

G.A. Repple & Company

Business Continuity Plan (BCP)

Revised September 8, 2021

Each Financial Regulatory Authority ("FINRA") member must create and maintain a written business continuity plan identifying procedure relating to an emergency or significant business disruption. Such procedures must be reasonably designed to enable the member to meet its existing obligations to customers. In addition, such procedures must address the member's existing relationships with other broker-dealers and counter-parties. The business continuity plan must be made available promptly upon request to FINRA staff.

Rule: FINRA Rule 4370(a)

I. Emergency Contact Persons

Our firm's three designated emergency contact persons are:

Name & Position	Business Phone	Alternate Phones	E-mail Address
Glenn A. Repple, President; Chairman of the Board; Gen Sec Principal;	407-339-9090	407-696-7228 h 407-310-8664 c	glenn@garepple.com
Bryan A. Repple, President; GAR Insurance Svcs;	407-339-9090	407-221-9042 c	bryan@garepple.com
Timothy G. Moyer: Chief Operating Officer (COO); Compliance Officer (CCO)	407-339-9090	407-415-2009 c	tmoyer@garepple.com

The firm's Chief Compliance Officer (CCO) will review these emergency contact names and information annually during the first quarter of each year or as needed to add or update. This information will be corrected or updated in the event of any changes.

Rule: FINRA Rule 4370(f)(1) and (2)

II. Firm Policy

Our firm's policy is to respond to a Significant Business Disruption (SBD) by safeguarding employees' lives and firm property to the best of our ability with prudence and reasonability, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of the firm's books and records, and assuring that our customers can continue to transact business. In the event that we determine we are unable to continue our business, we will assure that customers have prompt access to their funds and securities through our correspondent relationships.

Rule: FINRA Rule 4370(e)

A. 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 clearing firm.

Rule: FINRA Rule 4370(a)

B. Approval and Execution Authority

As of February, 2020, Timothy G. Moyer, a registered securities principal, was named the COO of G. A. Repple & Company. In this capacity he is responsible for approving the Business Continuity plan and for conducting the required annual review. Moyer, also the CCO, is responsible for updating the plan and has been given the authority to execute this BCP.

Rule: FINRA Rule 4370(d)

C. Plan Location and Access

Our firm will maintain for inspection copies of its BCP plan and the annual reviews, and the changes that have been made to it. A hard copy of the plan will be stored by the CCO in our Compliance Dept. An electronic copy of our plan is located on our internal network server in the following folder:

<H:\Compliance Dept\Compliance\BusinessContinuityPlanning>

III. Business Description

Our firm conducts business primarily in mutual funds, variable insurance, direct participation programs, equities and fixed income. Our firm is an introducing firm and does not perform any type of clearing function for itself or others. Furthermore, we do not hold customer funds or securities. We accept and enter orders. All brokerage transactions are sent to our clearing firm, which executes our orders, compares them, allocates them, clears and settles them. Our clearing firm also maintains our customers' accounts, grants access to customer accounts, provides statements and confirms, and delivers funds and securities. Our firm serves only retail customers.

Our clearing firm is National Financial Services, LLC (a division of Fidelity Investments™)

Corporate Office: 82 Devonshire Street, Boston, MA 02109,

www.nationalfinancial.fidelity.com

Client Service Manager: Brandon Bower

Brandon.Bower@fmr.com

401-292-3299

Client Service Supervisor: Marcelle Estriplet

Marcelle.Estriplet@fmr.com

212-335-5614

Relationship Manager: Keith MacDougal
Keith.macdougall@fmr.com 770-657-1166

Senior VP- Regional Managing Director: David Brown
david.brown@fmr.com 212-335-5064

NFS Customer Support (Back Office support only) [1-800-877-2410](tel:1-800-877-2410); GA Repple ID- 412173

All transactions that are not through an NFS Brokerage account are done by application way and are sent to the respective fund, program, escrow agent or insurance sponsor. All customer assets are held by the sponsor or escrow agent. Our firm does not hold any customers' funds or securities. These direct business accounts are maintained and serviced by the related sponsors and/or the transfer agents acting on their behalf. Customers would continue to have uninterrupted access to these accounts in the event of an SBD that might affect the firm.

Rule: FINRA Rule 4370(c)(10)

IV. Office Locations

A. Main Office Location

Our primary office is our Home Office located at 101 Normandy Road, Casselberry, FL 32707. Its main telephone number is 407-339-9090. Our employees may travel to that office by means of foot, car or public transportation. We engage in order taking and entry at this location. We also perform various administrative and accounting functions at this location.

V. Alternative Physical Location(s) of Employees

In the event of an SBD, we will move our staff from affected offices to the closest of our unaffected independently operated branch office locations. Below are three of our larger branches that could be used in the event of an SBD.

Name of Office	Office Address	Telephone
Avanti Wealth Management (Bilello)	110 Crown Oak Centre Drive Longwood, FL 32750	407-331-7330
Integrity Financial Services (Wahl)	4411 E Arlington Street Inverness, FL 34453	352-726-4379
Dan Hardt Financial Services (Hardt)	4350 Brownsboro Rd, Suite 110, Louisville, KY 40207	502-893-4381

If no other office location is available to house staff, we will move them by departments to the unaffected residences of one or more of the company's registered Principals.

Name of Principal	Home Address	Primary Telephone
Glenn Repple	4932 Tuskabay Ct, Winter Springs, FL 32708	407-699-7228

If the SBD is predicted to last more than a few days, we will immediately begin searching for alternative commercial space and implement that as quickly as possible.

Rule: FINRA Rule 4370(c)(6).

VI. Customers' Access to Funds and Securities

Our firm does not maintain custody of customers' funds or securities. These are maintained at our clearing firm, National Financial Services, LLC. In the event of an internal or external SBD, if telephone service is available, our registered persons will take customer orders or instructions and place orders via the Internet on either the NFS' FBSI or Streetscape platforms. If our Web access is available, our firm will post on our Web site that customers may access their funds and securities by contacting their representative. The firm will make this information available to customers through its disclosure policy.

If the Securities Investor Protection Corp. ("SIPC") determines that we are unable to meet our obligations to our customers or if our liabilities exceed our assets in violation of Securities Exchange Act Rule 15c3-1, SIPC may seek to appoint a trustee to disburse our assets to customers. We will assist SIPC and the trustee by providing our books and records identifying customer accounts subject to SIPC regulation.

Rule: FINRA Rule 4370(c)(10)

VII. Data Back-Up and Recovery (Hard Copy and Electronic)

HARD COPY RECORDS: Our firm maintains its primary hard copy books and records and its electronic records at the Home Office located at 101 Normandy Road, Casselberry, FL 32707. The firm's CCO is responsible for the maintenance of primary and back-up books and records. Our firm maintains the following document types and forms that are not transmitted to our clearing firm:

- All internal Broker/Dealer books and records, financial statements, bank records, correspondence, advertising, licensing records, applications for brokerage accounts that do NOT have check-writing capability and other non-originally signed NFS documents. In addition, we maintain all correspondence or servicing information concerning all direct business accounts.

Our firm maintains its back-up hard copy books and records at Iron Mountain Orlando (800-899-4766), located at 3600 Shader Rd, Orlando, FL 32808. Use of this facility began in Feb. of 2016. Records older than Feb 2016 are stored at Uncle Bob's Self Storage, 130 Concord Drive, Casselberry, FL 32707. Additional older back-up records are stored at the residence of the company's President, Glenn Repple, at 4932 Tuskabay Court, Winter Springs, FL 32708.

These records include paper copies, CDs, DVDs and image files. Our firm backs up its paper records by scanning them to electronic image storage and then transporting the paper to our back-up site. We back up our records as they are created and periodically transport them to the backup storage location.

ELECTRONIC RECORDS: We currently employ the services of TechQuility , Inc., a local IT company to provide custom hardware and commercial software support. TechQuility specializes in data storage and protection, spam filtering and in hardware maintenance and support. This company is responsible for the support of our internal and external servers.

Envy Labs, a local IT company was responsible for the creation in 2005 of our proprietary back office commission accounting software known as "RECAP". This software has been retired from active use as of Dec 31, 2013. We employ the services of Landmark Technology Ptnrs. for the "if and as needed" maintenance of this software. We plan to try to maintain this program as an active information archive for the FINRA required retention period.

As of January 1, 2016, the firm entered into agreement with J-Core, a commercial commission accounting software provided by Giacomo of Shrewsbury, NJ. All current commission accounting is occurring on J-Core and the rep on-line version, J-Pass. Our usage of this Java-based software is by secure internet connection. All primary data is created and stored on secure servers owned and maintained by Giacomo in secure locations in New York and other cities. Redundant backup copies of this data are also stored locally by the firm on our internal server system in the event of a catastrophic failure of the primary backup system.

CURRENT HARDWARE SYSTEM: The majority of our electronic information is stored in our internal server installation on a group of servers holding multiple hard drives. This installation is located in a protected area of our home office in an interior room with no outside access. This room is secured by a dead bolt lock. Access to this room is restricted to authorized and qualified personnel and service people. TechQuility provides on-going support to all of our server installations.

The internal servers are protected initially by two large UPS Battery backup systems that provide surge protection and back up power in the event of minor intermittent power failures. In the event of a longer term power failure, we have a portable gasoline powered generator that is capable of supporting the servers for a period of several days. This portable generator will provide sufficient power to run the critical functions of the office.

ENHANCEMENTS TO OUR SYSTEMS: Several major components of our network system have been removed from the internal office location to the more secure Data Center operated by Slicehost. This move was completed during the second quarter of 2009. In November of 2012, Slicehost changed its name to RackSpace.

This remote location, with limited and monitored access to the physical equipment, has redundant systems for backup power generation and the ability to withstand most common business interruptions. The location is staffed 24 hours a day with technical personnel. It is supplied with immediate battery power enabling emergency operations at full load for the short term with longer term back-up generators available. The available on-site generators have a 7 day underground fuel supply on hand.

TechQuility is also providing an ongoing cloud backup of our internal servers. This system backs up the new data approximately every 30 minutes and adds it to the existing archive. In the

event of an SBD that would render our server hardware unusable, TechQuility can assist us in activating our server in the cloud and it can function as usual from there until we can resume on our existing hardware. In the event our server hardware is damaged and must be replaced, TechQuility can provide replacement hardware within hours or it can be purchased locally from commercial outlets. The new server hardware can be configured and have the cloud backup restored in a matter of hours. If our primary site is inoperable, we can continue operations from our back-up site or an alternate location

Access to the servers will be available to Firm employees via a VPN connection established by TechQuility who is responsible for servicing these servers when necessary. This connection will be the normal method of accessing data on a routine basis during normal daily business operations from our office. In the event of either an Internal or External SBD, there should be no noticeable difference in our ability to access our servers if we are forced to move to temporary sites.

Additional storage space is maintained with Amazon web for the archiving of our Recap document database and other data requiring a large volume of space. In the event of an internal or external SBD that causes the loss of our paper records, we will physically recover them from our electronic storage. If our primary site is inoperable, we will continue operations from our back-up site or an alternate location.

INTERNET ACCESS: As of June 2012, we resumed our internet service with Spectrum and elected a high-speed internet service. This new Spectrum system has proven to be significantly more reliable on a daily basis than our previous microwave-based cable connection. In 2019, we upgraded our internet connection to a 50/50 Mbps high speed line. We use the telephone service company, Flowroute.com, to provide a trunk for a better SIP.

Rule: FINRA Rule 4370(c)(1).

VIII. Financial and Operational Assessments

A. Operational Risk

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 counter-parties, 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, telephones, cell phones, voice mail and secure email. In addition, we will retrieve our key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic).

Rule: FINRA Rules 4370(c)(3)

B. Financial and Credit Risk

In the event of an SBD, 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 net capital compliance. We will contact our clearing firm, critical banks, and investors (if appropriate) 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 net capital deficiency, we will file appropriate notices with our regulators and immediately take appropriate steps (as applicable), including filing net capital deficiency notices, contacting our regulatory and governing bodies, notifying our clearing firm and beginning actions to cease operation.

Rule: FINRA Rules 4370(c)(3)

IX. Mission Critical Systems

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

- Maintenance of communications with and between representatives, OSJ branches and the home office
- Supervision of securities functions, licensing and compliance
- Receipt and processing of all new account applications
- Placement of customer transactions and orders
- Receipt and deposit of funds received for deposit to NFS brokerage accounts
- Customer service requests to include additional investments, withdrawals and administrative services

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 and entry. Our clearing firm provides, through contract, the 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 related to brokerage.

Our clearing firm contract provides that our clearing firm will maintain its own 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 ability to maintain our business and has presented us with an executive summary of its plan, which is attached as Page 15. In the event our clearing firm executes its plan, it represents that it will notify us of such execution and will 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 firm has executed a Letter of Understanding with NFS, under which NFS offers to provide an alternative business location to the firm in the event of a SBD which results in the firm's inability to conduct business. This location is intended for short-term emergency use but will provide an immediate option if needed. Included in the services that would be available are computer, telecommunication, internet, operational, premises and/or employee support.

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 periodically to ensure effectiveness.

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 committed to the following SBD recovery time and resumption objectives: primarily to maintain uninterrupted services, but in extreme cases, recovery and resumption time period of the same day.

A. Our Firm's Mission Critical Systems

1. Order Taking

Currently, our firm receives orders from representatives and their customers via telephone, fax, e-mail, through the representative's NFS Wealthscape website (www.wealthscape.com), on the customers' NFS Wealthscape Investor website (www.wealthscapeinvestor.com) or by in-person visits by the customer. 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 representatives and customers when communications become available to tell them what alternatives they have to send their orders to us. Customers will be informed of alternatives by contacting their respective representatives.

2. Order Entry

Currently, our firm's representatives receive orders by recording them on paper and/or electronically and then by sending them to our clearing firm electronically by using the order entry function on the NFS Wealthscape website. Alternately, we place customer orders telephonically. Under our contract with NFS we can request that they handle money movement, cashiering and service requests in the event of an SBD. A written agreement is in place to authorize NFS on our notice to release for execution any customer orders that may otherwise be held up by any systems failure in the event of an SBD.

In the event of an internal SBD, we will enter and send transactions to our clearing firm by the fastest alternative means available, which include internet, telephone, fax and email. In the event of an external SBD, we will maintain the order in electronic or paper format, and deliver the order to the clearing firm by the fastest means available when it resumes operations.

3. Order Execution

Order execution is provided to our firm and its customers by NFS for brokerage and by the individual product sponsors for direct application way business.

B. Mission Critical Systems Provided by Our Clearing Firm

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

One provision of this contract included our choosing to change our method of internal access to a back-office system referred to as FBSI. This is an NFS information and entry system which is used on a daily basis by our trading department. We have discontinued the use of a partial T-1 hard wired connection only available in our physical office location and requiring an active telephone and power services to function. It has been replaced with the "Correspondent Gateway" which is an internet-based VPN portal that allows access from any computer with access to our VPN connection. This will result in a significant cost saving as well as allowing us far greater flexibility in allowing us to access this system in an emergency.

Rule: FINRA Rules 4370(c)(2)

X. Alternate Communications Between the Firm and Customers, Employees, and Regulators

A. Customers

We now communicate with our representatives and their customers using the telephone, e-mail, our Web site, fax, U.S. mail, and in person visits at our firm or at the other'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 have 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.

Rule: FINRA Rule 4370(c)(4)

B. 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. We will also employ a call tree so that senior management can reach all employees quickly via cell phone during an SBD. We have identified supervisory staff, noted below, who will initiate the call tree process to notify all affected staff. The person to invoke use of the call tree is: Glenn Repple, President and Chairman of the Board.

Level 1	Level 2	Level 3	
Glenn Repple, Pres. Chairman of the Board 407-310-8664			<i>Updated: 8-29-2019</i>
	Bryan Repple: CEO-Repple Fin Group, Pres.- Repple Insurance Services 407-221-9042		
		Marisa Rosado 352-557-1017	
	Timothy G. Moyer: COO, CCO G.A. Repple & Company 407-415-2009		
		Holly Rogers 407-927-3660	
		Linden Gould 407-462-0092	
		Kathy Gould 407-620-6229	
		Kevin Harris 407-288-2110	
		Jasmine Bravo 321-960-7424	
		Ethan Hughlett 913-375-6150	
		Steven Strohl 407-457-9645	
		Jessyca Strohl 407-383-6516	
		Allen Keller 813-447-8211	
		Hunter Moyer 407-810-6407	
		Lily Golembowski 407-383-6517	

Rule: FINRA Rule 4370(c)(5)

C. Regulators

We are currently members of the following SROs: SEC, and FINRA. We communicate with our regulators using the telephone, e-mail, fax, U.S. 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.

Rule: FINRA Rule 4370(c)(9)

XI. Critical Business Constituents, Banks, and Counter-Parties

A. 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 a SBD to them or our firm.

Below is a list of our major suppliers and some recent enhancements to their services:

- **Duke Energy (Power)** [800-228-8485]
 - We have replaced our previous connection via a residential power grid with a new commercial connection to a more reliable power grid serving the major roadway area at the front of our building. This is providing much higher power reliability and has incurred fewer service interruptions.
- **Spectrum {name changed from BrightHouse} (Cable/Internet Services)** [877-824-6249 (acct# 0050204900-01)]
 - The installation of this microwave technology as our primary internet connection has significantly increased the reliability of our internet access.
- **National Financial Services-technical support (Brokerage Trading/Support)**
 - A new internet-based connection has replaced our previous hard-wire T-1 line. This new connection provides a faster, less expensive data connection to NFS' internal processing and information systems that can now be accessed from any internet connection in the event that there is damage to our primary location.
- **UPS (Package Shipping)** [800-811-1648 (acct# 00004397RE)]
 - Overnight package delivery and tracking service.
- **TechQuility , Inc. (On-site hardware/commercial software/OS/Windows Exchange)** [321-283-4333]
 - Provides desktop computer equipment and maintenance, network equipment and maintenance, spam filtering, commercial software support
- **Jacomo (Commission Software)** 732-917-6322
 - Provides support for our proprietary commission accounting software ("RECAP").

Rule: FINRA Rule 4370(c)(7)

B. Banks

We have contacted our banks and lenders to determine if they can continue to provide the financing that we will need in light of the internal or external SBD. We have two primary banking relationships.

SunTrust Bank:

Lino A. Mancebo, Cust Svc,

Branch: 205 E. Semoran, Fern Park, FL 32730; 407-331-2100

If our banks and other lenders are unable to provide the financing, we will seek alternative financing immediately from the nearest available bank.

Rule: FINRA Rule 4370(c)(7)

C. Counter-Parties

We have no counter-parties with whom we have regular dealings. All transaction clearing and settlement is handled on our behalf by NFS.

Rule: FINRA Rule 4370(c)(7)

XII. Regulatory Reporting

Our firm is subject to regulation by the SEC, FINRA and any of the 50 states. 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.

- SEC/Washington: 202-942-8090
- SEC/Atlanta, GA: 404-842-7600
- FINRA/Rockville, MD: 301-590-6500
- FINRA/Boca Raton, FL: 561-443-8000

Rule: FINRA Rule 4370(c)(8).

XIII. Disclosure of Business Continuity Plan

We have posted a written BCP disclosure statement on our firm website, www.garepple.com.

We will also mail it to customers upon request. A copy of our summary disclosure statement is attached as Page 14 of this document followed by NFS' summary disclosure statement on Page 15.

Rule: FINRA Rule 4370(e).

XIV. Updates and Annual Review

Our firm's CCO will review this BCP annually, during the first quarter of the year, and modify it if needed with any changes in our operations, structure, business, or location or those of our clearing firm. In addition, our firm will update this plan as needed whenever we have a material change as described above.

The firm's CEO will review and approve the plan annually.

Rule: FINRA Rule 4370(b)

XV. 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.

Rule: FINRA Rule 3510(d)

Signed:

Title: Glenn A. Repple

Date: Update: September 8, 2021

G.A. Repple & Company

Business Continuity Statement

The independent financial advisor that you have chosen is associated with, and supervised by, G.A. Repple & Company, a registered Broker/Dealer and Investment Advisor. Together, your financial advisor and this firm recognize the importance of maintaining the highest possible quality of services for your accounts with us.

The Financial Industry Regulatory Authority (FINRA) [formerly National Association of Securities Dealers] which makes rules to protect you, the investor, has directed us to devise plans to respond to a variety of possibilities that might disrupt our ability to provide continuous service to you. They have also directed us to provide a summary of this information to you.

Business Interruptions:

Our team has developed plans that include the ability to recover from situations of varying severity that include, but are not limited to, unplanned evacuations, power outages, major water leaks, fire, severe weather, earthquakes, pandemics and any facilities failure that may cause business interruptions. We are designing our plans to prioritize our responses according to their time cruciality. Key features of the plans would include employee safety considerations, annual reviews and testing by various departments to assure that our plans are effective.

Our Business Partners:

- If a business interruption occurs at G.A. Repple and Company, you should be able to access your account information by contacting either your financial advisor or the investment company with whom you have your account. You should consult a recent statement for a phone number to contact the investment sponsor.
- If your account is a brokerage account with National Financial Services [NFS], you may have account access via Wealthscapeinvestor.com, or by calling your financial advisor. NFS is also required to have and distribute to all customers a copy of their own plan for handling any business interruptions. You may receive a copy of that summary in addition to this one.

Business Continuation:

It is our intent to recover from any business interruptions as quickly as possible. Our plans call for the use of generators in the event of loss of power lasting longer than four hours. In the event that our physical plant is damaged, it would be our intent to move to a secondary location in order to resume normal operations as quickly as possible. To protect our computer data, we have installed information backup systems and redundancy methods. We have also implemented an off site storage process to safeguard our backup copies. In the event that damage was extensive and widespread, we would plan to re-locate our offices in an unaffected location and resume operations from there.

Notifications:

- In the event G.A. Repple & Company's business is interrupted, we would attempt to notify our associated financial advisors as quickly as possible. We will request NFS to assume control of trading and account functions until we can resume normal operations. We may also delegate supervisory responsibility to other management level personnel at other locations in the event of a business interruption.
- G.A. Repple & Company will communicate with its regulatory agencies regarding the nature and extent of any significant outage as required by law.

Plan available for review:

You may request a copy of the current Business Continuity Plan at any time by writing to us at the address on this letter.

NATIONAL FINANCIAL SERVICES, LLC**Business Continuity Statement**

As you may know, your broker/dealer and National Financial Services LLC (NFS) have an agreement in which NFS may provide trade execution, clearing, and other related services for your brokerage account. In connection with these services, NFS is required to communicate its position on business continuity practices.

At NFS, we recognize how heavily you and your broker/dealer rely on our systems and services. We also recognize that the unexpected can and does occur—from simple situations to major outages. NFS has successfully supported critical business activities during disruptions of normal business processes resulting from hurricanes, tornados, blizzards, and other natural and man-made disasters. NFS wants you to know that we have an extensive plan in place to safeguard your assets and protect vital account information in the event of a business disruption.

NFS departments have pre-established contingency and disaster recovery plans. Components of these plans are tested periodically to ensure effectiveness. NFS and its affiliated companies consider contingency planning to be an iterative process, requiring ongoing review to assess various risks and appropriate responses. As a result, this plan may change as necessary. Please feel free to contact your broker/dealer at any time to receive the most recent version of our Business Continuity Statement.

NFS Continuity Planning Guidelines

NFS has developed plans that include the ability to recover from situations including, but not limited to, unplanned evacuations, power outages, major water leaks, fire, loss of water, severe weather, and any facilities failures that may cause business interruptions. Plans are designed to account for business interruptions of various lengths and scope and require that NFS is able to recover critical functions according to their time criticality. Key features of NFS's corporate disaster recovery planning include annual reviews of the following:

- Identification of all mission critical systems (and system backup and recovery for such systems)
- A review of financial and operational risks
- Alternate communications between NFS and your broker/dealer
- Employee safety strategies and communications
- Systems and telecommunications accessibility
- Alternate physical site location and preparedness

A corporate business continuity division articulates planning guidelines and coordinates response and event management across all NFS departments. Each NFS department has dedicated business contingency planners to prepare and test its specific plan. Each NFS department also follows enterprise-wide guidelines for contingency planning and disaster recovery from various scenarios.

NFS Contingency Planning and Business Recovery

NFS mitigates risks to reduce potential issues and impact. In the event of an outage, NFS has tested plans to support recovery of its critical business functions. In addition to following the guidelines stated above, NFS's recovery plans also include the following:

- **Employee Safety** – NFS companies place an emphasis on employee safety. We conduct regular evacuation drills which are led by trained floor wardens and supervised by on-site security personnel.
- **Backup Power** – Sites that support trading and operations are located in buildings with Uninterrupted Power Supply (UPS) and backup generators.
- **Separate Sites** – NFS is located in two primary locations in separate cities. NFS also has additional offices for certain trading and relationship support functions. These separate sites provide backup for certain critical functions.
- **Contingencies for Inclement Weather** – If there is a forecasted weather emergency, hotel rooms are obtained for essential personnel. If the weather emergency could result in an inability to access the primary site, the alternate site would be prepared for use and personnel would be sent there prior to the event. A number of personnel have remote access so they can work from home. Employees can access phone mail and e-mail messages remotely.
- **Contingencies for Pandemic** – If there is a pandemic such as the COVID-19, the firm has put in place procedures that are flexible to address. Protocols may include the following:
 - implementation of social distancing policies and capabilities;
 - distribution of hand sanitizers, masks, gloves and hygiene products;
 - increased sanitizing and disinfecting of facilities;

- increased use of communication channels to disseminate important health and safety;
- travel restrictions and quarantines (voluntary and/or mandatory) often based on CDC recommendations;
- minimization or elimination of group meetings;
- enhanced use of remote meeting and conference call capabilities;
- reassessment and revision of human resource policies and testing of information technology (IT) and remote work capabilities; and
 - increased allowable sick time and encouragement to use such time.
- **Designated Contingency Site** – There are pre-established, tested processes for rerouting of critical hotline numbers. In the event of a site outage, customers should experience minimal downtime in their ability to contact NFS.
- **Alternate Site Tests** – NFS conducts alternate site tests for its critical functions at least twice per year. Tests include verification of desktops, records, and re-routing of key hotlines.
- **Notification to Clients** – Procedures for notifying your broker/dealer have been established for NFS associates to follow in the event of an outage. Notification will include information regarding length of outage, instructions for contacting NFS, and support information (e.g., where to send faxes, issues pertaining to data transmissions and communications).

- **Regulatory Reporting** – NFS's business contingency plans are designed to ensure that, regardless of the length of an outage at a primary location, NFS's ability to continue to meet regulatory requirements, as mandated by the Securities and Exchange Commission, NYSE, and FINRA, would not be impacted.
- **Communications With Regulators** – NFS will communicate with its regulatory authorities regarding the nature and extent of any significant outage at a primary location, as required by applicable law and regulation.
- **Access to Your Funds** – A site outage at NFS would not impact your ability to have access to your available funds, as NFS's business continuity plans are designed to ensure sustained service. However, your ability to trade your available funds may be impacted by market events outside of NFS's control, such as when the market was closed following the September 11 tragedy. Our tested business continuity plans result in necessary personnel being available to approve transactions that result in the disbursement of available funds. In the event that your broker/dealer ceases operations, customers can call the NFS Customer Service Line at 617-563-5977.

If you have any questions, please contact your broker/dealer.