

Wealth And Wellness Group Business Continuity / Disaster Recovery Plan

Emergency Contact

Name: Robert Laura

Title: Senior Advisor / Chief Compliance office

Relationship to Firm: Owner

Firm Mailing Address: 690 Hope St, Suite B, Brighton Mi 48116

Firm Phone Number: 888-267-1138

Firm Policy

Our BCP's primary objectives are to continue providing services to our customers, protect the health and safety of our employees, and fulfill our legal and regulatory obligations. In the event that we determine we are unable to continue our business we will assure customers prompt access to their funds and securities.

Significant Business Disruptions (SBDs)

An SBD may affect only our firm (e.g., a fire in our office building or cyber event) or may be widespread affecting several firms or the operation of the securities markets (e.g., a terrorist attack, a natural disaster or a pandemic). Our response will vary depending on the severity of the SBD, which may include greater reliance on other organizations and systems, especially on the capabilities of our clearing firm.

Plan Approval and Annual Reviews

Robert Laura, Senior Advisor and firm owner is responsible for approving the plan and for conducting the required annual review.

Plan Location and Access

Our firm will maintain copies of its BCP, any modifications that have been made to the BCP and the annual reviews for inspection, and the BCP will be made available promptly upon request to FINRA staff.

Business Description:

Our firm is an independent investment management firm that conducts business in equity, fixed, and related securities for our clients. We do not perform any type of clearing function or hold customer funds or securities. After an order is accepted and entered by our firm, the order is sent to our clearing firm for execution, clearance and settlement. Our clearing firm also maintains our customers' accounts, can grant customers access to them, and delivers funds and securities.

Our clearing firm is:

Name: Charles Schwab & Co,

Address: 1958 Summit Park Drive, Orlando, FL 32810-5931

Phone: 800-515-2157

Login for clients: <https://client.schwab.com/Login/SignOn/CustomerCenterLogin.aspx>

Our Office Location is:

Our firm is located at 690 Hope St, Suite B, Brighton MI 48116

In the event of an SBD impacting our ability to operate in a location, staff in the affected office(s) will move to a back-up location at 10711 Hickory Knoll Ct, Brighton MI 48114

If the back-up location is unavailable or infeasible (e.g., due to the inability to employ social distancing during a pandemic), staff may temporarily work from a remote location (e.g., staff may work from home because of health and safety reasons during a pandemic). In this event, we will maintain a list of employee working locations and contact information.

The risk of cybersecurity events may be increased due to use of remote offices or telework arrangements. We will remain vigilant in our surveillance against cyber threats and take steps to reduce the risk of cyber events.

Customers' Access to Funds and Securities

Our firm does not maintain custody of customers' funds or securities. Our clearing firm, Charles Schwab & Co maintains custody of customers' funds or securities. If telephone or internet service is available during an SBD, our registered persons will take customer orders or instructions (including instructions to transfer customer accounts in the event our firm determines that it is unable to continue its business) and contact our clearing firm on their behalf. If registered persons are unable to service customers' orders or instructions, our firm will [post on our website or customer portal or send an email to customers notifying customers that they] may access their funds and securities by contacting [insert contact information]. The firm will make this information available to customers through its disclosure policy.

Data Back-Up and Recovery

Our firm maintains its primary or original books and records in both electronic and paper form at 690 Hope St, Suite B, Brighton MI 48116. Robert Laura, Senior Advisor and firm owner is responsible for the maintenance of these books and records.

Our firm exclusively maintains the following document types and forms that are not transmitted to our clearing firm:

- Investment Advisory Agreements
- Investment Policy
- Account Reviews
- Client Communication Notes

Our firm maintains its back-up copy of books and records in electronic form, paper form or both electronic online with Carbonite and Dropbox. Robert Laura, Senior Advisor and firm owner is responsible for the maintenance of the back-up copy of our books and records.

Our firm backs up its electronic books and records daily by with an online cloud service. The back-up copy of our books and records is maintained by a recordkeeping service Carbonite.com and Dropbox.com. In the event of an SBD that causes the loss of our primary or original books and records, we will obtain the back-up copy of books and records from that recordkeeping service.

Operational Risk

In the event of an SBD, we will identify whether there are any limitations on our ability to communicate with our customers, employees, critical business constituents, critical banks, critical counter-parties and regulators. Depending on the limitations, we will employ alternate modes of communication, including our website, phone and / or email, to communicate with customers, employees, critical business constituents, critical banks, critical counter-parties and regulators. If registered persons are unable to service customers, our firm will send an email to customers notifying customers that they may access their funds and securities by contacting Robert Laura, Senior Advisor / Chief Compliance office at 248-890-0834. In addition, we will retrieve our key activity records as described in the section above, Data Back-Up and Recovery.

Financial and Credit Risk

In the event of an SBD impacting our financial position, we will determine the value and liquidity of our investments and other assets to evaluate our ability to continue to fund our operations and remain in capital compliance. We will contact our clearing firm, critical banks and investors to apprise them of our financial status. If we determine that we may be unable to meet our obligations to those counter-parties or otherwise continue to fund our operations, we will request additional financing from our bank or other credit sources to

fulfill our obligations to our customers and clients. If we cannot remedy a capital deficiency, we will file appropriate notices with our regulators and immediately.

Mission Critical Systems

Our firm's "mission critical systems" are those that ensure prompt and accurate processing of securities transactions, including order taking, entry, execution, comparison, allocation, clearance and settlement of securities transactions, the maintenance of customer accounts, access to customer accounts and the delivery of funds and securities. More specifically, these systems include:

Mission Critical System Function Provider Contact Information

Our firm establishes and maintains our business relationships with our customers and performs the mission critical functions of order taking and entry and execution. Our clearing firm provides, through contract, the execution, comparison, allocation, clearance and settlement of securities transactions, maintenance of customer accounts, access to customer accounts and the delivery of funds and securities.

Our clearing firm contract provides that our clearing firm will maintain a business continuity plan and the capacity to execute that plan. Our clearing firm represents that it will advise us of any material changes to its plan that might affect our business or customers [and has presented us with an executive summary of its plan, which is attached]. In the event our clearing firm executes its 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 clearing firm 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 clearing firm represents that it will assist us in seeking services from an alternative source.

Our clearing firm represents that it backs up our records at a remote site. Our clearing firm represents that it operates 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 clearing firm has also confirmed the effectiveness of its back-up arrangements to recover from a wide scale disruption by testing.

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 disruption, 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. Our clearing firm has the following SBD recovery time and resumption objectives: recovery time period within 4-6 hours and resumption time of the same business day. Robert Laura will periodically review our clearing firm's capabilities to perform the mission critical functions the clearing firm has contracted to perform for our firm.

Our Firm's Mission Critical Systems

Order Taking

Currently, our firm receives orders from customers via phone or in-person visits by the client. During an SBD, we will continue to take orders through these methods that are available and reliable. As communications permit, we will inform our customers what alternative methods are available for sending orders. Customers will be informed of alternatives by phone, email or posting on the firm's website. If necessary, we will advise our customers to place orders directly with our clearing firm at Charles Schwab and Co.

Order Entry

Currently, our firm places customer orders through the Charles Schwab Advisor Center. In the event of an SBD impacting order entry and execution, we will enter and send orders to our clearing firm by the fastest alternative means available. In the event of our clearing firm experiences an SBD impacting order entry or execution, we

will maintain the order in electronic format and deliver the order to the clearing firm by the fastest means available when it resumes operations.

Alternate Communications Between the Firm and Customers, Employees and Regulators

A. Customers

In the event of an SBD, we will identify whether there are any limitations on our ability to communicate with customers. Depending on the limitations, we will employ alternate modes of communication, including our website, phone or email, to communicate with customers. When an alternate mode of communication is used we will consider any increased risk of cybersecurity events stemming from the alternate mode.

B. Employees

In the event of an SBD, we will identify whether there are any limitations on our ability to communicate with employees. Depending on the limitations, we will employ alternate modes of communication, including our website, phone or email, to communicate with employees. When an alternate mode of communication is used we will consider any increased risk of cybersecurity events stemming from the alternate mode.

Consistent with FINRA Rule 4511 (General Requirements), we will also employ the use of office-wide phone, email or text messages so that senior management can reach all employees quickly during an SBD. In addition, in the event that employees move to a back-up location or remote location for an extended period of time (e.g., due to a pandemic), we will circulate updated employee contact information within the firm to maintain service.

C. Regulators

We are currently members of the following self-regulatory organizations (SROs), and are also regulated by: The State of Michigan. Contact information for these regulators are
Department of Licensing and Regulatory Affairs (LARA)
Corporations, Securities & Commercial Licensing Bureau (CS&CL)
Securities and Audit Division
Address: PO Box 30018, Lansing, MI 48909
Overnight Mail (FedEx/UPS): 2407 N. Grand River Ave, Lansing, MI 48906
Phone: (517) 335-5237

In the event of an SBD, we will identify whether there are any limitations on our ability to communicate with regulators. Depending on the limitations, we will employ alternative modes of communication, including [our website, phone or email], to communicate with regulators. When an alternate mode of communication is used we will consider any increased risk of cybersecurity events stemming from the alternate mode.

In the event that we have relied on any guidance or temporary regulatory relief from a regulator during an SBD, we will document our reliance.

Critical Business Constituents, Banks and Counter-Parties

Business Constituents

In the event of an SBD related to 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), we will contact our critical business constituents and determine the extent to which we can continue our business relationship with them in light of the SBD.

Banks

In the event of an SBD related to our financing, we will contact our banks and lenders to determine if they can continue to provide the financing. The bank maintaining our operating account is: Fifth Third Bank.

Counter-Parties

In the event of an SBD related to our financing, we will contact our critical counter-parties, such as other broker-dealers or institutional customers, to determine if we will be able to carry out our transactions with them in light of the SBD. Where the transactions cannot be completed, we will work with our clearing firm or contact those counter-parties directly to make alternative arrangements to complete those transactions as soon as possible.

Regulatory Reporting

Our firm is subject to regulation by: The State of Michigan. We fulfill our regulatory reporting obligations using electronic means and the [FINRA Gateway](#).

In the event of an SBD, we will identify whether there are any limitations on our ability to fulfill our regulatory reporting obligations. Depending on the limitations, we will employ alternate modes of communication, including our website, phone or email, to communicate with regulators in fulfilling our regulatory reporting obligations. In the event we are unable to fulfill a regulatory reporting obligation in a timely manner we will notify our regulator at:

Department of Licensing and Regulatory Affairs (LARA)
Corporations, Securities & Commercial Licensing Bureau (CS&CL)
Securities and Audit Division
Address: PO Box 30018, Lansing, MI 48909
Overnight Mail (FedEx/UPS): 2407 N. Grand River Ave, Lansing, MI 48906
Phone: (517) 335-5237

Disclosure of Business Continuity Plan to Customers

Attached is our written BCP disclosure statement we provide customers at account opening. We also post the disclosure statement on our website and mail it to customers upon request.

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 clearing firm. In addition, our firm will review this BCP annually to determine whether any modification are necessary due to changes in our operations, structure, business or location or those of our clearing firm.

Succession of Key Personnel

Drummond Osborn will notify the firm's custodian, its clients, and the appropriate regulatory authority in the event of Mr. Laura's death or incapacity.

Senior Manager Approval

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

Signed: _____

Title: _____

Date: _____