Branch Office
Business Continuity Plan (BCP) Template
2020

Financial Freedom Wealth Management Group, LLC
Vancouver Branch

Branch Name or DBA

2020 Updates to the Branch Office Business Continuity Plan Template:

- Updated Quick Reference Guide
- Updated Preparedness checklists for major events
- Updated Safety and Preparedness Checklists and information for power outages and fire

If you already have your plan documented, copy and paste the relevant sections to your existing plan document.

GUIDELINES:

The attached template is provided to assist branch offices in fulfilling their need to create and maintain business continuity plans (BCPs) pursuant to the Branch Office Security Policy and to fulfill FINRA Rule 4370 (Business Continuity Plans) requirements. The template recognizes that many branch offices rely on parts of LPL Financial's BCP for many of the mission-critical functions of the branch.

Instructions:

1. Complete all highlighted areas of the template with the relevant information.
2. Review the remainder of the plan for appropriateness based on your branch's specific situation
3. Review and sign the plan to fulfill the requirement to annually review and approve.
4. Perform an annual Business Continuity failover test per the guidelines included in Attachment C
5. Distribute to your key personnel who would have a role in enacting the plan.
6. Update as necessary upon any changes to your business.

The attached template is written for branch offices that use LPL Financial for technology and services, and includes language regarding the nature of that particular relationship only. If your branch conducts a different type of business then the template should be modified to describe the entities you rely on and the nature of those relationships. The obligation to develop a BCP is not a "one-size-fits-all" requirement, and you must tailor your plan to fit your particular branch's situation.

Branch Office Security Policy Section 3.9:

Branch Offices must create and maintain a written business continuity plan identifying procedures relating to an emergency or significant business disruption. Such procedures must be reasonably designed to enable the branch to meet its existing obligations to customers. Branches must also conduct an annual failover test and review of their business continuity plan to determine whether any modifications are necessary in light of changes to the branch's operations, structure, business, or location.

The elements that comprise a business continuity plan are flexible and may be tailored to the size and needs of a branch. Each plan, however, must at a minimum, address:

1. Data back-up and recovery (hard copy and electronic)
2. All mission critical systems
3. Financial and operational assessments
4. Alternate communications between customers and the branch
5. Alternate communications between the branch and its employees
6. Alternate physical location of employees
7. Critical business constituent, bank, and counter-party impact
8. Regulatory Reporting – LPL handles regulatory reporting on my behalf
9. Communications with regulators –LPL handles communication with regulators on my behalf
10. Plans to ensure customers' prompt access to their funds and securities in the event that the branch determines that is unable to continue its business. Clients are instructed to call LPL to access their funds. Hybrids are responsible to report their regulatory authority and have the capability for their clients to call someone to service their accounts.

Keep in mind that the above-listed elements are not exhaustive; you should address other key areas for your plan to be complete and thorough, based on your branch's business and operations.

LPL Financial

2020 Branch Office Business Continuity Plan | Quick Reference Plan Summary

Data Backup and Recovery

LPL stores Books and Records for Corporate RIA and brokerage. If you are a Hybrid office, it is your responsibility to record 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-(800) 877-7210 x6835.
Electronic copies are kept at LPL Financial.

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I. INTRODUCTION

This manual documents the business continuity plan for

Financial Freedom WMG, LLC-Vancouver Branch , [Branch or DBA Name]

a LPL Financial branch office that conducts business in products that are available through LPL's platform. The purpose of this manual is to document the plans for the recovery of our critical business functions and systems in the event of a business disruption.

II. EMERGENCY CONTACT PERSONS

LPL Financial provides FINRA with the contact information for 2 emergency contact persons to fulfill this requirement for all branch office locations under LPL Financial. These 2 emergency contact persons are registered principles for LPL Financial. LPL Financial stays in compliance by updating this information upon any material change and reviewing the infor mation quarterly to ensure it is up to date.
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) 877-7210 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 affect 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 the capabilities of LPL Financial.

b. Approval and Execution Authority (Onsite Manager/Advisor)

Julia M Carlson CEO/OSJ [Name, Title]
is responsible for approving the plan and for reviewing it annually.

Julia M Carlson CEO/OSJ [Name, Title]
has the authority to execute this BCP.

c. Plan Location and Access
Our branch will maintain copies of its BCP plan and the annual reviews, and the changes that have been made to it for inspection. An electronic copy of our plan is located on:

www.financialfreedomwmg.com

[Path And Folder Name Where Plan Is Located] *Rule: FINRA Rule 4370(b), (d) and (e).*

IV. BUSINESS DESCRIPTION [State The Types Of Business That Your Branch Conducts.]

Investment and financial planning

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:

Boston
LPL Financial
75 State St, 24th Floor
Boston, MA 02108

Carolinas (Fort Mill)
LPL Financial
1055 LPL Way
Ft. Mill, SC 29715

San Diego
LPL Financial
4707 Executive Drive
San Diego, CA 92121

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

V. OFFICE LOCATIONS: Our office locations are:

a. Office Location #1

Financial Freedom WMG, LLC-Newport [Branch Name]

541-574-6464 [Phone Number]

1007 SW Bayley Street Newport, OR 97365 [Address]

We conduct business in equity, fixed & mutual funds. We accept & enter orders & SERVICE RETAIL CUSTOMERS [Functions Performed At This Location]

b. Office Location #2 (if applicable)

FFWMG, LLC-Salem [Branch Name]

971-599-5142 [Phone Number]

2288 Liberty Street NE Salem, OR 97301 [Address]

Same as above [Functions Performed At This Location]

VI. ALTERNATIVE PHYSICAL LOCATION(S) OF EMPLOYEES

In the event of an SBD, we will move our staff from affected office(s) to the closest of our unaffected office location(s). If none of our other office locations is available to receive those staff, we will move them to

Chandran Rajaratnam's residence for Vancouver office-Will be given at time of SBD [Address]

Available on Branch Copy [Phone Number]

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

IV. BUSINESS DESCRIPTION [State The Types Of Business That Your Branch Conducts.]

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:

Boston
LPL Financial
75 State St, 24th Floor
Boston, MA 02108

Carolinas (Fort Mill)
LPL Financial
1055 LPL Way
Ft. Mill, SC 29715

San Diego
LPL Financial
4707 Executive Drive
San Diego, CA 92121

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

V. OFFICE LOCATIONS: Our office locations are:

a. Office Location #1 3

Financial Freedom WMG, LLC-Corvallis — [Branch Name]

971-252-2545 — [Phone Number]

518 SW 3rd Street Corvallis, OR 97333 — [Address]

We conduct business in equity, fixed & mutual funds. We accept & enter orders & SERVICE RETAIL CUSTOMERS. — [Functions Performed At This Location]

b. Office Location #2 (if applicable) 14

Financial Freedom WMG, LLC-Eugene — [Branch Name]

541-727-0993 — [Phone Number]

975 Oak Street Suite 670, Eugene, OR 97401 — [Address]

We conduct business in equity, fixed & mutual funds. We accept & enter orders — [Functions Performed At This Location]

VI. ALTERNATIVE PHYSICAL LOCATION(S) OF EMPLOYEES

In the event of an SBD, we will move our staff from affected office(s) to the closest of our unaffected office location(s). If none of our other office locations is available to receive those staff, we will move them to

[Address]

[Phone Number]

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

IV. BUSINESS DESCRIPTION [State The Types Of Business That Your Branch Conducts.]

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:

Boston
LPL Financial
75 State St, 24th Floor
Boston, MA 02108

Carolinas (Fort Mill)
LPL Financial
1055 LPL Way
Ft. Mill, SC 29715

San Diego
LPL Financial
4707 Executive Drive
San Diego, CA 92121

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

V. OFFICE LOCATIONS: Our office locations are:

a. Office Location #1 5

Financial Freedom WMG, LLC-Vancouver — [Branch Name]

971-252-6562 — [Phone Number]

1220 Main Street, Suite 400, Vancouver, WA 98660 — [Address]

We conduct business in equity, fixed & mutual funds. We accept & enter order & SERVICE RETAIL CUSTOMERS. — [Functions Performed At This Location]

b. Office Location #2 (if applicable) 16

Financial Freedom WMG, LLC-Portland — [Branch Name]

503-471-1400 — [Phone Number]

121 SW Salmon Street, 11th Floor, Portland, OR 97204 — [Address]

We conduct business in equity, fixed & mutual funds. We accept & enter order — [Functions Performed At This Location]

VI. ALTERNATIVE PHYSICAL LOCATION(S) OF EMPLOYEES

In the event of an SBD, we will move our staff from affected office(s) to the closest of our unaffected office location(s). If none of our other office locations is available to receive those staff, we will move them to

[Address]

[Phone Number]

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

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) 877-7210.

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

N/A

[Any Additional Procedures]

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 Affected Locations
Members that maintained books and records at the affected 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 affected, 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-(800) 877-7210 x6835.

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:

N/A

[Name]

[Address]

Our branch maintains its primary electronic records at:

LPL Financial-ClientWorks

[Name]

75 State Street, 24th Floor Boston MA 02108

[Address]

LPL Financial ClientWorks
800-877-7210

[Name, Title, Phone Number] is responsible for the maintenance of these books and records. Our branch maintains the following document types and forms that are not transmitted to LPL Financial:

[List Document Types And Forms, Such As New Account Forms, Etc.]

None

Our branch maintains backup hard copy books and records at:

LPL Financial-ClientWorks

[Name]

75 State Street, 24th Floor Boston, MA 02108

[Address]

Responsible Party:

N/A

[Name Of Person Responsible For Back Up]

Backup Frequency:

Daily

[Frequency Records Are Backed Up]

The document types and forms that are backed up are:

All forms

[List Types Of Documents Backed Up]

Our branch backs up electronic records at:

LPL Financial-ClientWorks

[Name]

75 State Street, 24th Floor Boston, MA 02108

[Address]

Responsible Party:

N/A

[Name Of Person Responsible For Back Up]

Backup Frequency:

Daily

[Frequency Records Are Backed Up]

The document types and forms that are backed up are:

All forms

[List Types Of Documents Backed Up]

We back up electronic records Daily [Enter Frequency] by

ClientWorks-LPL Financial

[Describe Process]

and keeps a copy at Same as above

[Other Address; May Be The Same As Hard Copy Back-Up Site]

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 identify what means will permit us to communicate with our customers, employees, critical business constituents, criti cal 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 directly 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.

<u>Our Branch's Mission Critical Systems</u>

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

Currently, we enter orders by recording them on paper and sending them to LPL Financial electronically through BranchNet/ClientWorks or telephonically. LPL Financial represents under its BCP, we can expect service restoration within four (4) hours.

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, we will keep the order in the appropriate format and deliver back to LPL in proper format with expectations of LPL Financial to be back up and running in 4 hours.

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 the backup for the other. There are documented and tested plans in place to provide for a fail-over between the two sites.

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 records 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 the backup for the other. There are documented and tested 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: [Enter Name]

Caller	Call Recipients	Call Recipients
Julia Carlson	Lourdes Lozano	
Lourdes Lozano	Jason Harris	Matt Beck
Lourdes Lozano	Pati Lonergan	Amy Carlson
Lourdes Lozano	Eddie Symington	Shelly Heim
Jason Harris	Chandran Rajaratnam	Holli Rajaratnam
Jason Harris	DJ (David) Wright	Amber Traver
Jason Harris	Edgar Villegas	Sammie Guajardo
Jason Harris	Kyla Hedge	

[e.g., Person A, Person C] [e.g., Person B, Person C, Person D Person E.]

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.

Our other critical business constituents are:

Business Constituent	Services Provided	Alternatives in the event they are unavailable:
Salesforce	CRM/Documentation	Historical Backup Records

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:

Columbia Bank	541-265-6666
[Bank Name]	[Phone Number]
506 SW Coast Hwy Newport OR 97365	
[Address]	[Contact]

If our banks and other lenders are unable to provide the financing, we will seek alternative financing immediately from:

Umpqua Bank	541-265-7000
[Bank/ Lender Name]	[Phone Number]
1250 N Coast Hwy Newport OR 97365	
[Address]	

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.]

See Below

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 and mailed to customers upon request.
Rule: FINRA Rule 4370(e).

XV. 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.
Rule: FINRA Rule 4370(d).

[Signed]

CEO/OSJ

[Title]

10/29/2020

[Date]

LPL Financial & Affiliate Business Continuation Plan Summary

LPL Financial and our affiliate—The Private Trust Company—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, net work, 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 an unaffected 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) 877-7210 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.

Throughout the months of April & May 2020

[Date Of Completed Test]

TEST CHECKLIST

Strategy:

Yes	No	
☑	☐	1. Alternative office location (per Plan)
☐	☑	2. Work area recovery (Regus)
☐	☑	3. Home office (per Plan)

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:

Recovery Response Actions:

Which staff members were included in the test exercise/relocation event:

1. Julia Carlson-worked from home
2. Chandran Rajaratnam-worked from home
3. Holli Rajaratnam-worked from home
4. Amy Carlson-worked from home
5. Amber Traver-worked from home
6. Matt Beck-worked from home
7. Cassie Wilson-worked from home
8.
9.
10.

Recovery Response Actions:

Yes	No	
☑	☐	1. Were there any issues with network connectivity/phone access?
☑	☐	2. Were you able to transact "business as usual" at the recovery location?
Varies		3. How long did you remain at the recovery location:

TEST CHECKLIST

Test Outcomes:

Yes	No	
☑	☐	1. Was the test suitable and appropriate?
☑	☐	2. Did participants understand the BCP?
☑	☐	3. Did the BCP capture all roles to support activation?
☑	☐	4. Are roles and responsibilities appropriate and current?
☑	☐	5. Have backups been identified for all roles and responsibilities?
☑	☐	6. Are delegations of tasks appropriate?
☐	☑	7. Are any revisions or additions to the BCP required?
☑	☐	8. Has responsibility for these actions been assigned?
☑	☐	9. Has an appropriate timeframe been designated to complete the actions?
☑	☐	10. Has a report on the test been completed?
☑	☐	11. Has the test report been provided to the appropriate person(s) in the firm?
☑	☐	12. Has the BCP been updated with the results of the testing?
☐	☐	13. Has the revised BCP been approved by the Plan Owner(s)?

Areas of focus during Lessons Learned

Strategy:

Do your BCP strategies address All Hazards in a business disruption?

Yes	No	
☑	☐	1. No Access to facilities
☑	☐	2. No access to your Technology
☑	☐	3. Reduced access to people

Plan and Prepare:

Yes	No	
☐	☑	1. Are actions required to add missing information to your BCP?
☑	☐	2. Are hard and electronic copies of your BCP stored in appropriate, easily accessible and secure locations?
☑	☐	3. Are employee roles, responsibilities and priorities understood?

Continuity Response Actions:

Yes	No	
☑	☐	1. Do actions identify who does what, when and where?
☑	☐	2. Do 'manual work arounds' have a logical and easy to follow flow?
☑	☐	3. Were actions successfully completed?

Recovery Response Actions:

Yes	No	
☑	☐	1. Do actions identify who does what, when and where?
☑	☐	2. Do 'back to business as usual' actions have logical flow?
☑	☐	3. Are recovery actions practical? Are they sufficient?
☑	☐	4. Were actions successfully completed?

Interdependencies:

Yes	No	
☑	☐	1. Have all interdependencies been adequately addressed?

Communication:

Yes	No	
☑	☐	1. Are all staff and key departmental or regional contacts included?
☑	☐	2. Are all contact details complete, current and accurate?
☑	☐	3. Does the Plan address contacting staff to notify them whether they need to come to work or report to an alternate location?
☑	☐	4. Does the Plan identify key messages and communication channels to each of the stakeholders in the event Network/Technology systems are unavailable?
☑	☐	5. Does the Plan identify essential suppliers/ third party vendors and/or supplier/vendor contact details?

Resource Requirements:

(People, facilities, Network, Vital Records)

Yes	No	
☑	☐	1. Does the BCP anticipate all the resources required to support BCP activation?
☑	☐	2. Is it clear who the BCP coordinator should contact regarding required continuity resources?
☑	☐	3. Are all vital records, data or resources required to implement continuity strategies current and accurate?Were actions successfully completed?

Additional Test Commentary

Please see attached BCP Test Report

Conclusion

Please be aware that, while we have detailed plans in place, we cannot guarantee that we will be successful in achieving recovery in the times noted above. For example, we may not be able to implement a plan during a disaster as quickly as we expect, or there may be disasters that we have been unable to anticipate and for which we have no plan. Additionally, if parts of our plan are dependent upon third parties, we will have no control over the success or failure of the third party to respond appropriately to the challenges posed at the time of the disaster. Our continuity plans are periodically updated and modified. Updated plan summaries will be made available on our website (www.lpl.com) and can be obtained by submitting a written request.

Revision History

Revision History (Business Continuity Plan)

Revision Date	Name (First, Last)	Revision Summary
10/29/2020	Julia M Carlson	Removed 2 Employees from Call Tree
		Cassie Wilson & Payton Taylor
		Added 1 Employee Kyla Hedge

Completed BCP Tests

Revision Date	Name (First, Last)	Revision Summary

Attachment C: Damaged Books and Records Log

FINRA Guidance on Books and Records Maintained at the Affected Locations

Members that maintained books and records at the affected 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 affected, 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-(800) 877-7210 x6835.**

Document Category (Finra Rule 4510, NYSE Rule 440 or SEC Rules 17a-3 and 17a-4)

Description of recordsand information contained

Yes ☐ No ☐ Identifiable

Time Period

Yes ☐ No ☐ Backed Up/Stored Electronically?

If stored offsite or electronically enter location

Yes ☐ No ☐ Can be re-created?

Document Category (Finra Rule 4510, NYSE Rule 440 or SEC Rules 17a-3 and 17a-4)

Description of recordsand information contained

Yes ☐ No ☐ Identifiable

Time Period

Yes ☐ No ☐ Backed Up/Stored Electronically?

If stored offsite or electronically enter location

Yes ☐ No ☐ Can be re-created?

Document Category (Finra Rule 4510, NYSE Rule 440 or SEC Rules 17a-3 and 17a-4)

Description of recordsand information contained

Yes ☐ No ☐ Identifiable

Time Period

Yes ☐ No ☐ Backed Up/Stored Electronically?

If stored offsite or electronically enter location

Yes ☐ No ☐ Can be re-created?

Document Category (Finra Rule 4510, NYSE Rule 440 or SEC Rules 17a-3 and 17a-4)

Description of recordsand information contained

Yes ☐ No ☐ Identifiable

Time Period

Yes ☐ No ☐ Backed Up/Stored Electronically?

If stored offsite or electronically enter location

Yes ☐ No ☐ Can be re-created?

Document Category (Finra Rule 4510, NYSE Rule 440 or SEC Rules 17a-3 and 17a-4)

Description of recordsand information contained

Yes ☐ No ☐ Identifiable

Time Period

Yes ☐ No ☐ Backed Up/Stored Electronically?

If stored offsite or electronically enter location

Yes ☐ No ☐ Can be re-created?

Document Category (Finra Rule 4510, NYSE Rule 440 or SEC Rules 17a-3 and 17a-4)

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Time Period

Yes ☐ No ☐ Backed Up/Stored Electronically?

If stored offsite or electronically enter location

Yes ☐ No ☐ Can be re-created?

Document Category (Finra Rule 4510, NYSE Rule 440 or SEC Rules 17a-3 and 17a-4)

Description of recordsand information contained

Yes ☐ No ☐ Identifiable

Time Period

Yes ☐ No ☐ Backed Up/Stored Electronically?

If stored offsite or electronically enter location

Yes ☐ No ☐ Can be re-created?

Business Continuity Event Planning Checklists

Main Websites for Reference:

- [ ] 1. Ready.gov
- [ ] 2. Redcross.org

Emergency- American Red Cross App:

- [ ] 1. Apple User
- [ ] 2. Android User

- Monitors severe weather conditions in your area, or where loved ones may be by utilizing a live map
- Provides easy opportunity to learn more and prepare your family, home and business for weather events or business interruptions
- Receive the latest alerts

Preparedness Tips and Guidelines:

- [ ] 1. Earthquake Preparedness
- [ ] 2. Home Fire Safety Preparedness
- [ ] 3. Hurricane Preparedness
- [ ] 4. Power Outage Preparedness
- [ ] 5. Tornado Preparedness
- [ ] 6. Wildfire Safety Preparedness
- [ ] 7. Winter Storm Preparedness

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 affect 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.

Important

- ☐ 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.

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:

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 it they cannot find each other.
- ☐ Practice: STOP, DROP, and ROLL.
- ☐ Practice your fire safety plan at least twice a year.

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.
  If 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.

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.

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 and 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.

Know the Risks

- There is a house fire **every ten seconds** in the U.S.
- Home fires can spread in as little as **thirty seconds.**
- Make sure that your family has a **fire escape plan** for your home and practice it regularly.
- **Remember:** If there's ever a fire, GET OUT, STAY OUT and CALL for help.
- Cooking is the **leading cause** of house fires.
- More than **15,000** fires a year are started by clothes dryers. Clean the vents at least once a year.