



EFFICIENT WEALTH MANAGEMENT®
Intelligent Investing with Integrity

Disaster Recovery/Business Continuity Plan
Revision as of April 2017

Table of Contents

Cover Page	i
Table of Contents	ii
1. Business Continuity Plan - General Information	1
2. Contingency Assessment	4
3. Contingency Plan	17
4. Senior Manager Approval of the Business Continuity Plan	22

1. Business Continuity Plan - General Information

Recent events have brought the importance of creating and maintaining business continuity plans to light. In 2001, securities industry regulators surveyed firms in their jurisdictions to evaluate:

- Existence and/or content of business continuity plans
- Data back-up procedures
- Location of books and records
- Effects of the events of September 11, 2001 on the ability to conduct business

From the survey results, they determined that firms in the investments industry required guidance for development of written plans for recovery of their critical systems in the event of an unanticipated interruption in business.

To meet regulatory expectations, the firm's BCP must be reasonably designed to ensure that the firm can meet present obligations to customers in an unplanned interruption in business, such as in an emergency.

The regulators do not intend for all business continuity plans to be the same. Given the variety found among investments firms as well as the diverse nature of their businesses, firms must design customized plans to meet operational, size and other needs. Regulatory guidance suggests that the plan contain:

- Operational assessments
- Provisions for rapid resumption of mission critical systems
- Back-up arrangements for material relationships with business constituents, banks and appraisals of counter-party impact
- Back-up system for recovery of data (both hard copy and electronic data)
- Alternate means for communications for use between employees and the firm, as well as between customers and the firm
- Instructions for communications with regulators and regulatory reporting requirements in the event of a disaster
- Description of the alternate physical locations of employees and/or certain departments
- Assurance for customers' prompt access to their funds and securities in the event the firm determines it is unable to continue its business
- Provisions for updating the plan
- Provisions for periodic testing of the plan
- Notification of relevant provisions of the plan to customers of the firm

Our plan will address each of the relevant elements above.

1.1. Firm Policy

Our firm's policy is to respond to a Significant Business Disruption (SBD) by safeguarding employees' lives and firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of the firm'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 assure customers prompt access to their funds and securities (if applicable).

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 or power outage in our building. External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a city flood, earthquake, 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 clearing firm.

1.2. Business Description

The following content section is used to briefly describe our business. Included in the description are the types of business we conduct, whether we hold customer funds or securities, information about our clearing firm or custodian (if applicable), whether our customers are retail and/or institutional, and/or any other pertinent information.

Efficient Wealth Management is a fee-only Registered Investment Advisor firm. To a very large extent all technology is remote server based and all paperwork is securely scanned and available online from any approved laptop with appropriate password access. Efficient Wealth Management uses Charles Schwab Institutional and Fidelity Investments for custody and transaction of client assets. We do not hold customer funds or securities outside of accepted third-party custodians.

1.3. Office Locations

Our firm's office locations are identified below.

1.3.1. Office Locations

Primary or Other Office Location:	Primary Office
Address:	2829 Technology Forest Blvd Ste 300 The Woodlands, TX 77381
Phone #:	281-528-1200
Emergency Contact:	Paul J. Carroll
Emergency Phone #:	936-520-7618
Mission Critical Systems:	Order Taking Order Entry Maintenance Customer Accounts Access to Customer Accounts
Notes:	<i>All of these functions may be accessed remotely with secure Internet access.</i>

1.4. Designated Senior Manager - Plan Approval, Testing and Execution of Plan

Paul J. Carroll, Principal Member and Chief Compliance Officer, is designated to approve our business continuity plan, is responsible for conducting the required annual review and has the authority to execute this plan.

1.5. Updates to the Plan

The firm will update this plan as necessary based on material changes to its operations, general business, organizational structure or location. Among the types of changes that will be considered to be material are:

- Change of/addition to approved clearing firm or custodian
- Reorganization or addition/termination of responsible senior managers named in this document
- System enhancements, such as new network server, new back-up or retention software
- New or additional record-keeping location
- Any other change that would interfere with the orderly execution of this plan

1.6. Testing the Plan

To best ensure that the plan is adequate to provide means for rapid recovery of its essential systems, the firm will conduct periodic testing that may include:

- Audit of the back-up data
- Survey of responsible senior managers, including a duties assessment
- Survey of personnel to determine their knowledge of key components of the plan
- Planned disruption in any critical systems, such as the primary/secondary server or the central phone system

A record of the test results shall be retained among the firm's central files and documents.

At minimum, the firm will conduct periodic testing according to the frequency identified below.

1.7. BCP Documentation Location and Access

Our firm will maintain copies of its BCP, the annual reviews, and the changes that have been made to it for inspection.

1.7.1. Business Continuity Plan Records

Record: Business Continuity Plan

Format(s): Paper

Box.com

Location(s): *A copy, printed to PDF, is available on the office server cloud, Box.com, (search FileName: Business Continuity Plan). This can also be accessed by any medium available that can access server records (DVD Backup; Online Backup; Remote server access, if online).*

1.8. Local Emergency Contact Numbers

Following are local emergency contact numbers:

Life threatening – fire, police, medical	9-1-1
The Woodlands Fire Department (non-emergency)	281-367-3444
Montgomery County Sheriff’s Office (non-emergency)	936 760-5800
Houston Methodist The Woodlands Hospital	713-790-3333
Memorial Hermann -The Woodlands Hospital	713-897-2300
St Lukes Community Medical Center - The Woodlands	936 266-2000

2. Contingency Assessment

Business continuity planning is the process whereby financial institutions ensure the maintenance or recovery of operations, including services to customers, when confronted with adverse events such as natural disasters, technological failures, human error, or terrorism. The objectives of a BCP are to minimize financial loss to the institution; continue to serve customers and financial market participants; and mitigate the negative effects disruptions can have on an institution's strategic plans, reputation, operations, liquidity, credit quality, market position, and ability to remain in compliance with applicable laws and regulations. The following sections of the BCP will first address the vital personnel that are needed for successful implementation of the plan and then the firm's critical systems, areas of importance to the ongoing operation of the firm. Each section will address a specific type of risk, and will provide information and instructions to managers charged with responsibility for those areas.

2.1. BCP Team Leaders

In the event of an unplanned interruption in our business, it will first be important for us to identify integral personnel ("BCP Team Leader") that are needed for successful implementation of the plan and how to contact them. Access to this information at the time of an emergency will facilitate the resumption of the firm's operations.

The BCP Team Leaders identified in the table below are responsible for implementing the plan in their respective area(s) in the event of an emergency or other interruption in our business. Several means of communicating with the individual(s) listed below are provided. Questions regarding this information may be directed to the Chief Compliance Officer.

2.1.1. BCP Team Leaders

Area(s) of Responsibility:	Crisis/Emergency
	Records
	Technology
	Communications
	Facilities

Disaster Recovery/Business Continuity Plan

Human Resources
Customer Relations
Business Units and Processes
Security
Contacting Vendors/Critical Service Providers
Financial and Credit Risk
Other

Name: **Paul J. Carroll**
Phone: 281-528-1200
Cell Phone: 936-520-7618
Email: Paul@EfficientWealthManagement.com
Duties: Team Leader; Coordinate BCP
Area(s) of Responsibility: Crisis/Emergency
Records
Technology
Communications
Facilities
Human Resources
Customer Relations
Business Units and Processes
Security
Contacting Vendors/Critical Service Providers
Financial and Credit Risk

Name: **Elizabeth Brady**
Phone: 281-528-1200
Cell Phone: 512-826-5743
Email: Elizabeth@EfficientWealthManagement.com
Duties: Establish Communication with Paul Carroll.
Area(s) of Responsibility: Crisis/Emergency
Records
Technology
Communications
Facilities

Disaster Recovery/Business Continuity Plan

Human Resources
Customer Relations
Business Units and Processes
Security
Contacting Vendors/Critical Service Providers
Financial and Credit Risk

Name: Ashley Dominey Stewart
Phone: 281-528-1200
Cell Phone: 936-827-4368
Email: Ashley@EfficientWealthManagement.com
Duties: Team Leader; Coordinate BCP
Area(s) of Responsibility: Crisis/Emergency
Records
Technology
Communications
Facilities
Human Resources
Customer Relations
Business Units and Processes
Security
Contacting Vendors/Critical Service Providers
Financial and Credit Risk

2.2. Mission Critical Operations Risk Assessment

In order for the firm to resume its operations following an unplanned interruption, it must have an understanding of its mission critical systems and its critical business constituents. The firm must be prepared to implement steps to restore relationships, systems and contacts accordingly. The following tables contain pertinent information regarding the firm's mission critical systems and business constituents.

2.2.1. Critical Systems

Mission critical systems are those which are necessary to maintain the operation of the business, including its infrastructure. Depending upon the firm's business or the nature of the transactions processed, this may consist of anything related to order taking, entry, execution, comparison, allocation and settlement. Since a disaster might affect access customer accounts, associated persons (including employees, principals, and even clerical or ministerial staff) must be fully aware of how the plan will be maintained. This would include the systems for:

- Order taking, order entry

Disaster Recovery/Business Continuity Plan

- Maintenance of customer accounts, access to customer accounts

For each entry on the table below, the firm has identified a back-up system and/or point of contact to participate in its resumption and has been in contact with the parties responsible for back-up to confirm their readiness. Periodically, a senior manager of the firm will re-verify the accuracy and completeness of this data. If necessary, an amended plan shall be made available to responsible parties.

2.2.1.1. Mission Critical Systems and Back-up Plans

System:	Order Taking and Entry
Purpose:	Provide a means to accept a transaction instruction if primary location not accessible/functional.
Responsible Employee:	Paul Carroll
Emergency Contact #:	936-520-7618
Back-up Plan:	The primary phone line (a VOIP line) can be easily forwarded to any employee's cell phone. Trades can be executed using any approved Efficient Wealth Management owned laptop with secure wireless access.
Third Party:	Charles Schwab & Co.
Contact:	South Central
Phone:	877-738-6814
Third Party:	Fidelity Investments
Contact:	West Silver Team
Phone:	1-800-523-1203
System:	Maintenance and Access to Customer Accounts
Purpose:	Enable employees to access and maintain customer accounts.
Responsible Employee:	Paul Carroll
Emergency Contact #:	936-520-7618
Back-up Plan:	All customer account information can be accessed online. Remote, secure internet access to Redtail CRM; EWM Records and Custodians permits full remote functionality.
Third Party:	Redtail CRM
Contact:	Support
Phone:	800-206-5030
System:	Delivery of Funds and Securities
Purpose:	Permit timely delivery of funds and securities.
Responsible Employee:	Paul Carroll

Disaster Recovery/Business Continuity Plan

Emergency Contact #: 936-520-7618
Back-up Plan: Remote secure internet and/or cell phone access to custodians is all that is required.

Third Party: Charles Schwab Institutional
Contact: South Central
Phone: 877-738-6814

Third Party: Fidelity Investments
Contact: West Silver Team
Phone: 800-523-1203

2.2.2. Counter-Parties

Counter-parties are those firms that play critical roles in the delivery of services. Counter-parties include clearing firms, custodians, other entities such as institutions, investment advisers or broker-dealers who perform significant functions or roles in transacting business or carrying accounts.

A representative of the firm has contacted critical counter-parties to determine how business might be carried out in the event of an emergency or other interruption. In particular, the firm has ascertained means through which it can continue to place and clear transactions in the event customary systems are disabled.

A brief description of the contingency plan for our critical counter-parties is captured in the table below. In the event of an emergency or other business interruption, the BCP Team Leader responsible for contacting vendors and critical service providers (as identified in the Team Leaders table above) will use the information listed below to make contact with counter-parties.

2.2.2.1. Counter-Parties

Counter-Party: Charles Schwab & Co.
Contact: Mid-Market South Central
Phone: 877-738-6814
Back-Up Plan: Notify Schwab if assistance required.

Counter-Party: Fidelity Investments Institutional Wealth
Contact: West Silver Team
Phone: 800-523-1203
Back-Up Plan: Notify Fidelity if assistance required.

Disaster Recovery/Business Continuity Plan

Counter-Party: RedTail CRM

Contact: Support Desk
Phone: 800-206-5030
Back-Up Plan: Contact Redtail if assistance needed.

Counter-Party: PIE Technologies (MoneyGuidePro)

Contact: Help Desk
Phone: 800-743-7092
Back-Up Plan: Contact MoneyGuidePro help desk as needed.

Counter-Party: Box

Contact: Help Desk
Website: Box.com
Back-Up Plan: Contact as needed if unable to access daily backups

Counter-Party: Orion Advisor Services

Contact: Support
Phone: 877-304-3611
Back-Up Plan: Contact as needed for support.

Counter-Party: ETS Zone

Contact: Support
Phone: 713-559-1400
Back-Up Plan: Contact as needed for support (phones).

Counter-Party: Smarsh

Contact: Support
Phone: 866-762-7741
Back-Up Plan: Contact as needed for support (Smarsh hosted exchange, email archive, social media archive, website archive).

Counter-Party: AT&T Wireless

Contact: Customer Service
Phone: 877-377-0414
Back-Up Plan: Contact number if DSL not functioning properly.

Disaster Recovery/Business Continuity Plan

Counter-Party: Verizon Wireless

Contact: Customer Service

Phone: 281-296-2050

Back-Up Plan: Contact number if Wireless Secure Internet Access card not functioning properly.

Counter-Party: Woodforest National Bank

Contact: Linda Rager

Phone: 832-375-2772

Alternate Contact: Sara McKay

Phone: 281-465-5520

Back-Up Plan: Contact at WNB as needed.

Counter-Party: Amegy Bank

Contact: Annie Bradbury

Phone: 281-297-7966

Back-Up Plan: Contact Amegy Bank as needed.

Counter-Party: Comcast

Contact: Customer Service

Phone: 713-335-3278

Account Number: 8777 70 159 0663586

Back-Up Plan: Call at any sign of internet outages or general problems

2.3. Back-up

Recovery of the firm's data in the event customary systems cannot be accessed is a key component of the plan to resume operations in a timely and efficient manner.

Investment, securities, and other regulated entities are subject to regulations that require documents and data to be maintained in a certain manner and for certain periods of time. When prioritizing the recovery of data, pertinent securities regulations should also be considered.

To accomplish timely data restoration, the firm has catalogued the types of data it retains, the manner in which the data is retained (paper or electronic), and the location.

2.3.1. Data Catalogue: Back-up and Retention

The firm maintains any hard copy books and records at our primary place of business. Our firm also maintains records on electronic media and stores back-ups to those records in an off-site location. All records are scanned.

2.3.1.1. Data Back-Up and Storage

Record:	New Account Forms
Media:	Box.com
Record is Backed-up:	Yes
Back-up Media:	Internet- CrashPlan Pro
Frequency of Back-up:	CrashPlan Pro (ongoing)
Storage Location(s):	Box.com- Cloud, offsite CrashPlan Pro

Record:	Trade Records
Media:	Box.com
Record is Backed-up:	Yes
Back-up Media:	Internet- CrashPlan Pro
Frequency of Back-up:	CrashPlan Pro (ongoing)
Storage Location(s):	Box.com- Cloud, offsite CrashPlan Pro

Record:	Statements
Media:	Box.com
Record is Backed-up:	Yes
Back-up Media:	Internet- CrashPlan Pro
Frequency of Back-up:	CrashPlan Pro (ongoing)
Storage Location(s):	Box.com- Cloud, offsite CrashPlan Pro

Record:	Correspondence
Media:	Box.com
Record is Backed-up:	Yes
Back-up Media:	Internet- CrashPlan Pro
Frequency of Back-up:	CrashPlan Pro (ongoing)
Storage Location(s):	Box.com- Cloud, offsite CrashPlan Pro

Disaster Recovery/Business Continuity Plan

Record:	Advertising
Media:	Box.com
Record is Backed-up:	Yes
Back-up Media:	Internet- CrashPlan Pro
Frequency of Back-up:	CrashPlan Pro (ongoing)
Storage Location(s):	Box.com- Cloud, offsite CrashPlan Pro

Record:	Accounting Records
Media:	Box.com
Record is Backed-up:	Yes
Back-up Media:	Internet- CrashPlan Pro
Frequency of Back-up:	CrashPlan Pro (ongoing)
Storage Location(s):	Box.com- Cloud, offsite CrashPlan Pro

Record:	Employee Brokerage Account Statements
Media:	Box.com
Record is Backed-up:	Yes
Back-up Media:	Internet- CrashPlan Pro
Frequency of Back-up:	CrashPlan Pro (ongoing)
Storage Location(s):	Box.com- Cloud, offsite CrashPlan Pro

Record:	Organizational Documents
Media:	Box.com
Record is Backed-up:	Yes
Back-up Media:	Internet- CrashPlan Pro
Frequency of Back-up:	CrashPlan Pro (ongoing)
Storage Location(s):	Box.com- Cloud, offsite CrashPlan Pro

Disaster Recovery/Business Continuity Plan

Record:	Personnel Files
Media:	Box.com
Record is Backed-up:	Yes
Back-up Media:	Internet- CrashPlan Pro
Frequency of Back-up:	CrashPlan Pro (ongoing)
Storage Location(s):	Box.com- Cloud, offsite CrashPlan Pro

Record:	Client Files
Media:	Box.com
Record is Backed-up:	Yes
Back-up Media:	Internet- CrashPlan Pro
Frequency of Back-up:	CrashPlan Pro (ongoing)
Storage Location(s):	Box.com- Cloud, offsite CrashPlan Pro

Record:	Client Agreements
Media:	Box.com
Record is Backed-up:	Yes
Back-up Media:	Internet- CrashPlan Pro
Frequency of Back-up:	CrashPlan Pro (ongoing)
Storage Location(s):	Box.com- Cloud, offsite CrashPlan Pro

Record:	Third Party Contracts
Media:	Box.com
Record is Backed-up:	Yes
Back-up Media:	Internet- CrashPlan Pro
Frequency of Back-up:	CrashPlan Pro (ongoing)
Storage Location(s):	Box.com- Cloud, offsite CrashPlan Pro

Disaster Recovery/Business Continuity Plan

Record:	Other
	All other records kept in digital format.
Media:	Box.com
Record is Backed-up:	Yes
Back-up Media:	Internet- CrashPlan Pro
Frequency of Back-up:	CrashPlan Pro (ongoing)
Storage Location(s):	Box.com- Cloud, offsite CrashPlan Pro

2.3.2. Onsite Network Security

Effective systems of protection are needed to ensure the security of the firm's network. Although complex procedures may be required in certain instances, often simpler processes are easier to understand, implement and enforce. In determining its own procedures for the security of its network, the firm will consider:

- Firewalls, including centrally deployed rules and external resources
- Centrally managed anti-virus software
- Centrally managed protocol for user ID and Password updates according to scheduled time frames
 - Passwords may only be in effect for certain time frames; except when a password manager with dual-factor authentication in use.
 - Passwords may not be obvious (no spouse's, child's or pet's name)
 - Passwords must contain letters and numbers; symbols are recommended.
- Proactive scanning and network monitoring for suspicious behavior, new hosts, out of date systems

The BCP Team Leader(s) responsible for technology and security will implement one or more of the best practices noted above in an ongoing effort to maintain the security of its network.

Password Manager in Use:

- LastPass Enterprise using dual-factor authentication and allowing discrete control over individual access to passwords.

2.4. Key Personnel and Succession Plans

The unplanned absence of a key individual, for reasons of a major disaster or otherwise, could result in interruptions in the firm's business. For this reason, the firm has taken steps to plan for such absences, including the identification of key individuals/roles, and an outline for succession in the event of their unplanned absence.

The table below records lines of succession for key personnel.

2.4.1. Key Individual Succession Table

Key Individual: Paul Carroll
Title/Job Function: Principal
Primary Successor: Elizabeth Brady
Secondary Successor: Ashley Dominey Stewart/Sarah Babin

Notes:

Our firm does not maintain "key man" life insurance policies that will provide compensation to the firm in the event of the loss of certain personnel.

Our firm has a succession plan in the event a key person is no longer with the firm.

2.5. Financial and Credit Risk

Essential to our ability to manage risk is an understanding of where we face financial risk, including our ability to fund our operations and maintain adequate financing and sufficient capital. Additionally, we must manage our credit risk. Credit risk might be experienced in the event of an emergency due to the erosion of investments or capital resulting from the lack of liquidity in the broader market. Financial and credit risk may hinder the ability of our counter-parties to fulfill their obligations.

2.5.1. Financial Contacts: Lenders & Key Investors

The banks and lenders named below have been contacted to determine whether they can provide the financing that may be required in the event of an emergency. The banks and lenders have confirmed that adequate financing would be available in the event of a significant impact on the firm's capital.

In the event a principal of the firm determines that the firm may be unable to meet its obligations to any party listed below or otherwise to continue to fund its operations, the principal(s) may first seek alternative financing. Potential sources of alternative financing are noted below. If the firm's capital obligations cannot be met or remedied, a senior manager of the firm will file appropriate notices with the regulators.

2.5.1.1. Critical Banking and Credit Relationships

Source of Financing: Primary
Institution: American Express Credit Card
Phone #: 800-521-6121
Alternate Contact Info: Not available
Relationship/Account: Revolving credit account \$40,000 Line

Source of Financing: Secondary
Institution: Amegy Bank Credit Card
Phone #: 281-320-6905
Alternate Contact Info: Not available

Relationship/Account: Revolving credit account \$8,000 Line

2.6. Communications with Regulators and Regulatory Reporting Requirements

Our firm recognizes the importance of notifying regulators in a timely manner in the event of an interruption in the firm's business operations.

In the event of a business disruption, the firm will use the most efficient means of communication then available to communicate with relevant regulatory bodies. This might include any of the following means: phone, email, fax, U.S. mail, overnight mail services or personal contact. We will also check with the SEC and other regulators to determine which means of filing are still available to us, and use the means closest in speed and form (written or oral) to our previous filing method. In the event that we cannot contact our regulators, we will continue to file required reports using the communication means available to us.

2.6.1. Contact Information for Regulators

Regulator Name: Hill Compliance Advisors
Address: 1286 University Avenue, #206, San Diego CA 92103
Phone: 619-795-5986
Alt. Phone: 951-743-8291
Fax: 951-346-3773
Email: cindi@hilladvisors.com

2.7. BCP Disclosure Statement

The firm gives customers a written BCP disclosure statement at account opening at minimum. A new disclosure will be provided in the event the plan is updated due to a material change to our operations, structure, business or location. The firm may also post the disclosure statement on its website and/or mails it to customers upon request.

The disclosure statement addresses such items as the following:

- How the firm would react to events of varying scope by providing specific scenarios of varying severity
- If the firm plans to continue in business during each scenario and if so, the anticipated recovery time and general information on the firm's response
- A summary of the operating areas covered in the business continuity plan, the firm's plans for business operation recovery and the existence of back-up facilities and arrangements
- Alternative telephone number(s), website information, and clearing firm information including services the clearing firm may provide to customers in the event of a significant business disruption
- A copy of the disclosure statement is maintained with the BCP.

3. Contingency Plan

Matters of general importance to our employees, including emergency contacts, communications, instructions for action during natural disasters and other types of emergencies are covered in the following sections of our plan.

3.1. Employee Introduction

Emergency preparedness is the discipline which ensures an individual's or organization's readiness to respond to an emergency in a coordinated, timely and effective manner. When a disaster or emergency strikes, you may not have much time to act. Therefore, it is imperative that you prepare in advance for a sudden emergency.

Each firm must develop a disaster recovery and business continuity plan to meet its responsibilities to clients, staff, business associates and all those who may be affected by a disruption in the firm's business. For the plan to be successful, employees must be familiar with aspects of the plan that may affect them.

The firm's primary objective when responding to a significant business disruption (SBD) is to safeguard employees' lives and critical firm property, making a financial and operational assessment, quickly recovering and resuming operations as can be reasonably expected based on the circumstances, protecting the firm's most critical books and records, and allowing customers to continue to transact business.

Interruptions in business many take many forms including natural disasters, utilities disruptions and human-related events. Some interruptions may be localized and of short duration, whereas others may be life-changing events. The following is a list of significant disruptions that may affect the firm's business and its personnel.

- Natural Disasters come in many forms including earthquakes, tornados, hurricanes, fires and floods. Vulnerability to certain natural disasters may increase with a particular geographic location; however, it is important to remember that everyone is "always" vulnerable to some form of natural disaster, irrespective of location.
- Utilities emergencies may include electrical, natural gas, water and communications. Vulnerability to certain utilities emergencies may depend on: the type of building, the type of city/state infrastructure and the service providers that the firm's business depends on. However, it is important to remember that everyone is "always" vulnerable to some form of utilities emergency irrespective of location.
- Human action/inaction can result in many types of disasters. The most common types of human caused disasters include transportation, strikes, terror, human error and chemicals. Just like all disasters, vulnerability to certain human action/inaction may depend on: the type of building, the type of city/state infrastructure, the service providers that the firm's business depends on, the industry, and employee demographics. However, it is important to remember that everyone is "always" vulnerable to some form of human caused disaster.

Significant business disruptions may vary in scope, affecting the firm, a single building housing the firm, the business district where the firm is located, the city where the firm is located, or the whole region. Within each of these areas, the severity of the disruption may also vary from minimal to severe.

3.1.1. Outage Scenarios

The table below includes descriptions of various types of emergency situations we may encounter and how we plan to respond to these situations.

3.1.1.1. Outage Scenarios

Scenario: **Internet Outage**
Response: Notify Comcast then switch to AT&T Wired DSL Internet; else switch to T-Mobile Wireless Internet hotspot or move to remote location. See also Process Manual for detail on how to switch internet access.
Contact: Tech Support
Contact Phone #: 713-335-3278
Recovery Time: 30 Minutes

Counter-Party: **ETS Zone**
Contact: Support
Phone: 713-559-1400
Back-Up Plan: Contact as needed for support (phones).

Scenario: **Electrical Outage**
Response: Notify Centerpoint then move to remote location.
Contact: Customer Service
Contact Phone #: 800-427-7142
Recovery Time: 30 Minutes

Scenario: **Main Telephone Line Outage: Ring Central**
Response: Notify Ring Central to Forward Calls to Cell Number as appropriate. This is done through website.
Contact: www.ringcentral.com
EWM Mobile #: 281-402-6400
Contact Phone #: 888-898-4591 or 650-655-4591
Recovery Time: 15 Minutes

3.1.1.2. Local Emergency Personnel

Division: **Police Department**
Contact phone number: Montgomery County Sheriff 936 760-5800

3.2. Alternate Means of Communications Between Employees and the Firm

The firm now communicates with its employees using the telephone, cellular phone, email, instant messaging, fax, internet, pager and in person. In the event of a business disruption, the firm will use the most efficient means of communication still available to communicate with the other party. In the event of a business interruption, employees should contact the individual(s) identified below.

3.2.1. Firm Employee(s) to Contact

Name: Paul Carroll
Phone: 936-520-7618
Alt. Phone: 832-458-2742
Email: Paul@EfficientWealthManagement.com

Name: Elizabeth Brady
Phone: 512-826-5743
Email: Elizabeth@EfficientWealthManagement.com

Name: Ashley Dominey Stewart
Phone: 936-827-4368
Email: Ashley@EfficientWealthManagement.com

3.2.2. Call Tree

The firm uses a call tree in order that senior management may reach employees as quickly as possible in the event of a business disruption. The call tree is based on the geographical location of each individual, in case the only means of contact is in person.

Individuals identified as a "Caller" in the call tree are sent contact information periodically to ensure that they have current information and as a reminder of their responsibilities. Periodically, a senior manager of the firm will re-verify the accuracy and completeness of this data.

The person named below will initiate the use of the call tree:

Paul Carroll

3.2.2.1. Call Tree

Caller: Paul Carroll
Call Recipient: Elizabeth Brady
Phone #: 512-826-5743

Caller: Elizabeth Brady
Call Recipient: Ashley Dominey Stewart
Phone #: 936-827-4368

Disaster Recovery/Business Continuity Plan

Caller: Ashley Dominey Stewart

Call Recipient: Sarah Babin

Phone #: 409-781-1409

Caller: Sarah Babin

Call Recipient: Katie Waltrip

Phone #: 832-472-4611

Caller: Katie Waltrip

Call Recipient: Dani Johnson

Phone #: 985-209-8205

Caller: Danielle Johnson

Call Recipient: Cydney Pineda-Nash

Phone #: 713-516-6272

Caller: Cydney Pineda-Nash

Call Recipient: Sarah Boehm

Phone #: 512-565-3969

Caller: Sarah Boehm

Call Recipient: Paul Carroll

Phone #: 936-520-7618

3.3. Alternate Communications between the Firm and Customers

The firm now communicates with its customers using the telephone, email, our website, fax, U.S. mail, and in person visits at our firm or at the other's location.

In the event of a significant business interruption, the firm will assess which means of communication are still available, and use the means closest in speed and form (written or oral) to the means that were used in the past to communicate with the other party. For example, if the firm communicated with a party by email but the Internet is unavailable, we will call them on the telephone or send a fax where a record is needed.

In any event, the firm regularly advises its clients of accessibility during an emergency through its disclosure form and through postings on its website.

3.4. Alternate Physical Locations of Employees and/or Certain Departments

If the firm is unable to conduct business from its normal office location, the firm has arranged to have its personnel and operations relocated to a designated off-site backup facility ("Alternate Location"). In a disruption to only the firm or a building housing the firm, personnel and operations will be transferred to a local site when needed. In a disruption affecting the firm's business district, city, or region, personnel and operations will be transferred to a site outside of the affected area. Periodically, a senior manager of the firm will re-verify the accuracy and completeness of the data in the table below.

3.4.1. Alternate Business Locations

Location Name: PC Home Office
Address: 3210 Majesty Row, The Woodlands, TX 77380-2482
Phone: 281 528-1200
Email: Paul/Ashley/Elizabeth/Sarah/Katie
Directions to Alt. Location: Google Map

3.5. Customer Access to Funds And Securities

Customer funds or securities are maintained at clearing firm(s), qualified financial institutions such as mutual fund or insurance product sponsors, or other custodian(s) named in the table below.

In the event of a significant business interruption and if telephone service is available, appropriately qualified associated persons will take customer orders or instructions and contact the clearing firm on the customer's behalf when able. Customers are also informed by disclosure of the means through which they may directly access their funds at the custodian. This information will provide immediate relief to customers in situations where a significant business disruption is so severe that it prevents the firm from timely resumption or continuation in business.

If internet access is available, the firm will post on its website that customers may access their funds and securities. N/A Redundant... the client can only access their funds and securities through their custodian.

3.5.1. Clearing Firm(s)/Custodian(s)

Name: Schwab Institutional
Address: 1958 Summit Park Drive #500, Orlando, FL 32810-5931
Phone #: 800-435-4000
Alt. Phone #: 888-393-7272

Name: Fidelity Investments
Address: 100 Crosby Parkway, KC1U, Covington, KY 41015-8010
Phone #: 800-822-4816

4. Senior Manager Approval of the Business Continuity Plan

By signing below, a senior manager of the firm hereby approves this plan dated _____ and acknowledges he or she shall be responsible for conducting the required annual review.

Signature: _____

Print Name and Title: _____

Date of Approval: _____