

Business Continuity and Disaster Recovery Plan

EFA BUSINESS CONTINUITY PLAN

This EFA Business Continuity Plan is designed to provide all personnel with guidelines to be followed in the event of a Major Disruption to our business.

FIRM POLICY

Our primary objective is to ensure that everyone in the "EFA's Family" is taken care of. EFA'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.

EFA's plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only the Company's ability to communicate and do business, such as a fire or loss electrical power in the office or building.

External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a natural disaster, or another event that causes a wide-scale, regional disruption to essential services. The Company's response to an external SBD will rely more heavily on other organizations and systems, especially on the capabilities of product sponsors, federal emergency authorities, local officials and utility companies.

One half of that objective is concerned with an Evacuation Plan, which lays out some "best practices" for everyone's safety. The other half is a Recovery Plan for the future success of EFA even in the wake of a Major Disruption. Each of our jobs is dependent on EFA being able to provide a continuous level of high quality service in spite of the Disruption.

The Company operates from the following locations:

Type of Location, Registered or Unregistered	Address and Main Phone Number	Located in a Personal Residence? (Y or N)	Means of Transportation Employees Use to Reach Office	Mission Critical Systems Taking Place at Office
Registered	1160 Birchwood Road, Weston, FL 33327, (954) 385-5331	Yes	Car	All advisory services

The following individuals are responsible for the duties of each position stated below:

Chief Executive Officer:	Thomas Bastin
Chief Compliance Officer:	Thomas Bastin
Executive Representative:	Thomas Bastin
Client relations Manager:	Thomas Bastin
Disaster Recovery Coordinator (primary Contact):	Thomas Bastin
Disaster Recovery Coordinator (secondary Contact):	Brad Larsen

What Constitutes a Major Disruption?

A Major Disruption is any event that renders us unable to provide our usual level of service without immediate recovery action. A Major Disruption can fall into one of three categories:

1. During business hours, not requiring evacuation (e.g. major systems crash).
2. During business hours, requiring evacuation (e.g. an unscheduled fire alarm).
3. Outside of normal business hours, impacting future business activity.

Disaster Relief Team (DR Team)

Thomas Bastin has the overall responsibility for the EFA response to a Major Disruption. This includes deciding what to do internally (evacuate or not), activating external support and backup and coordinating the recovery. In the absence of Thomas Bastin then Brad Larsen will assume the duties of Thomas Bastin.

Employee	Title	Phone Number
Thomas Bastin	Disaster Recovery Coordinator (P)	(954) 385-5331
Brad Larsen	Disaster Recovery Coordinator (S)	(561) 722-4511

What Actions Will be Taken?

Immediate Response: The Disaster Recovery Coordinator will make a preliminary assessment are made as to the Nature of the Major Disruption and action to be taken (evacuation, etc.). The Disaster Recovery Coordinator then organizes the response.

Evacuation: Where required, all employees will evacuate the company's facilities and relocate to a back-up facility (see below).

Recovery: The Recovery Plan is implemented (see below).

Backup for Systems

The Disaster Recovery Coordinator is responsible for maintaining backup systems. Our main EFA location houses our key employees and an extensive amount of data that keeps us running. We operate the following systems and backups:

- **Data/Computer Backups:** All our databases, imaging, our shared drives and our individual networked drive are backed up nightly, ensuring that we would never lose more than a day's work. In addition, our client's business activities will not be affected in the event of a computer data disruption at our Company. Finally, EFA maintains a password protected portable external hard-drive that is backed up weekly and can be taken to any location. The CCO of EFA always takes the portable backup with him when traveling.
- **Battery Backups:** These are in place to protect our servers and data during a power outage.
- **Alarm System:** This is managed by an outside company that alerts the necessary authorities in the event of an unauthorized entry or a fire. The automatic fire detection system includes a building-wide sprinkler system.

Staff Relocation

The Disaster Recovery Coordinator is responsible for staff relocation. In the event of an emergency, we have arranged to relocate staff to either the Stuart or Still River office.

Evacuation Plan

If the Coordinator determines that personnel should evacuate the affected location(s), he must make an announcement to all personnel as appropriate procedures. The announcement may given via personal contact, e-mail, intercom or other methods as appropriate given the systems available and size of staff and building. This announcement should be short and concise, should calmly identify the situation and should provide instructions to employees on how to respond. This announcement should be repeated as often as necessary to avoid confusion and to ensure all employees are aware of the situation. After ensuring the physical safety of Company personnel, the Coordinator and the DR Team must then implement this BCP.

If the situation does not merit evacuation, steps should be taken to alert designated persons, the DR Team, of necessary actions to facilitate ongoing operations in the face of limited disruption. In this case, the Coordinator will determine which, if any, procedures in this BCP should be implemented.

Once the Disaster Recovery Coordinator announces the decision to evacuate, the following general procedures will be observed. While much of this plan is common sense, if a dangerous situation exists in a facility - get out immediately, following fire exit procedures. We want to make sure that everyone is well informed to expedite a speedy and safe evacuation, accounting for all staff members' well being. While we hope that we will never need to use this plan, it is critical that everyone knows what action to take in the event of an evacuation. Please be sure to review this plan, locate all emergency exits, and direct any questions to your supervisor.

When to Evacuate: Evacuate when you hear the overhead emergency alarm system sound, or when you are otherwise notified to leave the premises.

Immediate Steps to Take Upon Evacuation:

- DO:** Hang up the phone immediately!
- Take *nearby* personal items - purse, wallet, keys, coat, building key card, etc.
- Shut the door behind you if you are the last to leave an office / conference room
- Leave via the nearest emergency exit
- Go directly to your outdoor designated department meeting place
- Report any emergency matters to Relief Team personnel

- DON'T:** Do not use the elevator
- Do not stop to use the telephone
- Do not shut down your computer
- No heroics!

If you are on the telephone: Do not attempt to finish the call or transaction! Interrupt the caller if necessary, to calmly inform them that the building alarm system has sounded, and that you are required to evacuate the building immediately. Based on the urgency of their call, you may either offer to call them again once you are back at your desk, or directly transfer the call to a receptionist/extension.

Recovery Plan

It is impossible to provide for every Major Disruption contingency. However, it is EFA's goal to assist customers and provide them with the necessary information and help they need to service and access their accounts.

In the event of an SBD: (1) If telephone service is available, our employees will make efforts to assist our customers in contacting accessing their account, if so requested; and (2) If telephone service is not available, our firm will try other means and methods to assist our customers reach the necessary parties.

In addition, in the event of an SBD, our Company will immediately identify any methods available that will permit personnel to communicate with customers, other employees, critical business constituents, critical banks, critical counter-parties, and regulators.

If the Company determines that it may be unable to meet its obligations to those counter-parties or otherwise continue to fund its operations, EFA will request additional financing from our bank or from other credit sources to fulfill its obligations to our clients. If EFA cannot remedy a capital deficiency, they will take appropriate steps accordingly, including.

In the event there is suspension or termination of the Company's business, the Company will attempt to notify clients regarding the situation and provide them with instructions for accessing their funds or securities, if applicable, for verifying transactions in process or for conducting future business. Notification will be a form allowed based on the circumstances permitted by regulatory authorities and may include telephone calls, letters or a posting on the Company's website.

Critical Business Constituents, Banks, and Counter-Parties

Business constituents

EFA has contacted our critical business constituents (businesses with which the Company has an ongoing commercial relationship in support of its operating activities, such as vendors providing critical services), and determined the extent to which the Company can continue its business relationship with these businesses in light of the internal or external SBD. The Company 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.

Banks

EFA has contacted its banks and lenders to determine if they can continue to provide the financing that the Company may need in light of the internal or external SBD. The Company's accounts are currently with the following institutions:

Types of account	Name of Financial Institution	Address of Financial Institution	Telephone Number	Contact Name
Checking	Bank of America	1381 Weston Rd, Weston, FL 33326	(954) 384-6204	

If our banks and other lenders are unable to provide the financing, we will seek alternative financing immediately.

Regulators

The Company is registered with the SEC and has notice filed in the following states: Florida, Georgia, California, North Dakota, Massachusetts & Ohio.

EFA communicates with applicable regulators using the telephone 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.

Disclosure of Business Continuity Plan

The Company will disclose in writing a summary of our BCP to client at account opening or at the time a business relationship is established. The Company will notify clients in writing when material changes are made to the Plan than may affect their business relationship with the Company. The Company will also post the summary on our Web site and mail it to customers upon request.

The summary addresses the possibility of a future SBD and how we plan to respond to events of varying scope. In addressing the events of varying scope, the summary:

1. Provides specific scenarios of varying severity (e.g., a firm-only business disruption, a disruption to a single building, a disruption to a business district, a city-wide business disruption, and a regional disruption);
2. States whether we plan to continue business during that scenario and, if so, our planned recovery time; and
3. Provide general information on our intended response.

Our summary also discloses the existence of back-up facilities and arrangements. A copy of the Company's disclosure statement is included at the back of this Plan.

Updates and Annual Review

The Company will update this plan whenever there is a material change to its operations, structure, business or location.

The Company's BCP will be reviewed and modified, if necessary, at least annually, but no later than within 12 months of the date on which this Plan was put into effect or previously reviewed, to take into account any changes in the Company's operations, structure, business, or location.

Client Disclosure Statement

ERISA Fiduciary Advisors

EFA plans to quickly recover and resume business operations after a significant business disruption (SBD) 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 company's Business Continuity Plan (BCP) is designed to permit us to resume operations as quickly as possible, given the scope and severity of the SBD.

The BCP addresses: data back up 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 Fund Administrator and Custodian Bank backs up our important 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 Fund

Administrator and Custodian Bank that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments within a resumption time period. Your orders and requests for funds and securities could be delayed during this period.

In addition, the product sponsor maintains all records related to your investments and account holdings and backs up important records in accordance with their business continuity plan. For more information on their contingency plan, please contact the sponsor directly at the telephone number provided on your statements.

Significant Business Disruptions: The Company's plan takes into account two kinds Significant Business Disruptions, internal and external. Internal SBDs affect only the Company's ability to communicate and do business, such as a fire or loss electrical power in the office or building.

External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a natural disaster, or another event that causes a wide-scale, regional disruption in essential services.

Internal SBDs: In the event of a disruption in the Company's business operations due an internal SBD, the Company will attempt to continue to conduct business as usual by utilizing alternative communication methods (if available), such as the Internet, cell phones, etc., or by moving its operations to an alternative location.

If personnel or operations must be moved to an alternate location, the Company anticipates that it will resume regular operations as soon as personal can access the alternate site.

External SBDs: In the event of a disruption in the Company's business operations due to an external SBD, the Company will attempt to continue to conduct business as usual by moving its operations to an alternative location outside the effected area, if possible, or by providing customers with alternative communication arrangements, as indicated below, to conduct business or to access their funds and securities.

The Company will attempt to resume business and keep its customers informed regarding relevant events to the best of its ability based on the circumstances.

In all cases, the Company will resume normal business operations as soon as it is able to do so, based on the type and the extent of the disrupting event.

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.

Communications: In the event you are unable to reach the Company at our main number, please proceed as follows:

1. Contact the Company at the following alternate telephone number: (561) 722-4511 or (978) 501-1706.
2. Access the Company's website at www.efadvisor.com.
3. Contact the product sponsor directly at the number listed on your most recent statement.

Contact information: Any questions regarding the Company's Interruption Plans should be addressed to: Thomas Bastin, 1160 Birchwood Road, Weston, FL 33327, (954) 385-5331, cell (954) 818-7756.