

Continued business operations are critical for Hillspring Financial, Inc. (“HFI”). We will attain continued business operations by following our Business Continuity and Disaster Plan as follows:

### **Emergency Contact Persons**

HFI’s two emergency contact persons are: Kent Forsey, (623)583-6141, info@hillspringfinancial.com and Alan Cox, (623)583-6141, alan@hillspringfinancial.com. These names will be updated in the event of a material change, and our Executive Representative will review them annually.

### **Firm Policy**

HFI’s policy is to respond to a Significant Business Disruption (“SBD”) by safeguarding employees’ lives and firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of HFI’s books and records, and allowing our customers to transact business. In the event that HFI determines we are unable to continue our business; we will assure customers prompt access to their funds and securities.

### **Significant Business Disruptions**

Our plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only HFI’s ability to communicate and do business, such as fire in our building, death or incapacitation of a principal. In the event Kent Forsey becomes incapacitated or upon their death, Alan Cox, will notify all critical business constituents as well as all regulators who have jurisdiction over the business of HFI within 24 hours. Alan Cox will make sure that the credit demands of HFI are met.

Notification shall be given to all clients of HFI within five (5) business days from the death or incapacitation of any key persons of HFI. 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 the Client’s respective clearing firm.

### **Approval and Execution Authority**

Kent Forsey, Chief Compliance Officer, is responsible for approving the plan and for conducting the required annual review. Kent Forsey has the authority to execute this BCP.

### **Plan Location and Access**

HFI will maintain copies of its BCP plan and the annual review, and the changes that have been made to it for inspection. An electronic copy of our plan is located in a secure location.

### **Business Description**

As of November 15, 2017, Kent G Forsey, CFP® is the principal owner of Hillspring Financial, Inc. While ownership and firm name have changed, Hillspring Financial, Inc. (“HFI”) has proudly been serving clients since 1983 with Kent G Forsey, CFP® as President since August 18, 2011.

### **Office Location**

HFI’s main office is located at 12213 W Bell Rd, Ste 209, Surprise, AZ 85378. Its main telephone number is (623)583-6141.

### **Alternate Physical Location**

In the event of an SBD, HFI will move business operations to 12306 W Castle Rock Ct, Sun City West, AZ 85375.

### **Customers’ Access to Funds and Securities**

HFI does not maintain custody of customer’s funds or securities, which are maintained at our clearing firm, TD Ameritrade. In the event of an internal or external SBD, if telephone service is available, customers may access their funds and securities by contacting TD Ameritrade at 800-613-2401.

### **Data Back-Up and Recovery (Hard Copy and Electronic)**

HFI maintains its primary electronic and hard copy books and records at 12213 W Bell Rd, Ste 209, Surprise, AZ 85378. HFI backs up its electronic records daily on a web-based backup system in order to allow rapid resumption of the activities of HFI. In the event of an internal or external SBD that causes the loss of our records, HFI will recover them from our electronic back up.

### **Financial Operational Assessments**

#### **Operational Risk**

In the event of an SBD, HFI will immediately identify what means will permit us to communicate with our clients, employees, critical business constituents, critical banks, critical counterparties, and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options HFI will include our telephone voice mail, and secure e-mail. In addition, HFI 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, HFI 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 compliance with any net capital requirements. We will contact our clearing firm, critical banks, to apprise them of our financial status. If HFI determines that we may be unable to meet our obligations to those counterparties 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.

**Alternate Communications between HFI and Customers, Employees, and Regulators**

**Customers**

HFI now communicates with our customers using the telephone, e-mail, our Web site, or U.S. mail. In the event of an SBD, HFI will assess which means of communication are still available and use the means closest in speed and form 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.

**Employees**

HFI now communicates 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 and oral) to the means that we have used in the past to communicate with the other party.

**Critical Business Constituents**

HFI has 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. HFI will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services when we need them because of an SBD to them or HFI. Our major suppliers/vendors/affiliates are:

Company Name	City, State	Phone	Services provided
RIA Registrar	Arden Hills, MN	800-441-1219	Compliance consultant
TD Ameritrade	Irving, TX	800-613-2401	Custodian
Pacific Financial Group	Bellevue, WA	866-612-5808	Sub-advisor/TPM
AssetMark	Lynchburg, VA	800-664-5345	Sub-advisor/TPM
Bank Of America	Tampa, FL	888-287-4637	Bank
Computer Works	Surprise, AZ	623-428-5343	IT

**Regulatory Reporting**

We now file reports with our regulators using paper copies in the U.S. mail, and/or electronically using, e-mail, and the Internet. In the event of an SBD, HFI will check with all appropriate regulators to determine which means of filing are still available to us and use the means closest in speed and form to our previous filing method. In the event that HFI cannot contact our regulators, we will continue to file required reports using the communication means available to us.

**Disclosure of Business Continuity Plan**

HFI provides in writing a BCP disclosure to customers upon request.

**Updates and Annual Review**

HFI will review annually and update this plan whenever HFI has a material change to our operations, structure, location or business.

**Chief Compliance Officer Approval**

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

Signed: \_\_\_\_\_ Title: \_\_\_\_\_ Date: \_\_\_\_\_

**Employee Acknowledgements**

I have received and understand this Business Continuity Plan.

Signed: \_\_\_\_\_ Title: \_\_\_\_\_ Date: \_\_\_\_\_

Signed: \_\_\_\_\_ Title: \_\_\_\_\_ Date: \_\_\_\_\_

Signed: \_\_\_\_\_ Title: \_\_\_\_\_ Date: \_\_\_\_\_