

## **BUSINESS CONTINUITY PLAN**

### **FINANCIAL FOCUS, INC.**

Financial Focus, Inc. has developed a business continuity plan to describe how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we need to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

#### *Contacting us*

If, after a significant business disruption, you cannot contact us as you usually do, you may contact the President, Susan John, via her cell phone, (603) 455-3373, or Vice President, Kristen Madden, via her cell phone, (603) 651-7183.

In the event the business disruption affects our Wolfeboro office, we will post a bulletin on [www.yourfinancialfocus.com](http://www.yourfinancialfocus.com) advising you of the status of our operations and providing you with instructions on how you may access your funds and securities.

If you cannot access us through any of the means described above, you should contact the custodian of your funds directly. The custodian's contact information can be found on your most recent statement from them. The number for TD Ameritrade is (800) 669-3900; the number for Fidelity is (800) 544-6666; and the number for Vanguard is (800) 662-2739. The custodian will provide you with instructions on how to access your funds or securities, enter orders, or process other account-related transactions.

#### *Our business continuity plan*

We plan to quickly recover and resume business operations after a significant business disruption and to respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption. President Susan John will be responsible for evaluating any disruption and instituting the appropriate plan of action, with the input and assistance of the entire staff.

Our business continuity plan addresses data backup and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; critical supplier, contractor, bank, and counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

Financial Focus, Inc. backs up all important records in a remote, geographically separate area. While every emergency situation poses unique problems based on external factors, such as the time of day it occurs and the severity of the disruption, we have been advised by custodians that their objective is to restore their own operations and to be able to complete existing transactions and accept new transactions and payments within four hours of a local, non-severe business disruption. Our own objective is to restore our operations within one business day. Your orders and requests for funds and securities could be delayed during this period.

It is important to note, however, that the scope and impact of a local or regional disruption can vary significantly, and certain elements of our and our custodians' recovery plans may require a longer recovery period, which means your requests for funds or securities could be further delayed. During a business disruption, we will continually evaluate, estimate, and communicate the recovery time necessary to resume operations.

#### Varying disruptions

Significant business disruptions can vary in scope; for example, they can impact only our firm, only our office building, the neighborhood where our firm is located, the town where we are located, or the entire region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a severe disruption, we will transfer our operations to another location, if needed, and we expect to recover and resume critical business functions within three business days. In case of the loss of key personnel, Financial Focus, Inc. will retain the services of a NAPFA Member Registered Investment Adviser, if necessary, to minimize the impact of interruption, sustain a minimally acceptable level of services for an extended period, and return to normal business activities as soon as possible.

Whatever the situation, we plan to remain in business and notify you through our website, [www.yourfinancialfocus.com](http://www.yourfinancialfocus.com), about how to contact us. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our clients prompt access to their funds and securities by whatever means available to us.

#### Important disclaimers

Financial Focus, Inc. will adhere to the procedures described in its business continuity plan and described above to the extent commercially reasonable and practicable under prevailing circumstances. There are, however, an incalculable number of events or circumstances that could result in a significant business disruption, and their impact may vary greatly in size, scope, severity, duration, and geographic location. Further, significant business disruptions may result in varying degrees of harm to human life and regional or national infrastructure (power, transportation, communications, etc.), which could affect the firm's recovery in significant and different ways.

In light of this, Financial Focus, Inc., in its sole discretion, reserves the right to flexibly respond to any disruption in a situation-specific and prudent manner. Nothing in this disclosure document is intended to provide a guarantee or warranty regarding the actions or performance of the firm, its computer systems, or its personnel in the event of a significant business disruption.

#### For more information

If you have questions about our business continuity planning, you can contact us by writing to Financial Focus, Inc., PO Box 2250, Wolfeboro, NH 03894, or by calling us at (603) 569-1994.