

Adaptation Financial Advisory, Inc.

(“Adaptation Financial” or the “Company”)

Business Continuity Plan

Kevin V. Cox
BCP Designated Principal

08/26/2020

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1. PREFACE

Despite the efforts of each business, state and local government and federal agency to renovate, validate, and implement their mission-critical information systems, the financial industry remains vulnerable to the disruption of its business processes. Because most companies in the financial industry are highly dependent on information technology to carry out their business, a business disruption induced failure of one or more mission critical system(s) may have a severe impact on a financial services firm's ability to deliver core business services.

Because of these risks, the United States Securities and Exchange Commission ("SEC") has implemented programs to attempt to mitigate the risks associated with business failures in the financial industry which would be caused by an event causing a failure to deliver financial services as a result of a significant business disruption. Specifically, the SEC has required that firms create and maintain business continuity plans.

Ultimately, the business continuity planning process focuses on reducing the risk of business failures resulting from business disruptions. It safeguards a company's ability to produce a minimum acceptable level of outputs and services in the event of failures of internal or external mission-critical information systems and services. While it does not offer a long-term solution to all situations which create a significant business disruption, it will help Adaptation Financial Advisory, Inc. to prepare for a potential crisis.

2. REGULATORY BACKGROUND

2.1. General Overview

Based upon regulations and rules implemented by the SEC and other state securities regulators (collectively “Regulators”), and being held to the fiduciary standard, investment advisers are required to its clients’ interests from being placed at risk as a result of the adviser’s inability to provide financial services after a disaster, death of a key personnel or other interruption of business. Additionally, this business continuity plan is intended to address our obligation as an investment adviser to establish and maintain procedures to safeguard and maintain their records from destruction or loss.

2.2. Plan Elements.

The Business Continuity Plan (the “Plan”) for Adaptation Financial Advisory, Inc. (referred to herein as the “Adaptation Financial”, “Company”, “our”, “us”, and or “we”) addresses the 10 critical elements listed below:

1. Data back-up and recovery (hard copy and electronic);
2. All mission critical systems;
3. Financial and operational assessments;
4. Alternate communications between clients and Adaptation Financial;
5. Alternate communications between the member and its employees, supervised persons, and independent contractors providing clerical and advisory support to our clients (collectively “supervised persons”);
6. Alternate physical location of employees;
7. Critical business constituents, banks, and counter-party impact;
8. Regulatory reporting;
9. Communications with regulators; and
10. How Adaptation Financial will assure clients’ prompt access to their funds and securities in the event that we determine that we are unable to continue its business.

3. PLAN OVERVIEW

3.1. Company Policy

The policy of the Company is to respond to a Significant Business Disruption (“SBD”) by safeguarding employees’ lives and Company property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of the Company’s books and records, and to the extent practicable, allowing our clients to transact business as soon as possible following an SBD. In the event that the Company determines that it is unable to continue its business, Adaptation Financial will take steps

to assure clients prompt access to investments and the underlying issuers of those investments.

3.1.1. Significant Business Disruptions

The Plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only the ability of the Company to communicate and do business, such as a fire in its building. External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a city flood, or a wide-scale, regional disruption. The response of the Company to an external SBD relies more heavily on other organizations and systems.

3.1.2. BCP Designated Principal - Approval and Execution Authority

Kevin V. Cox (the “BCP Designated Principal”) is the registered and designated principal responsible for approving the Plan on behalf of Adaptation Financial , and for conducting the required annual review and testing. The BCP Designated Principal has the authority to execute this Plan.

3.1.3. Plan Location and Access

The Company will maintain copies of the Plan, the annual reviews, and the changes that have been made to it. The Firm will make such records available for inspection by the Regulators. An electronic copy of the Plan is located on the Company’s computer and/or in a folder named “Business Continuity Plan”.

3.1.4. Updates and Annual Review

The Company will update the Plan whenever there is a material change to the operations, structure, business, or location of Adaptation Financial . In addition, the Company will review this Plan annually, on or before 12/31 of each respective year, to modify it for any changes in the operations, structure, business, or location of Adaptation Financial .

3.2. Emergency Contact Persons

Executive management is aware of the potentially devastating financial, organizational, and political consequences of the failure of one or more mission-critical information systems. The emergency contact persons for the Company is:

Kevin V. Cox, CEO

Office phone number: 405-475-7892

Facsimile number: 972-774-1652

E-mail address: kcox@adaptfa.com

Alan R. Neimann, Board of Directors

Office phone number: 972-774-0700

Facsimile number: 972-774-1652

E-mail address: aniemann@adaptfa.com

Annetta Box Taylor, Compliance
Office phone number: 405-475-7892
Facsimile number: 972-774-1652
E-mail address: ataylor@adaptfa.com

3.3. Business Description

The Company is registered as an investment adviser with the SEC and notice filed in various other state regulatory jurisdictions. The Company furnishes investment advisory services and financial planning services. These services include recommending investments for client's needs, risk tolerance and other assets and obligations of the client. The Company is organized as a Corporation.

3.4. Office Location

The Company has set forth the main office on Attachment A, which is attached hereto and incorporated herein for all purposes. The Firm has additionally set forth on Attachment A the phone number for this respective location, the means of transportation that the supervised person may use to reach each respective facility, and which systems, as defined herein, take place at each location.

3.5. Alternative Physical Locations

In the event of an SBD, we will move our staff to an unaffected location, or they will work from their homes. Staff will use their cell phones, company laptops, tablets, and personal computers for contact purposes.

4. CUSTOMERS' ACCESS TO FUNDS AND SECURITIES

The Company does not maintain possession or custody of clients' funds or securities. Both client funds and securities are maintained by the respective custodian ("Custodian"). In the event of an internal or external SBD, if telephone service is available, our supervised persons will continue to manage client portfolios, and receive client orders or instructions and, to the extent practicable, assist such clients in contacting the issuers of the securities on their behalf. In the event that clients of the Company are unable to access Adaptation Financial, either at its primary phone number, or Adaptation Financial emergency number clients will be able to contact their Custodian, and or the respective issuers of securities directly for instructions on how they may obtain, prompt access to funds and securities, subject however, to any limitations set forth previously by such Custodian, and or issuers of investment products.

5. DATA BACK-UP AND RECOVERY.

5.1. Electronic and Hard Copy Books and Records

The Company maintains its primary hard copy books and records and electronic records at 700 Cedar Lake Blvd., Oklahoma City ,OK 73114. Kevin V. Cox is responsible for the maintenance of these books and records. The Firm maintains the following document types: (i) New account documentation and forms; (ii) client confirmations and account statements; (iii) financial records, including supporting documentation; and (iv) corporate records for Adaptation Financial .

5.2. Back-up Procedures

The company has contracted the services of Argus IT Services to perform continuous automatic secure online back-ups of its electronic records. The data is backed up on a cloud server.

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

6. FINANCIAL AND OPERATIONAL ASSESSMENTS.

6.1. Operational Risk

In the event of an SBD, the Company will immediately identify what means will permit Adaptation Financial to communicate with its clients, supervised persons, critical business constituents, critical banks, critical counterparties, and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options we will employ will generally include (a) facsimile; (b) email; (c) telephone; (d) telephone voice mail; (e) cellular and mobile phone service; and (f) service providers, including compliance consultants, attorneys and accountants; (g) messenger; and (h) mail service. In addition, we will retrieve our key activity records as described in the section, Data Back-Up, and Recovery.

6.2. Financial and Credit Risk

In the event of an SBD, the Company will determine if the business interruption causes the company to become capital deficient or interrupt its operations to the point that the alternative measures discussed in the sections above and below cannot be implemented, the Company's clients shall be referred to the respective Custodian.

6.3. Succession Plan

Adaptation Financial will cross-train personnel in different job functions to ensure that at least one other person has a working knowledge of each client's account. This can be accomplished by simulating unavailability of the key personnel, and have backup personnel handle accounts for a temporary period.

Additionally, Adaptation will take steps for the owners to develop and implement an adequate estate plan which can include wills, trust, or other instruments in place so that change of ownership upon death is understood by Company personnel, and who can plan accordingly. Notwithstanding the above, in the event that the Company is not able to manage the clients investment portfolios, the accounts will be referred to the Custodian of the account.

7. MISSION CRITICAL SYSTEMS

7.1. Mission Critical Systems - Definition

"Mission critical systems" are those that ensure prompt and accurate processing of securities transactions, including order taking, entry, execution, comparison, allocation, the maintenance of client accounts, access to client accounts, and the delivery of funds and securities.

7.2. Identify Business Systems

The Company will identify the mission critical systems utilized by Adaptation Financial in providing services to its clients.

7.3. Mission Critical Systems - Assessment

The Company has primary responsibility for establishing and maintaining its business relationships with clients, and the sole responsibility for maintaining our mission critical functions of portfolio management and order taking and entry. Its mission critical systems include desktop and laptop computers, and phone systems.

7.4. Mission Critical Systems Provided by Our Custodians

We rely, by contract, on our Custodian to provide order execution, order comparison, order allocation, client account maintenance and/or access and delivery of funds and securities.

8. ALTERNATIVE COMMUNICATIONS BETWEEN FIRM AND CUSTOMERS, EMPLOYEES AND REGULATORS.

8.1. Customers

The Company currently communicates with our clients using the telephone, email, U.S. mail, delivery services and in person visits at our offices or at the client's location. In the event of an SBD, Adaptation Financial will assess which means of communication are still available to it, and use the means closest in speed and form, either written or oral, to the means that have been used in the past to communicate with the other party. For example, if the Company has communicated with a party by email but the Internet is unavailable, Adaptation Financial will call them on the telephone and follow up where a record is needed with paper copy in the U.S. mail.

8.2. Employees and supervised Persons

The Company now communicates with its employees and supervised persons using the telephone, email, and in person. In the event of an SBD, Adaptation Financial will assess which means of communication are still available, and use the means closest in speed and form, either written or oral, to the means that have been used in the past to communicate with the other party. A copy of the corporate telephone directory, including home phone numbers and email addresses is attached hereto as Attachment B. Kevin V. Cox shall contact and communicate to all employees and supervised persons by telephone, email, messenger or in person.

8.3. Regulators & Regulatory Reporting

With respect to regulatory reporting, we currently file reports with the respective Regulators using paper copies in the U.S. mail and delivery services, electronically using facsimile, email, and the Internet, and through service providers who provide access through the same methods. In the event of an SBD, Adaptation Financial will check with the Regulators to determine which means of filing are still available to it, and use the means closest in speed and form (written or oral) to previous filing method utilized by the Company. In the event that the Company cannot contact its Regulators, it will continue to file required reports using the communication means available to Adaptation Financial. Contact information regarding the Regulators with whom Adaptation Financial files reports on a regular basis attached hereto on Attachment C.

9. CRITICAL BUSINESS CONSTITUENTS, BANKS, AND COUNTER-PARTIES

9.1. Business Constituents

The Company has contacted its critical business constituents (businesses with which Adaptation Financial has an ongoing commercial relationship in support of its operating activities, such as vendors providing us critical services), and determined the extent to which Adaptation Financial can continue its business relationship with them in light of the internal or external SBD. The Firm will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services when needed because of a SBD to them or Adaptation Financial. The Critical Business Constituents are set out on Attachment D, including the supplier's name, service and or product, address and phone number and any alternative supplier's name, service, address, and phone number.

9.2. Counter-Parties

The Company has contacted its critical counterparties, such as other broker-dealers, companies or entities offering investment products, or institutional clients, to determine if it will be able to carry out its transactions with them in light of the internal or external SBD. Where the transactions cannot be completed, Adaptation Financial will contact those counterparties directly to make alternative arrangements to complete those transactions as soon as possible.

10. SIGNIFICANT BUSINESS DISRUPTIONS

10.1. Internal SBD – Facilities Emergency Evacuation Procedures

10.1.1. Fire Emergency Evacuation Procedures

If an evacuation of any facility is necessary, follow the directions given by Kevin V. Cox, the designated Fire Marshal for the Company. If evacuation of the space is necessary because of fire, on hearing the fire alarm bells sounding continuously, employees should:

- Evacuate the building by the nearest available fire exit. As always, if you see or smell smoke, you should proceed to one of the other fire exits. Remember, if you have visitors or contractors with you, instruct them to follow you.
- CLOSE ALL DOORS WITHOUT CAUSING DELAYS, taking risks, or obstructing people behind you.
- DO NOT stop to collect personal belongings.
- DO NOT use the elevators.
- Leave the building by calmly walking to the Assembly Point.
- DO NOT re-enter the building until instructed to do so.

At the Assembly Point, report your presence to the Fire Marshal for the Company.

10.1.2. Evacuation for Bombs or Other Threats

If the Company has to evacuate the building facilities because of a bomb or any other threat, we will receive instructions from the building security coordinator to:

- Evacuate the building by an exit route that will be announced if instructions are given to evacuate. Remember, if you have visitors or contractors with you, instruct them to follow you.
- DO NOT turn lights or office equipment, e.g., computers, typewriters, photocopiers ON or OFF. If they are on, leave them on; if they are off, leave them off.
- DO NOT leave handbags/briefcases/etc. behind as they could cause problems for building searches.
- DO NOT use elevators unless instructed to do so by the building security officer or a Fire Marshal for the Company.
- Leave the building by calmly walking to the Assembly Point which you will receive from the Incident Control Point security staff during the evacuation.

At the Assembly Point, report your presence to the Fire Marshal for the Company.

10.2. Emergency during Business Hours

All personnel of the Company should follow the standard emergency evacuation procedures above. Further instructions will be given at the designated Assembly Point.

10.3. Emergency Outside of Business Hours

In an emergency involving any employees' personal safety, it is the responsibility of every employee to check in and report their whereabouts. You should leave a voicemail on one of the following phone lines:

Kevin V. Cox

Home/Cell Phone: 918-645-3766

Office phone: 405-475-7892

When leaving your initial message, please include the following information:

- Your name
- Your contact phone number
- Where you are physically
- Whether you have access to your voicemail and email

10.4. Pandemic Recovery Outline

Our mission is to protect staff from the impact of a pandemic illness, ensure information system uptime, data integrity and availability and overall business resilience. To achieve this mission, Rhodes will attempt to minimize the potential for infection and transmission of communicable diseases or diseases that pose a credible threat of transmission in the workplace. Examples of potential risks include swine flu, active TB, SARS, seasonal flu, and Covid-19.

We will generally follow the guidelines set forth by Centers for Disease control and Prevention (“CDC”); however the universal precautions generally include, staying at home when ill, frequent hand washing, ready access to hand sanitizer, wearing a mask to prevent airborne spreading, latex gloves, annual flu vaccinations, and encouraging supervised persons to take regular exercise and maintain a healthy and well-balanced diet.

Key trigger issues that would lead to activation of these pandemic steps include, escalating loss of staff due to illness, inability to adequately handle business operations, and or the orders of Federal, State, or local governmental entities. Based on the facts and circumstances surrounding a pandemic outbreak, the Company will decide when the BCP should be invoked, and to what the extent. To this end, we will evaluate the situation to determine the impact on Rhodes operations, determine the level of backup that will be needed, notifying appropriate emergency organizations (e.g. hospitals, clinics, etc.) if appropriate, and assigning responsibilities and activities to other supervised persons to ensure the Company's ability to maintain business operations. If the pandemic escalates to the point where a supervised persons' immediate family may be affected, the Company will notify the family members quickly. If necessary, we will move our unaffected employees to our alternative office location and or have supervised persons works from home in order to restore normal business operations.

11. EMPLOYEE AND SUPERVISED PERSONS AWARENESS OF PLAN

The Company will take steps to both educate and increase the awareness of its employee and supervised persons with respect to Adaptation Financial s' Plan, and the current actions being taken to address such issues by the financial services industry and the Company. The Company will provide access to the Plan to all supervised persons.

12. NOTIFICATION

In addition to any action taken by Adaptation Financial with respect to disruption of its business processes which relate to the ability of the Company to deliver financial services to its client's, Adaptation Financial will promptly notify the appropriate Regulators of any such problems.

13. MANAGER APPROVAL

In my capacity as the BCP Designated Principal for the Company, I have approved this Business Continuity Plan for the Company, effective as of the date set forth herein, as being reasonably designed to enable Adaptation Financial to meet its obligations to clients in the event of an SBD.

Kevin V. Cox, BCP Designated Principal

14. GLOSSARY

Application	A computer program or set of programs designed to help people perform certain types of work.
Assessment	The process of identifying core business areas and processes, completing an inventory, and analyzing systems supporting the core business areas, prioritizing their conversion or replacement, identifying risks and the necessary resources.
Business Function	A group of logically related tasks, which when they are performed, accomplish an objective.
Business Continuity Plan	A contingency plan describes the steps a company would take, including the activation of manual or contract processes, to ensure the continuity of its core business processes in the event which causes a business interruption induced system or process failure.
Company	Adaptation Financial Advisory, Inc.
Defect	A problem or "bug" that, if not removed, could cause a program to either produce erroneous results or otherwise fail.
Mission-Critical System	The loss of these critical functions would cause an immediate stoppage or significant impairment to core business areas.
Outsourcing	Paying another company or individual, to provide services that an organization might otherwise have performed itself, (i.e., software development, payroll).
Regulators	Refers collectively to the SEC, FINRA and various other regulatory entities having jurisdiction over the business activities of the Company.
SBD	Significant Business Disruption.
SEC	United States Securities and Exchange.

Attachment A
Adaptation Financial Advisory, Inc.
Business Continuity Plan
Office Locations

Main Office

Our main office is located at 700 Cedar Lake Blvd., Oklahoma City, OK 73114. Its telephone number is 972-774-0700. Our employees may travel to that office by car or public transportation. Its mission critical systems include desktop computers, and phone systems.

Branch Office / Office of Convenience

This office is located at 16300 Dallas Parkway, Ste 100, Dallas, TX 75248. Its telephone number is 405-475-7892. Our employees may travel to that office by car or public transportation. Its mission critical systems include desktop computers, and phone systems.

Attachment B

Adaptation Financial Advisory, Inc.

Business Continuity Plan

Corporate Telephone Directory

Name: Kevin V. Cox
Cell Phone: 918-645-3766
Home Phone: 918-645-3766
Office email: kcox@adaptfa.com
Alternate email: kcox@visionarylaw.org

Name: Alan P. Niemann
Cell Phone:
Home Phone:
Office email: aniemann@adaptfa.com
Alternate email:

Name: Annetta Box Taylor
Cell Phone: 918-645-3766
Home Phone: 918-645-3766
Office email: ataylor@adaptfa.com
Alternate email: annettamtaylor@gmail.com

Name: Shanon McCune Rivera
Cell Phone: 518-332-3946
Home Phone: 518-332-3946
Office email: smccune@adaptfa.com
Alternate email: shanon.mccune@gmail.com

Attachment C

Adaptation Financial Advisory, Inc.

Business Continuity Plan Regulator Contact Information

The following sets forth a list of the primary Regulators that the Company submits filings and or reports to on a regular basis, including addresses and phone numbers:

Securities and Exchange Commission (“SEC”)

SEC Headquarters

100 F Street, NE
Washington, DC 20549
Office of Investor Education and Assistance
(202) 551-6551

IARD Web Site:

<http://www.iard.com/>

Attachment D
Adaptation Financial Advisory, Inc.
Business Continuity Plan
Critical Business Constituents

Primary Suppliers

Argus IT Services
1111 West Carrier Pkwy, Ste 300
Grand Prairie, TX 75050
469-471-0035
Matthew Meadows

Causeway Realty, LLC
14414 Blanco Rd., Ste 200
San Antonio, TX 78216
Marty Melle
mmelle@cswy.com

Gazillion Office Products, LLC
122 Rose Lane, Ste K1
Frisco, TX 75036
888-601-8585
Brennan Bloom
brennan.bloom@gazillionop.com

Hartman Income REIT Management, Inc.
17300 Dallas Parkway, Ste 1055
Dallas, TX 75248
Mindy Bubert
mbubert@hi-reit.com

Nextiva
8800 E Chaparral Road, Suite 300
Scottsdale, AZ 85250
Customer Support - 800-285-7995

The LeGaye Law Firm
2002 Timberloch Drive, Suite 200
The Woodlands, TX 77380
Phone: 281-367-2454
www.legayelaw.com