



2021 Business Continuity Plan

Stewardship Advisory Group (the “Firm”) is providing you with this document to inform you of its ability to respond to certain business disruptions at the main office of Stewardship Advisory Group

I. Emergency Contact Persons

Primary Contact: Jeff Rogers, Founder & Chairman Office: 407-470-1405, Cell: 407-468-5620 Email: Jeff@StewardshipAdvisory.com

Alternate Contact: Scott Pletcher, Chief Operating Officer: 407-470-1405, Cell: 352-989-1158 Email: Scott@StewardshipAdvisory.com

II. Firm Policy

In general, Stewardship Advisory Group maintains a business continuity plan and intends to continue business in the event of a significant business disruption. Our policy is to respond to a Significant Business Disruption (SBD) by safeguarding employee’s lives and firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of the firm’s books & records and allowing our clients to transact business as quickly as possible. In the event we are unable to continue our business, we will endeavor to provide customers prompt access to their funds and securities. This policy has been distributed to all staff. **A copy is stored in a secure location at our business address and virtually on our website.**

In the event of a significant business disruption at the main office, Stewardship Advisory Group may route calls to an office location in a separate geographic location and, if necessary, transfer operations to a facility maintained by a third-party vendor. Although Stewardship Advisory Group intends to continue business in the event of a significant business disruption, there are some disruptions that may render the Firm unable to continue business. Under such circumstances, Stewardship Advisory Group will ensure that clients will be able to access their Advisor within a reasonable period of time.

To provide clients with up-to-date information during a significant business disruption to the main office of Stewardship Advisory Group, clients may call the Firm’s emergency telephone number at (407)468-5620 or visit our emergency information Web page at www.StewardshipAdvisory.com.

You may Also Email us at Jeff@StewardshipAdvisory.com.

A. Significant Business Disruptions (SBDs)

The following sections describe specific events and Stewardship Advisory Group’s corresponding general response to those events. Clients, however, should note that these responses are subject to modification and, depending on the severity of a specific event Stewardship Advisory Group cannot guarantee that it will be able to follow the stated course of action. If these responses are modified, Stewardship Advisory Group will post the updated disclosure statement on its Web site. In the alternative, you may request that the Firm send you, by mail, a copy of the updated disclosure statement.

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, a tornado or snow/ice storm. External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, hurricane, city-wide flood or a wide-scale regional disruption. Our response to an external SBD relies more heavily on other organizations and systems, especially on the capabilities of our Broker/Dealer, United Planners' Financial Services of America (United Planners').

Under the following scenarios, Stewardship Advisory Group intends to continue its business:

A Disruption to a Single Building or Firm-Only Business Disruption

These disruptions may be caused by physical damage, technology problems, or an inability to have personnel arrive at an office. In the event that there is a significant business disruption to a single building or the Firm's internal primary systems, Stewardship Advisory Group may, if necessary, transfer its operations or route incoming calls to another office in a separate geographic location. From this separate location, Stewardship Advisory Group will accept client communications. In this process, clients may experience a minor delay in reaching the firm due to increased client calls, technology delays, or other minor difficulties arising from the transfer of operations. Stewardship Advisory Group expects that operations could be disrupted for up to one (1) hour.

A Business-District, City-Wide, or Regional Disruption

In the event that there is a significant business disruption that affects the business district, city, or region where any of the Firm's primary systems are located, Stewardship Advisory Group may, if necessary, transfer its operations or route incoming calls to another office in a separate geographic location office. In this process, clients may experience a minor delay in reaching the Firm due to increased client calls, technology delays, or other minor difficulties arising from the transfer of operations. If the disruption is significant, Stewardship Advisory Group may transfer its operations to a third-party service provider.

Additionally, for securities and investment management needs in the event of a significant business disruption, Clients could contact our Broker/Dealer, United Planners Financial Services of America at 7333 E. Doubletree Ranch Rd. #120 Scottsdale, AZ 85258 (800) 966-8737 or (480) 991-0225.

B. Approval and Execution Authority

Jeff Rogers, a Registered Principal, is responsible for approving the plan and for conducting the required Annual Review.

C. Plan Location and Access

Our firm will maintain copies of its Business Continuity Plan and the annual reviews and changes that have been made to it for inspection. A copy is stored in a secure location at our business address and an electronic copy is available virtually on our website.

III. Business Description

Our firm conducts business in various types of investments including mutual funds, stocks, bonds, ETFs, variable annuities and variable life insurance, UITs, REITs and Managed Investment Accounts. Our firm is an Introducing Firm and does not perform any type of clearing or custodial functions for itself or others. Furthermore, we do not hold customer funds or securities. We accept and enter orders. All transactions are sent to our Broker/Dealer, United Planners Financial Services of America, which then sends them to Pershing, LLC. our clearing firm, which clears & settles them. Our clearing firm also maintains our customer's accounts, can grant customers access to them and delivers funds and securities.

Our firm services only retail customers. We do not engage in any private placements or any other outside business activities that involve securities.

Our clearing firm is Pershing, LLC. We do not deal directly with Pershing, LLC, but instead with our Broker/Dealer, United Planners Financial Services of America at 7333 E. Doubletree Ranch Rd. #120 Scottsdale, AZ 85258 (800) 966-8737; www.UnitedPlanners.com. Our contact person at that firm includes various employees of United Planners. The department we deal with relating to securities transactions is the Operations Department. We do not contact Pershing directly at any time.

IV. Office Locations

Our firm is located at 885 Sedalia Street, Suite 102 Ocoee, FL 34761. Our main telephone number is 407-470-1405. Our employees travel to that location primarily via personal vehicles, but may take alternate forms of transportation should they ever need to. We engage in order taking and entry at this location.

V. Alternate Physical Locations of Employees

In the event of a Significant Business Disruption, we will move our staff from the affected office to our respective homes where we will work virtually to serve our clients. We maintain frequently used web sites and could engage in order taking and entry from these locations.

VI. Client Access to Funds and Securities

Our firm does not maintain custody of client's funds or securities, which are maintained at our clearing firm, Pershing, LLC. In the event of an internal or external SBD, if telephone service is available, our Registered Representatives will take client orders or instructions and contact our clearing firm through United Planners' Financial Services of America on their behalf and if our Web access is available, our firm will post on our website that customers may access their funds and securities by contacting United Planners' Financial Services of America. The firm will make this information available to clients through its disclosure policy.

If SIPC determines that we are unable to meet our obligations to our clients 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 Clients. We will assist SIPC and the Trustee by providing our books & records identifying client accounts subject to SIPC regulation.

VII. Data Backup and Disaster Recovery

Our firm maintains its primary hard copy books and records and its electronic records at our primary office. Jeff Rogers, a Registered Principal is responsible for the maintenance of these books & records. Our firm maintains the following documents types and forms that are not transmitted to our clearing firm through United Planners. Income and Outgoing client communications (letters), client information which includes names, addresses, phone numbers, Emails, social security numbers, account numbers, dates of birth, records of phone calls (incoming/outgoing), Email messages, meetings, results of meetings and when their next appointment for review is due.

In order to assure the integrity of the Firm's data and operational capabilities, Stewardship Advisory Group has incorporated a multi-phase Data Backup and Disaster Recovery (BDR) Platform. In the event of a local system failure, this system utilizes Dual RAID hard drives, backup to a local BDR system and stand by servers which would minimize the risk of data loss and minimize time to recovery. In the event of total destruction or loss of the Firm's office facilities or hardware, the BDR system also incorporates automatic backup to an offsite, secure location in another region of the country. In worst case scenario of total loss of our office facilities or hardware, the Backup and Disaster Recovery system would allow us to replicate the lost data and be fully operational within 24-48 hours.

All Emails and new account forms are further backed up at United Planners' Financial Services of America electronically.

VIII. Financial and Operational Assessments

This responsibility is taken care of by United Planners Financial Services of America

IX. Mission Critical Systems

Our firm's "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 client accounts, access to client accounts and delivery of funds and securities.

We have primary responsibility for establishing and maintaining our business relationships with our clients and have sole responsibility for our Mission Critical functions of order taking, entry and execution. Our orders all go through United Planners' Financial Services of America, then to the clearing firm which provides, through contract, the execution, comparison, allocation, clearance and settlement of securities transactions, the maintenance of client accounts, access to client accounts and the delivery of funds and securities.

A. Our Firm's Mission Critical Systems 1) Order Taking

Currently, our firm receives orders from clients via phone or in person requests. 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 clients when communications become available to tell them what alternatives they have to send their orders to us. Clients will be informed of alternatives by Email. If necessary, we will advise our clients to place orders directly with our clearing firm through United Planners' Financial Services of America.

2) Order Entry

Currently, our firm enters by logging into NetExchange 360 and electronically sending them to United Planners and then they send them to our clearing firm electronically or by phone.

In the event of an internal SBD, we will enter and send records to United Planners from our Emergency Location, they will in turn, send them to our clearing firm by the fastest alternative means available, which include electronic or telephone. In the event of an external SBD, we will maintain the order in electronic or paper format and deliver the order to the clearing firm by the fastest means available when it resumes operations. In addition, during an internal SBD, we may need to refer our clients to deal directly with our Broker/Dealer for order entry.

3) Order Execution

We currently execute orders by sending them first to United Planners, who then sends them to Pershing, LLC. In the event of an internal SBD, we would sue the same procedure at our Emergency Location. In the event of an external SBD, we would contact United Planners' Operations Department for further instructions.

4) Other Services Currently Provided to Clients In addition to those services listed above in this section we also maintain close contact with clients and review their accounts with them periodically. We also help them with Mutual Funds, Annuities and other investments. In the case of an internal SBD, we would continue to provide these services at our Emergency Location. In the event of an external SBD, we would endeavor to provide these services using computers & website services for the fund companies.

B. Mission Critical Systems Provided by our Home Office

Our firm relies on our Broker/Dealer, United Planners, to provide any critical systems that we might need in the event of an internal or external Significant Business Disruption.

X. Alternate Communications between the Firm and Clients, Employees and Regulators

A. Clients

We currently communicate with our clients using phone, Email, our website, fax, U.S. Mail and in person visits at our firm or other locations. 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 we have used in the past to communicate with the other party. For example, if we have communicated with a client by Email, but the Internet is unavailable, we will call them on the phone and follow up where a record is needed with a paper copy via U.S. mail.

B. Employees

We currently communicate with our employees using the business phone, their cell phones, 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 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, office and cell phone numbers. We have identified persons, noted below, which live near each other and may reach each other in person:

The person to invoke use of the call tree is:

Jeff Rogers

The backup person is:

Scott Pletcher

Caller: Jeff Rogers

Call Recipients: Scott Pletcher, Cathy Rogers, Denise Pass, Nick Ellison, Brandon Catrett

Caller: Scott Pletcher

Call Recipients: Joe Morson, Don Purcell, Victoria Harrelson,

Caleb Hunter

Note: The situation will dictate who will initiate the call.

C. Regulators

We, through United Planners Financial Services of American, are currently members of the following SROs: FINRA, SIPC. We communicate with our Regulators by going through the Home Office of United Planners. We use the phone, Email, fax, U.S. Mail and in person. In the event of an SBD, we will access 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.

XI. Critical Business Constituents, Banks and Counter-Parties

A. Business Constituents

We have contacted our critical business constituents (businesses with which we have an ongoing commercial relationship in support of our operating activities, such as vendors providing us critical services) and determined the extent to which we can continue our business relationship with them in light of an internal or external SBD. 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 an SBD to them or our firm. Our major suppliers are:

- Salentica (Customer Relationship Management Software)
- Goldman Sach/MoneyGuide Pro (Laura Holt - Goldman Sachs) 972-441-8066 (Customer Relationship Management Software & Planning tools)
- SON Technology (407) 936-2220 Support@SONTechnology.com (Computer Systems, Server and Backup Disaster Recovery System)

B. Banks

Not applicable as we are not a clearing firm.

C. Counter-Parties

This is something that United Planners' Financial Services of America would do on our behalf. We would contact United Planners' and we would not contact other parties, such as other Broker/Dealers or institutional customers.

XII. Regulatory Reporting

United Planners' Financial Services of America currently files reports with our regulators using paper copies in the U.S. mail and electronically using Email, fax and the Internet. In the event of an SBD, we will check with United Planners to see if we should be doing anything at that point in time.

XIII. Disclosure of Business Continuity Plan

We provide in writing a BCP disclosure statement to clients at account opening and every two years. Our Broker/Dealer sends these disclosures for each new account that is opened by a new client.

XIV. Updates and Annual Review Our firm will update this plan whenever we have a material change to our operations, structure, business or location or to those of our clearing firm. In addition, our firm will review the BDP annually, no later than December 31st, to modify it for any changes in our operations, structure, business or location or those of our clearing firm.

XV. Senior Manager Approval

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

Signed: Jeff Rogers

Title: Registered Principal

Date: 2021