

CBL Wealth Management

Business Continuity Plan (BCP)

Updated Sept 1, 2023

I. Emergency Contact Persons

Our firm's two emergency contact persons are: Christopher Lindsay, 760-214-9146, Chris@CBLWealthManagement.com and Charles Schwab & Co., Inc. (Schwab), 800-435-4000, [www.schwab.com/contact us](http://www.schwab.com/contact-us) OR www.schwaballiance.com. (CBL Wealth management has selected Charles Schwab & Co., Inc. as primary custodian for our clients' accounts)

The firm will provide FINRA with the contact information for the two emergency contact persons: (1) name; (2) title; (3) mailing address; (4) email address; (5) telephone number; and (6) facsimile number through the FINRA Contact System (FCS). Christopher Lindsay will promptly notify FINRA of any change in this information through FCS (but no later than 30 days following the change) and will review, and if necessary update, this information within 17 business days after the end of each calendar year.

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 assure customers prompt access to their funds and securities.

A. Significant Business Disruptions (SBDs)

Our plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only our firm's ability to communicate and do business, such as a fire in our building. 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. Our response to an external SBD relies more heavily on other organizations and systems, especially on the capabilities of our primary custodian.

B. Approval and Execution Authority

Christopher Lindsay – Sole Proprietor, a registered principal, is responsible for approving the plan and for conducting the required annual review. Christopher Lindsay has the authority to execute this BCP.

C. 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 Website in the "about us" section.

III. Business Description

Our firm conducts business primarily in equity, fixed income, and derivative securities. Our firm is an introducing firm and does not perform any type of clearing function for itself or others. Furthermore, we do not hold customer funds or securities. We accept and enter orders. All transactions are sent to our primary custodian, which executes our orders, compares them, allocates them, clears and settles them. Our primary custodian also maintains our customers' accounts, can grant customers access to them, and delivers funds and securities. Our firm services retail and institutional customers. We do not engage in any private placements.

CBL Wealth management has selected Charles Schwab & Co., Inc., (El Paso Operation Center 1945 Northwestern Drive, El Paso, TX 79912) as primary custodian for our clients' accounts. Clients may gain access to their individual accounts by calling 1-800-435-4000 or visiting www.schwaballiance.com. Charles Schwab & Co., Inc. has established its own BCP in the event internal/external factors impact business operations.

IV. Office Locations

A. Primary Office Location

Our Location #1 Office is located at 18564 US Highway 18 Suite 205, Unit B1, Apple Valley Ca. 92307. Its main telephone number is 760-214-9146. We engage in order taking and entry primarily at this location.

V. Alternative Physical Location(s) of Employees

In the event of an SBD, we will move our staff from the affected location to a safe alternate location.

VI. Customers' Access to Funds and Securities

Our firm does not maintain custody of customers' funds or securities, which are maintained at our primary custodian, Charles Schwab & Co., Inc. (www.schwaballiance.com). 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 primary custodian on their behalf, and if our Web access is available, our firm will post on our website that customers may access their funds and securities by contacting Schwab – www.schwaballiance.com. The firm will make this information available to customers through its disclosure policy.

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

Our firm maintains its primary hard copy books and records and its electronic records at 18564 US Highway 18 Suite 205, Unit B1 Apple Valley, Ca. 92307. Christopher Lindsay is responsible for the maintenance of these books and records. Our firm maintains the following document types and forms that are not transmitted to our primary custodian: Customer Profile, contracts and associated notes.

Our firm does not maintain back-up hard copy books and records in any other location(s).

The firm backs up its electronic records quarterly by downloading to a password protected and encrypted external hard drive which is stored offsite at Chris Lindsay's personal address.

In the event of an internal or external SBD that causes the loss of our paper records, we will recover them from our back-up drive. If our primary site is inoperable, we will continue operations from an alternate location. For the loss of electronic records, we will retrieve the physical drive and electronically recover all missing data.

VIII. 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 customers, employees, critical business constituents, critical banks, critical counterparties and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options we will employ will include the use of our website, cloud based voice mail, secure email and telephone. 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

Our firm maintains a capital reserve in an amount greater than the minimum capital reserve requirements imposed by state regulators. In the event of a SBD, we will determine the best use of our capital reserves to ensure our ability to continue to fund our regular operations, ensure all mission critical elements of operation are replaced or maintained and all contractual/fiduciary obligations to clients are met.

IX. Mission Critical Systems

Our firm's "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. More specifically, these systems include: Access via telephone or internet to our primary custodian(s) (Charles Schwab & Co., Inc) which custodian assets and facilitate all trade execution and clearing.

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 primary custodian provides, through contract, the execution, comparison, allocation, clearance and settlement of securities transactions, maintenance of customer accounts, access to customer accounts and the delivery of funds and securities.

Our primary custodian contract provides that our primary custodian will maintain a business continuity plan and the capacity to execute that plan. Our primary custodian represents that it

will advise us of any material changes to its plan that might affect our ability to maintain our business and has presented us with an executive summary of its plan, which is available on their website. In the event our primary 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 primary 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 primary custodian represents that it will assist us in seeking services from an alternative source.

Our primary custodian represents that it backs up our records at a site. Our primary 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 primary 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.

Christopher Lindsay will periodically review our primary custodian’s capabilities to perform the mission critical functions the primary 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 in-person, telephone or equivalent “verbal” means. 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 electronic communications (email, website, text or massaging). If necessary, we will advise our customers to place orders directly with our primary custodian, Charles Schwab & Co., Inc., at 1-800-435-4000.

2. Order Entry

Currently, our firm enters orders by sending them to our primary custodian electronically or telephonically.

In the event of an internal SBD, we will enter and send records to our primary custodian by the fastest alternative means available, which include electronic submission and telephone. In the event of an external SBD, we will maintain the order in electronic or paper format, and deliver the order to the primary 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 primary custodian for order entry.

3. Order Execution

ALL order execution is done by our primary custodian. In the event of an internal/external SBD, we would continue to rely on our primary custodian to execute properly entered orders.

4. Other Services Currently Provided to Customers

In addition to those services listed above in this section, we also provide financial planning and consulting. In the event of an internal/external SBD, we would continue to provide via verbal or written means such services as needed.

B. Mission Critical Systems Provided by Our Primary custodian

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

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

A. Customers

We now communicate with our customers using Telephone, email, Website, Text, "ZOOM"/video, Fax, U.S. Mail and in-person visits at our location or the client's home/business (or location of choice). 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 email 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

As a sole Proprietor with no employees CBLWM has no plans to disclose with regard to employee communication.

C. Regulators

We are currently members of the following self-regulatory organizations (SROs), and are also regulated by: Finra, SEC/*State of California*. We communicate with our regulators using telephone, Website (secure log-in) email, fax and U.S. Mail. 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.

XI. 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.

B. Banks

We have contacted our bank(s) to determine if they can continue to provide the financial service we will need in light of the internal or external SBD. The bank maintaining our operating account is: Schwab.

C. Counter-Parties

We have contacted our critical counterparties, such as other broker-dealers or institutional customers, to determine if we will be able to carry out our transactions with them in light of the internal or external SBD. Where the transactions cannot be completed, we will work with our primary custodian or contact those counterparties directly to make alternative arrangements to complete those transactions as soon as possible.

XII. Regulatory Reporting

Our firm is subject to regulation by: the SEC/State of California. We now file reports with our regulators using paper copies in the U.S. mail, and electronically using fax, email and the Internet. In the event of an SBD, we will check with the SEC, FINRA 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.

XIII. Disclosure of Business Continuity Plan

Attached is our written BCP disclosure statement we provide customers at account opening annually and whenever significant changes to the BCP require clients be updated. We also post the disclosure statement on our website and mail/email it to customers upon request.

XIV. 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 primary 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 primary custodian.

XV. 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: Christopher Lindsay

Title: Sole Proprietor/Chief Compliance Officer

Date: Sept 1, 2023

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CBL Wealth Management's Business Continuity Planning

CBL Wealth Management 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 – If after a significant business disruption you cannot contact us as you usually do by dialing or texting 760-214-9146 or by emailing Chris@CBLWealthmanagement.com you should try our alternative number 760-983-3001 or go to our website at www.CBLWealthManagement.com for more information. If you cannot access us through either of those means, you should contact our primary custodian, Charles Schwab & Co., Inc at [www.schwab.com/contact us](http://www.schwab.com/contact-us) OR www.schwaballiance.com 1-800-435-4000 for instructions on how they may assist in providing prompt access to your funds and/or enter trades as requested

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

Our primary custodian, Charles Schwab & Co., Inc, backs up important client 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 primary custodian that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments with minimal delay. 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 expect to recover and resume business within 3 days. 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 within 5 days. In either situation, we plan to continue in business, transfer operations to our primary custodian if necessary, and notify you through our website www.CBLWealthManagement.com or our customer emergency number, 760-214-9146 how to contact us. 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 760-214-9146 or Chris@CBLWealthmanagement.com.

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