

## **BUSINESS CONTINUITY AND DISASTER RECOVERY PLAN**

Swiss Alpine Wealth Management 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.

Nathan Pugh is the sole supervised person of the firm.

Nathan Pugh, Managing Director, +41-024-494-2641,  
[Nathan@swissalpinewealthmanagement.com](mailto:Nathan@swissalpinewealthmanagement.com)

Nathan Pugh will ensure that a review is conducted on at least an annual basis. In addition, Nathan Pugh 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 December 31<sup>st</sup> every year, to modify it for any changes in operations, structure, business or location or those of clearing firm. Nathan Pugh is responsible for maintaining and updating the Plan. Swiss Alpine Wealth Management 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 the firm’s website. Nathan Pugh is responsible for making sure that all electronic versions are maintained in this location. Nathan Pugh is responsible for maintaining hard copies. Hard copies will be maintained at Route de Clos Soleil 6C.

### **SIGNIFICANT BUSINESS DISRUPTIONS**

Swiss Alpine Wealth Management 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

Swiss Alpine Wealth Management conducts a variety of advisory services to clients, which may include, investment consulting, asset management, financial planning and pension consulting. As part of implementing the advice provided, the firm may recommend equity securities, mutual funds, variable insurance products, fixed income securities, and derivative securities. Swiss Alpine Wealth Management is an investment adviser and does not perform any type of clearing functions for itself or others. Swiss Alpine Wealth Management 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 the firm will implement their transactions and will receive statements from these firms. The firm does not engage in private placements.

The clients' custodian will vary by client. The custodian has also given the following alternative contact in the event it cannot be reached: *To be decided*.

## OFFICE LOCATIONS

Swiss Alpine Wealth Management has the following office locations:

1. Office Location. The main office location is at Route de Clos Soleil 6C, Leysin, Switzerland 1854. The main telephone number at this location is +41-024-494-2641. Employees may travel to this location by means of foot, car subway, train, bus, plane. All types of business and services provided by Swiss Alpine Wealth Management 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 with the following phone number +41-076- 259-2385. The following employees will be required to report to work at this alternate phone number in the case of an SBD at the main office location:

<b>Employee Name</b>	<b>Title</b>
Nathan Pugh	Managing Director

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

Swiss Alpine Wealth Management does not maintain custody of clients' funds and securities. Custody is maintained at various qualified custodians.. 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, Swiss Alpine Wealth Management will post on its Website that customers may access their funds and securities by contacting their chosen custodian. Swiss Alpine Wealth Management will make this information available to clients through its disclosure document.

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

Swiss Alpine Wealth Management maintains its primary hard copy books and records and its electronic records at its main office location previously referenced in this document. Nathan Pugh 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 (Hard Copy and Electronic).

Swiss Alpine Wealth Management maintains its back-up hard copy books and records at Route de Clos Soleil 6C, Leysin, Switzerland, 1854. Nathan Pugh is responsible for the maintenance of these back-up books and records. Swiss Alpine Wealth Management backs up its electronic records weekly by backing up to an external HD Drive, and keeps a copy at Route de Clos Soleil 6C, Leysin, Switzerland, 1854 weekly. 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 our website, telephone, cell phone, email etc. In addition, the firm will retrieve key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic).

### **Financial and Credit Risk**

In the event of an SBD, the firm will determine the value and liquidity of its investments and other assets to evaluate its ability to continue to fund operations. The firm will contact clients' custodians, critical banks, and investors to apprise them of its financial status. If the firm determines that it may be unable to meet its obligations to those counter-parties or otherwise continue to fund operations, it will request additional financing from a bank or other credit sources to fulfill its obligations to customers and clients. If the firm cannot remedy any financial deficiency, it will file appropriate notices with regulators and immediately take appropriate steps, including notifying all clients immediately.

## **MISSION CRITICAL SYSTEMS**

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.

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

Swiss Alpine Wealth Management relies, by contract, on outside custodian(s) to provide *order execution, order comparison, order allocation, and the maintenance of customer accounts, delivery of funds and securities, and access to customer accounts.*

## **ALTERNATE COMMUNICATIONS BETWEEN THE FIRM AND CUSTOMERS, EMPLOYEES, AND REGULATORS**

### **Customers**

Swiss Alpine Wealth Management now communicates with customers using the telephone, email, Website, fax, U.S. mail, and in-person visits at our firm or at another location in the United States as well as various video conferencing applications. In the event of an SBD, the firm will access which means of communications are still available and use the means closest in speed and form (written or oral) to the means used in the past to communicate with clients. For example, if the firm has communicated with a party by email but the Internet is unavailable, the firm will call them on the telephone and follow-up where a record is needed with a paper copy in the U.S. mail. The firm will continue to provide status communications until normal business hours can resume.

### **Employees**

Swiss Alpine Wealth Management now communicates with employees using the telephone, email, Website, fax, U.S. mail, and in-person visits at our firm or at another location in the United States as well as various video conferencing applications. In the event of an SBD, the firm will access which means of communication are still available and use the means closest in speed and form (written or oral) to the means used in the past to communicate with employees. The firm 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, office phone, cell phone numbers and business and personal email addresses. (Exhibit A) The firm has identified persons, noted below, who live near each other and may reach each other in person if necessary. A copy of this call tree will be maintained in paper copy and electronically at all locations from which business can be conducted. All employees listed as a Caller will be responsible for maintaining a paper and electronic copy of this BCP and the call tree at their personal residence as well as the main office location from which they conduct business on a regular basis. Nathan Pugh will be responsible for maintaining and updating the call tree and making sure all employee contact information remains current. Information will be updated at least quarterly as needed and all changes will be communicated to all affected employees. Nathan Pugh will be responsible for activating the use of the call tree. The following is the call tree currently being used:

<b>Caller</b>	<b>Call Recipients</b>
<i>Nathan Pugh</i>	<i>Clients</i>

### **REGULATORS**

Swiss Alpine Wealth Management is currently subject to regulation by or a member of the following organizations SEC. The firm communicates with regulators using the telephone, email, Website, fax, U.S. mail, and in-person visits at our firm or at another location in the United States as well as various video conferencing applications. In the event of an SBD, the firm will assess which means of communication are still available and will use the means closest in speed and form (oral or written) to the means used in the past to communicate with the other party. Regulatory information will be maintained on the Master Contact List. (Exhibit B) Nathan Pugh will be responsible for maintaining the Master Contact List and updating it at least quarterly when necessary.

### **CRITICAL BUSINESS CONSTITUENTS, BANKS, AND COUNTER-PARTIES**

#### **Banks**

Swiss Alpine Wealth Management has contacted its banks and lenders to determine if they can continue to provide the financing that will be needed in light of the internal or external SBD. The bank maintaining the firm operating account is Wells Fargo Broadway & 10<sup>th</sup> Branch, 781, Broadway, New York, NY 10003. If the banks and other lenders are unable to provide the financing, the firm will seek alternative financing immediately from a different US bank. Contact information for all banks and other lenders will be maintained on the Master Contact List. (Exhibit B).

#### **Counter-Parties**

Swiss Alpine Wealth Management has contacted its critical counter-parties, such as broker/dealers or institutional customers, to determine if it will be able to carry out transactions with them in light of the internal or external SBD. Where the transactions cannot be completed, it will work with custodian(s) or contact those counter-parties directly to make alternative arrangements to complete those transactions as soon as possible. Contact information for all counter-parties will be maintained on the Master Contact List. (Exhibit B)

### **REGULATORY REPORTING**

Swiss Alpine Wealth Management is subject to regulation by SEC. The firm now files reports with regulators using paper copies in the U.S. mail and electronically using fax, email, and the Internet. In the event of an SBD, it will check with the SEC and other regulators to determine which means of filing are still available and use the means closest in speed and form (written or oral) to its previous filing method. In the event that the firm cannot contact regulators, it will continue to file required reports using the communication means available.

Contact information for each regulator referenced above will be maintained on the Master Contact List. (Exhibit B)

## EXHIBIT A

### CALL TREE EMPLOYEE EMERGENCY CONTACT INFORMATION

Name	Office # or Ext.	Home Phone #	Cell Phone #	Office Email Address	Personal Email Address
Nathan Pugh	+41-024-494-2641	+41-024-494-2641	+41-076-259-2385	Nathan@swissalpinewealthmanagement.com	natefin33@gmail.com

## EXHIBIT B

### Master Contact List

Entity Name	Office # or Ext.	Home Phone #	Cell Phone #	Office Email Address	Personal Email Address

### Other Emergency: Death

Nathan Pugh has determined that, should he suddenly pass away (die) for any unforeseen reason, all willing clients should immediately contact Brian D. Gawthrop at Robinswood Financial to take over management of their assets. He can be contacted at 3425 Carillon Point, Building 3000, 4<sup>th</sup> Floor Kirkland, WA 98033. [brian@robinswood.com](mailto:brian@robinswood.com) Office: (425) 296-1611 ext. 4.