ASHWORTH SULLIVAN WEALTH ADVISORS
2020 BUSINESS CONTINUITY PLAN

Emergency Contact Persons

Our firm's two emergency contact persons are:

Marcus Ashworth
Senior Partner
W (770) 771-5823
C (404) 314-9270
H (770) 772-4215
Email: marcus@ashworthsullivan.com

Casey Sullivan
Senior Partner
W (770) 771-5822
C (404) 824-6588
Email: casey@ashworthsullivan.com

These names will be updated in the event of a change.

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. If we determine we are unable to continue our business, we will assure customers prompt access to their funds and securities.

Significant Business Disruptions (SBDs)

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 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, 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 custodian(s).

Approval and Execution Authority

Jessica Vickery, CCO and Registered Principal, is responsible for approving the plan and for conducting the required annual review. Jessica Vickery has the authority to execute this BCP.

Plan Location and Access

Our firm will maintain copies of its BCP plan and the annual reviews, and the changes that have been made to it for inspection. A physical copy of the BCP will be stored with the company's written policies and procedures manual, which is kept in a binder in the operations office. An electronic copy of our plan is located on our cloud server under the "General" folder, in the BCP subfolder.

Business Description

Ashworth Sullivan Wealth Advisors conducts business in equity, fixed income, mutual funds and alternative securities. Our firm is a Registered Investment Advisory Firm in which we accept and enter orders through Triad Advisors, LLC, TD Ameritrade, or SEI Private Trust Company. All securities transactions are sent directly to one of three custodians: National Financial in the case of Triad, SEI Private Trust Co., or TD Ameritrade, either of whom executes our orders, compares them, allocates them, clears, and settles them. Our custodians also maintain our customers' accounts, grants, customers access to them, and delivers funds and securities. We do not hold any customer funds or securities. We assess our clients' risk tolerance, suitability, time frame, and goals to design investment strategies accordingly. We maintain discretionary authority and continually monitor, rebalance, and/or re-allocate client portfolios, as necessary.

Custodians

TD Ameritrade Institutional
510 Wateridge Vista Drive
San Diego, CA 92121-5775
1-800-431-3500
southeast@tdameritrade.com

National Financial Services
260 Franklin Street, Suite L7B
Boston, MA 02110
(800) 801-9942
www.nationalfinancial.com

SEI Private Trust Company
One Freedom Valley Drive
Oaks, PA 19456
(610)676-1000

Broker-dealer

Triad Advisors, Inc.
5155 Peachtree Parkway, Suite 3220
Norcross, Georgia 30092
(800) 720-4003
www.triad-advisors.com
Contact: Jae Lee. Jae.Lee@triad-advisors.com

Ashworth Sullivan Office Locations

30000 Mill Creek Avenue, Suite 340
Alpharetta, Georgia 30022
(770) 771-5812
www.ashworthsullivan.com

Alternative Physical Location(s) of Employees

In the event of an SBD, we will move our key personnel the non-affected office location or to the home of Marcus Ashworth:

810 Colonial Lane
Alpharetta, Georgia 30004
(770) 772-4215

A secondary alternate location in which we may move our key personnel is to the home of Casey Sullivan:

144 Coryell St.
Marietta, Georgia 30060
(770) 579-9797

All other staff will utilize the terminal server of our Broker/Dealer Triad Advisors, Inc, and that of our custodians. Phone numbers will be forwarded to respective member's individual mobile phone, via the Comcast Business mobile app. The main phone line will be answered by our Office Manager's mobile phone via the Comcast Business mobile app. Incoming and Outgoing calls will be conducted as per usual.

Customer Access to Funds and Securities

Our firm does not maintain custody of customers' funds or securities, which are maintained at our custodians, National Financial LLC, and/or TD Ameritrade Institutional, and/or SEI Private Trust Company, or directly at the investment company, who acts as custodian for those accounts. 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 custodian or custodial investment company or insurance carrier on their behalf, and if our Web access is available, our firm will post on our Website that customers may access their funds and securities by contacting emergency contact numbers. The firm will make information and disclosures known to customers through our website that is handled by an outside entity with co-locations.

Data Back-Up and Recovery (Paper and Electronic)

Our firm maintains its primary books and records in electronic format at 30000 Mill Creek Avenue, Suite 340, Alpharetta Georgia 30022. We maintain no paper books and records. Jessica Vickery, Chief Compliance Officer is responsible for the maintenance of these books and records. Our broker-dealer maintains certain books and records in electronic format for us. These include account registrations (a culmination of information from new account forms) and client e-mail correspondence. Our firm

maintains the following document types and forms that are not transmitted to our custodians or our broker-dealer: regulatory records, investment policies, financial plans, portfolio reviews, proposals, client correspondence excluding emails, and applications for direct investment company.

The firm utilizes cloud-based document storage through Box. Box uses 256-bit AES encryption and redundancy to assure security and uptime of the files. Box's corporate network and datacenters are continually tested in accordance with SSAE 16 Type II standards, and Box carries regularly updated third-party SOC1 and SOC2 certifications of their compliance. Box maintains their own SSAE 16 Type II certification and audits for their corporate operations and platform. Box's physical infrastructure is designed not only for disaster recovery, but true disaster avoidance, building in advanced measures for N+1 redundancy for all components, geographical diversity, physical security, and environmental controls. Access to systems are monitored around the clock by onsite monitoring and guards, and access to cages are restricted to only top-level clearance Box employees, managed by keys and biometric scanning.

In the event of an internal or external SBD that causes the loss of our digital records, we will physically recover them from our back-up storage in Box. If our primary site is inoperable, we will continue operations from our back-up site or an alternate location.

Financial and Operational Assessments

Operational Risk

Client Communication: in the event of an SBD, we will immediately identify what means will permit us to communicate with our customers, employees, critical business constituents, critical banks, critical counterparties, and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options we will employ will include our website, telephone, voicemail, and secure e-mail.

In addition, we will retrieve our key activity records as described in the section above, Data Back-Up and Recovery.

Mission Critical Systems

We have primary responsibility for establishing and maintaining our business relationships with our customers and have sole responsibility for our mission critical functions of order taking, order entry, and submitting to the custodian any request for distribution of funds. "Mission Critical Systems" are the systems and processes that allow us to fulfill these functions.

By utilizing National Financial's or TD Ameritrade Institutional's or SEI's trading systems, we can place orders from anywhere we have secure internet access. Maintenance of books and records and client data files held in electronic format by our broker-dealer would also be accessed via a secure internet connection. These documents are also in our cloud server.

Our custodians provide execution, clearance and settlement of securities transactions, the maintenance of customer accounts, access to customer accounts, and the delivery of funds and securities.

Our custodians will maintain a business continuity plan and the capacity to execute that plan. Our custodians represent that it will advise us of any material changes to its plan that might affect our ability to maintain our business and presented us with an executive summary of its plan. In the event one of our custodians execute their plan, it represents that it will notify us of such execution and provide us equal access to services as its other customers. If we reasonably determine that our custodian has not or cannot put its plan in place quickly enough to meet our needs, or is otherwise unable to provide access to such services, our custodian represents that it will assist us in seeking services from an alternative source.

Our broker-dealer represents in its business continuity plan summary that it is prepared to resume business in the event of a SBD. Our broker-dealer will continue to conduct business during those disruptions and may choose to relocate key personnel and services to designated backup facilities. If our broker-dealer executes its plan, it will notify us of such execution and provide for alternate arrangements for conducting regular business.

Both our broker-dealer and our custodians represent that they back up records at a remote site. All three firms represent that they operate a back-up operating facility in a geographically separate area with the capability to conduct the same volume of business as its primary site. Our broker-dealer and our custodians have also confirmed the effectiveness of their back-up arrangements to recover from a wide scale disruption by testing and have confirmed that they test their back-up arrangements several times per year.

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 disruptions, 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. Both our broker-dealer and our custodians have the following SBD recovery time and resumption objectives: recovery time period of within 4 hours and resumption time within the same business day.

Our Firm's Mission Critical Systems

Order Taking

Currently, our firm receives orders from customers via in person or by telephone. During an SBD, either internal or external, we will continue to take orders through any of these methods that are available and reliable, and in addition, as communications permit, we will inform our customers when communications become available to tell them what

alternative they have to send their orders to us. Customers will be informed of alternatives by our web page, emails, and telephone.

Order Entry

Currently, our firm executes customer orders by placing them electronically using our custodians' trading platforms. Alternatively, we place customer orders by fax directly to our broker-dealer's trading desk at (678) 405-5695 or by phone at (770) 840-8444. Triad Advisors, Inc, National Financial Service, and TD Ameritrade Institutional anticipate, under their BCPs, we can expect services to resume within 4 hours during an SBD.

Order Execution

In the event of an internal SBD, we will enter and send records to our custodians by the fastest alternative means available, which include place customer orders by calling directly to our broker-dealer's trading desk at (770) 840-8444. In the event of an external SBD, we will maintain the order in electronic or format, and deliver the order to the custodian by the fastest means available when it resumes operations. In addition, during an internal SBD, we may need to refer our customers to deal directly with our custodian for order entry.

Other Services Currently Provided to Customers

In addition to those services listed above in this section, account access via the internet is provided to clients to review their portfolio history by our custodian via our website. Since this is a non-mission critical service, in the event of an internal SBD, we would temporarily not provide this service. Depending on the length and permanence of the disruption we would make a decision or when to restore the service. In the event of an external SBD, we would use the same decision-making process as the internal SBD.

Mission Critical Systems Provided by Our Custodians

Our firm relies, by contract, on our custodians to provide order execution, order comparison, order allocation, and the maintenance of customer accounts, delivery of funds and securities, and access to customer accounts.

Communication between Customers, Employees, & Regulators

Customers

We now communicate with our customers using the telephone, e-mail, our Website, fax, U.S. mail, and in person visits at our firm or the client's location. In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party. For example, if we communicated with a party by e-mail but the Internet is unavailable, we will call them on the telephone and follow up where a record is needed with paper copy in the U.S. mail.

Employees

We now communicate with our employees using the telephone, e-mail, and in person. In the event of an SBD, we will assess which means of communication are still available to

us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party. Senior management will contact each other and establish the means and responsibility of who will contact the financial advisors and support staff.

Succession Planning

Our Firm has a succession plan in the event we have a significant event such as death or dismemberment to a key employee/owner. In the event an Investment Advisor Representative is unable to provide service to an account, the advisory responsibilities of those accounts will be transferred to another Advisor within the Firm. Those accounts will remain with the new Investment Advisor until the original Investment Advisor Representative is able to re-assume his/her responsibilities. In the event of death of one of the Firm's owners, then the deceased owner's ownership will be purchased by the remaining owner, In the event of the loss of key personnel, the Firm will look quickly to hire someone to fill that position. However, the key person's roles and responsibilities will immediately be delegated to another qualified person or one of the Firm's principals until the role is filled.

Regulators

We are associated with Triad Advisors, LLC, a member of FINRA. Normally through our broker-dealer we communicate with our regulators using the telephone, e-mail, fax, U.S. mail, and/or in person. In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party. Employees will use phone provider's mobile access application for phone system continuation from remote locations.

Critical Business Constituents, Banks, and Counterparties

Business constituents

We have contacted our critical business constituents (businesses with which we have an ongoing commercial relationship in support of our operating activities, such as vendors providing us critical services), and determined the extent to which we can continue our business relationship with them in light of the internal or external SBD. We will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services when we need them because of an SBD to them or our firm. We maintain a supplemental contract with certain critical business constituents to provide such services. The alternative suppliers are disclosed below. Our major suppliers are:

Telephone and Internet: Comcast Business (800) 391-3000 ;
Business.comcast.com
Email Provider: Smarsh, Inc. (866) 762-7741 www.smarsh.com
Web site: Niche Labs. (866) 413-7952 www.nichelabs.com

Banks

We have contracted our banks and lenders to determine if they can continue to provide the financing that we will need considering the internal or external SBD. The bank maintaining our operating account is:

Wells Fargo Bank
7001 North Point Parkway, Alpharetta GA 30022; (770) 410-3800

Counterparties

We will contact our critical counterparties, such as other broker-dealers or institutional customers, to determine if we will be able to carry out our transactions with them considering the internal or external SBD. Where the transactions cannot be complete, we will work with our custodian or contact those counterparties directly to make alternative arrangements to complete those transactions as soon as possible.

Regulatory Reporting

Our firm is subject to regulation by: Securities and Exchange commission (SEC), the Financial Industry Regulatory Authority (FINRA), and various state regulators. We now file reports with our regulators using paper copies in the U.S., mail, and electronically using fax, e-mail, and the internet. In the event of an SBD, we will check with the SEC, FINRA, 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.

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 custodian. In addition, our firm will review this BCP annually, to modify it for any changes in our operations, structure, business, or location or those of our custodian.

Senior Manager Approval

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

Signed: **APPROVED**
By Jessica Vickery at 5:03 pm, Aug 27, 2020

Title: Jessica Vickery, Chief Compliance Officer

Date: 08/27/2020