

Continued business operations are critical for Hillspring Financial, Inc. (“HFI”). In support of this, HFI has developed a Business Continuity and Disaster Recovery Plan (BCP) that provides guidance for the firm in the event of an unanticipated interruption of normal business operations. The BCP includes the recovery, resumptions, and maintenance of all aspects of the business, including data backup and recovery; mission critical systems; alternative communications with clients, employees, and regulators; critical third-party vendors; executive succession plans; and regulatory reporting.

Hillspring Financial, Inc. is an investment advisor and does not perform any type of clearing functions for itself or others and does not hold customer funds or securities. Custody of all client funds and securities are maintained by independent qualified custodians such as Charles Schwab, Interactive Brokers, and AssetMark Trust Company. In addition to maintaining client accounts, the custodians also grant clients access to their accounts and deliver funds and securities.

Below are a few examples of what might occur if HFI were to experience a business disruption of varying magnitude:

- If our office became unavailable or had a power outage, telephone calls would continue to be accessed remotely via our VOIP phone service and, if necessary, employees would be instructed to work from home.
- In the event of a public health crisis that resulted in a high rate of employee absenteeism, HFI would focus available personnel on critical business functions that directly support client needs. Additionally, we would enact our workforce continuity plan which includes a provision for employees to work from home.

Although HFI has taken significant steps to develop and implement sound business recovery practices, after significant business disruption clients may still experience delayed or reduced services or access as the firm recovers. While no contingency plan can eliminate all risk of service interruption or temporarily impeded account access, we regularly assess and update our plans to mitigate reasonable risk.