

# **BUSINESS CONTINUITY AND DISASTER RECOVERY PLAN**

Titan Retirement Advisors has developed this Business Continuity and Disaster Recovery Plan (the “Plan”) in order to provide guidance regarding the steps and actions that should be taken in the event of an unanticipated interruption of normal business operations. This document will outline the triggers for when alternate business processes need to be deployed, the steps to deploy the alternate business processes, the methods for verifying that business has been properly restored and ensuring data integrity and activities for returning to normal business processing. This Plan will help safeguard employees’ lives and firm property, allow a method of making financial and operational assessments, recover and resume business operations in a rapid and efficient manner, protect firm books and records, continue to allow clients to transact business at all times and provide clients with access to their funds and securities in the event the firm determines that it cannot continue to do business. All employees will receive a copy of this Plan and will sign an acknowledgement of receipt, review and understanding. (Exhibit C)

Titan Retirement Advisors has designated the following individuals as members of the Business Continuity Team:

- Josh Coughran, Managing Member, 713-239-2866, [josh@titan-advisors.com](mailto:josh@titan-advisors.com)

These team members are designated as the main emergency contact persons for the firm. The team members designated above will be responsible for developing the Plan. Josh Coughran will have the responsibility for approving the plan and ensuring Josh Coughran must approve the plan and will ensure that a review is conducted on at least an annual basis. In addition, Josh Coughran will be responsible for activating the Plan in the event of interruption to normal business operations.

The Plan will be updated whenever there is a material change to operations, structure, business, or location. In addition, the firm will review the Plan annually, on January 13, to modify it for any changes in operations, structure, business or location or those of clearing firm. Josh Coughran is responsible for maintaining and updating the Plan. Titan Retirement Advisors will maintain copies of the Plan, the annual reviews, and any changes that have been made to the Plan for inspection by regulators. A report will be prepared documenting the review of the Plan and any updates that are made. An electronic copy is located on the main computer server located at the firm's home office. Josh Coughran is responsible for making sure that all electronic versions are maintained in this location. Josh Coughran is responsible for maintaining hard copies. Hard copies will be maintained the physical files located at the firm's home office.

## **SIGNIFICANT BUSINESS DISRUPTIONS**

Titan Retirement Advisors has written this Plan anticipating two kinds of significant business disruptions (“SBDs”): internal and external. Internal SBDs affect the firm’s ability to communicate and do business (e.g., a fire in the building). External SBDs prevent the operation of the securities markets or a number of firms. Examples of an external SBD include terrorist attacks, a city flood, or a wide-scale, regional disruption. Firm response to an external SBD relies more heavily on other organizations and systems, especially on the capabilities of any clearing firms or outside investment adviser firms with which the firm has established a relationship.

## **BUSINESS DESCRIPTION**

Titan Retirement Advisors conducts a variety of advisory services to clients which may include, portfolio management; and pension consulting services. As part of implementing the advice provided, the firm may recommend equity securities, mutual funds, variable insurance products, fixed income securities, and derivative securities. Titan Retirement Advisors is an investment adviser and does not perform any type of clearing functions for itself or others. Titan Retirement Advisors does not hold customer funds or securities. An outside custodian recommended by the firm or selected by the client maintains custody of all client funds and securities. We accept and enter orders. All transactions are sent to an outside broker/dealer or custodian, which executes, compares, allocates, clears and settles orders. These custodians also maintain customers’ accounts, can grant customers access to them and delivers funds and securities. Clients will be made aware of the broker/dealer or other custodian through whom Titan Retirement Advisors will implement their transactions and will receive statements from these firms. The firm does not engage in private placements.

The firm utilizes broker dealer custodians typically chosen by the by the third party administrator for the retirement plan client.

## **OFFICE LOCATIONS**

Titan Retirement Advisors has the following office locations:

1. **Main Office Location.** The main office location is at 5757 Flewellen Oaks Lane, Suite 610 Fulshear, Texas 77441. The main telephone number at this location is 713-239-2866. Employees may travel to this location by means of foot, car, and bus. All types of business and services provided by Titan Retirement Advisors are performed from this location.

If business cannot be conducted from the main office location, business will be conducted from the closest available business location.

If no other office location is available to receive staff, the firm will move them to the residence addresses of the Managing Members of the firm. The following employees will be required to report to work at these alternate locations in the case of an SBD at the main office location:

<b>Employee Name</b>	<b>Title</b>
Josh Coughran	Managing Member

## **CUSTOMERS' ACCESS TO FUNDS AND SECURITIES**

Client funds are maintained with the custodial broker dealer chosen by the third party administrator for the retirement plan client. In the event of an internal or external SBD, if telephone service is available, investment adviser representatives will take customer orders and instructions and contact clients' custodians on behalf of the client. If firm Web access is available, Titan Retirement Advisors will post on its Website that customers may access their funds and securities by contacting the account custodian.

## **DATA BACK-UP AND RECOVERY (HARD COPY AND ELECTRONIC)**

Titan Retirement Advisors maintains its primary hard copy books and records and its electronic records at its main office location previously referenced in this document. Josh Coughran, *Chief Compliance Officer*, 713-239-2866 is responsible for the maintenance of these books and records. The firm maintains the following document types and forms:

- Financial records
- Organizational records (*Corp. Records, Partnership Records, etc.*)
- Form ADV annual delivery documents and logs
- A copy of firm written policies and procedures and any revisions made to this document
- A copy of the firm's Code of Ethics and any amendments to this document
- Records of any violations to the Code of Ethics and any actions taken as a result of the violations
- Written Acknowledgement Statements executed by employees acknowledging receipt of the firm's written policies and procedures and its Code of Ethics
- An affiliated access persons list
- Holdings reports
- Solicitor Disclosure Documents and Agreements
- Any written agreements entered into by the firm
- A copy of the firm's Privacy Policy Statement and proof of annual delivery
- All client documentation and any data gathering documents
- Financial plans prepared for clients
- Client agreements
- Copies of any checks received
- Copies of any reports prepared and sent to clients
- Copies of any fee statements or notifications sent to clients

Titan Retirement Advisors backs up its electronic records by having documents scanned and uploaded to a web based record retention service.

In the event of an internal or external SBD that causes the loss of paper records, the firm will physically recover them from its back-up site. If the primary site is inoperable, it will continue operations from the back-up site or an alternate location. For the loss of electronic records, it will either physically recover the storage media or electronically recover data from its back-up site, or, if the primary site is inoperable, continue operations from the back-up site or an alternate location.

## **FINANCIAL AND OPERATIONAL ASSESSMENTS**

### **Operational Risk**

In the event of an SBD, the firm will immediately identify what means will permit it to communicate with 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 employed will include telephone, voice mail, call forwarding and cell phones. In addition, the firm will retrieve key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic).

### **MISSION CRITICAL SYSTEMS**

Titan Retirement Advisors has the primary responsibility for establishing and maintaining business relationships with customers and has sole responsibility for mission critical functions of order taking, entry and execution. Firm “mission critical systems” are those that ensure prompt and accurate processing of client 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.

Outside custodians utilized by the firm provide 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. These outside custodians will maintain a business continuity plan and the capacity to execute that plan. In the event that any of the custodian firms that the firm has a relationship with executes its plan, it represents that it will notify the firm of such execution and provide the firm with equal access to services as its other customers. If the firm reasonably determines that the custodian(s) has not or cannot put its plan in place quickly enough to meet firm needs, or it's otherwise unable to provide access to such services, the custodian firm represents that it will assist the firm in seeking services from an alternative source.

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. The custodian firm(s) has the following SBD recovery time and resumption objectives recovery time period of as soon as possible; and resumption time of as soon as possible.

### **Firm Mission Critical Systems**

1. **Order Taking.** Currently, Titan Retirement Advisors may receive orders from customers via telephone. During an SBD, either internal or external, the firm will continue to take orders through any of these methods that are available and reliable. In addition, as communications permit, the firm will inform customers when communications become available to tell them what alternatives they have to send their orders. Customers will be informed of alternatives by fastest and most convenient alternative communication means available. If necessary, the firm will advise customers to place orders directly at the custodial broker dealer chosen by the third party administrator for the retirement plan client.
2. **Order Entry.** Currently, Titan Retirement Advisors enters orders by recording them on paper and/or electronically. Then they are sent to the clearing firm electronically or verbally via telephone. Alternatively, the firm places orders through the custodial broker dealer chosen by the third party administrator chosen by the third party administrator chosen by the retirement plan client. The firm has contacted the custodial broker dealer chosen by the third party administrator for the retirement plan client and was told that, under its business continuity plan, the firm can expect services will resume as soon as possible within as soon as possible.

In the event of an internal SBD, the firm will enter and send records to the clearing firm by the fastest alternative means available, which include fastest and most convenient alternative communication means available. In the event of an external SBD, the firm will maintain the order in electronic or paper format, and deliver the order to the custodian by the fastest means available when it resumes operations. In addition, during an internal SBD, the firm may need to refer customers to deal directly with the custodian for order entry.

3. **Order Execution.** The firm currently executes orders by transaction are entered using the web based service provided by the account custodian. In the event of an internal SBD, the firm would transactions will be entered using the fastest and most convenient alternative communication means available

### **Mission Critical Systems Provided by Outside Custodian(s)**

Titan Retirement Advisors relies, by contract, on outside custodian(s) to provide order execution, order comparison, order allocation, maintenance of customer accounts, delivery of funds and securities, access to customer accounts.