

## Business Continuity Plan

### Background

While it is recognized it is not possible to create a plan to handle every possible eventuality, it is the intent of TRAL to set up a framework to be used in the most likely of scenarios. It is also the intent that this framework provide guidance as to how to respond should an unforeseen situation occur.

TRAL believes that an adviser's fiduciary obligation to its clients includes the obligation to take steps to protect the clients' interests from being placed at risk as a result of TRAL's inability to provide advisory services after, for example, a natural disaster or, in the case of some smaller firms, the death of the owner or key personnel. The clients of an adviser that is engaged in the active management of their assets would ordinarily be placed at risk if the adviser ceased operations.

### Emergency Information

#### *Firm Contact Persons*

TRAL's emergency contact persons are:

Contact Name	Phone	Email	Relationship
Jonathan M Coyne	281-202-3369	jon@investtitan.com	Executive Assistant
Callie Torres	281-777-4227	callie@investtitan.com	Executive Assistant

#### *Support Services*

In the event of an emergency, the following is a list of support services and the methods by which they may be contacted:

Emergency Services (EMS): 911

Fire Department: 911

Police Department: 911 or Non-Emergency 281-346-2202

Internet Service Provider: Comcast Business 855-335-7922

Data Backup Provider: Pipedrive Support@pipedrive.com

**Alternative firm contact in case of death of Key Personnel**

Michelle O Coughran

This information will be updated in the event of a material change, and TRAL's CCO will review the plan on an annual basis.

### **Firm Policy**

TRAL'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 the firm's books and records, and allowing its clients to transact business.

In the event that TRAL determines it is unable to continue its business, it will assure clients prompt access to their funds and securities.

### **Significant Business Disruptions (SBDs)**

TRAL's plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only TRAL's ability to communicate and do business, such as a fire in its building or the death of a key member of the firm. External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a city flood, or a wide-scale, regional disruption.

TRAL's response to an external SBD relies more heavily on other organizations and systems, such as the brokerage firm(s) and Internet Service Providers it uses.

### **Pandemics, Epidemics, & Outbreaks**

TRAL recognizes that pandemics, epidemics, and other types of outbreaks constitute business disruptions of a special nature. These situations impact not only TRAL as a company, but also its personnel, clients, and vendors. Accordingly, TRAL intends to implement the following procedures during such a situation.

#### ***General Business Operations***

Promptly, and then intermittently thereafter, TRAL will conduct a high-level assessment of the situation's impact on business and operations. Specifically, TRAL will identify and address:

- any weaknesses or unforeseen issues
- any inability to conduct essential operations or operate essential systems
- any inability to monitor third party vendors

#### ***Information Security & Remote Operations***

TRAL will also alert personnel to the increase likelihood of phishing attempts and client impersonation schemes related to the situation. For example, bad actors may target individual staff members with requests for wire transfers posing as a client, emails related to state or federal work from home updates, changes to healthcare benefits, changes in information security policy related to working from home, software required to install on computers in order to work from home, the latest epidemic statistics, or even discounted offers on items in

short supply. Accordingly, the firm will refer personnel to TRAL's cybersecurity best practices and ensure that those practices are up to date.

If necessary, TRAL will also conduct training for its personnel to address (i) potential information security issues commonly associated with remote work and (ii) the importance of protecting non-public client information at all times. In particular, advisory personnel are instructed to:

- access the internet only from secure WiFi connections or via a virtual private network ("VPN")
- avoid using public WiFi networks, which are vulnerable to exploitation
- store any sensitive, non-public information on non-company devices only after taking the proper security protections and obtaining authorization

If having personnel work remotely, then TRAL will also:

- catalogue systems that cannot be accessed remotely, if any
- shut down non-essential hardware (e.g., computers)
- lock its physical storage (e.g., file cabinets) and all office access
- check in with building management, if applicable, to determine current security at the facility
- require that firm personnel continue following advertising guidelines for applicable communications
- ensure electronic cataloguing of communication is still taking place
- continue to document all interactions with clients, regardless of the medium of interaction
- update TRAL's business continuity plan as needed

### ***Third Party Vendors***

If appropriate, TRAL will endeavor to discuss with vendors the following:

- the vendor's business continuity efforts
- the vendor's disaster recovery plans
- the vendor's reliance on, and communications to date with, the vendor's vendors

### ***Company Personnel***

If appropriate, TRAL will limit or altogether avoid in-person meeting with clients and advisory personnel and allow or require (as appropriate) personnel to work remotely. Any personnel that is limited in their ability to work remotely, will immediately inform their supervisor.

Limitations include but are not limited to:

- Inadequate hardware, software, or other systems
- Need to perform caregiving services for children or other persons
- Physical incapacity

If essential personnel are limited in their ability to work remotely, then the firm will determine if alternate or temporary personnel are available to perform necessary functions. Additionally, TRAL will conduct check-ins with advisory personnel no less than weekly regarding remote work conditions.

## **Approval and Execution Authority**

The CCO is responsible for approving the plan and for conducting the required annual review. The CCO has the authority to execute this BCP.

## **Plan Location and Access**

TRAL maintains copies of its BCP and annual reviews, and all changes that have been made. A physical copy of the BCP is stored with the company's Written Policies and Procedures Manual, which is kept in the following location: President's Office in the bottom drawer of his desk in a green filing folder. An electronic copy of this plan is stored: The File will be in a PDF file saved in the Titan Retirement Advisors cloud storage, in a file named the TRA Business Continuity Plan.

Each employee is given a copy of the plan and notified of the location/file within TRAL's electronic systems to which employees have access. Physical copies need to be returned upon termination of employment with the firm.

## **Custodian and Brokerage Firm Contacts**

Interactive Brokers LLC (CRD# 36418)  
One Pickwick Plaza, 2nd Fl.  
Greenwich, CT 06830  
(203) 618-5710

Charles Schwab & Co., Inc. Advisor Services  
450 Newport Center Dr. Suite, #410  
Newport Beach, CA 92660  
(877) 687-4085

## **Office Locations**

TRAL's primary office address and phone number are:

5757 Flewellen Oaks Ln Ste 601  
Fulshear, TX 77441  
United States  
713-239-2866

TRAL engages in client servicing, order taking and entry at this location.

## **Alternative Physical Location(s) of Employees**

In the event of an SBD that makes it impossible or impractical to use any or all of the company offices, TRAL will move its staff from affected offices to the closest of its unaffected office locations.

If TRAL's other office locations are not available, it will move the firm operations to:

5757 Flewellen Oaks Ln  
Ste 504  
Fulshear, TX 77441  
United States  
808-679-5800

### **Clients' Access to Funds and Securities**

TRAL does not maintain physical custody of clients' funds or securities, which are maintained at its brokerage firm. In the event of an internal or external SBD, if telephone service and internet service are available, TRAL's investment adviser representatives (IARs) will take customers' orders or instructions from its alternative locations, phone numbers, websites or alternative email addresses and contact its brokerage firm on their behalf. If internet access is available, TRAL will post on its website that clients may access their funds and securities by contacting it.

### **Data Back-Up and Recovery (Hard Copy and Electronic)**

TRAL maintains its primary hard copy books and records and its electronic records at its primary office.

The firm's CCO is responsible for the maintenance of these books and records. TRAL maintains the following document types and forms that are not transmitted to its brokerage firm: Investment Policy Statements, Client Contracts and other related documents.

The firm backs up its electronic records daily by online digital backup and keeps a copy at Apple icloud, Pipedrive, Microsoft 365.

In the event of an internal or external SBD that causes the loss of its paper records, TRAL will physically recover them from its back-up site(s). If its primary site is inoperable, TRAL will continue operations from its 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(s). If its primary site is inoperable, TRAL will continue operations from its back-up site or an alternate location. TRAL obtains the Business Continuity Plans of its electronic storage partners for access to its records in case of a regional event.

### **Operational Assessments**

#### ***Operational Risk***

In the event of an SBD, TRAL will immediately identify what means will permit it to communicate with its clients, employees, critical business constituents, and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications

options TRAL will employ will include its website, telephone voice mail, secure email, etc. In addition, TRAL will retrieve its key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic). Employees will establish contact with the firm's Emergency Contacts and communicate key firm directives as they apply to operating the business whether it be from a new location, each employee's residence or an alternative regional location with access to a different power grid from the principal office.

### ***Mission Critical Systems***

TRAL's "mission critical systems" are those that ensure client communication, access to client accounts and trading systems. More specifically, these systems include the office computer systems.

TRAL has primary responsibility for establishing and maintaining its business relationships with its clients. TRAL's brokerage firms/custodians provide the execution, comparison, allocation, clearance and settlement of securities transactions as well as the maintenance of customer accounts, access to customer accounts, and the delivery of funds and securities.

TRAL's brokerage firm/custodian contracts provide that the brokerage firms/custodians will maintain business continuity plans and the capacity to execute those plans.

TRAL's brokerage firms/custodians represent that they back up TRAL's records at remote sites. TRAL's brokerage firms/custodians represent that they operate back-up operating facilities in geographically separate areas with the capabilities to conduct the same volume of business as their primary sites. They have also confirmed the effectiveness of their 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. The recovery times for custodians are expected to be consistent with the recovery time indicated in the specific custodian's business continuity plan or other relevant documentation. However, the firm will not typically have access to the custodian's business continuity plan and recovery times will of course differ depending on the specific system affected. Please see "Custodian and Brokerage Firm Contacts" above.

## **The Firm's Mission Critical Systems**

### ***Trading***

TRAL uses the electronic order entry system provided by its custodian or another third party to enter trading activity and transactions. If electronic means are not available, TRAL may place orders by fax or telephone, in which case order tickets will still be maintained.

In the event of an internal SBD, TRAL will enter and send records to its brokerage firm by the fastest alternative means available. In the event of an external SBD, TRAL will maintain the order in electronic or paper format, and deliver the order to the brokerage firm by the fastest means available when it resumes operations. In addition, during an internal SBD, TRAL may need to refer its clients to deal directly with its brokerage firm for order entry.

### ***Client Account Information***

TRAL currently accesses client account information via its brokerage firm's website. In the event of an internal SBD, TRAL would access client information via fax correspondence, alternate phone systems, etc. TRAL may relocate to its alternative business location(s) if access to the brokerage firm website can be accomplished.

## **Alternate Communications with Clients, Employees, and Regulators**

### ***Clients***

TRAL now communicates with its clients using the telephone, email, its website, fax, U.S. mail, and in person visits at TRAL's or at the other's location. In the event of an SBD, TRAL will assess which means of communication are still available to it, and use the means closest in speed and form (written or oral) to the means that it has used in the past to communicate with the other party. For example, if TRAL has communicated with a party by email but the Internet is unavailable, TRAL will call the party on the telephone and follow up and where a record is needed with paper copy in the U.S. mail. In the event of an anticipated significant regional business disruption, TRAL will communicate to its clients in advance how to establish contact with it and its personnel or brokerage and custodian prior to the disruptive event occurrence.

### ***Employees***

TRAL now communicates with its employees using the telephone, email, and in person. In the event of an SBD, TRAL will assess which means of communication are still available to it, and use the means closest in speed and form (written or oral) to the means that it has used in the past to communicate with the other party. In the event of key employees being unable to perform their job functions, immediately and for any time period afterwards, TRAL will delegate, if possible, those key functions to other employees.

### ***Regulators***

TRAL communicates with its regulators using the telephone, email, fax, U.S. mail, and in person. In the event of an SBD, TRAL will assess which means of communication are still available to it, and use the means closest in speed and form (written or oral) to the means that it has used in the past to communicate with the other party.

## **Regulatory Reporting**

TRAL is subject to regulation by the Securities and Exchange Commission (SEC). TRAL now files reports with its regulators using the IARD System. In the event of an SBD, TRAL will check with the SEC to determine which means of filing are still available to it, and use the means closest in speed and form (written or oral) to its previous filing method. In the event that TRAL cannot contact its regulators, it will continue to file required reports using the communication means available to it and forward those reports at the earliest opportunity.

***Regulatory Contact:***

Office of Compliance Inspections and Examinations  
U.S. Securities and Exchange Commission  
100 F Street, N.E.  
Washington, DC 20549  
(202) 551-6200

Investment Adviser Regulation Office, Division of Investment Management  
U.S. Securities and Exchange Commission  
100 F Street, N.E.  
Washington, DC 20549  
(202) 551-6999

**Death of Key Personnel**

The following personnel are identified as “Key Personnel” without which it would be difficult or impossible to continue operating the firm and/or properly service clients:

Joshua J Coughran	President and Managing Member
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If some event made it impossible for any person listed above able to continue to service the firm, TRAL would implement the following succession plan:

In the event Joshua J Coughran is unable to service his clients, Michelle Coughran, 1% owner of the RIA, would hire a licensed advisor to continue servicing the clients of Titan retirement advisors LLC.

In case of death of any key personnel, the following will assume the responsibility to make contact with the clients of the firm in the most efficient manner possible and as soon as possible to allow clients to access their accounts. If a business succession plan is to be implemented, clients will be contacted to obtain consent prior to any assignment of their advisory management contracts with this firm to a successor firm.

Michelle O Coughran	minority shareholder of Titan Retirement Advisors LLC
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TRAL will update this plan whenever it has a material change to its operations, structure, business or location or to those of its brokerage firm. In addition, TRAL will review this BCP annually, to modify it for any changes in its operations, structure, business, or location or those of its brokerage firm.

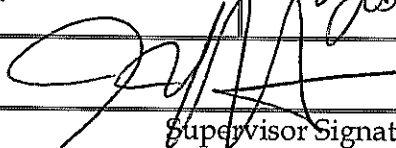
**Approval & Signature**

*Supervisor Approval*

Approve the firm's Business Continuity Plan (BCP) program by signing below.

I have approved this Business Continuity Plan as reasonably designed to enable TRAL to meet its obligations to clients in the event of a Significant Business Disruption.

Signed:

Officer Name and Title:	Joshua Goughran / owner / CEO / COO	
	Supervisor Signature	4/24/2023
		Date