



Business Contingency / Disaster Recovery Plan

Revised December 4, 2019

This disaster recovery plan exists to ensure business continuity in the event of a death or disability of a key member, or in the event of a local or regionalized disaster, particularly an event that renders the main office inoperable.

In the event of a death or disability of a key member, the role is temporarily filled by an existing staff member, and the leadership team decides upon and pursues a reorganization plan. If CEO/CIO is unable to function in their role, the President becomes the acting CEO, and the Sr. Portfolio Manager becomes the acting CIO. If the COO and/or CCO is unable to function in their role, the CEO becomes the acting COO and CCO.

If an event renders the main office inoperable, Sterneck Capital employees are to work from a secure location, such as their home or a library, in which they have secured access to the internet. If secured broadband access isn't available, employees shall use the wireless network from their provider (in most cases Verizon).

All core systems (Custodial, portfolio management, model/rebalance, CRM, email, document storage, planning, etc.) are web based and accessible through any secured internet connected computer. All employees are trained in how to access these resources through their Sterneck Capital Management provided device, or an alternative device.

We choose to work with reputable vendors in which reasonable efforts are made to ensure redundancy and security. Key vendors include our custodian, systems and reporting partners, all of whom have a significant stake in securing client information and remaining operational.

If internet systems are down in the region, Sterneck Capital Management leadership will assess the expected duration, geographic impact, and whether relocating to an unaffected area is necessary and feasible. Key personnel will be informed of the decision with accommodations made to relocate.

If/when applicable, clients and business partners will be notified if a natural disaster or event impacts staff accessibility or business activities; however, such a scenario is anticipated to be rare due to the contingency plans in place.

Questions regarding business contingency can be directed to the CEO or COO at 816-531-2254 or info@sterneckcapital.com.