.S. mail and in person. 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 party.

Rule: FINRA Rule 4370(c)(9).

## **XII. Critical Business Constituents, Banks, and Counter-Parties**

a. Business constituents

Critical business constituents are businesses with which we have an ongoing commercial relationship in support of our operating activities such as vendors providing critical services.

LPL Financial provides most of our critical services. We will quickly establish alternative

arrangements if a business constituent can no longer provide the needed goods or services when we need them because of a SBD to them or our firm.

Rules: FINRA Rule 4370(c)(7).

b. Banks

We have contacted our banks and lenders to determine if they can continue to provide the financing that we will need in light of the internal or external SBD. The bank maintaining our operating account is: *First Security Bank, 5619 Hwy 5 North, Bryant, AR 72022, 501-228-8000.*

If our banks and other lenders are unable to provide the financing, we will seek alternative financing immediately from: *Arvest Bank, Reynolds Road, Hwy 5, Bryant 72022.*

Rules: FINRA Rule 4370(c)(7).

c. Counter-Parties

LPL Financial maintains the relationships with our critical counter-parties on our behalf. Where the transactions cannot be completed, we will work with LPL Financial or contact those counterparties directly to make alternative arrangements to complete those transactions as soon as possible.

Rules: FINRA Rule 4370(c)(7).

### **XIII. Regulatory Reporting**

*Describe how your firm will file its regulatory reports in the event of an SBD.*

**Contact Independent Advisor Alliance, OSJ; they will handle regulatory reporting.**

LPL will file regulatory reports on our behalf (unless you are a hybrid RIA)

Rule: FINRA Rule 4370(c)(8).

### **XIV. Disclosure of Business Continuity Plan**

LPL Financial has a BCP disclosure statement that is provided to our customers at account opening and attached to this document as “Attachment A”. The BCP Disclosure statement is also posted to [www.lpl.com](http://www.lpl.com) and mailed to customers upon request.

Rule: FINRA Rule 4370(e).

### **XV. Testing, Updates and Annual Review**

We will test our plan on an annual basis (see attachment B), and update this plan as an outcome of the test, or whenever we have a material change to our operations, structure, business or location or to those of LPL Financial. In addition, our firm will review this BCP annually to modify it for any changes in our operations, structure, business or location or those of LPL Financial.

Rule: FINRA Rule 4370(b).

**XVI. Onsite Manager/Advisor Approval**

I have reviewed the annual test results and approve the testing and this Business Continuity Plan as reasonably designed to enable our branch to meet its obligations to customers in the event of an SBD.

Signed: \_\_\_\_\_



Title: \_\_\_\_\_

Director of Compliance

Date: \_\_\_\_\_

10/29/2026

## **LPL Financial & Affiliates Business Continuation Plan Summary**

LPL Financial and affiliates are committed to providing timely service to our clients. We recognize the importance of preparing for various disaster scenarios that could hamper our ability to provide service. We have taken aggressive steps to provide for business contingency and continuity planning under a variety of potential scenarios. We continue to evaluate our continuity plans and take the necessary actions to ensure the proper resources are available to provide for the recovery and timely resumption of critical business operations to internal business units, third-party business partners, and clients.

### **LPL Financial Business Continuation Strategy**

#### **Headquarters and Staff**

LPL Financial has headquarters and operations staff located in three principal locations: Boston, Fort Mill, and San Diego. The Boston office serves as the primary site for our executive office, Legal, and Research. These units, while vital to the company on a continuing basis, are not considered mission-critical for the daily back-office operation of our business. In the event of a disaster that would make the Boston office unserviceable, the San Diego office is its alternative facility.

#### **Mission-Critical Departments**

Both the Fort Mill and San Diego offices serve as primary locations for our mission-critical departments, including: Operations, Trade Execution and Processing, and the Service Center. Each office serves as the backup for the other. There are documented and tested plans in place to provide for a fail-over between the two sites.

The LPL Financial Production Data Center is located in a second and distinct Charlotte location. The alternate Data Center is located in Dallas, Fort Worth, Texas.

- The Production Data Center facility is located approximately ten miles from the Fort Mill office location.
- The Production Data Center infrastructure is fully redundant in terms of power, network, and equipment.
- Each of our office locations also has fully redundant networking and telecommunications systems.
- There is redundant connectivity across Boston, Fort Mill, and San Diego.

The LPL Financial brokerage computing platform is operated in another geographical region of the United States by an unaffiliated third-party vendor. None of the scenarios presented in this document would pose a threat of business disruption to this remote site. The third-party vendor has a complete business continuity plan that includes alternative sites and recovery times within four hours.

### **Business Scenario Preparedness**

#### **Single Building Disruption**

If LPL Financial loses the ability to perform business in one of our buildings, recovery staff associated with mission-critical functions will begin processing at our alternate processing site (Boston, Fort Mill, or San Diego, depending on the impacted department).

We have plans in place for this relocation, and these plans are tested periodically. Recovery time objectives vary based on the criticality of the function that is disrupted.

### **Regional Disruption**

If LPL Financial loses the ability to perform business at either the Fort Mill or San Diego location, mission-critical San Diego functions would be failed over to our Fort Mill office and vice versa. Staff associated with non-mission-critical functions will be relocated to an alternative site (e.g., hotel, home) in a non-impacted area. We have plans in place for this recovery and they are tested periodically. Recovery time objectives vary based on the criticality of each function.

### **Remote Data Center Disruption**

If LPL Financial loses the ability to perform business in our Production Data Center in Charlotte, mission-critical systems will be recovered to our Dallas, Fort Worth Data Center. We have plans in place for this recovery and they are tested periodically. Mission-critical systems recovery is expected within four hours.

### **Pandemic Event**

LPL Financial has plans in place to continue business during a pandemic event. Our plan is a multi-tiered action plan based on the World Health Organization (WHO) alert phases with triggering events for each phase. As the threat of a pandemic becomes greater and a new phase is triggered, we will assess our plans and determine the appropriate course of action.

### **Access to Your Funds**

A site outage should not impact our customers' ability to access their available funds, as LPL Financial business contingency plans are designed to ensure sustained service. However, their ability to trade securities may be impacted by market events outside the control of LPL Financial, such as when the market was closed following the September 11 tragedy. Our tested business continuity plans result in necessary personnel being available to approve transactions that result in the disbursement of available funds. In the event that your LPL Financial advisor ceases operations due to a significant business interruption, you may call (800) 558-7567 for emergency assistance.

## **Business Continuity Annual Test Requirement**

Testing your BCP confirms that your strategies will reduce business interruption and enable a successful recovery. Also, performing test exercises will ensure that your employees are properly trained in their responsibilities and understand their roles during a business continuity event.

To assist in your BCP test exercise, please find a Test Checklist on the next page.

How to perform your test:

### **Recovery Strategy Execution (Alternative Physical Location)**

- Person or Group simulates a “real life” event
- Use a scenario that could impact your organization to execute the step by step plan specific to the documented recovery strategy (leverage another office location, utilize a home location, or contract with a Work Area Recovery vendor such as Regus)
- Relocate required staff to the selected recovery location
- Document which staff relocated
- Verify connectivity is in place (phone & network), and that you can transact business as required to support clients
- Ensure communication strategies are useful, timely and accurate
- Utilize recovery location from 1-4 hours
- Demonstrate areas of success and identifies single points of failure and opportunities to update your plan

After completing your test, review the results and hold a Lessons Learned meeting to discuss findings, experiences and review the goals and objectives. Be sure to make any necessary updates to your current BCP.

Please utilize the included checklist on the next few pages to assist in documenting your test.

# BCP Test Checklist

| TEST CHECKLIST                   |                                                                                                                                                               | YES    | NO |
|----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|----|
| <b>Strategy</b>                  | What Alternative Physical Location was leveraged for the test, and was it able to support the business processes/staff and the continuation of your business: |        |    |
|                                  | 1. Alternative office location (per Plan)                                                                                                                     |        |    |
|                                  | 2. Work area recovery (Regus)                                                                                                                                 |        |    |
|                                  | 3. Home office (per Plan)                                                                                                                                     | x      |    |
|                                  |                                                                                                                                                               |        |    |
| <b>Recovery Response Actions</b> | Which staff members were included in the test exercise/relocation event:                                                                                      |        |    |
|                                  | 1. Kimmy James                                                                                                                                                |        |    |
|                                  | 2.                                                                                                                                                            |        |    |
|                                  | 3.                                                                                                                                                            |        |    |
|                                  | 4.                                                                                                                                                            |        |    |
|                                  | 5.                                                                                                                                                            |        |    |
|                                  | 6.                                                                                                                                                            |        |    |
|                                  | 7.                                                                                                                                                            |        |    |
|                                  | 8.                                                                                                                                                            |        |    |
|                                  | 9.                                                                                                                                                            |        |    |
|                                  | 10.                                                                                                                                                           |        |    |
|                                  |                                                                                                                                                               |        |    |
| <b>Recovery Response Actions</b> | 1. Were there any issues with network connectivity/phone access?                                                                                              |        | x  |
|                                  | 2. Were you able to transact “business as usual” at the recovery location?                                                                                    | x      |    |
|                                  | 3. How long did you remain at the recovery location:                                                                                                          | 7 hrs. |    |
|                                  |                                                                                                                                                               |        |    |
| TEST CHECKLIST                   |                                                                                                                                                               | YES    | NO |
| <b>Test Outcomes</b>             | 1. Was the test suitable and appropriate?                                                                                                                     | x      |    |
|                                  | 2. Did participants understand the BCP?                                                                                                                       | x      |    |
|                                  | 3. Did the BCP capture all roles to support activation?                                                                                                       | x      |    |
|                                  | 4. Are roles and responsibilities appropriate and current?                                                                                                    | x      |    |
|                                  | 5. Have backups been identified for all roles and responsibilities?                                                                                           | x      |    |
|                                  | 6. Are delegations of tasks appropriate?                                                                                                                      | x      |    |

| <b>Test Outcomes<br/>(Continued)</b>         |                                                                                                                           | YES | NO |
|----------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|-----|----|
|                                              | 7. Are any revisions or additions to the BCP required?                                                                    |     | x  |
|                                              | 8. Has responsibility for these actions been assigned?                                                                    | n/a |    |
|                                              | 9. Has an appropriate timeframe been designated to complete the actions?                                                  | n/a |    |
|                                              | 10. Has a report on the test been completed?                                                                              | x   |    |
|                                              | 11. Has the test report been provided to the appropriate person(s) in the firm?                                           | x   |    |
|                                              | 12. Has the BCP been updated with the results of the testing?                                                             | x   |    |
|                                              | 13. Has the revised BCP been approved by the Plan Owner(s)?                                                               | x   |    |
| <b>Areas of focus during Lessons Learned</b> |                                                                                                                           | YES | NO |
| <b>Strategy</b>                              | Do your BCP strategies address All Hazards in a business disruption?                                                      | x   |    |
|                                              | 1. No Access to facilities                                                                                                | x   |    |
|                                              | 2. No access to your Technology                                                                                           | x   |    |
|                                              | 3. Reduced access to people                                                                                               | x   |    |
| <b>Plan and Prepare</b>                      | Are actions required to add missing information to your BCP?                                                              |     | x  |
|                                              | Are hard and electronic copies of your BCP stored in appropriate, easily accessible and secure locations?                 | x   |    |
|                                              | Are employee roles, responsibilities and priorities understood?                                                           | x   |    |
|                                              | Do the employees responsible for recovering operations have their own hard copy of the BCP to reference at time of event? | x   |    |
| <b>Continuity Response Actions</b>           | Do actions identify who does what, when and where?                                                                        | x   |    |
|                                              | Does the 'manual work-around' have a logical and easy to follow flow?                                                     | x   |    |
|                                              | Were actions successfully completed?                                                                                      | x   |    |
| <b>Recovery Response Actions</b>             | Do actions identify who does what, when and where?                                                                        | x   |    |
|                                              | Do 'back to business as usual' actions have logical flow?                                                                 | x   |    |
|                                              | Are recovery actions practical? Are they sufficient?                                                                      | x   |    |
|                                              | Were actions successfully completed?                                                                                      | x   |    |
| <b>Interdependencies</b>                     | Have all interdependencies been adequately addressed?                                                                     | x   |    |

|                                                                              |                                                                                                                                                     |     |    |
|------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|
| <b>Communication</b>                                                         | Are all staff and key departmental or regional contacts included?                                                                                   | x   |    |
|                                                                              | Are all contact details complete, current and accurate?                                                                                             | x   |    |
|                                                                              |                                                                                                                                                     |     |    |
|                                                                              |                                                                                                                                                     |     |    |
| <b>Communication<br/>(Continued)</b>                                         |                                                                                                                                                     | YES | NO |
|                                                                              | Does the Plan address contacting staff to notify them whether they need to come to work or report to an alternate location?                         | x   |    |
|                                                                              | Does the Plan identify key messages and communication channels to each of the stakeholders in the event Network/Technology systems are unavailable? | x   |    |
|                                                                              | Does the Plan identify essential suppliers/ third party vendors and/or supplier/vendor contact details?                                             | x   |    |
|                                                                              |                                                                                                                                                     |     |    |
| <b>Resource Requirements</b><br>(People, facilities, Network, Vital Records) | Does the BCP anticipate all the resources required to support BCP activation?                                                                       | x   |    |
|                                                                              | Is it clear who the BCP coordinator should contact regarding required continuity resources?                                                         | x   |    |
|                                                                              | Are all vital records, data or resources required to implement continuity strategies current and accurate?                                          | x   |    |

#### Additional Test Commentary

|  |
|--|
|  |
|--|

#### Conclusion

Please be aware that while LPL Financial has detailed plans in place, we cannot guarantee that we will be successful in achieving recovery in the times noted above in every circumstance. For example, the firm may not be able to anticipate all impacts of a disaster which may limit response time or circumstances that cause our plans to be less effective. LPL Financial's continuity plans are periodically updated and include principal/senior leader review and approval. Current plan summaries are available on the firm's website ([www.lpl.com](http://www.lpl.com)) and may also be obtained by submitting a written request.

## Revision History

### Business Continuity Plan Revision History

| Revision Date | Name (First, Last) | Revision Summary |
|---------------|--------------------|------------------|
| 7/26/2018     | Mona Khairi        | Updated template |
| 7/10/2019     | Mona Khairi        | Updated template |
| 2/28/2020     | Mona Khairi        | Updated template |
| 3/30/2021     | Mona Khairi        | Updated template |
| 3/30/2022     | Mona Khairi        | Updated template |
| 2/01/2023     | Mona Khairi        | Updated template |
| 3/19/2024     | Mona Khairi        | Updated template |
| 03/10/2025    | Mona Khairi        | Updated template |
| 09/16/2025    | Mona Khairi        | Updated template |

### Completed BCP Tests

| Test Date  | Test Approver Name (First & Last) | Test Results Summary              |
|------------|-----------------------------------|-----------------------------------|
| 7/26/2018  | Alisha Macom                      | Proper access/processes were done |
| 7/02/2019  | Alisha Macom                      | Proper access/processes were done |
| 2/28/2020  | Kimmy James                       | Proper access/processes were done |
| 3/30/2021  | John Shrewsbury                   | Proper access/processes were done |
| 3/30/2022  | John Shrewsbury                   | Proper access/processes were done |
| 1/27/2023  | Kimmy James                       | Proper access/processes were done |
| 3/18/2024  | Kimmy James                       | Proper access/processes were done |
| 3/10/2025  | Kimmy James                       | Proper access/processes were done |
| 10/28/2026 | Kimmy James                       | Proper access/processes were done |

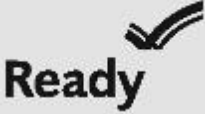
## Attachment C: Damaged Books and Records Log

### **FINRA Guidance on Books and Records Maintained at the Impacted Locations**

*Members that maintained books and records at the impacted locations should make every effort to retrieve or back-up such records. If any such records were permanently destroyed, a list of the types of books and records required to be maintained pursuant to NASD Rule 4510 and SEC Rules 17a-3 and 17a-4 must be prepared. The list should include the time periods impacted, but need not include records that can be recreated from an electronic database or that can be retrieved otherwise from a service bureau, back-up records storage facility, etc. All such lists must be submitted to LPL Financial through the Compliance Service Center at 1-(844) 610-0009.*

| Identifiable?<br>(Y/N) | Document<br>Category<br>(Finra Rule<br>4510,<br>NYSE Rule<br>440 or SEC<br>Rules 17a-3<br>and 17a-4) | Description of records and<br>information contained | Time<br>Period | Backed Up/<br>Stored<br>Electronically?<br>(Y/N) | If stored offsite<br>or electronically<br>enter location | Can be<br>re-<br>created?<br>(Y/N) |
|------------------------|------------------------------------------------------------------------------------------------------|-----------------------------------------------------|----------------|--------------------------------------------------|----------------------------------------------------------|------------------------------------|
|                        |                                                                                                      |                                                     |                |                                                  |                                                          |                                    |
|                        |                                                                                                      |                                                     |                |                                                  |                                                          |                                    |
|                        |                                                                                                      |                                                     |                |                                                  |                                                          |                                    |
|                        |                                                                                                      |                                                     |                |                                                  |                                                          |                                    |
|                        |                                                                                                      |                                                     |                |                                                  |                                                          |                                    |
|                        |                                                                                                      |                                                     |                |                                                  |                                                          |                                    |
|                        |                                                                                                      |                                                     |                |                                                  |                                                          |                                    |

# Business Continuity Event Planning Checklists

|                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Main Websites for Reference</b>                                                                                                                                                                                                                                                                                                                                               | <input type="checkbox"/> <a href="http://Ready.gov">Ready.gov</a><br><br><br><br><input type="checkbox"/> <a href="http://Redcross.org">Redcross.org</a><br><br>                                                                                                                                      |
| <b>Emergency- American Red Cross App</b> <ul style="list-style-type: none"> <li>• Monitors severe weather conditions in your area, or where loved ones may be by utilizing a live map</li> <li>• Provides easy opportunity to learn more and prepare your family, home and business for weather events or business interruptions</li> <li>• Receive the latest alerts</li> </ul> | <ul style="list-style-type: none"> <li>○ <a href="#"><u>Apple</u></a> User</li> <li>○ <a href="#"><u>Android</u></a> User</li> </ul>                                                                                                                                                                                                                                                                                                                                      |
| <b>Preparedness Tips and Guidelines</b><br><b>(Click any of the following)</b>                                                                                                                                                                                                                                                                                                   | <ul style="list-style-type: none"> <li>✓ <a href="#"><u>Earthquake Preparedness</u></a></li> <li>✓ <a href="#"><u>Home Fire Safety Preparedness</u></a></li> <li>✓ <a href="#"><u>Hurricane Preparedness</u></a></li> <li>✓ <a href="#"><u>Power Outage Preparedness</u></a></li> <li>✓ <a href="#"><u>Tornado Preparedness</u></a></li> <li>✓ <a href="#"><u>Wildfire Safety Preparedness</u></a></li> <li>✓ <a href="#"><u>Winter Storm Preparedness</u></a></li> </ul> |



# Power Outage

## Checklist

A Power Outage is an unexpected loss of electric power. Power Outages may interrupt communication, transportation, water, businesses, and result in spoiled food and water contamination. It is hard to predict when these events will happen but to ensure, that these interruptions, do not impact our ability to serve our customers here are some tips and strategies:



### ✓ Before a Power Outage

- ☐ Take note of how many electrical appliances you need that run on electricity.
- ☐ Have an Emergency Kit.
- ☐ Have an electrical maintenance manager onsite or on call for immediate help.
- ☐ Be familiar with what equipment can and cannot be turned off.
- ☐ Have working batteries.
- ☐ Functional flashlights, for every person, with extra batteries.
- ☐ Register for text notifications of weather alerts and warnings.
- ☐ Keep a thermometer in the refrigerator and freezer to keep track of the temperature when the power comes back. Food should be disposed if temperature is 40° Fahrenheit (4° Celsius).
- ☐ Have a cooler and ice on hand for keeping food cold.
- ☐ Maintain gas tanks with at least a half of tank of gas.
- ☐ Keep cell phones and electrical equipment charged.
- ☐ Consider getting a generator. Confirm its power is sufficient for your home/building and that you know how to operate it.
- ☐ Check or install a carbon monoxide detector.

### ✓ During a Power Outage

- ☐ Unplug appliances, equipment, and electronics to avoid an electrical surge when power resumes.
- ☐ Keep freezer and refrigerator closed. Food will stay cold in the fridge for approximately 4 hours, the freezer for 48 hours. Use coolers with ice if necessary.
- ☐ Use flashlights, not candles.
- ☐ Try to stay indoors and not on the road as the traffic lights will be disrupted and traffic will be heavy.
- ☐ Have non-perishable food.
- ☐ Avoid carbon monoxide poisoning by keeping stove and gas appliances off and generators outside.
- ☐ Leave one light on so you are aware when the power comes back.
- ☐ Use the stairs, not the elevator, as the elevator will be disabled.

It is important for the employees to know the building, equipment, and the emergency plan for what they need to do in these instances!

### ✓ After a Power Outage

- ☐ Do not touch fallen power lines. Report collapsed power lines to your utility company.
- ☐ Dispose of any food exposed to 40° Fahrenheit (4° Celsius) and any food with a suspicious odor or color. If unsure, throw it out, to ensure that you do not consume contaminated food.
- ☐ Check in with family and friends to ensure their safety and yours.

### Preparedness Tips

#### Step 1: Emergency Kit:

- Have copies of important documents, 1 Gallon of water per day per person, flashlights, batteries, non-perishable food, and first aid kit.

#### Step 2: Make a Plan:

- Place to meetup outside house and or outside, practice plan 2 times a year with entire family include pets.

#### Step 3: Be informed:

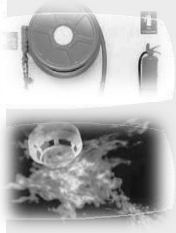
- Monitor the news, at one family member should be CPR certified.

## Energy Conservation Tips:

- Turn off lights, computers, and other devices when they are not being used.
- Use energy-efficient halogen, compact fluorescent lights, or LED bulbs.
- Go Easy on the A.C.



# EXIT



# Fire Safety Checklist

In the case of a fire, you may have as little two minutes to escape. Smoke alarms can give an early warning, to activate your fire safety plan. To ensure, all employees have the necessary resources and knowledge to protect themselves and others in a fire situation and guarantee a fast recovery, follow these tips:

**IF your clothes catch on Fire:**  
**STOP**- where you are  
**DROP**- to the ground, covering your face.

**ROLL**- back and forth until the flames go out. Running makes the fire burn faster.

\*Call for medical attention.

## ✓ Before a Fire

- Install a smoke alarm in every room and level of your house of building and test once a month. Replace batteries once a year.
- Learn how to use a fire extinguisher.
- Educate you children on smoke alarms and what to do if they hear it.
- Have at least two planned exits for each person and designated meeting spot outside away from where the fire would occur.
- Confirm everyone knows how to call 911 for help.
- Set emergency contacts and communications to endure all members know who to contact if they cannot find each other.
- Practice: **STOP, DROP, and ROLL.**
- Practice your fire safety plan at least twice

## ✓ During a Fire

- Know the building's evacuation plan.
- Evacuate calmly and quickly.
- **GET OUT, STAY OUT, and CALL 911.**
- Yell "FIRE" to alert others and go outside immediately. Use stairs only, not elevators.
- Never open doors that are warm to touch. In they are use your second way out.
- If you encounter smoke, stay low to the floor.
- If smoke or fire block your exits, stay in the room with the door closed. Place a wet towel under the door and call the fire department or 911. Open a window and shine a flashlight or wave a cloth to indicate you need help.
- Once outside, go to your meeting place and/or follow the emergency contact plan.

## ✓ After a Fire

- Call 911. Cool and cover burns to reduce injury or infection.
- Dispose of any food exposed to heat, smoke, or soot.
- Check in with family and friends to ensure their safety and yours.
- Stay out of the building until local fire authorities say it is safe to enter.



## Fire Safety Tips:

- ✓ Install smoke alarms on every level of your building/house.
- ✓ Test Smoke alarms in every month to ensure they are working and the batteries are not dead.
- ✓ Plan and practice a fire escape plan twice a year.
- ✓ If a fire occurs, **GET OUT, STAY OUT, and CALL FOR HELP.** Never go back inside for anything or anyone.

## Fire Safe Habits:

- Keep items that can catch on fire 3 feet away from anything that gets hot.
- Smoking materials is the most common reason and starter of home fires. Please use precautions if you smoke.
- Educate a<sup>2n1</sup>d talk with your children about fire danger and keep matches and lighters out of their reach.



- Be cautious and aware of burning candles. Do NOT leave them unattended.