



Eastwood

WEALTH MANAGEMENT

Business Continuity Plan

Introduction

This manual documents the business continuity plan for Eastwood Wealth Management, an LPL Financial branch office that conducts business in: equity, fixed income, mutual funds, derivative securities and insurance products and the recovery of our critical business functions and systems in the event of a business disruption.

I. Emergency Contact Persons

LPL Financial provides FINRA with the contact information for 2 emergency contact persons to fulfill this requirement for all branch office locations under LPL Financial. These 2 emergency contact persons are registered principals for LPL Financial. LPL Financial stays in compliance by updating this information upon any material change and reviewing the information quarterly to ensure it is up-to-date. In the event of an emergency and a client is not able to contact Eastwood Wealth Management, please call LPL Financial directly at (800) 877-7210 and/or our Client Center at (800) 558-7567.

Rule: FINRA Rule 43709(f); NASD Rule 1160

II. Branch Policy

Our branch's policy is to respond to a Significant Business Disruption (SBD) by safeguarding employees' lives and our property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of our branch'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 direct our clients to LPL Financial at (800) 877-7210 and/or our Client Center at (800) 558-7567 for emergency assistance and access to their funds.

A. Significant Business Disruption (SBDs)

Our plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only our branch's ability to communicate and do business, such as fire in our building. External SBDs prevent the operation of the securities markets or a number of branches, 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 LPL Financial.

B. Approval and Execution of Authority

Tim Evans, CFP®, a registered principal, is responsible for approving the plan and for reviewing it annually.

Tim Evans, CFP® has the authority to execute this BCP.

C. Plan Location and Access

Our branch 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: Eastwood Wealth Management main computer under main folder Practice Management, Systems Manual sub folder, Business Continuity Plan sub folder.

Rule: FINRA Rule 4307(b), (d) and (e)

III. Business Description

Our branch office conducts business in: equity, fixed income, mutual funds, derivative securities and insurance products. We accept and enter orders and service retail and institutional clients.

LPL Financial performs all clearing functions and holds customer funds or securities on our behalf. All transactions are sent to LPL Financial, which executes our orders, compares them, allocates them, clears and settles them. LPL Financial also maintains our client's accounts, can grant clients access to them and deliver funds and securities.

LPL Financial is located at:

Boston	Carolinas (Fort Mill)	San Diego
LPL Financial	LPL Financial	LPL Financial
75 State St	1055 LPL Way	4707 Executive Drive
24th Floor	Ft. Mill, SC 29715	San Diego, CA 92121
Boston, MA 02108		

Our contact number for LPL Financial is: (800) 877-7210 and/or our Client Center at (800) 558-7567

IV. Office Location

Our office location is:

1213 Culbreth Drive
Wilmington, NC 28405
910-509-7123

V. Alternative Physical Location of Employees

In the event of an SBD, we will move our staff from the affected office to the closest professional office available capable of handling our day-to-day functions and communicate this location to our clients.

Rule: FINRA Rule 4370(c)(6)

VI. Client's Access to Funds and Securities

LPL Financial maintains custody of client's funds or securities on our behalf. 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 LPL Financial on their behalf, and if our Web access is available, our branch will post on our website that customers may access their funds and securities by contacting LPL Financial at (800) 877-7210 and/or our Client Center at (800) 558-7567.

If the Securities Investor Protection Corporation (SIPC) determines that we are unable to meet our obligations to our clients or if our liabilities exceed our assets in violation of Securities Exchange Act Rule 15c3-1, SIPC may seek to appoint a trustee to disburse our assets to clients. We will assist SIPC and the trustee by providing our books and records identifying customer accounts subject to SIPC regulation.

Rules: FINRA Rule 4370(a); Securities Exchange Act Rule 15c3-1; see also 15 U.S.C § 78eee

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

Our branch maintains its primary hard copy books and records at:
Eastwood Wealth Management
1213 Culbreth Drive
Wilmington, NC 28405

Our branch maintains its primary electronic records at:
Eastwood Wealth Management
1213 Culbreth Drive
Wilmington, NC 28405

Tim Evans, CFP® CLTC, Registered Principal, at 910-509-7123 is responsible for the maintenance of these books and records.

Our branch maintains backup hard copy books and records at:
LPL Financial

Boston	Carolinas (Fort Mill)	San Diego
LPL Financial	LPL Financial	LPL Financial
75 State St	1055 LPL Way	4707 Executive Drive
24th Floor	Ft. Mill, SC 29715	San Diego, CA 92121
Boston, MA 02108		

Our branch backs up electronic records at:
LPL Financial

Boston	Carolinas (Fort Mill)	San Diego
LPL Financial	LPL Financial	LPL Financial
75 State St	1055 LPL Way	4707 Executive Drive
24th Floor	Ft. Mill, SC 29715	San Diego, CA 92121
Boston, MA 02108		

In the event of an internal or external SBD that causes the loss of our paper records, we will physically recover them from our back-up site. If our primary site is inoperable, we will continue operations from our back-up site or an alternate location. For the loss of electronic records, we will either physically recover the storage media or electronically recover data from our back-up site, or, if our primary site is inoperable, continue operations from our back-up site or an alternate location.

Rule: FINRA Rule 4370(c)(1)

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. In addition, we will retrieve our key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic). If needed, we will direct customers directly to LPL Financial at: (800) 877-7210 and/or our Client Center at (800) 558-7567.

Rule: FINRA Rules 4370(c)(3),(c)(4),(c)(5),(c)(6),(c)(7),(c)(9 & (g)(2))

B. Financial and Credit Risk

In the event of an SBD, we will determine the value and liquidity of our investments and other assets to evaluate our ability to continue to fund our operations and remain in capital compliance. We will contact LPL Financial, critical banks and investors to apprise them of our financial status. If we determine that we may be unable to meet our obligations to those counter-parties or otherwise continue to fund our operations, we will request additional financing from our bank or other credit sources to fulfill our obligations to our customers and clients. If we cannot remedy a capital deficiency, we will file appropriate notices with our regulators and immediately take the appropriate steps.

Rule: FINRA Rule 4370(c)(3), (c)(8) & (g)(2)

IX. Mission Critical Systems

“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.

We have primary responsibility for establishing and maintaining our business relationships with our clients and have sole responsibility for our mission critical functions of order taking, entry and execution. LPL Financial provides 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.

A. Our Branch’s Mission Critical Systems

Order Taking

Currently, we receive orders from customers via telephone, or in person. 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. If customers are unable to

reach the branch to place trades they can contact the LPL Financial Service Center at (800) 877-7210 and/or our Client Center at (800) 558-7567.

Order Entry

Currently, we enter orders by recording them on paper and electronically and sending them to LPL Financial electronically through BranchNet or telephonically. LPL Financial represents under its BCP, we can expect service restoration within 4 hours.

In the event of an internal SBD, we will enter and send records to LPL Financial by the fastest alternative means available, which include telephone or BranchNet/ClientWorks. In the event of an external SBD, we will maintain the order in electronic or paper format, and deliver the order to LPL Financial 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 LPL Financial for order entry.

Order Execution

LPL Financial executes orders on our behalf. LPL Financial's Fort Mill and San Diego offices serve as primary locations for Trade Execution. Each office serves as the backup for the other. There are documented and tested plans in place to provide for a fail-over between the two sites.

B. Mission Critical Systems Provided by LPL Financial

Our branch relies on LPL Financial to provide order execution, order comparison, order allocation, customer account maintenance and/or access and delivery of funds and securities.

LPL Financial backs up our records at a remote site. LPL Financial's Fort Mill and San Diego offices serve as primary locations for mission-critical processing, including: Operations, Trade Execution and Processing, and the Service Center. Each office serves as backup of the other. There are documented and tested plans in place to provide for a fail-over between the two sites.

Rules: FINRA Rules 3510(c)(2) & (g)(1)

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

A. Customers

We now communicate with our customers using the telephone, email, our website (www.EastwoodWealth.com), fax, U.S. mail and in-person visits at our office or another location. In the event of an SBD, we will access 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.

Rule: FINRA Rule 4370 (c)(4)

B. Employees

We now communicate with our employees using telephone, email and in person. 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. We 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 and office phone numbers. We have identified persons, noted below, who live near each other and may reach each other in person:

The person to invoke use of the call tree is: Tim Evans, CFP® CLTC

Rule: FINRA Rule 4370 (c)(5)

C. Regulators

We communicate with our regulators using telephone, email, fax, U.S. mail and in person. 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.

Rule: FINRA Rule 4370 (c)(9)

XI. Critical Business Constituents, Banks, and Counter-Parties

A. Business Constituents

Critical business constituents are businesses with which we have an ongoing commercial relationship in support of our operating activities such as vendors providing critical services. LPL Financial provides most of our critical services. 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.

Rules: FINRA Rule 4370(c)(7)

B. Banks

We have contacted our banks and lenders to determine if they can continue to provide financing that we will need in light of internal or external SBD. The bank maintaining our operating account is Bank of America.

Rules: FINRA Rule 4370 (c)(7)

C. Counter-Parties

LPL Financial maintains the relationships with our critical counter-parties on our behalf. Where the transactions cannot be completed, we will work with LPL Financial or those counterparties directly to make alternative arrangements to complete those transactions as soon as possible.

Rules: FINRA Rule 4370(c)(7)

XII. Regulatory Reporting

We are subject to regulation by the SEC, FINRA and the North Carolina Department of Insurance. 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.

Rule: FINRA Rule 4370 (c)(8)

XIII. Disclosure of Business Continuity Plan

LPL Financial has a BCP disclosure statement that is provided to our customers at account opening and attached to this document as “Attachment A”. The BCP Disclosure statements is also posted at www.lpl.com and mailed to clients upon request.

Rule: FINRA Rule 4370 (e)

XIV. Updates and Annual Review

We will update this plan whenever we have a material change to our operations, structure, business or location or to those of LPL Financial. 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 LPL Financial.

Rule: FINRA Rule 4370 (b)

XV. Senior Manager Approval

I have approved this Business Continuity Plan as reasonably designed to enable our branch to meet its obligations to clients in the event of an SBD.

Rule: FINRA Rule 4370 (d)

Signed: Timothy W. Evans, CFP® CLTC

Title: Registered Principal

Date: 01/26/2018

Attachment A to LPL Financial Business Continuity Plan Disclosure

LPL Financial & Affiliate Business Continuation Plan Summary

LPL Financial and our affiliates-UVEST Financial Services and The Private Trust Company-are committed to providing timely service to our clients. We recognize the importance of preparing for various disaster scenarios that could hamper our ability to provide service. We have taken aggressive steps to provide for business contingency and continuity planning under a variety of potential scenarios. We continue to evaluate our continuity plans and take the necessary actions to ensure the proper resources are available to provide for the recovery and timely resumption of critical business operations to internal business units, third-party business partners, and clients.

Eastwood Wealth Management Business Continuation Strategy

In the event Tim Evans, CFP® CLTC is incapacitated, a separate agreement is in place to protect the functionality and clients of Eastwood Wealth Management. Another wealth management firm has been identified with similar views to continue servicing clients with minimal disruption. At this time, the contingent firm is a silent partner with no ownership of Eastwood Wealth Management or tangible/intangible information. Procedures are in place to facilitate a transition in a timely manner should it be required.

LPL Financial Business Continuation Strategy

Headquarters and Staff

LPL Financial has headquarters and operations staff located in three principal locations: Boston, Fort Mill and San Diego. The Boston office serves as the primary site for our executive office, Legal and Research. These units, while vital to the company on a continuing basis, are not considered mission-critical for the daily back-office operation of our business. In the event of a disaster that would make the Boston office unserviceable, the San Diego office is its alternate facility.

Mission-Critical Departments

Both the Fort Mill and San Diego offices serve as primary locations for our mission-critical departments, including: Operations, Trade Execution and Processing, and the Service Center. Each office serves as the backup for the other. There are documented and tested plans in place to provide for a fail-over between the two sites.

The LPL Financial Production Data Center is located in a second and distinct Fort Mill location. The alternate Data Center is located in Dallas, Fort Worth, Texas.

- The Production Data Center facility is located approximately ten miles from the Fort Mill office location.
- The Production Data Center infrastructure is fully redundant in terms of power, network and equipment.
- Each of our office locations also have fully redundant networking and telecommunications systems.
- There is redundant connectivity across Boston, Fort Mill and San Diego.

The LPL Financial brokerage computing platform is operated in another geographical region of the United States by an unaffiliated third-party vendor. None of the scenarios presented in this document would pose a threat of business disruption to this remote site. The third-party vendor has a complete business continuity plan that includes alternative sites and recovery times within four hours.

Business Scenario Preparedness

Single Building Disruption

If LPL Financial loses the ability to perform business in one of our buildings, recovery staff associated with mission-critical functions will begin processing at our alternate processing site (Boston, Fort Mill or San Diego, depending on the impacted department). We have plans in place for this relocation and these plans are tested periodically. Recovery time objectives vary based on the criticality of the function that is disrupted.

Campus Disruption

If LPL Financial loses the ability to perform business at either the Fort Mill or San Diego location, mission-critical San Diego functions would be failed over to our Fort Mill office and vice versa. Staff associated with non-mission-critical functions will be relocated to an alternative site (e.g., hotel, home) in an unaffected area. We have plans in place for this relocation and they are tested periodically. Recovery time objectives vary based on the criticality of each function.

Remote Data Center Disruption

If LPL Financial loses the ability to perform business in our Production Data Center in Fort Mill, mission-critical systems will be recovered to our San Diego Data Center. We have plans in place for this recovery and they are tested periodically. Mission-critical systems recovery is expected within four hours.

Pandemic Event

LPL Financial has plans in place to continue business during a pandemic event. Our plan is a multi-tiered action plan based on the World Health Organization (WHO) alert phases with triggering events for each phase. As the threat of a pandemic becomes greater and a new phase is triggered, we will access our plans and determine the appropriate course of action.

Access to Your Funds

A site outage should not impact our clients ability to access their available funds, as LPL Financial business contingency plans are designed to ensure sustained service. However, their ability to trade securities may be impacted by markets events outside of the control of LPL Financial, such as when the market was closed following the September 11th tragedy. Our tested business continuity plans result in necessary personnel being available to approve transactions that result in the disbursement of available funds. In the event that Eastwood Wealth Management ceases operations due to a significant business interruption, you may call LPL Financial at (800) 877-7210 and/or our Client Center at (800) 558-7567 for emergency assistance.

Conclusion

Please be aware that, while we have detailed plans in place, we cannot guarantee that we will be successful in achieving recovery in the times noted above. For example, we may not be able to implement a plan during a disaster as quickly as we expect, or there may be disasters that we have been unable to anticipate and for which we have no plan. Additionally, if parts of our plan are dependent upon third parties, we will have no control over the success or failure of the third party to respond appropriately to the challenges posed at the time of the disaster. Our continuity plans are periodically updated and modified. Updated plan summaries will be made available on our website, www.EastwoodWealth.com and www.lpl.com, and can be obtained by submitting a written request.