

ProAthlete Wealth Management LLC

Business Continuity Plan (BCP)

(Last Update February 2022)

I. Emergency Contact Persons

Our emergency contact person is: Gintare Zubrute, (561) 988-5540, gintare@pawm.com.

II. Firm Policy

Our firm'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 promptly contact our clients. See Attachment A for a summary of our firm's business continuity plan.

III. Significant Business Disruptions (SBDs)

Three (3) contingency procedures have been developed to respond to one or more of the SBD listed events.

Disruption scenarios and contingency plans Event	Severity	Plan
a. Power outage at the office	Low	1
b. Internet link malfunctioning at the office	Low	1
c. External Server Failure	Medium	2
d. Temporary office inaccessibility for any reason	Low	1
e. Natural disasters (hurricanes, fires, pandemics and large-scale disasters)	Medium	2/3 (depending on severity)
f. Accident to a fatality level of a majority of, or all employees	High	3

A. Contingency Plans

We developed three (3) action plans to be executed in case of business interruption, depending on the type and severity of the disruption. These plans are detailed below:

Plan 1

This first plan is intended to be executed in any situation where there is a temporary impediment of use of physical dependencies of the Firm, or access to documents and systems essential to the Firm's operation. In all cases, employees are instructed to adopt the following procedures:

- Inform the CCO or Senior Management;
- Evaluate estimated time to regain access to office and/or urgent activities to another Firm location, if possible; and
- Continue performing their work-related activities from home.

Specifically, the following instructions must be followed in the event of:

1. Office Power Outage: The CCO should contact the relevant service providers, notify them about the problem and assess the estimated interruption time. If the forecast for service reinstatement is for longer than 2 hours, all employees will be instructed to finish their workday from home (the company will offer computers to be taken and returned on the next day for employees who do not have necessary equipment at home).
2. Internet Link(s) Malfunctioning at the Office: If none of the links work satisfactorily and reinstatement of service is expected in longer than 2 hours, all employees are instructed to finish their workday from home, as described above.
3. Temporary office inaccessibility: The CCO should contact and notify the building's administrator and inquire about estimated access time, in order to make decisions and take necessary actions. It is important that all employees follow the local government and firefighters guidelines and instructions at all times. If access restoration is estimated for 2 hours or longer, employees are allowed to finish their workday from home.
4. Natural disasters (hurricanes, pandemics, fires, etc.): In any of these events, employees are allowed to work from their homes via secure remote access and when applicable or necessary, may transfer part of their activities to an alternative Firm Office. If natural disasters are of larger scale and also affected the residences of employees, Plan 2 below must be followed.

In the event employees must work from home, we have enabled employees' access to the Firm's files through Google Drive, which can be accessed with internet access from any location.

Plan 2

This Plan shall be executed in any situation where the access to the Firm's external or cloud server is severely disrupted, and consequently, the employees cannot access files and information systems, whether in the office or at home. In this case, associates should adopt the following procedures:

- Inform the CCO;
- Immediately contact the supplier of cloud computing;
- Evaluate estimated time for service restoration and access the latest version of the backup through local servers, when available;
- Resume activities partially, from the last backup, and inform customers of possible limitations on performance, if applicable;
- Synchronize work on external servers when access is restored;
- Notify authorities and regulatory agencies, federal, State and local, if necessary.

Plan 3

In these situations, employees should ensure transparency with customers and if possible, the continuity of the company's crucial business activities. Specifically, in this event you must:

- Inform customers about the incident, the action plan to be implemented, and the estimated impact;
- Contact key suppliers and partners to update the contact information, access, passwords and powers of attorney;
- Retrieve the procedures manuals of the various business areas, and plan for work redistribution in order of importance;
- Plan mid-term actions, including hiring new employees, sale or merger of the company, or total interruption of activities;
- Notify authorities and regulatory agencies, federal, State and local, if necessary.

IV. Approval and Execution Authority

Gintare Zubrute, CCO, is responsible for approving the plan and for conducting the required annual review. Both Ms. Zubrute and Mr. George Landa has the authority to execute this BCP.

V. Plan Location and Access

Our firm 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 Google Drive.

VI. Business Description

We are a registered investment adviser with the U. S. Securities and Exchange Commission (“SEC”) and noticed filed in our home State of Florida, and other States applicable. We provide investment advisory products and services to our clients.

Our primary custodian is Charles Schwab & Co" Inc. (“Schwab”), 311 Main Street, San Francisco, CA 94105, <https://advisorservices.schwab.com>. Information on how Schwab protects client data can be found at [SchwabSafe | Charles Schwab](#).

VII. Office Locations

Our Firm only has an office located 4401 N. Federal Highway, Suite 201, Boca Raton, FL 33431. Its main telephone number is (561) 988-5540. Our employees may travel to the office by means of foot, car, train or bus.

VIII. Alternative Physical Location(s) of Employees

In the event of an SBD, each staff member will move from the affected office to each staff member’s home, where each has access to the cloud server and can fully operate at their alternative location. See the call tree under Section X (B) below for each staff member’s home telephone number.

IX. Customers’ Access to Funds and Securities

Our firm does not maintain custody of customers’ funds or securities, which are maintained at our custodian, Schwab. 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 our custodian on their behalf, and if our Web access is available, our firm will post on our Web site that customers may access their funds and securities by contacting Schwab directly.

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

Our firm maintains its primary hard copy books and records and its electronic records at the home office. Gintare Zubrute, CCO, (561) 988-5540, gintare@pawm.com, is responsible for the maintenance of these books and records. Our firm maintains certain document types and forms that are not transmitted to our custodian: (please refer to the firm's Policies and Procedures Manual for a list of documents maintained).

Most of the firm’s records are kept in electronic format. The firm backs up its electronic records daily and copies are stored in our Google Drive. Any hard copy documents are maintained in our home office in lockable cabinets.

In the event of an internal or external SBD that causes the loss of our paper records, we will physically recover them from either our electronic records or from our clients. 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.

XI. 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 clients, 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 Web site, telephone voice mail, secure e-mail and cell phones. In addition, we will retrieve our key activity 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 custodian, critical banks and client 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 and immediately take appropriate steps.

XII. Mission Critical Systems

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.

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 entry. Our custodian provides, through contract, 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.

Our custodian contract provides that our custodian will maintain a business continuity plan and the capacity to execute that plan. Our custodian represents that it will advise us of any material changes to its plan that might affect our ability to maintain our business. In the event our custodian executes its plan, it represents that it will notify us of such execution and provide us equal access to services as its other customers. If we reasonably determine that our custodian has not or cannot put its plan in place quickly enough to meet our needs, or is otherwise unable to provide access to such services, our custodian represents that it will assist us in seeking services from an alternative source.

Our custodian represents that it backs up our records at a remote site. Our custodian represents that it operates a back-up operating facility in a geographically separate area with the capability to conduct the same volume of business as its primary site. Our custodian has also confirmed the effectiveness of its back-up arrangements to recover from a wide scale disruption by testing.

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.

Ms. Zubrute will periodically review our custodian's capabilities to perform the mission critical functions the custodian has contracted to perform for our firm.

A. Our Firm's Mission Critical Systems

1. **Order Taking**

Currently, our firm receives orders from customers via telephone, e-mail and in person visits by the customer. 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 by telephone. If necessary, we will advise our customers to place orders directly with our custodian at (800) 435-4000.

2. **Order Entry**

Currently, our firm enters orders by recording them on paper and/or electronically and sending them to our custodian electronically or telephonically. Alternatively, we place customer orders through Schwab's order entry system. In addition, we may send paper applications to certain issuers (e.g., variable annuities, etc.).

In the event of an internal SBD, we will enter and send records to our custodian by the fastest alternative means available. In the event of an external SBD, we 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, we may need to refer our customers to deal directly with our custodian for order entry.

3. **Order Execution**

Due to the nature of our business, we do not execute orders.

B. Mission Critical Systems Provided by Our Custodian

Our firm relies, by contract, on our custodian to provide order execution, order comparison, order allocation, and the maintenance of customer accounts, delivery of funds and securities, and access to customer accounts.

XIII. Alternate Communications Between the Firm and Customers, Employees, and Regulators

A. Customers

We now communicate with our customers using the telephone, e-mail, our Web site, fax, U.S. mail, and in person visits at our firm or at the other’s location. 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 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.

B. Employees

We now communicate 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 or oral) to the means that we have used in the past to communicate with the other party. We will also employ a call tree so that senior management can reach all employees quickly during an SBD. The call tree includes all staff home and office phone numbers. We have identified persons, noted below, who live near each other and may reach each other in person:

The person to invoke use of the call tree is: Gintare Zubrute

Caller	Call Recipients
Gintare Zubrute (443) 454 - 0933	George Landa (561) 883 -7310
	Cell #: 561 -212-3167

C. Regulators

We are currently members of the following regulators: SEC and applicable States. We communicate with our regulators using the telephone, e-mail, fax, U.S. 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 or oral) to the means that we have used in the past to communicate with the other party.

XIV. 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 our firm. Our major suppliers are:

Charles Schwab & Co. Inc.

311 Main Street, San Francisco, CA 94105
(800) 435-4000

Chris Crawford
150 E. Palmetto Park Road, Suite 330
Boca Raton, FL 33432
561.416.1066 T
561.212.7035 C

Investnet

Fred Diaz (312-827-7036)
35 East Wacker Drive 24th Floor
Chicago, IL 60601
855-393-8028

B. Banks

The bank maintaining our operating account is: City National Bank located at 1140 6th Ave, New York, NY 10036, Elizabeth Maisonet, Tel: 917-322-5224. If our banks and other lenders are unable to provide the financing, we will seek alternative financing through our personal resources.

C. Counter-Parties

We have contacted our critical counter-parties, such as our clients, to determine if we will be able to carry out our advisory services with them in light of the internal or external SBD. Where the advisory services cannot be completed, we will work with our custodian or contact those counter-parties directly to make alternative arrangements to complete or continue those advisory services as soon as possible.

XV. Regulatory Reporting

Our firm is subject to regulation by: the SEC, and the Florida state regulator. We now file reports with our regulators using paper copies in the U.S. mail, and electronically using fax, e-mail, and the Internet. In the event of an SBD, we will check with the SEC, 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. Our regulator contact information is:

U.S. Securities and Exchange Commission
Miami Regional Office
801 Brickell Ave., Suite 1950
Miami, FL 33131
Phone: 305-982-6300
E-mail: miami@sec.gov

Florida Office of Financial Regulation
200 E. Gaines Street
Tallahassee, FL 32399
(850) 487-9687

XVI. Disclosure of Business Continuity Plan

We provide in writing a BCP disclosure statement to customers at the time a contract or agreement is entered into with our client. We also post the disclosure statement on our Web site and mail it to customers upon request. Our disclosure statement is attached.

XVII. Updates and Annual Review

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 review this BCP annually to modify it for any changes in our operations, structure, business or location or those of our custodian.

XVIII. Senior Manager Approval

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

Signed:  _____

Title: George Landa

Date: 2/03/2022

ProAthlete Wealth Management LLC's Business Continuity Planning

ProAthlete Wealth Management 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 – Contact us as you usually do at (561) 988-5540/gintare@pawm.com (or 443-454-0933). If you cannot access us through either of those means, you should contact our custodian, Charles Schwab & Co. Inc. (“Schwab”) at (800) 435-4000 for instructions on how you may have prompt access to your funds and securities, enter orders and process other trade-related, cash and security transfer transaction.

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 our firm 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 counterparty impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

Our custodian, Schwab, backs up our important records in a geographically separate area. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, we have been advised by our custodian that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments within a timely manner. 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 our firm, a single building housing our firm, the business district where our firm 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 our firm or a building housing our firm, we will transfer our operations to a local site when needed and 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 possible. In either situation, we plan to continue in business, transfer operations to our custodian if necessary, and notify you via email or phone. 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 561-988-5540.

ProAthlete Wealth Management LLC Business Continuity Plan – Sample Email Blast

Pre-Event

To all PAWM Advisers, Inc. clients.

_____ is anticipated to have a significant impact on _____ and a wide part of the state beginning on _____.

In anticipation of the storm’s arrival and to allow PAWM team members to prepare or evacuate, we have implemented our Business Continuity plan. The storm will likely have a significant impact on _____ locations and we anticipate closing by 5pm, _____.

In the case of a power loss, the _____ and/or _____ Office will remain closed until power is restored; however, we will be operating on backup power from a remote location and can be reached by cell phone and email.

You can call either office and leave a detailed message as we will be checking for messages regularly and will return your call as soon as possible. If you have an emergency that requires your immediate attention, you can contact _____ at _____ or _____ at _____.

If you do not get through, you can contact Charles Schwab directly at (800) 435-4000.

For account “review only” access, you can log into your **PAWM Advisers, Inc.** portal at any time.

Thank you for your patience and stay safe.

Post Event

DATE UPDATE __ (2:00 p.m.)

We have completed a damage and safety assessment of the _____ and _____ offices.

1. The _____ office has resumed normal operations and is fully staffed.
2. As we reported earlier this week, the _____ area sustained substantial damage from _____. The good news is that power is being restored much quicker than initially projected.
3. We have assessed the damage, primarily flooding to the bottom floor and wind damage. We are fortunate to be on the third floor and had no water intrusion. The flood damage had been mitigated and power has been restored to the building. We are estimating that the _____ office to be fully operational by the beginning of the week of _____. In the meantime, operations will continue at the _____ office.

Thank you for your patience and have a great day.