

# **Business Continuity Plan Summary**

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**AlphaTrust Advisors<sup>®</sup>**

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## About this Summary

This document summarizes the Business Continuity Plan (the “BCP”) maintained by AlphaTrust Advisors. It is provided in response to client, counterparty, and request-for-proposal information requests. The full BCP is an internal document; this summary describes the substantive program and the Firm’s commitments without operational identifiers. AlphaTrust Advisors may discuss additional detail under an appropriate confidentiality arrangement.

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### 1. Scope

“AlphaTrust Advisors” refers to AlphaTrust Advisory Group, LLC, AlphaTrust Law Group, LLC, AlphaTrust Tax Services, LLC, AlphaTrust Insurance Services, LLC, and any affiliated entity operating under the AlphaTrust brand. The BCP applies to all of those entities and to their employees.

A Significant Business Disruption (“SBD”) is an incident, internal or external, that prevents the Firm or its critical service providers from operating normally for more than four business hours, prevents access to the Firm’s physical office, or impairs the Firm’s ability to serve clients or meet regulatory deadlines.

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### 2. Risks the Firm Has Planned For

The Firm’s BCP addresses a range of disruptions, including:

- Cyber incidents (ransomware, account takeover, phishing, vendor breach).
- Loss of internet or phone connectivity.
- Loss of access to the Phoenix office.
- Pandemic or wide-area public-health events.
- Death, disability, or extended absence of the President or Chief Compliance Officer.
- Outage at the Firm’s custodian or other critical service provider.
- Natural disaster affecting the Firm’s office (fire, flood, severe storm, earthquake).
- Tax-system disruption (e.g., IRS e-file or AZ Department of Revenue outage).
- Court system or e-filing disruption.
- Insurance-carrier portal or appointment-system outage.

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### 3. Critical Functions and Recovery Priorities

Critical business functions are tiered by how quickly they must be restored after an SBD.

**Tier 1 — restored by end of the first business day**

- Confirmation that advisory client funds and securities are safe and accessible through the Firm's custodian, Charles Schwab Advisor Services.
- Trade review, approval, execution, and confirmation reconciliation for the Advisory practice.
- Inbound and outbound client communication (telephone routed to mobile devices, email, and the public website notice).
- Access to client records for any matter with a court, IRS, regulatory, or carrier deadline within five business days.
- Practice-specific essentials: custodian and platform access (Advisory); access to IRS and Arizona e-file systems with extension filings as a default risk-mitigation step where deadlines fall during the SBD (Tax); calendaring of imminent court, arbitration, or administrative deadlines and substitute-counsel arrangements where needed (Law); carrier appointment continuity and producer-license status (Insurance).

**Tier 2 — restored within ten business days**

- Management reporting and client file maintenance.
- Accounts payable and billing.
- Form ADV brochure delivery to new Advisory clients.
- Hardware and software testing and reinstallation.
- Marketing material review and email/social-media surveillance.
- Performance reporting.

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**4. Communicating with Clients During a Disruption**

During an SBD, the Firm communicates with clients through, in order of availability: (1) email broadcast through the Firm CRM; (2) a banner on alphatrustadv.com explaining the outage; (3) a recorded message on the main phone line; and (4) outbound calls from the Firm's advisers, counsel, tax professionals, and account managers to clients with imminent transactions or deadlines.

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**5. Client Access to Funds and Securities**

Advisory client assets are held by Charles Schwab Advisor Services. If the Firm itself is unreachable during an SBD, an Advisory client may transact directly with Schwab to access funds and securities. Schwab Advisor Services may be reached at (800) 435-4000. This direct-to-custodian path is the Firm's primary safeguard for client access in any disruption that affects the Firm's communications channels.

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## 6. Regulatory Coordination

The Chief Compliance Officer is the Firm's single point of contact for regulator communications during an SBD. The Firm follows the response timelines set by each regulator (SEC, IRS, AZ Department of Revenue, FTC, applicable state insurance regulators where the Firm holds non-resident producer licenses, and the AZ Attorney General for state breach-notification matters). Where a regulatory deadline cannot be met because of the SBD, the Firm requests an extension in writing as soon as practicable.

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## 7. Remote Work

The Firm operates a cloud-first technology stack. Employees report to their assigned worksite under normal operations; during an SBD, employees may work remotely until conditions allow return. The Firm has tested remote operations and is capable of operating remotely for an extended period.

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## 8. Succession

The Firm has documented succession arrangements for the prolonged disability or death of the President or the Chief Compliance Officer. Succession includes designated successors for legal and ownership purposes, operational continuity for the Firm's practice areas, and the orderly transition or transfer of client engagements where the Firm cannot continue.

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## 9. Testing, Training, and Annual Review

The Firm tests the BCP at least annually through a remote-work day for all staff and a tabletop exercise rotating among the identified risks. Backup restoration is tested annually. Each new hire receives BCP onboarding within their first 30 days, and all personnel complete an annual BCP refresher and sign an acknowledgement. The BCP is reviewed within 60 days of the anniversary of its effective date and after any material change to the Firm's operations, structure, business, or location.

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*This summary is provided for informational purposes. The underlying Business Continuity Plan and the Firm's other compliance policies govern in all cases.*