BURLINGTON ALLIANCE CAPITAL MANAGEMENT, LLC

BUSINESS CONTINUITY AND DISASTER RECOVERY PLAN

EFFECTIVE DATE: AUGUST 2022

Chris Norris, President and CCO

TABLE OF CONTENTS

1. INTRODUCTION

As part of its fiduciary duty to its clients, and as required under the federal Compliance Program Rule, Burlington Alliance Capital Management, LLC (hereinafter, "Burlington Alliance") has adopted this *Disaster Recover/Business Continuity Plan* (hereinafter, the "Plan") to provide for the firm's recovery from an emergency or disaster and for the resumption of business operations in as short a period as possible. These policies and procedures are, to the extent practicable, designed to address those specific types of disasters and potential risks that Burlington Alliance might reasonably face given its business and location. *See* **"TYPES OF DISASTERS – VULNERABILITY ASSESSMENT"** attached hereto as **Appendix A**. In the event that we determine we are unable to continue our business, we will assure customers prompt access to their funds and securities.

Burlington Alliance's principal office location is:

2823 South Church Street, Burlington, North Carolina 27215

2. BACKGROUND

Since the terrorist activities of 9/11/2001, all advisory firms need to establish written disaster recovery and business continuity plans for the firm's business. This will allow advisers to meet their responsibilities to clients as a fiduciary in managing client assets, among other things. It also allows a firm to meet its regulatory requirements in the event of any kind of an emergency or disaster, whether internal or external, such as a bombing, fire, flood, earthquake, power failure or any other event that may disable the firm or prevent access to our office(s).

3. DISASTER RECOVERY TEAM

Name	Title	Office Phone	Home Phone	Cellphone
Chris Norris	President/CCO	(336) 660-2782	N/A	(336) 601-0442
Amber Bowen	Director of Client Services & Operations	(336) 660-2782	N/A	(336) 269-3986

4. RESPONSIBILITIES

Each employee is responsible for understanding his/her role during a disaster. The following individuals have the primary responsibility for implementation and monitoring of the Plan:

- The CCO is responsible for:
  - Documenting computer back-up procedures, i.e., frequency, procedure, person(s) responsible, etc.
  - Designating back-up storage location(s) and persons responsible to maintain back-up data in separate locations.
  - Establishing back-up telephone/communication system for clients, personnel and others to contact the firm and for the firm to contact clients.
  - Determining and assessing back-up systems and/or recovery plans for key vendors and mission critical service providers.
  - Identifying and listing key or mission critical people in the event of an emergency or

disaster, obtaining their names, addresses, e-mail, fax, cell phone and other information and distributing this information to all personnel.

- Designating and arranging for "hot," "warm," or home site recovery location(s) for mission critical persons to meet to continue business, and for obtaining or arranging for adequate systems equipment for these locations.
- Conducting periodic and actual testing and training for mission critical and all personnel.

5. WHEN AN EMERGENCY/DISRUPTION OCCURS

5.1 Emergency During Office Hours

In the event of an emergency during office hours, call 911 or (336) 660-2782. The next appropriate course of action will depend on the nature of the emergency. Most types of emergencies will require all employees to quickly evacuate the building, including fire, bomb threats, etc. If so, gather your belongings, including any medications, if time safely permits and promptly exit the building. Certain emergencies, however, may require that employees remain in-doors, including the release of a hazardous airborne substance in the immediate vicinity of the firm's principal office. Employees should always follow the instructions of emergency personnel. If it is necessary to evacuate the building, please refer to the **"BUILDING EVACUATION PLAN"** attached to this Plan as **Appendix B**. Please note key alternative routes in the event that main exit-ways are impassable during an emergency. All employees are to meet at the designated area indicated below, if safe to do so, following any evacuation of the principal office.

Designated Meeting Area: Parking Lot; right side of parking

5.2 After-Business Hours Disruption/Discovery and Notification of Employees

In the event of a business disruption or disaster occurring after business hours, each employee must be contacted, informed of the nature of the event and given instructions regarding if, when and where to convene. Any employee initially discovering an emergency situation at the principal office must contact Chris Norris to inform him of the situation. If, for any reason, Chris Norris cannot be reached, the employee to contact is Amber Bowen who will contact Chris Norris, if possible, and together the two will determine a course of action. (If, for instance, the disruption involves a power failure, the two will attempt to contact the utility company to obtain an estimate of when power will be restored to the principal office). Once a plan of action has been decided upon, Chris Norris shall initiate the Employee Call Tree. Chris Norris will attempt to contact the first employee on the "**EMPLOYEE CONTACT SHEET**" attached to this Plan as **Appendix C.**

If an employee cannot reach the next employee named on the call sheet, he/she will attempt to contact the next employee until he/she reaches an employee. Each employee notified must agree to contact the next employee on the list or continue down the list until an employee is reached. Each employee must keep track of the employees that could not be reached and inform the next contacted employee of these names. The employee reaching the end of the call sheet will attempt to contact the employees that could not be reached the first time until he/she either reaches an employee or fails to contact any of the remaining employees. When contacted, each employee is to be apprised of the situation. The employees will be provided with instructions either to meet at the principal office, or at the alternative business location or to await further instructions.

5.3 Disruption in Services of Critical Third-Party Vendor(s)

Chris Norris, CCO, will maintain a readily available list of contact information for clearance and settlement organizations, banks, administrators, prime brokers, counterparties, regulators and other key business relationships.

In the event of a disruption in the services provided by a critical service provider, Chris Norris or other designated individual will attempt to contact the vendor to determine the nature of the problem and an estimate of the restoration of services. If the vendor cannot be reached and services cannot be restored, Chris Norris will put together a team of Burlington Alliance employees from the critical service area affected to determine an appropriate "work-around" solution. Burlington Alliance may also consider referencing the vendor's own recovery plan on file in the Chief Compliance Officer's office to attempt to determine likely causes of the disruption and the vendor's own estimate of the restoration of services therefrom. If continued efforts to contact the vendor and/or to restore services are unsuccessful, consider contacting a back-up or replacement vendor. A list of mission critical Third-Party vendors is on the secure One Drive; additionally filed in the folder labeled Compliance.

6. ALTERNATE SITE FOR BUSINESS OPERATIONS

If Burlington Alliance's principal office is damaged or otherwise inaccessible, Burlington Alliance has designated and office suite at Burlington Alliance's secondary alternate campus as a temporary alternate location from which to restore normal business operations. If the expected duration of the disruption or inaccessibility of the Burlington Alliance's principal office is longer than a month, Chris Norris will determine a more permanent alternative location or new principal office. Depending on an employee's job requirements and the availability of a personal computer and internet access at home, some employees may be permitted or required to work remotely for a time from his/her residence. Due to Burlington Alliance's relatively small size and staff, this determination will be made and communicated to each employee at the appropriate time based on the circumstances.

Burlington Alliance's Alternate Campus:

1214 Turrentine Street, Burlington, North Carolina 27215

In the initial stages of a disruption, each employee will be contacted and given instructions. See Section 9 "**COMMUNICATIONS**" of this Plan.

7. DATA PROTECTION, BACK-UP & RECOVERY

7.1 Back Up Procedures

All data on Burlington Alliance's systems is backed-up by Integrity Marketing Group ("Integrity") to a remote location daily. All vendor contact information is available through Integrity and all employees can access this information via cell phone, tablet, laptop, or any device with an internet connection. This process is fully automated and is completed via a secure internet connection. Email confirmations of each completed back up are sent by the Data Back-Up & Storage Vendor to Integrity and will daily verify that backups are completed. In addition, local backups are maintained. It is Burlington Alliance's policy to convert vital paper-based records (i.e., contact information, portfolio history, client agreements, etc.) to electronic form and maintained on Burlington Alliance's systems. Critical contact information for clients and vendors a secure cloud environment through Shareholder Services Group's Institutional Advisor Portal and the RedTail CRM/Email.

7.2 Recovery Procedures

If Burlington Alliance's systems are accessible and otherwise undamaged following an emergency, as may be the case in the event of a power failure, it may be possible to safely retrieve and transport Burlington Alliance's server and hardware systems, containing all electronically stored data, to the alternate site for restoration of business operations. In the initial stages of the disruption, Chris Norris will make the determination regarding the physical and economic possibility and practicality of this course of action or whether a complete back-up to the alternate system is warranted.

Burlington Alliance utilizes a backup system that can be used to restore to any other computer. If the machine has an internet connection, we can download important files as needed. If the server is a total loss, Chris Norris can request a complete image, where Integrity will send us a physical hard drive that fully replicates the last real-time server backup.

8. FROM DISASTER TO RECOVERY – A TIMELINE OF TASKS

As noted above, business disruption can occur from such relatively benign events as a power failure. The timeline provides step-by-step guidelines for Burlington Alliance's response and recovery from such an event. Of course, an actual emergency may require some deviation from this guide and unique situations may require creative solutions. Throughout any emergency and business disruption, we remind each employee to be mindful of Burlington Alliance's fiduciary duty to its clients both when evaluating the situation and when determining the appropriate course of action. See **"FROM DISASTER TO RECOVER – A TIMELINE OF TASKS"** attached hereto as **Appendix D**.

9. COMMUNICATIONS

9.1 Telecommunications Disruption

In the event that local "land-line/VOIP" telephone service is disrupted; employees are encouraged to use their personal cellular phones to conduct business until service is restored. Burlington Alliance has arranged with its telephone service provider, Nextiva a cloud-based internet communications provider, to use a feature called Call Forwarding in the event of a local telecommunications disruption. This feature will forward all in-coming telephone calls made to the principal office to everyone's cellular telephone number. This contingency is used currently because the forwarding system is operational full-time.

A readily available list of contact information (including home address and home, work, cellular and e-mail contact information) of all personnel is under Item 3 "**DISASTER RECOVERY TEAM"** and **Appendix C "EMPLOYEE CONTACT SHEET"** attached hereto.

9.2 Internet & Email Service Disruption

Burlington Alliance's email is setup via a hosted exchange through Microsoft 365. An employee can simply login to their email account online. If Microsoft 365 were to have an outage, we could then use Chris Norris' gmail account (christopher.norris73@gmail.com) to inform clients of alternative methods of communication until the issue is resolved.

9.3 Client Communications

We have created the following procedures to accommodate communications between the Firm and its clients:

In the event of an emergency, we will contact our clients as considered necessary with instructions as to how we will continue with transactions and services. We will also send an email to all clients with the contact information for all Firm service providers where events such as inclement weather may cause a disruption to business. The telephone numbers of service providers will also be available on the website and will be provided to clients on at least an annual basis.

10. LOSS OF KEY PERSONNEL

Chris Norris serves as Chief Compliance Officer and maintains advisory responsibilities. Mr. Norris also handles all Burlington Alliance client investment accounts. Should something happen to Mr. Norris, rendering him incapable of fulfilling him duties, Amber Bowen will contact additional advisors who will be designated to fulfil their role in the interim. Burlington Alliance can continue to operate as normal in the event of the incapacity of Chris Norris through the agreement in place with Burlington Alliance's parent company.

Training, Testing & Revision of Plan

10.1 Distribution of the Plan

Each employee will receive a pdf copy (paper copy available) of the Plan and will be required to sign an acknowledgement that they have read and understands the Plan. See **"ACKNOWLEDGEMENT FORM"** attached hereto as **Appendix E**. One copy of the Plan is to be kept at the employee's workstation. The employee should maintain another copy at the employee's home address or on the employee's cell phone. **ALL EMPLOYEES ARE REQUIRED TO MAINTAIN A CURRENT COPY OF THIS PLAN (PDF acceptable) IN AN EASILY ACCESSIBLE FORMAT**. This information can be retained on cell phone, tablet or laptop computers in an Adobe pdf format for ease of access. The acknowledgement is to be provided to all employees in a timely fashion.

A copy of the Plan is also maintained in a secure location at with Keith Hall, the CFO of Burlington Alliance's parent company, along with all relevant insurance policies. This information will be retained on cell phone, tablet or laptop computers in an Adobe pdf format for ease of access.

i) Regulatory Reporting

If requested, Burlington Alliance, will provide the Securities and Exchange Commission or appropriate state regulatory agency with a copy of the Plan.

10.2 Training

The Plan will be reviewed at least annually with all employees at a firm-wide meeting. Minutes of these meetings will be kept and attendance by all employees is mandatory. If an employee has any questions regarding the Plan or their role in the event of an emergency, he/she is encouraged to ask Chris Norris for clarification. It is imperative that all personnel are familiar with the policies and procedures of the Plan and have a thorough understanding of his/her responsibilities in the event of an emergency.

10.3 Testing, Plan Revision & Recordkeeping

Chris Norris will periodically, and on at least an annual basis, test the Plan. Such tests may be as complex as running a simulation of an actual disaster, including the restoration of data to alternate systems, or as basic as testing the employee call tree. Typically, but not always, testing will be conducted after hours to minimize disruption of normal business operations. In order to gain realistic results that may be used to

revise and optimize the effectiveness of the Plan in the event of a real emergency, not all tests will be announced ahead of time to all employees.

Test results will be evaluated and documented by Chris Norris and a determination of any weaknesses exposed by the test will be made at that time. The Plan will be revised accordingly to fill gaps discovered during testing. The Plan may also be revised pursuant to reviews and the issuance of regulatory guidance.

Changes in business operations, contracts and contacts, including new employees, new vendors or new addresses for existing employees or vendors, etc. must be reflected in the Plan. Most importantly, current client contact information must be maintained as part of the Plan. Chris Norris will be responsible for ensuring that the Plan is updated periodically and as required by the frequency of such changes. Changing the date in the lower left-hand corner of the Plan will indicate any such revision. Any revision to the Plan will be distributed to all employees and each employee will be required to provide a new, signed acknowledgement form of receipt to Chris Norris. Old copies of the Plan will be exchanged for the new copies to assure that no employee holds an outdated copy or confuses an outdated copy for a current copy during an emergency. A revised copy will also be placed on the Chris Norris server. All prior versions of the Plan will be destroyed except for one copy maintained in Burlington Alliance's files as required by applicable regulations.

APPENDIX A

TYPES OF DISASTERS – VULNERABILITY ASSESSMENT BUSINESS IMPACT ANALYSIS

FIRM VULNERABILITY WORKSHEET

The following is designed to assist the Disaster Recovery Team to assess the firm's vulnerability and plan for possible disaster scenarios.

Resulting Business Disruptions Possible

Certain disruptions may result from any or several of the causes listed above (although the cause may impact the duration of the disruption). The Plan must provide for the recovery of critical processes from these disruptions (including, without limitation, interruptions due to fire, flood, earthquakes, power outages, elements of nature and acts of God, acts of war, terrorism, riots, civil disorders, rebellions and/or revolutions). These include (among others):

- Partial or total physical damage to the firm's office and/or equipment and/or files
- Partial or total physical damage to a critical vendor's office and/or equipment and/or files
- Inaccessibility to office, equipment or files (whether damaged or not)
- Inaccessibility of a critical vendor to its office, equipment or files
- Power outage
- Loss of life or incapacity of critical personnel
- Loss of communications (phones/internet)

Critical Processes of Various Business Groups: Burlington Alliance is a smaller firm with a small administrative staff. As such, the same individuals will handle its critical processes and the firm is not, strictly speaking, separated into business groups. Nevertheless, for purposes of this analysis, the firm's critical processes are categorized as follows:

1. ***Finance***

   - Tax materials and preparation
   - Monthly close (including calculating returns, account valuations, calculating fees and billing client accounts) (dependent on third-party vendors)

2. ***Portfolio Management and Other Advisory Services***

   - Research and analysis (dependent on third-party vendors)
   - Trading capability (dependent on third-party vendors)
   - Adhering to client suitability, portfolio guidelines and client-imposed restrictions

3. ***HR***

   - Payroll (dependent on third-party vendors)
   - Benefit administration (dependent on third-party vendors)

4. ***Client Relations***

- Quarterly reports summarizing performance (dependent upon Finance Unit and third-party vendors)
- Website updates (posting dependent on third-party vendors)

5. ***Legal***

- Regulatory compliance (including Form ADV amendments, state notice filings and fees, Form 13F filings, if applicable, etc.)
- Client reporting (Proxy voting, Form ADV, Part II offering, privacy notice delivery & proxy reporting)
- Trading compliance (proprietary & personal, including initial and annual holdings reports and quarterly transaction reports)

6. ***IT***

- User support (dependent on third-party vendors)
- System recovery (dependent on third-party vendors)
- User account administration (dependent on third-party vendors)

7. ***Central files:***

- Organization, maintenance and security of records
- Regulatory Compliance- all required books and records
- Insurance documents

The Plan must address the back-up and recovery of all critical and required books and records pertaining to the above processes, not only to the firm's main systems but also to the firm's alternate site for business operations in the event of a loss of the firm's principal place of business. The Plan must also provide for back-up systems (hardware and software) by which these critical processes can be carried out notwithstanding a loss of the firm's principal address.

Because many of the firm's critical processes are dependent to a large extent on third party vendors, the Plan must also provide for a review of (1) who the firm's critical vendors are, and (2) due diligence reviews of those vendor's disaster recover/business continuity plans.

APPENDIX B

BUILDING EVACUATION PLAN

2823 South Church Street, Burlington, North Carolina 27215

The building is two stories, with one entrance in and out.
Exits are clearly marked.

APPENDIX C

EMPLOYEE CONTACT SHEET

Chris Norris, CCO

Home Address: 1492 Lake Country Drive Extension, Asheboro, North Carolina 27205

Home Email Address: christopher.norris73@gmail.com

Office Phone: (336) 660-2782

Home Phone: N/A

Cellular Phone: (336) 269-6233

Amber Brown, Director of Client Services & Operations

Home Address: 5804 Harriett Court, Summerfield, NC 27358

Home Email Address: Amber.bown88@yahoo.com

Office Phone: (336) 660-2782

Home Phone:

Cellular Phone: (336) 269-3986

Josh Sullivan, Investment Advisor Representative

Home Address: 4985 Southgate Parkway, Myrtle Beach, South Carolina 29579

Home Email Address: Josh.myrtlebeach@gmail.com

Office Phone: N/A

Home Phone: N/A

Cellular Phone: (919) 201-3471

APPENDIX D

FROM DISASTER TO RECOVERY – A TIMELINE OF TASKS

0 – 2 hours:

Discovery and Assessment:

- Does disaster/emergency occur during business hours?
  - If yes, CALL 911, or use Burlington Non-Emergency contacts: emergency **336-229-3500**; For Fire use non-emergency **336-229-3564**.
  - Is evacuation necessary? Does remaining in the building pose a threat to the safety of employees?
  - If, yes, evacuate building and meet at safe, designated location outside building (CAVEAT: ALWAYS FOLLOW INSTRUCTIONS OF EMERGENCY PERSONNEL).
  - If safety permits, secure all confidential client information prior to evacuation.
  - Conduct a roll call at designated location to ensure the health and safety of all employees.
  - Attempt to assess estimated amount of time before possible resumption on-site. If more than a day, determine whether to initiate a set-up of alternate site.
    - If safety does not demand evacuation of building, can normal operations resume (i.e., is there a power outage or other resulting disruption that does not permit resumption of business?)?
    - If the disruption does not permit the resumption of normal business activities, attempt to assess estimated amount of time before possible resumption on-site.
    - If less than a day, determine whether to dismiss employees for a period of time.
    - If more than a day, determine whether to initiate a set-up of the firm's alternate location.
    - If disruption results from an emergency at a key third-party vendor, assess amount of time until restoration by vendor, formulate a work around or determine whether an alternative vendor may fill the gap.
- If after-hours disaster/emergency, anyone initially discovering situation must notify Chris Norris immediately. Does situation preclude safe, normal business operations? (Chris Norris will make this determination).
  - If yes, execute call tree. Inform employees of situation, direct them to avoid principal office and to await further instruction.
  - If no, attempt to quickly assess estimated amount of time before possible resumption on-site and execute call tree to inform employees of situation and where and when to reconvene.

2 – 6 hours

Initiate Emergency Recovery/Contact Critical Vendors

- Assess which staff will meet at alternative location and which will work from home. Set a time the following day for a conference call, if possible, or otherwise require each staff member to call in a set time. Notify staff accordingly.
- Begin to compile list of data lost or otherwise inaccessible.
- If possible, begin to salvage data and files from principal office or make plans for such salvage as soon as safety and the authorities permit.
- If necessary, initiate recovery of backed-up data to alternate systems.
- Begin to capture expenses associated with disruption.
- If necessary, notify insurance carriers of situation.
- Arrange with authorities and/or landlord to participate in salvage operations and secure confidential information ASAP.
- Notify and brief key vendors on situation, including broker-dealers.
- Request broker dealers send (fax email or other remaining means) information regarding client holdings and trade blotters.
- Determine if and what client communication is necessary.
- If possible and if estimated time of disruption calls for it, consider recording emergency voicemail to provide basic information regarding situation to clients and vendors calling in.
- If possible and if estimated time of disruption calls for it, contact webhost to post a notice to clients on the firm's home page informing them of the situation, how to contact Chris Norris and any other prudent information.
- If possible and if estimated time of disruption calls for it, consider sending an email to all clients informing them of situation and other important information. If disruption includes a failure of website and email systems, use firm's back-up national email system (Google) and send an email to all clients informing them of situation and other important information.
- Verify that restoration of back-up data was successful, and systems are fully operational. If necessary, contact IT vendors for priority assistance. (If disruption is not localized, priority assistance may not be feasible, thus, testing systems before an emergency occurs is critical).

6 – 8 hours

Restoration of Normal Business Operations

- Conduct a reconciliation of accounts to verify that holdings match broker-dealer information.
- Resume normal operations.
- Assess damage and estimated time until principal office will be accessible and operational. If estimate is more than a month, begin to formulate plan for new principal office or a more-permanent alternate location.
- Review compliance checklist to determine whether any critical filings are required in the near future.

APPENDIX E

ACKNOWLEDGEMENT FORM DISASTER RECOVERY PLAN

Version: August 2022

I, the undersigned employee of Burlington Alliance, hereby acknowledge and certify that I have read and reviewed the entire contents of the **Burlington Alliance**'s **Business Continuity & Disaster Recovery Plan**. I accept responsibility for understanding my role in the event of an emergency.

_____

Printed Name of Employee

_____

Signature

_____

Date