Tetrant Advisory LLC Business Continuity Plan (BCP)

Critical Elements

Tetrant Advisory LLC 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 Tetrant Advisory LLC is able to recover critical functions according to their time criticality. Key features of Tetrant Advisory LLC's corporate disaster recovery planning include reviews of the following:

- 1. Data back-up and recovery;
- 2. All mission critical systems;
- 3. Financial and operational assessments;
- 4. Alternate communications between customers and the member;
- 5. Alternate communications between the member and its employees;
- 6. Alternate physical location of employees;
- 7. Critical business constituents, banks, and counter-party impact;
- 8. Regulatory reporting;
- 9. Communications with regulators; and
- 10. Assurance of customers' prompt access to their funds and securities in the event that Tetrant Advisory LLC determines that it is unable to continue its business.

I. <u>Emergency Contact Persons</u>

Tetrant Advisory LLC's emergency contact person is:

Robert M. Siddoway Registered Principal and Owner Phone: (480) 335-5669 Email: ROB@TETRANT.COM

II. <u>Firm Policy</u>

Tetrant Advisory LLC'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 the firm's books and records, and allowing our customers to transact business. In the event that we determine we are unable to continue our business, we will assure customers prompt access to their funds and securities.

A. Significant Business Disruptions (SBDs)

Our plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only Tetrant Advisory LLC'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 health related pandemic, 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 product sponsors or custodian.

B. <u>Approval and Execution Authority</u>

Robert M. Siddoway is responsible for approving the plan and for conducting the required annual review. Robert M. Siddoway has the authority to execute this BCP.

C. <u>Plan Location and Access</u>

Tetrant Advisory LLC will maintain copies of its BCP plan and the annual reviews, and the changes that have been made to it for inspection. An electronic copy of our plan is located on our website www.Tetrant.com.

III. <u>Business Description</u>

Tetrant Advisory LLC conducts business in equities, options, mutual funds, variable insurance products, and alternative investments. Tetrant Advisory LLC 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 transactions are sent direct to sponsor companies or to one of our custodians, SEI Private Trust Company and/or Betterment, which execute our orders, compare them, allocate them, clear, and settle them. Our product sponsors and custodian also maintain our customers' accounts, can grant customers access to them, and deliver funds and securities. Tetrant Advisory LLC services only retail customers. We do not engage in any private placements.

Our custodians are:

- SEI Private Trust Company, 100 Cider Mill Road, Oaks, PA 19456 and the contact at the firm is:
 Customer Service, (800) 342-5734
- Betterment, 61 W 23rd Street, 4th Floor, New York, NY 10010 and the contact at the firm is:
 - Customer Service, (888) 646-2581

IV. Office Location

Our offices are located at 1467 W Elliot Rd, Ste 102, Gilbert, AZ 85233 and at 22211 S Ellsworth Rd, Queen Creek, AZ 85142. Our main telephone number is (888) 852-8070. Our employees may travel to that office by means of car. All of our business activities take place at these locations.

V. <u>Alternative Physical Location(s) of Employees</u>

In the event of an SBD, we will move our staff from the affected main office in Gilbert to our satellite office located at:

Tetrant 22211 S Ellsworth Rd Queen Creek, AZ 85142

We may also require employees to work from their homes if neither of these facilities is available.

VI. <u>Customers' Access to Funds and Securities</u>

Tetrant Advisory LLC does not maintain custody of customers' funds or securities, which are maintained either directly with sponsor companies or with our custodians, SEI Private Trust Company and/or

Betterment. In the event of an internal or external SBD, if telephone service is available, our registered persons will take customer orders or instructions and contact the respective product sponsor or custodian on their behalf, and if our Web access is available, Tetrant Advisory LLC will post on our website that customers may access their funds and securities by contacting the sponsor companies or custodian directly. The firm will make this information available to customers through its disclosure policy.

If 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.

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

Tetrant Advisory LLC maintains its primary hard copy books and records and its electronic records at 1467 W Elliot Rd, Ste 102, Gilbert, AZ 85233. Robert M. Siddoway is responsible for the maintenance of these books and records. Tetrant Advisory LLC maintains the following document types and forms that may not be transmitted to our product sponsors or custodian: client notes, fact finders, and new account forms.

Tetrant Advisory LLC maintains a back-up digital copy of our books and records through the use of two electronic storage databases (double redundancy). The first is held with our financial CRM and the second set of records are held electronically with each 3rd party product sponsor. These records are digital copies. Robert M. Siddoway is responsible for the maintenance of these back-up books and records. Tetrant Advisory LLC backs up its paper records by digitizing and uploading them to our digital storage providers on a weekly basis.

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

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

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 capital compliance. We will contact our product sponsors or custodian, 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.

IX. <u>Mission Critical Systems</u>

Tetrant Advisory LLC'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: Cellular Phones, Computers, Email, Fax, other online technologies, and other direct product sponsor websites used for order entry and other changes to customer accounts.

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 order entry. Our product sponsors and custodian provide, through contract, the execution, clearance, and settlement of securities transactions, maintenance of customer accounts, access to customer accounts and the delivery of funds and securities.

A. <u>Tetrant Advisory LLC's Mission Critical Systems</u>

a. Order Taking

Currently, Tetrant Advisory LLC receives orders from customers via telephone and in-person visits. 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 customers when communications become available to tell them what alternatives they have to send their orders to us. Customers will be informed of alternatives via email and online at our website WWW.TETRANT.COM. If necessary, we will advise our customers to place orders directly with our product sponsors or custodians, SEI Private Trust Company and/or Betterment.

b. Order Entry

Currently, Tetrant Advisory LLC enters orders by recording them on paper and electronically and sending them to our product sponsors and custodian either electronically or telephonically. In the event of an external SBD any one of these systems or sponsors may be affected and we will work to obtain up-to-date information on either their restoration or alternative methods to complete client transactions.

In the event of an internal SBD, we will enter and send records to our product sponsors and custodian by the fastest alternative means available, which include electronically and via telephone. In the event of an external SBD, we will maintain the order in electronic or paper format, and deliver the order to the product sponsor or custodian by the fastest means available when it resumes operations. In addition, during an internal SBD, we may need to refer our customers to deal directly with the product sponsor or custodian for order entry.

B. Mission Critical Systems Provided by Product Sponsors and Custodian

Tetrant Advisory LLC relies, by contract, on our product sponsors and custodian to provide order execution, order comparison, customer account maintenance and/or access and delivery of funds and securities.

X. <u>Alternate Communications Between the Firm and Customers, Employees, and Regulators</u>

A. <u>Customers</u>

We now communicate with our customers using telephone, email, fax, our website, and in-person at Tetrant Advisory LLC. 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 email 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.

B. <u>Employees</u>

We now communicate with our employees using telephone, email, fax, 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. During an SBD Robert M. Siddoway will reach out to Edwin C. Knight and Roy P. Layton to ensure up-to-date communication and updates are given to all associated persons.

C. <u>Regulators</u>

We are currently members of the following self-regulatory organizations (SROs), and are also regulated by: *FINRA, SEC, and the State of Arizona.* We communicate with our regulators using telephone, email, fax, and U.S. mail. 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.

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 Tetrant Advisory LLC.

B. <u>Banks</u>

We do not currently have any bank loans, nor do we plan to have any bank loans in the future. If funds are needed to meet reserve requirements the firm's principals plan to make capital contributions from their personal assets to meet any shortfall.

C. <u>Counter-Parties</u>

We have contacted our critical counterparties, 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 internal or external SBD. Where the transactions cannot be completed, we will work with our product sponsors and custodian or contact those counterparties directly to make alternative arrangements to complete those transactions as soon as possible.

XII. <u>Regulatory Reporting</u>

Tetrant Advisory LLC is subject to regulation by: FINRA, SEC, and the State of Arizona. We now file reports with our regulators using paper copies in the U.S. mail, and electronically using fax, email and the Internet. In the event of an SBD, we will check with the State of Arizona, 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.

XIII. Disclosure of Business Continuity Plan

We provide in writing a BCP disclosure statement to customers at account opening, post the disclosure statement on our web site (<u>WWW.TETRANT.COM</u>), and mail it to customers and non-customers upon request.

XIV. Updates and Annual Review

Tetrant Advisory LLC will update this plan whenever we have a material change to our operations, structure, business or location or to those of our product sponsors or custodian. In addition, Tetrant Advisory LLC will review this BCP annually, at our annual planning meeting during the first week of January, to modify it for any changes in our operations, structure, business or location or those of our product sponsors or custodian.

XV. <u>Senior Manager Approval</u>

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

Signed: <u>Robert M Síddoway</u>

Title: <u>Owner</u>

Date: <u>01/31/2017</u>

Tetrant Advisor LLC's Business Continuity Planning

Tetrant Advisory LLC has developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

Contacting Us – If after a significant business disruption you cannot contact us as you usually do at (888) 852-8070, or ROB@TETRANT.COM you should call our alternative number at (480) 744-0585, or go to our website at WWW.TETRANT.COM for an updated status. If you cannot access us through either of those means, you should contact either the product sponsor or our custodians, SEI Private Trust Company and/or Betterment; all contact information can be found online or on your statements.

Our Business Continuity Plan – We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit Tetrant Advisory LLC to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data backup and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

Our records are backed up electronically using two digital storage solutions (double redundancy). These two providers (Financial CRM System and 3rd Party Product Sponsors) maintain the digital records in geographically separate areas. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, our objective is to restore our operations and be able to complete existing transactions and accept new transactions and payments as soon as possible. Your orders and requests for funds and securities could be delayed during this period.

Varying Disruptions – Significant business disruptions can vary in their scope, such as: only Tetrant Advisory LLC, a single building housing Tetrant Advisory LLC, the business district where Tetrant Advisory LLC is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only Tetrant Advisory LLC or a building housing Tetrant Advisory LLC, we will transfer our operations to a local site in the Chandler-Gilbert-Mesa-Queen Creek, AZ area when needed and expect to recover and resume business as soon as possible. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area, and recover and resume business as soon as feasibly possible. In either situation, we plan to continue in business, transfer operations to our product sponsors or custodian if necessary, and notify you through our website WWW.TETRANT.COM. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer's prompt access to their funds and securities.

For more information – If you have questions about our business continuity planning, you can contact us at (888) 852-8070 or INFO@TETRANT.COM.