

2018 BUSINESS CONTINUITY AND DISASTER RECOVERY PLAN

Dated 12-19-17

SANDLAPPER Securities, LLC (“SLS”) has developed this Business Continuity and Disaster Recovery Plan (the “Plan”) in order to provide guidance regarding the steps and actions that should be taken in the event of an unanticipated interruption of normal business operations. This document will outline the triggers for when alternate business processes need to be deployed, the steps to deploy the alternate business processes, the methods for verifying that business has been properly restored and ensuring data integrity and activities for returning to normal business processing. This Plan will help safeguard employees’ lives and firm property, allow a method of making financial and operational assessments, recover and resume business operations in a rapid and efficient manner, protect firm books and records, continue to allow clients to transact business at all times and provide clients with access to their funds and securities in the event the firm determines that it cannot continue to do business.

SLS has designated the following individuals as members of the Business Continuity Team:

- **Trevor Gordon, CEO, (864) 679-4701, trevor.gordon@sandlappersecurities.com**
- **Mark Reinstein, President, (864) 679-4701, mreinstein@sandlappersecurities.com**
- **Bjorn Jordan, CCO (864) 679-470, bjordan@sandlappersecurities.com**
- **Brooke Jones, Operations Manager, (864) 679-4701, bjones@sandlappersecurities.com**

These team members are designated as the main emergency contact persons for the firm. The team members designated above will be responsible for developing the Plan. The CEO will have the responsibility for approving the plan and ensuring that a review is conducted on at least an annual basis. In addition, he will be responsible for activating the Plan in the event of interruption to normal business operations.

The Plan will be updated whenever there is a material change to operations, structure, business, or location. In addition, the firm will review the Plan at least annually to modify it for any changes in operations, structure, business or location or those of clearing firm. The CCO is responsible for maintaining and updating the Plan. Sandlapper will maintain copies of the Plan, the annual reviews, and any changes that have been made to the Plan for inspection by regulators. A report will be prepared documenting the review of the Plan and any updates that are made. An electronic copy is located on the SLS server. The CCO is responsible for making sure that all electronic versions are maintained in this location. The CCO is responsible for maintaining hard copies. Hard copies will be maintained at 800 E. North Street, 2nd Floor Greenville, SC 29601.

SIGNIFICANT BUSINESS DISRUPTIONS

Sandlapper has written this Plan anticipating two kinds of significant business disruptions (“SBDs”): internal and external. Internal SBDs affect the firm’s ability to communicate

and do business (e.g., a fire in the building). External SBDs prevent the operation of the securities markets or a number of firms. Examples of an external SBD include terrorist attacks, a city flood, or a wide-scale, regional disruption. Firm response to an external SBD relies more heavily on other organizations and systems, especially on the capabilities of any clearing firms or outside investment adviser firms with which the firm has established a relationship.

BUSINESS DESCRIPTION

Sandlapper is a full service broker/dealer offering the following products to clients: equities, fixed income, mutual funds, variable annuities and various alternative investments. Sandlapper does not perform any type of clearing functions for itself or others. Sandlapper does not hold customer funds or securities. An outside custodian recommended by the firm or selected by the client maintains custody of all client funds and securities. We accept and enter orders. All transactions are sent to an outside broker/dealer or custodian, which executes, compares, allocates, clears and settles orders. These custodians also maintain customers' accounts, can grant customers access to them and delivers funds and securities. Clients will be made aware of the broker/dealer or other custodian through whom Sandlapper will implement their transactions and will receive statements from these firms.

Clients currently have relationships with the following broker/dealers and custodians:

Clearing Firm Name	Address	Phone Number	Email Address	Website
Sterne Agee & Leach Inc.	800 Shades Creek Pkwy Suite 700 Birmingham, AL 35209	800-2644863	dexner@sterneagee.com	www.sterneagee.com
Equity Institutional	1 Equity Way Westlake, Ohio 44145	866-360-7182	r.luca@equityinstitutional.com	www.equity_institutional.com
1 st Trust of Onaga	214 W. 9th St. PO Box 420 Onaga, KS 66521	800.521.9897	jbarnes@ftconaga.com	www.firsttrustcompanyofonaga.net
Community National Bank	4811 U.S. Route 5 Newport, VT 05855	802-334-7915		www.communitynationalbank.com

OFFICE LOCATIONS

Sandlapper has the following office locations:

1. **Main Office Location.** The main office location is at 800 E North Street, 2nd Floor, Greenville, South Carolina 29601. The main telephone number at this location is 864-679-4701. All types of business and services provided by Sandlapper are performed from this location.

2. Branch Office Locations. Services are also conducted from the branch offices of Sandlapper:

Address	City	State	Postal Code	Telephone
800 East North St. 2nd Floor	GREENVILLE	SC	29601	864-679-4701
700 Princess Anne St.	FREDERICKSBURG	VA	22401	540-371-1177
2522 Chambers Rd. Suite 100	TUSTIN	CA	92780	877-313-1868
1 City Boulevard West Suite 870	ORANGE	CA	92868	714-939-1031
420 10th St. NW	WATERTOWN	SD	57201	605-882-3465
2312 Eastlake Ave E	SEATTLE	WA	98103	866-596-1031
29800 Agoura Road	AGOURA HILLS	CA	91301	818-478-8844
2702 Erie Ave	Cincinnati	OH	45208	513-533-0228
11901 Santa Monica Blvd #605	Los Angeles	CA	90025	310-454-3100
1660 Hwy 100 South Suite 500	St. Louis Park	MN	55416	612-508-0388
3447 Pelham Rd. Suite 100	Greenville	SC	29601	864-458-8151
1754 Technology Drive Suite 236	San Jose	CA	95110	408-984-7526
200 East Main Street	Easley	SC	29640	864-226-1942
10210 North Central Expressway Suite 112	Dallas	TX	75231	972-284-0090
171 S. Main Street	Doylestown	PA	18901	267-247-5190

If business cannot be conducted from the main office location, business will be conducted from the closest available business location.

If no other office location is available to receive staff, the firm will move them to **5 Norman Place, Greenville, SC 29615**. The main telephone number at this location is **864-270-3148**. The following employees will be required to report to work at these alternate locations in the case of an SBD at the main office location:

Employee Name	Title
Trevor L. Gordon	CEO
Mark Reinstein	President
Brooke Jones	Operations Manager

CUSTOMERS' ACCESS TO FUNDS AND SECURITIES

Client funds are maintained with Sterne Agee & Leach Inc, or other qualified custodians. In the event of an internal or external SBD, if telephone service is available, investment adviser representatives will take customer orders and instructions and contact clients' custodians on behalf of the client. If firm Web access is available, Sandlapper will post on its Website that customers may access their funds and securities by contacting their custodian. Sandlapper will make this information available to clients through its disclosure document.

DATA BACK-UP AND RECOVERY (HARD COPY AND ELECTRONIC)

Sandlapper maintains its primary hard copy books and records and its electronic records at its main office location previously referenced in this document. The CCO is responsible for the maintenance of these books and records. The firm maintains the following document types and forms:

- Financial records
- Organizational records (*corporate records, etc.*)
- A copy of firm written policies and procedures and any revisions made to this document
- An affiliated access persons list
- Holdings reports
- Solicitor Disclosure Documents and Agreements
- Any written agreements entered into by the firm
- A copy of the firm's Privacy Policy Statement and proof of annual delivery
- All client documentation and any data gathering documents
- Client agreements
- Copies of any checks received
- Copies of any reports prepared and sent to clients

Sandlapper maintains its back-up hard copy books and records at 800 E. North Street, 2nd Floor, Greenville, SC 29601. These records are paper and electronically filed. Operations Manager is responsible for the maintenance of these back-up books and records. The firm backs up its paper records by copying and taking them to its back-up site. Records are backed up annually.

Sandlapper backs up its electronic records daily by cloud service, and keeps a copy at cloud back-up server.

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

FINANCIAL AND OPERATIONAL ASSESSMENTS

Operational Risk

In the event of an SBD, the firm will immediately identify what means will permit it to communicate with customers, employees, critical business constituents, critical banks, critical counter-parties and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options employed will include Website, telephone voice mail, call forwarding, and cell phones. In addition, the firm will retrieve key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic).

Financial and Credit Risk

In the event of an SBD, the firm will determine the value and liquidity of its investments and other assets to evaluate its ability to continue to fund operations. The firm will contact clients' custodians, critical banks, and investors to apprise them of its financial status. If the firm determines that it may be unable to meet its obligations to those counter-parties or otherwise continue to fund operations, it will request additional financing from a bank or other credit sources to fulfill its obligations to customers and clients. If the firm cannot remedy any financial deficiency, it will file appropriate notices with regulators and immediately take appropriate steps.

MISSION CRITICAL SYSTEMS

Sandlapper has the primary responsibility for establishing and maintaining business relationships with customers and has sole responsibility for mission critical functions of order taking, entry and execution. Firm "mission critical systems" are those that ensure prompt and accurate processing of client 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.

More specifically, these systems include:

Outside custodians utilized by the firm provide the 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. These outside custodians will maintain a business continuity plan and the capacity to execute that plan. The custodian(s) represent that it will advise the firm of any material changes to its plan that might affect its ability to maintain business and presented the firm with an executive summary of its plan, which is attached. In the event that any of the custodian firms that the firm has a relationship with executes its plan, it represents that it will notify the firm of such execution and provide the firm with equal access to services as its other customers. If the firm reasonably determines that the custodian(s) has not or cannot put its plan in place quickly enough to meet firm needs, or it's otherwise unable to provide

access to such services, the custodian firm represents that it will assist the firm in seeking services from an alternative source.

Recovery-time objectives provide concrete goals to plan for and test against. They are not, however, hard and fast deadlines that must be met in every emergency situation, and various external factors surrounding a disruption, such as time of day, scope of disruption and status of critical infrastructure-particularly telecommunications-can affect actual recovery times. Recovery refers to the restoration of clearing and settlement activities after a wide-scale disruption; resumption refers to the capacity to accept and process new transactions and payments after a wide-scale disruption.

Firm Mission Critical Systems

1. **Order Taking.** Currently, Sandlapper receives orders from customers via telephone, fax, or in person visits by the customer. During an SBD, either internal or external, the firm will continue to take orders through any of these methods that are available and reliable. In addition, as communications permit, the firm will inform customers when communications become available to tell them what alternatives they have to send their orders. Customers will be informed of alternatives by email. If necessary, the firm will advise customers to place orders directly with their custodian.
2. **Order Entry.** Currently, Sandlapper enters orders by recording them on paper and/or electronically. Then they are sent to the clearing firm electronically or verbally via telephone.

In the event of an internal SBD, the firm will enter and send records to the clearing firm by the fastest alternative means available. In the event of an external SBD, the firm will maintain the order in electronic or paper format, and deliver the order to the custodian by the fastest means available when it resumes operations. In addition, during an internal SBD, the firm may need to refer customers to deal directly with the custodian for order entry.

3. **Order Execution.** The firm currently executes orders electronically through the custodian's order execution system. In the event of an internal SBD, the firm would use any means necessary to fill orders such as calling in or faxing orders to the custodian. In the event of an external SBD, the firm would update the website to reflect whether or not the firm is currently taking orders.

Mission Critical Systems Provided by Outside Custodian(s)

Sandlapper relies, by contract, on outside custodian(s) to provide order execution, order comparison, order allocation, and the maintenance of customer accounts, delivery of funds and securities, and access to customer accounts.

ALTERNATE COMMUNICATIONS BETWEEN THE FIRM AND CUSTOMERS, EMPLOYEES, AND REGULATORS

Customers

Sandlapper now communicates with customers using telephone, email, fax, U.S. mail, and in person visits at the firm. In the event of an SBD, the firm will access which means of communications are still available and use the means closest in speed and form (written or oral) to the means used in the past to communicate with clients. For example, if the firm has communicated with a party by email but the Internet is unavailable, the firm will call them on the telephone and follow-up where a record is needed with a paper copy in the U.S. mail. The firm will continue to provide status communications until normal business hours can resume.

Employees

Sandlapper now communicates with employees using the telephone, email, and in person. In the event of an SBD, the firm will access which means of communication are still available and use the means closest in speed and form (written or oral) to the means used in the past to communicate with employees.

The firm will also employ a call tree so that senior management can reach all employees quickly during an SBD. The call tree includes all staff home, office phone, cell phone numbers and business and personal email addresses. (Exhibit A) The firm has identified persons, noted below, who live near each other and may reach each other in person if necessary. A copy of this call tree will be maintained in paper copy and electronically at all locations from which business can be conducted. All employees listed as a Caller will be responsible for maintaining a paper and electronic copy of this BCP and the call tree at their personal residence as well as the main office location from which they conduct business on a regular basis. The CCO will be responsible for maintaining and updating the call tree and making sure all employee contact information remains current. Information will be updated at least quarterly as needed and all changes will be communicated to all affected employees.

The CCO will be responsible for activating the use of the call tree. If he is not available or is unable to activate the use of the call tree, The Operations Manager will be responsible for activating the use of the call tree. The following is the call tree currently being used:

Caller	Call Recipients
Bjorn Jordan	Mark Reinstein
Mark Reinstein	Brooke Jones

Training will be provided to all employees of the procedures that should be taken in the event of an internal or external SBD. Employees will be made aware of the alternate

locations from which business can be conducted. Employees will also be aware of which employees have been designated as essential personnel that will be required to report to the alternate business location.

Regulators

Sandlapper is currently subject to regulation by FINRA and the SEC. The firm communicates with regulators using telephone, e-mail, fax, U.S. Mail and/or in person visits. In the event of an SBD, the firm will assess which means of communication are still available and will use the means closest in speed and form (oral or written) to the means used in the past to communicate with the other party. Regulatory information will be maintained on the Master Contact List. (Exhibit B) The CCO will be responsible for maintaining the Master Contact List and updating it at least quarterly when necessary.

CRITICAL BUSINESS CONSTITUENTS, BANKS, AND COUNTER-PARTIES

Business Constituents

Sandlapper has contacted its critical business constituents (businesses with which it has an ongoing commercial relationship in support of operating activities, such as vendors providing critical services), and determined the extent to which the firm can continue business relationships 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 them because of a SBD to them or the firm.

Major vendors are:

Supplier's Name	Service/Product	Address	Phone Number
<i>Sterne Agee & Leach Inc.</i>	<i>Custodian</i>	<i>800 Shades Creek Pkwy Suite 700 Birmingham, AL 35209</i>	<i>800-264-4863</i>
<i>Equity Institutional</i>	<i>Custodian</i>	<i>1 Equity Way Westlake, OH 44145</i>	<i>866-360-7182</i>
<i>1st Trust of Onaga</i>	<i>Custodian</i>	<i>214 W. 9th St. Onaga, KS 66521</i>	<i>800-521-9897</i>
<i>Community National Bank</i>	<i>Custodian</i>	<i>4811 US Route 5 Newport, VT 05855</i>	<i>802-334-7915</i>
<i>Foothills Data</i>	<i>It Services</i>	<i>1027 S. Pendelton St. Suite B-251, Easley SC 29642</i>	<i>864-420-5243</i>
<i>Artisan Software</i>	<i>Compliance & Trading Software</i>	<i>7676 Hazard Center Dr. Sand Diego, CA 92108</i>	<i>619-725-1350</i>

Contact information will also be maintained on the Master Contact List. (Exhibit B)

Banks

Sandlapper has contacted its banks and lenders to determine if they can continue to provide the financing that will be needed in light of the internal or external SBD. The bank maintaining the firm operating account is National Bank of SC, 201 E. McBee Ave #100, Greenville, SC 29601, (864) 241-7900, Paula Barton. The bank maintaining the firm proprietary account is National Bank of SC, 201 E. McBee Ave #100, Greenville, SC 29601, (864) 241-7900, Paula Barton. If the banks and other lenders are unable to provide the financing, the firm will seek alternative financing immediately from National Bank of SC, 201 E. McBee Ave #100, Greenville, SC 29601, (864) 241-7900, Paula Barton. Contact information for all banks and other lenders will be maintained on the Master Contact List. (Exhibit B)

Counter-Parties

Sandlapper has contacted its critical counter-parties, such as broker/dealers or institutional customers, to determine if it will be able to carry out transactions with them in light of the internal or external SBD. Where the transactions cannot be completed, it will work with custodian(s) or contact those counter-parties directly to make alternative arrangements to complete those transactions as soon as possible. Contact information for all counter-parties will be maintained on the Master Contact List. (Exhibit B)

REGULATORY REPORTING

Sandlapper is subject to regulation by FINRA and the SEC. The firm now files reports with regulators using paper copies in the U.S. mail and electronically using fax, email, and the Internet. In the event of an SBD, it will check with the SEC and other regulators to determine which means of filing are still available and use the means closest in speed and form (written or oral) to its previous filing method. In the event that the firm cannot contact regulators, it will continue to file required reports using the communication means available. Contact information for each regulator referenced above will be maintained on the Master Contact List. (Exhibit B)

