# Financial Advisors Network, Inc.

## **Business Continuity Plan (BCP)**

#### 1. <u>Emergency Contact Persons</u>

Our firm's emergency contact persons are:

Mr. Kamps, Managing Member and Brian Douglass, Chief Compliance Officer 1432 Edinger Avenue, Suite 320, Tustin, CA 92780

Phone number: 866-526-7726

## 11. <u>Firm Policy</u>

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 the firm's books and records, and allowing our customers to transact business.

Brian Douglass is responsible for approving the plan and for conducting the required annual review. Brian Douglass has the authority to execute this Business Continuity Plan. Rod Kamps is designated as an emergency contact person/backup principal for the Business Continuity Plan.

If in the event of a major catastrophe of the Tustin office, the following procedures will go into effect.

Upon arrival at 1432 Edinger Avenue, Suite 200, Tustin, CA 92780, any staff member should ascertain the condition of the office due to a major catastrophe and make the decision to immediately begin notifying other staff members via cell phone and proceed to the Disaster Recovery Office ("DRO" — see Section V for actual address). If the staff member is not sure to the extent of, or consequences of, the catastrophe, that staff member should contact a member of the senior management immediately or wait for them to arrive.

FAN maintains a listing of all employees with current contact information, a copy of which is retained with this Business Continuity Plan.

#### Ill. Business Description

Financial Advisors Network, Inc. is an Investment Advisory firm involved in the financial management of client accounts.

Our custodians are LPL Financial ("LPL"), Charles Schwab ("Schwab"), TD Ameritrade and SEI:

#### LPL Financial LLC

4707 Executive Drive, San Diego, California 92121-3091

Phone: (800) 877-7210

#### Charles Schwab & Co. Inc.

2423 East Lincoln Drive Phoenix, AZ 85016-1215 Phone: (877) 711-9376

#### TD Ameritrade Institutional

200 S 108<sup>th</sup> Avenue Omaha, NE 68154 (800) 669-3900

#### Millennium Trust Company LLC

2001 Spring Road, Suite 700 Oak Brook, IL 60523 (800) 258-7878

#### **SEI** Investments

1 Freedom Valley Drive Oaks, PA 19456 Phone: (610)676-1000 pcarbone@seic.com

#### IV. Office Locations

Financial Advisors Network, Inc. has its offices located in Tustin, California.

Our employees may travel to this office by means of foot, car, bus or taxi. We engage in order taking and entry at this location.

#### V. Alternative Physical Location of Employees

In the event of an SBD, we will move our trading desk operations to the following site:

10660 Emerson Bend, Tustin, CA 92782

This DRO has been equipped with computers and phones.

#### VI. Customers' Access to Funds and Securities

Our firm does not maintain custody of customers' funds or securities LPL, Schwab, TD Ameritrade and SEI do hold our client's funds or positions. 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 our custodians on their behalf.

## VII. Date Back-up and Recovery (Hard Copy and Electronic)

Our firm maintains its primary books and records and its electronic records in our Tustin office.

Our firm maintains its back-up of its electronic and hard copy materials at

10660 Emerson Bend, Tustin, CA 92782

FAN's onsite computer is backed up weekly. The firm utilizes local disk, remote disk, Blu-Ray disk, and cloud synchronization backup strategies. The majority of FAN's records are retained in electronic format. Damage to FAN's filing cabinets could be partially irrecoverable. The firm would contact the various fund and insurance companies FAN works with and request any client statements that are not retained electronically to the extent needed.

In the event of an internal or external SBD that causes 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.

## VIII. Financial and Operational Assessments

In the event of an SBD, we will immediately identify what means will permit us to communicate with our customers, employees, critical business constituents, and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options we will employ will include our telephone voice mail, and secure email. In addition, we will retrieve our key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic).

In the event that Financial Advisors Network, Inc. is put in a position to raise funds due to a credit issue, the firm will apply for a loan or credit line through one of the banking institutions it currently uses.

#### IX. Mission Critical Systems

Our firm's "mission critical systems" are those that ensure prompt and accurate processing of securities transactions, including order taking, entry, execution, comparison, allocation, clearance and settlement of securities transactions, the maintenance of customer accounts, access to customer accounts, and the delivery of funds and securities.

All electronic records required to maintain operation of mission critical systems are automatically and electronically synchronized to our DRO. Successful synchronization is checked weekly and audited monthly.

## X. <u>Internet Connection</u>

Our DRO has an internet connection that will enable the trading desk to access the LPL system as well as the website of our custodians and regulators. Our internet carrier is Cox Communications.

## Xl. <u>DRO Telephone System</u>

Financial Advisors Network, Inc. has a telephone system in place at the DRO office that our trading office phones can be transferred to in the event of a SBD. In the event of a building loss, FAN would contact the telephone company and re-route calls to the DRO, with cell phones providing additional calling capability until the telephone company reestablishes a normal level of operation.

## XII. Critical Business Constituents Banks and Counter-Parties

Our critical business constituents, banks, etc. will be contacted by Mr. Kamps, Managing Member.

FAN maintains a listing of critical business constituents, banks and vendors with current contact information, a copy of which is retained with this Business Continuity Plan

#### XIII. Disclosure of Business Continuity Plan

We provide in writing this BCP disclosure statement to customers upon their request.

## XIV. Updates and Annual Review

Our firm will update this plan whenever we have a material change to our operations, structure, business or location or to those of our custodians. In addition, our firm will test and review the BCP annually with an outside data services firm or other service provider to test and modify it for any changes.

## XV. Senior Management Approval

K Douglass

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

Signed:

Title: Chief Compliance Officer

Date: May 31, 2019