

Kravitz Group Holdings, LLC. Business Continuity and Disaster Recovery Plan
(as required by 21 VAC5-80-160 F)

Policy

This policy outlines **Kravitz Group Holdings (KGH)**, immediate and long-term contingency planning and recovery process. The purpose of this Contingency and Disaster Recovery Plan is to provide specific guidelines for KGH to follow in the event of a failure of any critical business capability.

Responsibility

The Registered Representative is responsible for creating and maintaining KGH's immediate and long-term contingency planning and recovery procedures that are appropriate to the scale and scope of the Company's business.

If the office of KGH (the "Company" and/or the "Investment Advisor"), becomes uninhabitable or destroyed and if the physical files of the Company are destroyed

The Company will then acquire new office space as quickly as possible. All original and physical client account opening forms as well as other documentation (client Information, all types of adoption agreements, margin agreements, powers of attorney, trust documents, account statements, and copies of new account applications) are scanned and archived on the Company's computer, a third-party cloud-based platform (Microsoft OneDrive), the Company's server, and/or off-site at the custodian's site. The Company uses Microsoft OneDrive as its third-party, cloud-based platform technology of choice for the storage of its client's back-up digital copies of forms and documents.

All client information (general information such as name, address, phone, date of birth, social security numbers, and specific account information including account numbers and positions) is stored in the Company's client database. Backups are made daily and are archived both on the Company's computer, server and/or stored off-site within the Company's file on a third-party cloud-based platform, Microsoft OneDrive as discussed above. Back-ups are password protected.

RIA information (including a list of RIA clients and their fee arrangement) is stored in a data file that is archived as discussed above.

The Company's financial information is stored in a data file that is archived in an off-site third-party cloud-based provider as well as discussed above.

If the electronic files of the Company are destroyed.

The Company will restore from its electronic backup all pertinent company and client records. The archived records are stored on the Company's server and/or a third-party off-site cloud-based provider as discussed above.

If the phones of the Company are out for an extended period. The Company will request that our phone carrier forward or add a message to our line directing all incoming calls to a series of cell phone, or alternate business numbers, which will be determined at the time.

In the event of the loss of key personnel. The firm recognizes that Michael Allen Kravitz, Registered Representative/Investment Advisor Representative is a “key” employee, for whose loss the firm must establish contingencies in an effort to prevent disruption to client service. Should Mr. Kravitz become unable to fulfill his obligations to the firm and clients, the firm has appointed Marie Antoinette Lord as the assigned Individual that will simply alert clients of the incapacity or death of the key person(s) and the winding down of the business. This individual is not to conduct business on behalf of the Investment Advisor as an Investment Advisor Representative. Marie Antoinette Lord, will simply notify client(s) to the death of Michael Allen Kravitz and direct the client(s) to the custodian whom has custody of the clients assets. An accessible client list (created by Registered Representative and identified as to the whereabouts of said list to Marie Antoinette Lord), of all the clients the firm has, is kept and regularly updated to contain the most current contact information for the client(s). List includes the name of the client, the contact information of client(s) custodian whom maintains custody of their assets, and the contact information for each client. A digital copy of this list is stored with the Investment Advisor forms on its computer and within the cloud-based back-up data storage file, on third-party platform “Microsoft OneDrive”.

In the event no registered investment adviser representatives remain able to perform duties which require such registration, the firm will immediately stop the receipt of compensation.

Allocation of Duties in the Event of Death or Incapacity of Key Personnel

In the event of the death or incapacity of the firm’s key personnel. Marie Antoinette Lord, shall take all the following steps necessary to ensure a smooth winding down of the business by performing the respective duties; establishing a:

1. **Means to Provide notification to clients** of the investment advisor and to those states in which the advisor is registered of the death or incapacity of key person(s). Notify clients within five business days from the death or incapacity of key persons.
2. **Means for clients to receive an actual notice of the investment advisor death or incapacity and client control of their assets occurs** by being notified of the name and contact information for the custodian whom maintains custody of the client(s) assets.
3. **Means for the credit demands** of the investment advisor to be met.
4. **Means to Ensure sufficient data backups** to allow rapid resumption of the investment advisor's activities.

Notification to Regulatory Authorities and Others.

The Company will notify appropriate authorities, vendors (including account custodians), and other parties immediately, or as necessary. Notify the Virginia Division of Securities and Retail Franchising via IARD/CRD/by Phone within 24 hours of the death or incapacity of key persons.

Applicable Law per 21 VAC5-80-160(F):

*A specifically named person who will either conduct or wind down the business on behalf of the investment advisor needs to be named in the firm's disaster recovery plan. If the named person will conduct business on behalf of the investment advisor, the individual needs to be a registered investment advisor representative. If the individual is simply alerting clients of the incapacity or death of the key person(s) and winding down the business, the named person does not need to be a registered investment advisor representative.

Annual Testing

The Company will conduct a comprehensive test of the Contingency/Disaster Recovery Plan (DR Plan) on an annual basis and the results of the test will be documented and retained on file. If the DR Plan is implemented, this can serve in lieu of the annual testing as described above. Such incidents will also be documented and retained on file.

The Registered Representative and or CCO will have the responsibility for testing and documenting actual implementation of the DR Plan. The Company's business is highly cloud-based, therefore much of the testing is dependent on internet access at the alternate location.

The items tested during the annual testing process will include 1) access to the internet from the alternate location, 2) access to the various service providers (including custodians, email, archiving and phone services), 3) the ability to forward phones to cell phones, and 4) the integrity of backup services, etc.

If a disaster occurs, every effort will be made by the Company to contact all Advisors and or clients. This will either be done by phone calls, emails, general mailing, and/or posting a message on the company website. A list of all clients can also be received by contacting the various custodians.

A step by step plan and phone tree is given to every employee.