

# BUSINESS CONTINUATION PLAN

## TRUST ADVISORY GROUP, LTD. / AGES FINANCIAL SERVICES, LTD.

Clients are given a Disclosure Statement when an account is opened which instructs the client to visit our website [www.agesbrokerage.com](http://www.agesbrokerage.com) or [www.trustadvisorygroup.com](http://www.trustadvisorygroup.com) in the case of a disaster. A copy of this plan will be given to a client upon written request.

**This Trust Advisory Group, Ltd. (TAG) / AGES Financial Services, Ltd. (AGES) Business Interruption Plan is designed to provide all personnel with guidelines to be followed in the event of a Major Disruption to our business.**

**Our primary objective is to ensure that everyone in the "TAG / AGES Family" is safe.**

One half of that objective is concerned with an Evacuation Plan, which lays out some "best practices" for everyone's safety. The other half is a Recovery Plan for the future success of TAG/AGES even in the wake of a Major Disruption. Each of our jobs is dependent on TAG/AGES being able to provide a continuous level of high quality service in spite of the Disruption.

### What Constitutes a Major Disruption?

A Major Disruption is any event that renders us unable to provide our usual level of service without immediate recovery action. A Major Disruption can fall into one of three categories:

1. During business hours, not requiring evacuation (e.g. major systems crash)
2. During business hours, requiring evacuation (e.g. an unscheduled fire alarm)
3. Outside of normal business hours, impacting future business activity

### Disaster Relief Team (DR Team)

The President has the overall responsibility for the TAG/AGES response to a Major Disruption. This includes deciding what to do internally (evacuate or not), activating external support and backup and coordinating the recovery. In the absence of the President then the Director of Operations will assume the duties of The President. Behind The President is the Disaster Relief Team (DR Team) as follows:

TAG/AGES Disaster Relief Team			
Responsibility	Name	Title	Cell Phone Number
Employees	William H. McCance	President	(617) 650-2066
Facilities	William H. McCance	President	(617) 650-2066
IT Systems	Bobby Kelly	CCO	(978) 821-5835
Operations	Bobby Kelly	Director of Operations	(978) 821-5835
Media Contact	William H. McCance	President	(617) 650-2066
Finance	Bruce Fox	FinOp	(508) 341-2599

--

## **What Actions Will be Taken?**

The actions divide themselves into time periods starting with the moment the Major Disruption takes place:

### **Backup for Systems**

TeamLogic IT is responsible for maintaining backup systems. Our main TAG/AGES location at 444 Washington Street, Suite 407, Woburn, MA houses our key employees and an extensive amount of data that keeps us running. We operate the following systems and backups:

- **Data/Computer Backups:** All our databases, imaging, our shared drives and individual networked drives are backed continuously in 15 minute intervals, ensuring that we would never lose more than 15 minutes of work.
- **Battery Backups:** These are in place to protect our servers and data during a power outage.

### **Offsite Data Storage**

Computers are backed up on a nightly basis by TeamLogic IT. Located on the H drive are the names, addresses and phone numbers for all, product sponsors, registered representatives, investment advisor representatives, consultants. The President maintains the contacts for phone service providers and internet service providers.

### **Staff Relocation**

The President is responsible for staff relocation. In the event of an emergency, we have arranged to relocate staff to:

Regus Office Suites  
102 Burlington Centre  
35 Corporate Drive  
4th Floor  
Burlington, Massachusetts 01803

Multiple laptops are stored off site and will be used to retrieve backed up information at the temporary site.

Regus also maintains offices nationwide. In case of a disaster that affects a large area. The firm can relocate to another state or area of the country.

## Evacuation Plan

Once the President announces the decision to evacuate, the following general procedures will be observed. While much of this plan is common sense, if a dangerous situation exists in a facility - get out immediately, following fire exit procedures. We want to make sure that everyone is well informed to expedite a speedy and safe evacuation, accounting for all staff members' well being. While we hope that we will never need to use this plan, it is critical that everyone knows what action to take in the event of an evacuation. Please be sure to review this plan, locate all emergency exits, and direct any questions to your supervisor.

When to Evacuate: Evacuate when you hear the emergency alarm system sound, or when you are otherwise notified to leave the premises.

Some quick do's and do not's.

### DO

Hang up the phone immediately!

Take *nearby* personal items - purse, wallet, keys, coat, building key, etc.

Shut the door behind you if you are the last to leave an office / conference room

Leave via the nearest emergency exit

Go directly to your outdoor designated department meeting place

Report any emergency matters to Relief Team personnel

### DON'T!

Do not use the elevator

Do not stop to use the telephone

Do not shut down your computer

No heroics!

If you are on the telephone: Do not attempt to finish the call or transaction! Interrupt the caller if necessary, to calmly inform them that the building alarm system has sounded, and that you are required to evacuate the building immediately. You may offer to call them again once you are back at your desk.

## Recovery Plan

It is impossible to provide for every Major Disruption contingency. However, the Recovery Plan for every Major Disruption has a pattern which should be followed:

	<u>Who</u>	<u>What</u>
<b><u>0 –15 Minutes After Incident</u></b>		
Step 1	DR Team	Preliminary Assessment (See Below)
Step 2	Employee Member	Employee Headcount (See Below)
Step 3	President	Organize Response Teams (See Below)

**15-30 Minutes After Incident**

President	Decide on Evacuation Plan (See Above)
-----------	---------------------------------------

**30 Minutes – 1 hour After Incident**

Step 1	DR Team Members	Response Team to location (See Below)
Step 2	IT Systems Member	Phone and Internet Routing ( See Below)
Step 3	Facilities Member	Facilities Recovery Procedures (See Below)
Step 4	Operations Member	Operations Recovery Procedures (See Below)

**1-6 Hours after incident**

Step 1	President - Contact DR Team members for update
Step 2	IT Systems Member Backup Restore (See Below)
Step 3	IT Systems Member Activate phones at site (See Below)
Step 4	IT Systems Member Prepare Desktop Computers (See Below)

**6 Hours after incident**

Finance Member	Assess financial needs, arrange cash flows (See Below)
----------------	--

**Business Recovery Plan Testing**

We run tests on this procedure twice annually with the following results:

- 60 minutes Internet (Link to clearing, internet, etc.), Phones, Call Center
- 90 minutes E-mail
- 2.5 hours Public Community Link
- 6 hours Full Database

## **Business Recovery Plan Maintenance**

Everything is located on the H drive in the folder Business Continuation Plan

Monthly

1. Rep Email Addresses – Broker Names and Addresses on H drive and on Redtailtechnology.com or ConstantContact.com

As needed but no less than annually

1. Employee Phone Trees – Update any employee changes
2. Business Contacts – Update product sponsor name and addresses
3. DR Plan - (DR Plan)
4. Employee Handout - (Employee Handout.doc)

Attached

- Business Contacts
- Employee Phone Tree
- Strategic Partner Contracts
- Data
  - i. Rep Email Addresses
  - ii. Rep Passwords & Logins
  - iii. DR Plan (Word)

## **Plan Actions**

### **0 – 15 Minutes**

#### **Preliminary Assessment and Alert**

#### **Areas of Assessment**

Determine if we can go back to working out of 444 Washington Street, Suite 407, Woburn MA.

- Is the electricity going to be out for more than 24 hours?
- Condition of Computer Network/Phones?
- Damage to the building?
- HVAC in extreme weather?
- Other Hazards?

Damage Notes:

If we know that we can't access the building/servers in the next 24-48 hours the President should Declare an Alert.

The Alert is a warning to all personnel that a situation may be developing. DR Team will designate a recovery site (Regus) where we can access our backup system. Alerting speeds up the recovery process if we were to need it with no cost/risk to us.

Declaring: At the point where we know that we need to recover our business either because the servers are not fixable or accessible, or because we need space to work in, we should declare. Declaration should be by e-mail, voice announcement, telephone and personal contact. The Declaration should be a uniform

short announcement, preferably written and repeated so as to avoid confusion. It should (a) identify the situation (b) instruct as to action and (c) identify contact person(s). It should be designed to create calm and order.

Alert Recipients:

Emergency services ( police, fire, EMT, etc )  
All employees  
All service (consultant) personnel  
All representatives  
All strategic service partners:

### Employee Headcount

William McCance  
Bruce Fox  
Bobby Kelly  
Linda Tallent  
Ali Contarino  
John Cadigan  
Adam Willis  
Samuel Grant  
Eric Majka

### **30 Minutes – 1 Hour**

### **Response Team to Location**

Send the entire Response Team to the appropriate Recovery Site to handle Rep phone calls and begin the initial technical recovery.

William McCance  
Bobby Kelly  
Linda Tallent  
Ali Contarino  
Bruce Fox

### **Notify Phone/Internet Vendors**

#### **Instructions for routing phones**

1. Done through [www.Ringcentral.com](http://www.Ringcentral.com)
2. Verify Our:
  - a. Company Name – AGES Finance Services, Ltd.
  - b. Address – 444 Washington Street, Suite 407, Woburn, MA 01801
3. Request that AGES Finance Services, Ltd. phone numbers:  
(781) 933-6100, be re-directed to the inbound numbers at (617) 650-2066, or appropriate number the new location.

#### **Instructions for routing Internet**

The Regus location maintains constant internet connectivity. This will allow email communication to be reestablished upon arrival.

E-mail servers are maintained and operated by Global Relay. The servers are located on each coast. The company website is maintained by Smarsh with servers on both coasts to ensure maximum uptime.

Client account access is maintained by our clearing firm Pershing. Pershing maintains servers on both coasts to ensure maximum uptime.

## **Facilities Recovery Procedures**

William H. McCance will assess facilities and determine if and when business can resume at the Woburn address or make arrangements for new office location.

## **Operations Recovery Procedures**

Bobby Kelly will contact StoneX to alert them of the situation StoneX, Don Exner at (800) 264-4863

Our IT consultant, TeamLogic will be called upon to assist with software, systems and hardware.

## **Notifications**

Employees will be notified of emergency situation via phone contact

William H. McCance (617) 650-2066

Registered Representative/Investment Advisor Representative will be notified via e-mail and phone contact of the situation and will be provided phone numbers in which they should use to contact William H. McCance cell (617) 650-2066.

- Employees will be informed of the situation and will be instructed to either stay home or proceed to alternate site in Burlington or other location as warranted.
- Answering machine messages at alternate site will be changed to the Trust Advisory Group greeting

## **1-6 Hours**

Restore service at Regus location by Bobby Kelly will prepare computers and restore system.

## **Secondary Damage Assessment**

- Will our firm be able to return to 444 Washington Street, Suite 407, Woburn MA, and if so, when?
- Insurance Claim Work

## **Start DR Logs**

Servers

Phones

PCs

Data

Miscellaneous Technology

Building Condition

- i. Photo documentation of the site and search area
- ii. Produce reports on damage
- iii. Insurance Claim

Human Resources

- i. Headcount
- ii. Pay cycle
- iii. Contacts

OPERATIONS

FINANCE

- i. Arrange for emergency funds
- ii. Commissions Run

## **Assess Financial Needs**

William H. McCance will assess needs arrange necessary financing for business continuation.