

Harris & Associates

Business Continuity Plan ("BCP")

I. Firm Policy

Harris & Associates is committed to safeguarding the interests of our clients and customers in the event of any emergency or Significant Business Disruption ("SBD"). This BCP summarizes Harris & Associates' efforts to mitigate risks inherent with unforeseen business interruptions. The BCP is designed to protect our employees' well-being, 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 even in the event of an emergency or SBD.

II. Significant Business Disruptions (SBDs)

SBDs can range from small interruptions such as a power outage to major catastrophes such as terrorist attacks and natural disasters. These events affect our firm's ability to communicate with clients and essential service providers and prevent the operation of the securities markets.

III. Business Description

Harris & Associates is a Registered Investment Advisory firm involved in the financial management of client accounts.

IV. Office Locations

Harris & Associates has one office located at 505 N. Sepulveda Blvd., Suite 5, Manhattan Beach, CA 90266.

V. Disaster Recovery Office (DRO)

In the event of an SBD, if our office location is compromised or inaccessible and telephonic or internet contact down, we will assemble physically at the following site:

Manhattan Beach Fire Dept. Station 1

400 15th Place
Manhattan Beach, CA 90266
(310) 802-5200

Operations and communications will continue based on available options under SBD conditions. Clients may leave messages through the DRO, until temporary SBD communications are established.

Directions:



505 N Sepulveda Blvd to Manhattan Beach Fire Dept. Station 1

You can enter notes here.

505 N Sepulveda Blvd

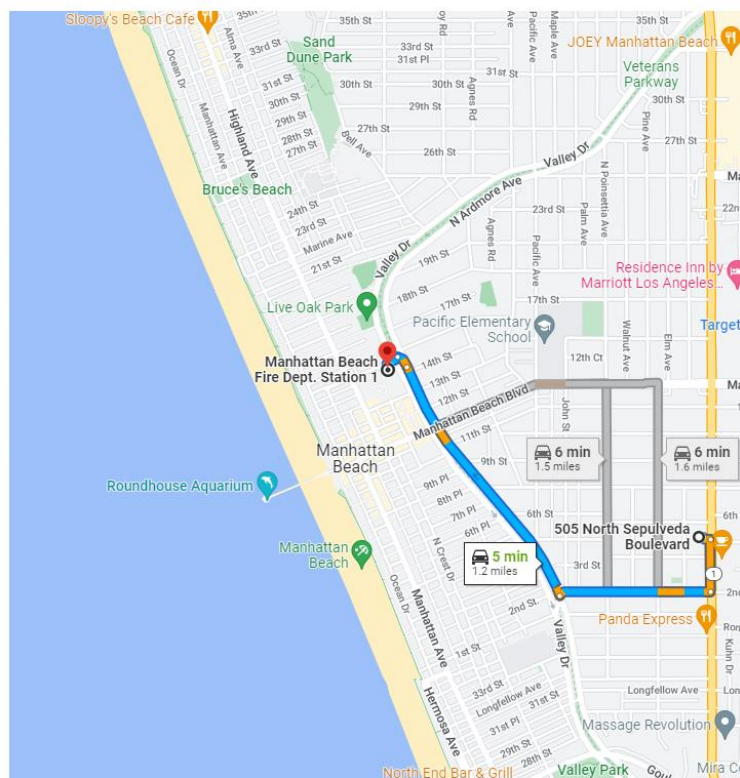
Manhattan Beach, CA 90266

- ↑ 1. Head east toward N Sepulveda Blvd
- ↘ 2. Turn right onto N Sepulveda Blvd
● Pass by Taco Bell (on the right)
- ↘ 3. Turn right onto 2nd St.
- ↘ 4. Turn right onto N Ardmore Ave
- ↙ 5. Keep left to continue toward 15th St
- ↙ 6. Turn left onto 15th St
● Destination will be on the left

Manhattan Beach Fire Dept. Station 1

400 15th St, Manhattan Beach, CA 90266

These directions are for planning purposes only. You may find that construction projects, traffic, weather, or other events may cause conditions to differ from the map results, and you should plan your route accordingly. You must obey all signs or notices regarding your route.



VI. Disaster Recovery Team:

<u>Name</u>	<u>Title</u>	<u>Cell Phone Number</u>
Dave Harris	Chief Compliance Officer	310-722-1563
Jennifer Pangelinan	Operations Manager	310-200-5955

VII. Responsibilities

Each Disaster Recovery Team member is responsible for understanding his/her role during a SBD. The following individuals have the primary responsibility for implementation and monitoring of the BCP:

- Dave Harris is responsible for documenting computer back-up procedures, i.e., frequency, procedure, person(s) responsible, etc.
- Dave Harris is responsible for designating back-up storage location(s) and persons responsible to maintain backup data in separate locations. Dave Harris has one backup storage device and Jennifer Pangelinan has the most recent backup storage device.
- Dave Harris is responsible for identifying, contacting, listing key or mission critical people in the event of an emergency or disaster, obtaining their names, addresses, e-mail, fax, cell phone and other information and distributing this information to all personnel.

- Dave Harris is responsible for designating and arranging recovery location(s) for mission critical persons to meet to continue business, and for obtaining or arranging for adequate systems equipment for these locations.
- Dave Harris is responsible for establishing back-up telephone/communication system for clients, personnel and others to contact the firm and for the firm to contact clients.
- Dave Harris is responsible for determining and assessing back-up systems and/or recovery plans for key vendors and mission critical service providers.
- Dave Harris is responsible for conducting periodic and actual testing and training for mission critical and all personnel.

VIII. When an SBD Occurs During Office Hours

In the event of an emergency during office hours, call 911. The next appropriate course of action will depend on the nature of the emergency. Most types of emergencies will require all employees to quickly evacuate the building, including fire, bomb threats, etc. If so, gather your belongings, if time safely permits and promptly exit the building.

Certain emergencies, however, may require that employees remain in-doors, including the release of a hazardous airborne substance in the immediate vicinity of the firm's principal office. Employees should, at all times, follow the instructions of emergency personnel. All employees are to meet at the designated area indicated below, if safe to do so, following any evacuation of the principal office.

Designated Meeting Area: Central Parking Area. If not available, Taco Bell parking lot. If that is not accessible, intersection of Third St. and Larsson St. (If necessary, see signage for safe indoor location.)

IX. When an SBD Occurs After Office Hours

In the event of an SBD occurring after business hours, each employee must be contacted, informed of the nature of the event, and given instructions regarding if, when and where to convene. Any employee initially discovering an emergency situation at the principal office must contact Dave Harris to inform him of the situation. If, for any reason, Dave Harris cannot be reached, the employee should message, or make their way to the Disaster Recovery Office (DRO).

If, for instance, the disruption involves a power failure, an employee must first notify Dave Harris or a Disaster Recovery Team Member (Corporate Director). A designated Disaster Recovery Team Member shall contact the utility company to obtain an estimate of when power will be restored to the principal office. Once a plan of action has been decided upon, the designated Disaster Recovery Member will contact all employees to notify them of the appropriate course of action.

X. Disruption in Services of Critical Third-Party Vendor

In the event of a disruption in the services provided by a critical service provider, Dave Harris will contact the vendor to determine the nature of the problem and an estimate of the restoration of services. If the vendor cannot be reached and services cannot be restored, Dave Harris will determine an appropriate "work-around" solution. Harris & Associates will also reference the vendor's own recovery plan on file to attempt to determine likely causes of the disruption and the vendor's own estimate of the restoration of services therefrom. If

continued efforts to contact the vendor and/or to restore services are unsuccessful, Dave Harris may access all relevant files via the online cloud or one of the firm's solid-state back-up drives. This information will be available at the DRO. Business will continue to run using personal telephones, cloud technology, and internet services if available at the DRO. Otherwise, following convening at the DRO, operations will continue using the solid-state back-up and personal or available communications.

XI. Customers' Access to Funds & Securities

Our firm does not maintain custody of customers' funds or securities. Our firm has selected Charles Schwab & Co., Inc. (Schwab)¹ as primary custodian for our clients' accounts. In the event of an internal or external SBD, if telephone service is available, our employees will take customer orders or instructions and contact our custodian on their behalf.

XII. Data Back-Up & Recovery (Electronic)

Our firm maintains electronic copies of books and records in PKS Rep Portal aka Sycamore Community Lightning (cloud-based storage). In addition to cloud security and backup, we maintain two solid-state backup drives offline.

Quick Books (Bookkeeping Files): In addition, all books and records are scanned and uploaded onto QuickBooks Online, an online cloud data storage. All data is backed-up daily. This process is fully automated and is completed via a secure Internet connection.

In the event of an internal or external SBD that causes loss of our paper records, we will recover them from our QuickBooks Online cloud software. For the loss of electronic records, for instance, a record is mistakenly deleted, we will contact QuickBooks Online support center to recover the lost data.

Redtail (Customer Relationship Management Files): Personal client information, including email addresses, are available on our CRM in the cloud (Redtail) and can be remotely accessed via available computers. In case internet access is down, we have a copy of Redtail data on our solid-state backup drives.

PKS Rep Portal (Sycamore Community Lightning) (Advisory & Brokerage Client Documents): All client documents and reports are stored electronically in our Broker Dealer's portal, PKS Rep Portal, online Cloud website.

Name: **PKS Rep Portal** (Rep facing portal to Sycamore platform leveraged with the LaserApp/DocuSign for forms).

The system is fully backed up to Arcus platform (W.O.R.M Compliant) nightly as well as incremental changes (Individual change from previous) and secondary long-term storage to Amazon S3 Glacier after several days.

¹ These materials have been independently produced by Harris & Associates. Harris & Associates is independent of, and has no affiliation with, Charles Schwab & Co., Inc. or any of its affiliates ("Schwab"). Schwab is a registered broker-dealer and member SIPC. Schwab has not created, supplied, licensed, endorsed, or otherwise sanctioned these materials nor has Schwab independently verified any of the information in them. Harris & Associates provides you with investment advice, while Schwab maintains custody of your assets in a brokerage account and will effect transactions for your account on our instruction

Backups are verified and file length character sets are certified with their Hash. All files have been test restored to our test Data Bed and verified as restored. This happens and verifies on a regular basis of at least once per quarter. All backups are also encrypted in transit and at rest.

PKS does regular restores of the production backed up data to the test bed and PKS may develop changes sometimes as much as weekly, to ensure everything is done correctly, and all data restored to ensure the changes do not break anything prior to roll out to production.

The full nightly backup also has the ability to do individual file restores if needed.
(Provided by Harlow Diegel, PKS IT Director, on 3/31/2022)

iTechCare 24/7: No client identifiable information is stored locally. Our IT Service Provider, iTechCare 24/7, provides backup of our local encrypted drives (Network Attached Storage). In the event of data loss, contact Paul Monroe of iTechCare at (310) 543-9946 to speak with a customer service representative to assist with data retrieval.

Carbonite: No client identifiable information is stored locally. Carbonite provides backup of our local computers. In the event of data loss, contact Carbonite at 877-222-5488, Monday – Friday (9:00 AM – 7:30 PM EST).

XIII. Financial & Operational Assessments

In the event of an SBD, we will immediately identify what means will permit us to communicate with our customers, employees, critical business constituents, and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options we will employ will include our web site, personal mobile phones, and secure email. In addition, we will retrieve our key activity records as described in the section above, *Data Back-Up & Recovery (Hard Copy & Electronic)*.

Harris & Associates maintains financial reserves at Schwab. In the event the firm is put in a position to raise funds due to a credit issue, the firm may access company reserve funds or utilize credit card borrowing as needed. Longer term, the firm also may apply for a loan or credit line, if necessary, through one of the banking institutions it currently uses.

XIV. Mission Critical Systems

Our firm’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. These mission critical systems are available at our DRO, or online by means of the company mobile device.

XV. Internet Connection

Our internet carrier is Spectrum Enterprise. In the event our internet is unavailable, our DRO or other resource may have an internet connection enabling access to Schwab’s online system as well as the websites of our regulators and other service providers.

XVI. Telephone System

In the event that our local "land-line" telephone service is disrupted, employees are encouraged to use their personal cellular phones to conduct business until service is restored. Harris & Associates may be able to access the emergency telephone system (satellite or radio) in place at the DRO office for critical contact calls. Trading office calls may be by mobile phones in the event of an SBD.

XVII. Loss of Key Personnel

Dave Harris is the sole principal for Harris & Associates. In the event Dave Harris is incapacitated or fails to be competent in performing his duties, Jennifer Pangelinan will be responsible for all business functions of Harris & Associates. Jennifer Pangelinan will notify Broker Dealer, Congress Wealth, all clients, key vendors, and regulatory agents of such event and will submit any proper transactions for clients, as applicable.

XVIII. Refunding Fees Paid in Advance

In the event that Harris & Associates is unable to conduct business, clients will be given a pro-rata refund of unearned advisory fees from the day any specific business services were disrupted.

XIX. Disclosure of Business Continuity Plan

We may provide this BCP disclosure statement in writing to customers upon their request.

XX. Updates, Testing & Annual Review

Each employee will receive two (2) copies of the Harris & Associates' BCP. One copy of the Plan is to be kept at the employee's workstation. The other copy is to be kept at the employee's home address.

Our firm will update this plan whenever we have a material change to our operations, structure, business or location, or to those of our custodian. In addition, our firm will test and review the BCP annually with an outside data services firm or other service provider to test and modify it for any changes.

XXI. Senior Management Approval

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

Signed: 
Title: Chief Compliance Officer

Date: September 1, 2023

See Attached Appendix A

APPENDIX A

EMPLOYEE CONTACT SHEET

Dave Harris

(C): 310-722-1563

Email: dave@harrisadvisory.com

List of Duties: Advising, Planning, Trading, Compliance and all executive functions.

Jennifer Pangelinan

(C): 310-200-5955

Email: jennifer@harrisadvisory.com

List of Duties: Manage Operations, financial, tax, overhead, books and records, and oversee client relations. Provide client contact, appointments, client reporting, planning support and oversee computer programs, back-up, compliance submissions, advertising, promotions and general operations and business development support.