

2022 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 Legacy Asset Management, Inc (referred to as Legacy) to setup a framework to be used in the most likely of scenarios. It is also the intent that this framework provides guidance as to how to respond should an unforeseen situation occur.

Legacy believes that an advisor's fiduciary obligation to its clients includes the obligation to take steps to protect the clients' interests from being placed at risk because of Legacy'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 advisor that is engaged in the active management of their assets would ordinarily be placed at risk if the advisor ceased operations.

Business Description

Legacy conducts business in mutual funds, exchange traded funds, equities, fixed income, and other securities; it does not hold customer funds or securities. Transactions are sent to Legacy's custodian, Charles Schwab which executes its orders, compares them, allocates them, clears, and settles them. Legacy's custodian maintains its clients' account, grants clients' access to them, and delivers funds and securities.

Emergency Information

Firm Contact Persons

Legacy's two emergency contact persons are:

Joseph R. Birkofer – 713-503-2641 jbirkofer@legacyasset.com - President/CCO

Carole Hughes – 281-900-6920 chughes@legacyasset.com – Office Manager

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)/Fire Department/Police Department: 911

Internet Service Provider: PS Lightwave – 832-615-8000

Data Backup Provider: Carbonite 855-227-2249

Accountant – Help Me Bookkeeper – Doug Robinson – 713-688-1863 doug@helpmebookkeeper.com

Alternative firm contact in case of death of key personnel: Joseph Birkofer 713-503-2641 or Carole Hughes 281-900-6920

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

Firm Policy

Legacy'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.

If Legacy determines it is unable to continue its business, it will assure clients prompt access to their funds and securities.

Significant Business Disruptions (SBDs)

Legacy's plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only Legacy'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 several firms, such as a terrorist attack, a city flood, or a wide-scale regional disruption.

Legacy'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.

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

Legacy 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: In the COO's office file.

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

Legacy's Custodian and Brokerage Firm Contacts

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

Office Locations

Legacy's primary office address and phone number are:

3411 Richmond Ave., Suite #750
Houston, TX 77046
United States
713-355-7171

Legacy 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 the company offices, Legacy will move its staff from affected offices to the closest of its unaffected office locations. If none of Legacy's other office locations are available, it will move the form operations to:

2315 Bolsover Street
Houston, TX 77005
United States
713-503-6295

Mission Critical Systems

Legacy'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.

Legacy has primary responsibility for establishing and maintaining its business relationships with its clients. Legacy's custodian provides the execution, comparison, allocation, clearance, and settlement securities transactions as well as the maintenance of customer accounts, access to customer accounts, and the delivery of funds and securities.

Legacy's brokerage / custodian contract provides that the brokerage firm / custodian will maintain a business continuity plan and the capacity to execute that plan.

Legacy's brokerage firm / custodian represents that it backs up Legacy's records at a remote site. Legacy's brokerage firm / 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. It 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, 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.

Charles Schwab & Co., Inc Advisor Services has the following SBD recovery time objectives: within seconds for critical, core trading functions and within seconds for critical, non-core trading functions.

The Firm's Mission Critical Systems

Trading

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

In the event of an internal SBD, Legacy will enter and send records to its brokerage firm by the fastest alternative means available. In the event of an external SBD, Legacy 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, Legacy may need to refer its clients to deal directly with its brokerage firm for order entry.

Clients Access to Funds and Securities

Legacy does not maintain 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, Legacy's investment advisor 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, Legacy will post on its website and Twitter and LinkedIn that clients may access their funds and securities by contacting it.

Mutual Fund and Insurance Companies

Client Service Phone Numbers

AIG	(800) 888-2452
Allianz	(800) 950-5872
American Funds	(800) 421-0180
Austin Capital LLC	(800) 593-7232
Delaware Life	(877) 253-2323
Fidelity Investments	(800) 343-3548
Genworth Life Insurance	(888) 436-9678
Invesco Investment Services	(800) 959-4246
Jackson National Life	(800) 644-4565
John Hancock Investments	(800) 395-1113
July Services	(888) 333-5859
LT Trust	(800) 831-8675
Lincoln Financial Group	(800) 942-5500
Mass Mutual (Empower)	(800) 854-0647
MetLife Insurance	(800) 638-5433
Nationwide	(800) 848-6331
Standard	(800) 858-5420
Transamerica Life Insurance	(866) 835-8866
T. Rowe Price	(800) 354-2351
Vanguard/Ascensus	(866) 794-2145
Victory Funds	(800) 839-3863
Voya	(800) 584-6001

The firm will make this information available to customers through its disclosure policy as well.

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

Legacy maintains its primary hard copy books and records and its electronic records at its primary office. Additionally, current client data is backed up on the web.

The firm's CCO is responsible for the maintenance of these books and records. Legacy 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 Carbonite.

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

Operational Assessments

In the event of an SBD, Legacy 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 Legacy will employ will include its website, telephone voice mail, secure e-mail, etc. In addition, Legacy 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.

Client Account Information

Legacy currently accesses client account information via its brokerage firm's website. In the event of an internal SBD, Legacy would access client information via fax correspondence, alternate phone systems, etc. Legacy 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

Legacy communicates with its clients using the telephone, e-mail, its website, fax, US Mail, and in person visits at Legacy or at another location. In the event of an SBD, Legacy will assess which means of communication is still available to it and use the means closest in speed and form (written and oral) to the means that it has used in the past to communicate with the other party. For example, if Legacy has communicated with a party by e-mail but the internet is unavailable, Legacy will call the party on the telephone and follow up and where a record is needed with paper copy in the US Mail. In the event of an anticipated significant regional business disruption, Legacy 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

Legacy communicates with its employees using telephone, e-mail, US Mail, and in person. In the event of an SBD, Legacy 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.

Regulators

Legacy communicates with its regulators using the telephone, e-mail, fax, US Mail, and in person. In the event of an SBD, Legacy will assess which means of communication is 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

Legacy is subject to regulation by the Securities and Exchange Commission (SEC). Legacy now files reports with its regulators using IARD/CRD System. In the event of an SBD, Legacy will check with the SEC to determine which means of filing is still available to it and use the means closest in speed and form (written or oral) to its previous filing method. If Legacy 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
US Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549
202-551-6200

Investment Advisor Regulation Office
Division of Investment Management
US Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549
202-551-6999