



**The Broughton Investment Group**

**Business Continuity Plan Template**

Version 1.02

March 19, 2020



Approval Page

Policy

It is the policy of The Broughton Investment Group, Inc. to maintain service delivery or restore services as rapidly as possible following an emergency that disrupts services. As soon as the safety of employees, staff, visitors and clients has been assured, the facility will give priority to providing or ensuring clients access to funds and records.

Plan Authorization

The Business Continuity Plan (BCP) has been developed for use by The Broughton Investment Group. By affixing the signature indicated below, this BCP is hereby approved for implementation and intended to supersede all [previous versions. This BCP was established to promote a system to: save lives; protect the health, ensure the safety of the company environment; alleviate damage and hardship and reduce future vulnerability within the facility. Further, this document indicates the commitment to ongoing planning, training, and exercise activities in order to ensure the level of preparedness necessary to respond to emergencies or incidents affecting the company.



Paul K. Broughton, Chief Executive Officer

16-MARCH 2020

Date



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## Introduction

This documents the Business Continuity Plan (BCP) for The Broughton Investment Group Inc. (The BIG Inc.), a Registered Investment Advisor firm that services clients by providing financial planning services. In the event of a disaster which interferes with The Broughton Investment Group Inc.'s ability to conduct business from one of its offices, this plan is to be used by the responsible individuals to coordinate the business recovery of their respective areas and/or departments. The plan is designed to contain, or provide reference to, all the information that might be needed at the time of a business recovery.

## Emergency Contact Persons

The 2 emergency contacts registered executive for the BIG Inc. are as follows:

- Texas – Tony Ackerman, President and Chief Operating Officer; Houston, TX 713-825-0710, [ackerman@thebroughtoninvestmentgroup.com](mailto:ackerman@thebroughtoninvestmentgroup.com), and
- Florida – Paul K. Broughton, Owner and Chief Executive Officer, 830-522-0882, [paul@thebroughtoninvestmentgroup.com](mailto:paul@thebroughtoninvestmentgroup.com).

Alternates are:

- Paul K. Broughton, owner; [paul@thebroughtoninvestmentgroup.com](mailto:paul@thebroughtoninvestmentgroup.com); 830-522-0882 and
- Scott King, Director of Security; [scott@thebroughtoninvestmentgroup.com](mailto:scott@thebroughtoninvestmentgroup.com); 512--800-5464)

The Big Inc. stays in compliance by updating this information upon any material change and reviewing the information semi-annually to ensure it is up to date.

## The BIG Policy

The BIG Inc.'s policy is to Ensure the safety of employees and visitors in the office building (in case of an emergency call 911). Have advanced preparations to ensure critical business functions can continue. And have documented procedures to ensure a quick and effective execution of recovery strategies for critical business functions.

The objective of the Business Continuity Plan is to coordinate recovery of critical business functions in managing and supporting the business recovery in the event of a facilities (office building) disruption, disaster or declared pandemic. If normal business will be disrupted due to any of the aforementioned items; we will notify customers of the advanced preparations to be implemented and assure them continued assistance and access to their funds and securities as set forth in this plan.

## 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 other branches, such as a terrorist attack, pandemic, 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 custodian – TD Ameritrade (TDA).

## Approval and Execution Authority

Paul K. Broughton a registered principal, is responsible for approving the plan and the local state Key Persons are responsible for conducting the required annual review. Paul K. Broughton, CEO (along with the state local Key Persons or Director of Security) has the authority to execute this BCP.

## Plan Location and Access

Each branch will maintain copies of their branch BCP plan, and the changes that have been made to it for inspection. An electronic copy of our Business Continuity Plan can be found on our website under the "Resources" Tab at: [www.thebroughtoninvestmentgroup.com](http://www.thebroughtoninvestmentgroup.com). All employees will receive a hard copy of this document, as well as any subsequent updates, in their Compliance Binder.

## Business Description

Our firm is a Registered Investment Advisor firm that services clients by providing financial planning services. we do not hold customer funds or securities. We accept and enter orders. All transactions are sent to our clearing firm, which executes our orders, compares them, allocates them, clears and settles them. Our clearing firm also maintains our customers' accounts, can grant customers access to them, and delivers funds and securities.

Our custodian is TD Ameritrade (TDA) Independence West Team 7801 Mesquite Bend Dr., Ste 112, Irving, TX 75083-6043. Ph 800-400-6288 independence@tdameritrade.com ([www.tdameritrade.com](http://www.tdameritrade.com)).

## Team Organization

This section of the plan identifies who will participate in the recovery process for each Branch Location's Business Continuity Plan. The participants are organized into one or more teams. Each location has a designated Key Person to act as team leader and an alternate for that person. Some locations with multiple team members are assigned either to specific responsibilities or as team members to carry out tasks as needed.

## Office Location

Our office locations are:

### Houston, TX:

1300 W Sam Houston Parkway S, Suite 100  
Houston, Texas, 77042 USA  
832-581-7781

This is our main office, and we perform advisory services at this location.

### San Antonio, TX:

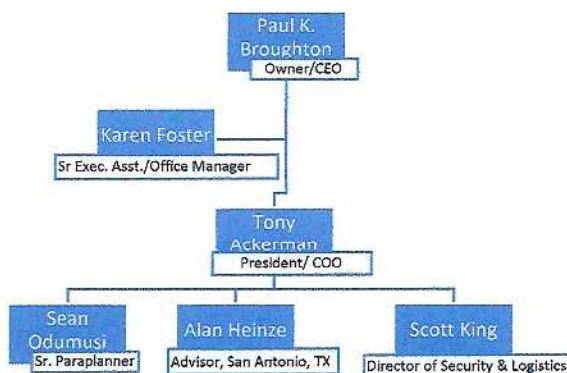
9901 IH 10 West, Ste. 800 San Antonio, Texas USA  
210-273-6565

Advisory services are performed at this location.

### Miami, FL:

2501 S. Ocean Dr. Apt 1003, Hollywood, FL 33019 USA  
714-321-1174

Advisory services are performed at this location. No corporate books or records are maintained there.







## Alternative Physical Location(s) of Employees

In the event of an SBD, we will move our staff from affected office(s) to the closest of our unaffected office location(s). If none of our other office locations is available to receive staff, we will move them to working remotely from home with their company provided computer(s) and their cell phones.

## Recovery Teams

This section of the plan identifies who will participate in the recovery process for each Branch Location's Business Continuity Plan. The participants are organized into one or more teams. Each location has a designated Key Person to act as team leader and an alternate for that person. Some locations with multiple team members are assigned either to specific responsibilities or as team members to carry out tasks as needed.

### Branch Recovery Teams

#### Houston, TX Recovery Team Descriptions

- Team Leader – Tony Ackerman
- Backup Team Leader – Karen Foster (Alternate – Scott King)
- Team Member - IT & Systems- Sean Odumusi
- Team Member - Director of Security and Logistics- Scott King

#### San Antonio, TX Recovery Team Descriptions

- Team Leader – Tony Ackerman
- Backup Team Leader – Alan Heinze (Alternate – Paul K Broughton)
- Team Member - Director of Security and Logistics- Scott King

#### Miami, FL Recovery Team Descriptions

- Team Leader – Tony Ackerman
- Backup Team Leader – Paul K Broughton (Alternate – Scott King)
- Team Member - Director of Security and Logistics- Scott King

### Recovery Team Assignment Descriptions

**Crisis Management Team (CMT)** – responsible for overall business operations across the organization. Also directly involved during all crucial phases of operations including: When to transition from disaster recovery to Business continuity, frequency and methodologies for testing Plan and when plan needs to be initiated.

- Paul K. Broughton, President, CEO
- Anthony “Tony” Ackerman, President, COO
- Scott King, Director of Security & Logistics

**Team Leader-** collaborates closely with the (CMT) to take action on pressing matters and is responsible for optimizing the use of assets and resources as well as monitoring the effectiveness of the BCP. Initiates, executes and maintains Business continuity and disaster recovery plan. Coordinate with CMT to modify plan in order to adapt responses to specific scenarios.

Responsible for overall business operations across the organization and directly involved during all crucial phases of damage and operations assessment including IT infrastructure vital to business operations and streamline processes that involved systems and application action if necessary including: System software, recovery for client apps, database protection, connectivity, hardware, restoring operations and failover to alternate site.

Point of contact with media and public services to avoid communication misunderstandings which includes vendors, investors, employees and clients during a disruption. In the event of media relations becomes necessary, coordination with the CMT is crucial to ensure the accuracy of information is broadcasted about the company to protect the reputation and brand perception of the company. This becomes especially necessary if the company is at fault for a mishap due to negligence or an error.

**Backup Team Leader** – assists the Team Leader or acts as Team Leader in the absence of the designated Team Leader or until their arrival. Serves as or in conjunction with Admin/HR Leader to provide support to the entire organization. Responsible for all activities related to people affected by the event such as workforce visitors, contractors, personnel evacuation, first aid to the wounded, and contact with emergency services and personnel families as needed.

If evacuation becomes necessary, as in the case of a cyclone or flood then Director of Security and CMT would be necessary for the critical components for items, equipment and people being moved to a safe location, (for pandemic events – visit [cdc.gov](http://cdc.gov) for more information). Before the onset of an approaching hurricane, (or after a disruptive event) transportation would also be necessary as part of the preventative measures.

**Director of Security and Logistics-** collaborates closely with the (CMT) and local facility's staff after a major disruption to ensure the health and safety of company personnel. Understand and adhere to protocols of facility and official agencies such as fire and police to prioritize rescue efforts in response to the crisis situation at hand until official team can arrive on the scene.

**IT & Systems-** collaborates closely with Team Leader to assess damage and connectivity of systems and hardware for usage at alternate site. Streamline processes that involve systems and applications for recovery of client, web and application software and database protection. Assist with testing and restoration of operations to main location.





## Customers' Access to Funds and Securities

The Broughton Investment Group Inc. does not maintain custody of customers' funds or securities. They are maintained by TDA 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 TD Ameritrade on their behalf. The BIG Inc will make this information available to customers through its disclosure policy.

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

The BIG maintains its primary hard copy books and records at:

1300 W Sam Houston Parkway S, Suite 100 Houston, Texas, 77042 USA  
832-581-7781

Team Leader (Backup Team Leader) is responsible for the maintenance of these books and records. The Big Inc. maintains the following document types and forms (hardcopy and electronically) that are not transmitted with TDA: Case notes, New Account Advisory Agreements, Miscellaneous working documents, check / security receipt log, Non-cash compensation, Form ADV Part 2, Compliance Files, Insurance Policy Information, Registered Investment Advisor (RIA) Policy, background information, Investment Advisory Agreement, Tax documents, Financial Plan Information, Email Correspondence, Power of Attorney (POA) & Discretionary Investment management Agreement.

The Big Inc. stores backup client documents on a USB thumb drive currently kept in a secure location at the individual Branch Offices.

The Big Inc. backs up client data utilizing a cloud-based CRM tool to store electronic data; currently being managed by Wealth Box. It can be accessed remotely using a secure login process from any location with internet access.

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.

## Financial and Operational Assessments

The Big Inc.'s procedure to identify changes in its operational, financial and credit risk exposures in the event of an SBD.

### Operational Risk

In the event of an SBD, Team Leader will immediately identify what means will permit us to communicate with our customers, employees, critical business constituents, 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 an alternate site depending on the branch location. A notification will be posted to our website or via email, or text messages with instructions to clients on how to reach an advisor. Should they be unable to reach the appropriate BIG team member.

## 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. Team Leader, in collaboration with CMT, will contact TDA, advisors and investors to apprise them of our financial status. If the crisis results in a financial shortfall, to meet our obligations and continue operations, we will request additional financing from backup sources such as bank, insurance policies, Key Man resources or other credit sources to fulfill our obligations to our clients. If we cannot remedy a capital deficiency, we will file appropriate notices with our regulators and immediately take the appropriate steps.

## Pandemic Planning

In the event a CMT Member or Branch Team Leader in accordance with the procedures established (or, under the cdc.gov website), determines that a Pandemic event has made it impossible to operate the firm as usual, the office will be closed and business will resume with employees working remotely from home or other designated location. Employees will utilize their company issued computer(s) and their cell phones. This will be communicated to employees through the phone tree. Employees will be required to remain home should they be affected by the Pandemic so as not to spread it to other employees and/or visitors to their office.

## Shelter in Place

Sheltering in place means taking immediate shelter wherever you are, whether it's at home, work, school or in transit. The phrase is often heard during a disaster in which chemical or radiological contaminants have been released into the air, but also goes along with other emergencies and natural disasters. A call to shelter in place may come with little notice and require that you act fast, which means that preparing to shelter in place ahead of time can be critical to your safety.

## Mission Critical Systems

The Big Inc.'s "mission critical systems" are those systems that ensure prompt and accurate processing of securities transactions. These transactions are performed by security licensed advisors and include 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 is a collaborative effort between the advisor and the custodian TD Ameritrade.

We have a primary responsibility for establishing and maintaining our business relationships with our customers and the sole responsibility for our mission critical functions of order taking and entry. TD Ameritrade provides the execution, comparison, clearance and settlement of securities transactions, maintenance of customer accounts, access to customer accounts and the delivery of funds and securities.

Our custodian – TD Ameritrade – provides a BCP statement dedicated to providing clients with secure and reliable access to their accounts. TD Ameritrade's BCP is intended to permit the firm to maintain business operations such as processing client orders and transactions, providing access to cash and securities, trade execution and providing access to information about balances and transactions in client accounts. Once systems were back on-line the BIG Advisors would generate a report for that time frame to identify what (if any) transactions were executed.



## The BIG's Mission Critical Systems

### Order Taking

Currently, The BIG Group Inc. receives orders from customers via telephone, email, mail and meetings with the customer. During an SBD, either internal or external. We will continue taking orders through any of these methods that are available and reliable. In addition, as communications permit, we will inform our customers when communications become available what alternatives measures, they have to process their orders. Customers will be informed of alternatives by phone or email. If it becomes necessary, we will advise our customers to place orders directly with our custodian, TD Ameritrade by visiting their website ([www.tdameritrade.com](http://www.tdameritrade.com)).

### Order Entry

Currently, The Big Group Inc. enters orders by recording them on paper and/or using the Veo One system. If this is a paper order, the order is submitted to TD Ameritrade electronically by use of the TD Ameritrade Veo One website or overnight service.

In the event of an internal SBD, we will enter and send records to TD Ameritrade by the fastest alternative means available, which includes electronically or over the phone. In the event of an external SBD, we will maintain the order in electronic or paper format and deliver the order to the clearing firm 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 clearing firm for order entry.

## TDA Mission Critical Systems

Disruption of service at any of our service centers will result in calls, orders, and electronic communications being rerouted to an alternative service center located in a different region of the country with a separate power grid and transportation system.

A significant disruption in our primary data center will result in a transition to systems at an alternate data center. Our data centers are each supported by backup power generators and are in different regions of the country with different power grids and transportation networks.

## Alternate Communications Between the Firm & Customers, Employees, & Regulators Customers

We now communicate with our customers using phone, email, website, overnight service and U.S. mail and in-person visits at our office or another location. 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.

We will use whatever means of communication available to us including email, phone, our website or updating our voicemail to instruct our clients to contact TD Ameritrade if we will be unable to transact business for them due to power or network outages.

### 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 Team Leader (or Backup Team Leader if the Team Leader is unavailable) for each of the various branch locations.

Caller	Call Recipients
Branch Key Person (Team Leader)	Backup Team: Leader, Scott King, and Paul K. Broughton
Team Leader or Backup Team Leader	Branch Employees

### Regulators

We are currently state registered in the State of Texas and Florida. We communicate with regulators using our intermediary RIA in a Box or directly using telephone, email, fax, U.S. mail or 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.

## Critical Business Constituents, Banks, and Counterparties

### 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. 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 an SBD to them or our firm.

Business Constituents	Service(s) Provided	Contact Information	Alternative
RIA in a Box	Registration and Compliance	Dorothy, Grace or Beth Rosepal	440-970-0194; info@riainabox.com
Wealth Box	CRM and data management	ckopanski@wealthbox.com 917.565.8794	support@wealthbox.com

### Banks and/or Insurance

We will contact our banks and lenders to determine if operations will continue in a normal fashion providing the financing and funds in case of an internal or external SBD. The bank maintaining our operating account is: Wells Fargo, 9492 FM 1283, Lakehills, TX 830-751-2287.

If our banks and/or other lenders are unable to continue business as normal, depending on the severity of the event, we have backup resources in place to utilize as business funds and will continue to monitor other means as resources if necessary

### Counterparties

We have contacted our critical counterparties, such as TD Ameritrade, to determine if we will be able to carry out our transactions with them considering internal or external SBD. Where the transactions cannot be completed, we will work with them directly to make alternative arrangements to complete those transactions as soon as possible.



## Regulatory Reporting

The BIG Inc. is subject to regulation by Texas State and Florida State Securities Regulators. We now file reports with our regulators using either RIA in a Box, 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 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. If we cannot contact our regulators, we will continue to file required reports using the communication means available to us.

Texas State Securities Board  
1919 North Loop W., Ste 300  
Houston, TX 77008  
713-426-0336

Florida Office of Financial Regulation  
200 E. Gaines Street  
Tallahassee, FL 32399  
850-487-9687

## Disclosure of Business Continuity Plan

Attached is our written BCP disclosure statement we provide customers at account opening (other times of disclosure if applicable, e.g. annually). We also [post the disclosure statement on our website and] mail it to customers upon request.

## Updates and Annual Review

The BIG Inc. will update this plan whenever we have a material change to our operations, structure, business or location or to those of our clearing firm. 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 custodian.



# The Broughton Investment Group

## BCP

### Appendix and Schedules





## Appendix A to The BIG Inc BCP

### Customers

The BIG Inc. has developed a BCP on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions are 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 reach your advisor via phone or advisor's email address, you should call at 832-581-7781 or go to our website [info@thebroughtoninvestmentgroup.com](mailto:info@thebroughtoninvestmentgroup.com). If you cannot access us through either of those means contact TD Ameritrade Independence West Team 7801 Mesquite Bend Dr. Ste 112, Irving, TX 75083-6043 Ph 800-400-6288 [independence@tdameritrade.com](mailto:independence@tdameritrade.com) ([www.tdameritrade.com](http://www.tdameritrade.com)).

### Our BCP

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. Our BCP is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

TD Ameritrade, 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 clearing firm that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments within [resumption time period]. Your orders and requests for funds and securities could be delayed during this period.

### Varying Disruptions

Significant business disruptions (SBD) 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 an estimated time frame. 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 a specified period timeframe. In either situation, we plan to continue in business, transfer operations to TD Ameritrade if necessary, and notify you through our website or our customer emergency number. 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.

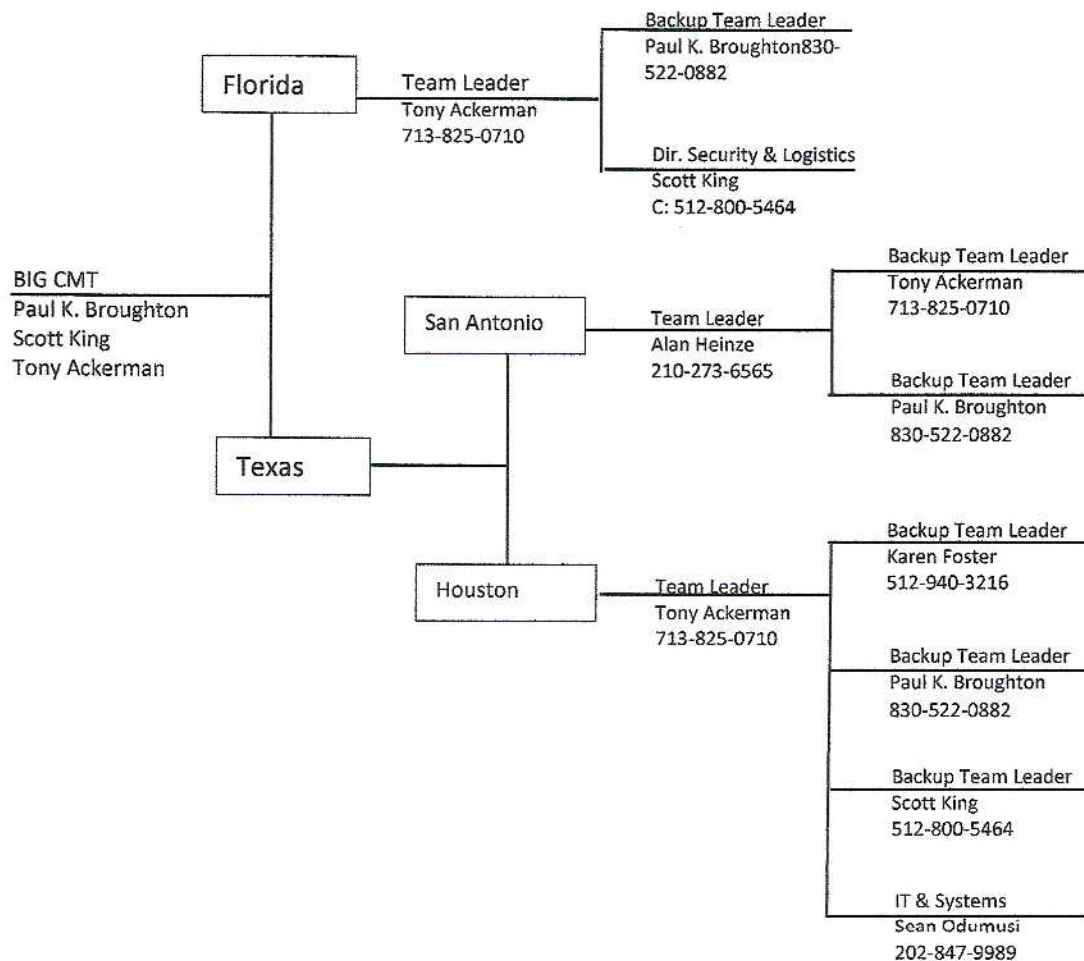
### For more information

If you have questions about our Business Continuity Plan (BCP), you can contact us at 832-581-7781 or [info@thebroughtoninvestmentgroup.com](mailto:info@thebroughtoninvestmentgroup.com).



# Appendix B to The BIG Inc BCP

## Call Tree





## Appendix C to The BIG Inc BCP

### Pandemic Planning – Sheltering in Place

A pandemic occurs when a disease becomes widespread over a country or globally. This fact sheet provides information on how to prepare for “Sheltering-In-Place” in the event of a possible pandemic.

Emergencies generally require one of two responses: “shelter in place” or “get out of Dodge.” Sheltering in place is appropriate when it is safer to stay in your home than to leave it, such as during a pandemic flu outbreak or period of civil unrest. But leaving in a hurry is the right thing to do in advance of forest fires, hurricanes or floods. Most of us can predict based on our geographic location (and perhaps past experience) which type of emergencies we are most likely to face.

### Background

A severe pandemic (defined as a worldwide epidemic) in a vulnerable population, such as the 1918 flu pandemic, represents a worst-case scenario for pandemic planning and preparedness. Communities, individuals, employers, schools, and other organizations are being asked to plan for the use of interventions that will help limit the spread of disease. Pandemic concerns escalated due to spread of avian influenza (H5N1) virus, which has the potential to threaten human health, among animals in Asia, Africa, the Middle East, and Europe. In 2009 a pandemic occurred from a new influenza virus called H1N1 (referred to as “swine flu” early on). This virus is spreading from person-to-person worldwide. Health experts are predicting that we will see a continuation of the spread of the H1N1 influenza virus.

Depending on the severity of a pandemic, commercial airlines might drastically curtail or even cease operations. Travel restrictions could also impede people from returning to their home country or fleeing to other countries. For these reasons, it may make more sense to “shelter-in-place” (stay home and practice “social distancing” to avoid infection) for an appropriate period of time.

### Preparation

Families should prepare at least two weeks of emergency supplies (food, water, medicines, and so on) in order to shelter-in-place during a pandemic.

## Best Strategies for Protecting Against A Pandemic Flu

The best forms of protection against a pandemic are community strategies which delay or reduce its impact. Often called non-pharmaceutical interventions, such strategies may help reduce the pandemic until a vaccine is available.

As you plan, it is important to think about the challenges which you may face, particularly if a pandemic is severe. Below we cover some situations which may be caused by a severe pandemic, and ways to address them.

### Possible Social Disruption

- Plan for the possibility that regular services—such as those provided by hospitals and other health care facilities, banks, stores, restaurants, government offices, and post offices—may be disrupted.
- Prepare backup plans in case regular public gatherings are canceled.
- Consider how to care for people with special needs, in case the services they require are no longer available.

### Disruption of Work Routine



- Your employer if you may require you to work from home.
- Your employer's Emergency Management Team (EMT) will review how business may continue during a pandemic utilizing the CDC [Business Pandemic Influenza Planning Checklist](#) (EMT Schedule 1 of the BIG BCP).
- Your employer will advise you about leave policies during a pandemic.
- Plan for a possible reduction—or temporary loss—of income if you are unable to work, or the business you work for is closed.

## Hygiene

Another matter which may seem a bit of “common sense” but deserves mention: Take steps to limit the spread of germs by making good hygiene a habit.

- Wash hands frequently with soap and water or an alcohol-based hand cleaner.
- Cover your mouth and nose with a tissue when you cough or sneeze. Clean your hands after coughing or sneezing.
- Put used tissues in a waste basket.
- Cough or sneeze into your upper sleeve if you don't have a tissue.
- Don't be a hero; stay at home if you are sick.

## Prepare

Stock supplies of water, as well as food that doesn't easily spoil; during a pandemic you may not be able to find an open store with supplies. Also, remember that public waterworks services may be interrupted.

Make sure to store foods that:

- Are non-perishable (will keep for a long time) and don't require refrigeration
- do not require cooking, in case you are unable to cook
- require little or no water, so you can conserve water for drinking

Stocking supplies can also be useful in other types of emergencies, such as power outages and disasters. Make a checklist of items to have on hand for a long-forced stay at home.

## Stay Informed

Knowing the facts is the best preparation for any pandemic. Identify trustworthy sources for reliable information.

- Reliable, accurate, and up-to-date information is available at [www.pandemicflu.gov](http://www.pandemicflu.gov).
- Another source for information on pandemics is the Centers for Disease Control and Prevention (CDC) Hotline at: 1-800-CDC-INFO (1-800-232-4636). This line is available in English and Spanish, 24 hours a day, 7 days a week. TTY: 1-888-232-6348. Questions can be e-mailed to [cdcinfo@cdc.gov](mailto:cdcinfo@cdc.gov).
- Also look for information on your local and state government Web sites. Find available links to each state's public health department at [www.cdc.gov/other.htm.states](http://www.cdc.gov/other.htm.states).
- Listen to local and national radio, watch news reports on television, and check your newspaper and other reliable sources of printed and Web-based information.

## Living Internationally

Those living in areas with undependable infrastructure for water, electricity, and food availability should evaluate their situation and prepare emergency supplies accordingly (including nonperishable food, potable water, and medicines) for the possibility of sheltering-in-place for at least two and up to twelve weeks.

Water purification techniques for drinking water such as boiling, filtering, and adding chlorine to locally available rainwater, lakes, rivers, and wells may replace the need to store large quantities of water.

Boiling water will kill most types of disease-causing organisms and is the most reliable method of purifying water easily.

- Bring the water to a rolling boil for two minutes. Add one minute for each 5,000 feet of elevation. The addition of chlorine bleach to water is also a viable alternative.
- For clear water, add 8 drops per gallon (3.8 liters) and let stand for at least 15 minutes. If the water is cloudy, add twice as much bleach.
- Bleach used for water purification should be unscented and have a concentration of sodium hypochlorite of at least 4 percent.

### Precautions Planning – Daily Basis

If you are genuinely worried about the threat of a global pandemic, then the key thing is to be prepared. If you're properly prepared, if and when it happens, you'll be able to minimize the chances that you and your family are affected.

Ultimately, outbreaks of infectious diseases that lead to pandemics occur when disease is spread from one person (or animal) to another. If you can minimize your contact with the outside world for a prolonged period of time, you can pretty much guarantee that you won't get sick (barring some very unfortunate circumstances).

There are some basic things that can help decrease your chances of getting sick in a pandemic situation. A lot of them are common sense, but we'll list them here anyways.

- Wash your hands frequently, and whenever possible use alcohol based hand sanitizer, particularly after interacting with other people
- When washing your hands, wash for 20 seconds with soap.
- Wash your hands immediately after you sneeze or cough.
- Avoid crowded places when possible
- Avoid touching your eyes, nose or mouth with your hands. (Avoid touching your face in general).
- Avoid close contact with anybody who's sick
- Clean and disinfect areas of your home/office that are touched frequently with disinfecting wipes or something similar
- If you do need to go into a crowded area (or if there is someone in your home or office who is sick), wear a surgical face mask, and in particular, encourage those who are sick to wear face masks (studies have shown that these are most effective when worn by those who are sick).

These are the recommendations given by government entities like the CDC.

### Travel

Those living in or traveling to countries with the potential of pandemic disease should consider the potential risks. Keep informed of the latest medical guidance and practical information and plan accordingly.



## Appendix D to The BIG Inc BCP

### How to get ready for hurricanes

Unlike tornadoes, which can strike with little warning, hurricanes are much easier to predict, usually giving residents in high-risk areas time to prepare. But like most disasters, it's best to get prepared while the weather is nice outside and well before a threat occurs. How to get ready for hurricanes.

### What's a hurricane?

Hurricanes are large tropical storms that form over warm ocean waters. A tropical storm becomes a hurricane once its winds reach 74 miles per hour. Once a hurricane forms, officials can estimate the path it will travel and how strong it will become. There are five categories of hurricanes, and a category five is most dangerous. People living in the nation's coastal communities, particularly those along the Atlantic and Gulf Coast regions, are at highest risk. In addition to dangerous winds, hurricanes can cause flooding, storm surges and tornadoes.

### Making preparations

Preparing a hurricane emergency supply kit is critical if you live in an at-risk area. While not all hurricanes are accompanied with evacuation orders, the storm can still leave you without power and access to roads.

Make sure your kit includes a three- to five-day supply of water and non-perishable food, with one gallon of water stored for each person per day. For example, if you have four people in your household, you'll need 12 gallons of water for a three-day supply. Enough water is especially important if you lose power during hot summer months. Prepare enough food and water for pets too.

Your supply kit should also include a first aid kit, manual can opener, flashlight, batteries, a battery-operated radio, clothing and bedding, copies of important documents, hygiene supplies and hand sanitizer, water-purifying agents, and needed medical supplies, such as prescriptions or contact lenses. It's also a good idea to prepare a portable emergency supply kit that includes maps and booster cables in case of evacuation. Make sure to check and update your stockpile regularly and switch out expired food items.

Learn about your community's hurricane warning system, evacuation routes and nearby hurricane shelters. Some hurricane shelters are equipped to house people with special medical needs, so alert local officials ahead of time if you or a loved one will need assistance staying safe. Also, most shelters won't allow you to bring your pets, so plan accordingly.

To protect your home and reduce the risk of flying debris, cover doors and windows with board or place large strips of heavy tape across windows to prevent them from shattering. Secure any items outside your home that could become flying debris. Fill sinks and bathtubs with water and adjust refrigerators to the coolest temperature. Make sure your vehicles are filled with gas.

### Listen to officials

If local officials issue a hurricane watch, it means a hurricane is possible in your area. A hurricane warning is issued if it is expected to hit your community.





While the decision to leave your home can be hard, do not ignore evacuation orders. If you have time before evacuating, turn off the gas, electricity and water. Once you're on the road, follow designated evacuation routes, as they are the safest way to get to shelter. Also, make sure your family emergency plan includes a pre-designated meeting place in case you have to evacuate in a hurry and all family members are not together.

If evacuation orders aren't given and you decide to remain at home, stay inside until officials say it's safe to leave. A calm in the storm can mean that the hurricane's "eye" is passing over and dangerous winds will continue after it's passed. And in case your home is too damaged to stay in after the hurricane is over, be ready to evacuate to a nearby shelter or make contingency plans to stay with friends or relatives.

Lastly, be neighborly. Restoring power after a hurricane can take days or even weeks. If you get power back before others in your neighborhood, lend a helping hand.



## Appendix E to The BIG Inc BCP

### How to get ready for Tornadoes

Known as nature's most violent storms, tornadoes can strike with little or no warning, destroying entire neighborhoods in just a few minutes. But preparing ahead of time, knowing the signs of a coming tornado and familiarizing yourself with tornado warning systems can help keep you and your loved ones safe. How to get ready for tornadoes

### How to get ready for floods

A tornado is a dangerous rotating column of air that is in contact with both the ground and a cumulonimbus cloud, which is the type of cloud involved in thunderstorms. Its violent winds can reach hundreds of miles per hour.

Tornadoes can happen anywhere in the world, but they mostly happen in the United States. Every state is susceptible to tornadoes; however, they are most common in regions east of the Rocky Mountains in the spring and summer. According to the National Weather Service, the United States experiences 800 tornadoes in an average year.

Tornadoes are extremely powerful, capable of destroying even well-constructed homes and buildings, uprooting trees and hurling heavy pieces of debris.

### How to get ready for floods

Tornado warning systems can differ from town to town, so get to know your community's tornado warning system. Know the difference between alerts for a tornado watch, which is when weather conditions mean a tornado is possible, and a tornado warning, which is when a tornado funnel has been sighted. Also, if you have children, get to know their school's tornado plan.

During thunderstorms, use a battery-operated radio to listen to weather updates and instructions from local officials. Also, be aware of tornado warning signs: dark, greenish skies; large hail; a large, dark, low-lying cloud; a visible, rotating funnel; or a loud roar.

To prepare your household, pick a room where household members as well as pets can stay safe. Ideally, the room should be in a basement or underground shelter. If that's not available, pick a room in the interior of the house with no windows. Create a household tornado drill and make sure everyone knows what to do. And don't forget to practice your drill. Put together an emergency stockpile kit and store it somewhere you can best access it during an emergency.

In preparing for tornadoes, secure large appliances, such as the water heater, as well as large, top-heavy pieces of furniture. Mark where utility switches are located so that they can be turned off if you have enough time. Consider storing important documents or copies of documents in a fire and waterproof safe.

If you'll need help during an emergency, ask someone nearby if she or he will assist you. Think about giving that person a spare key to your home in case of such emergencies.

### How to get ready for floods

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Version Number: 1.00

Last Updated: February 4, 2019  
Printed: TBD, 2020



If you're in a building, such as your house, workplace or school, when a tornado occurs, go as quickly as possible to the pre-designated shelter area. Remember to stay away from windows.

Mobile homes are not safe in a tornado. If you know where a safe shelter is, leave the mobile home immediately or seek safety on the lowest floor of a nearby building.

If you're in a car, seek shelter in a sturdy building. If there are flying debris while you are driving, pull over and park. As a last resort, you can stay in your car with your seat belt on, lowering your head down below the windows and covering with your hands and a blanket, if available. Another last resort option is to get out of your car, find a place that is noticeably lower than the level of the road and lie in it, covering your head with your hands. Your choice should be decided based on circumstances.

### **How to get ready for floods**

When the tornado has passed, check yourself and your household members for injuries. If someone is seriously injured, do not attempt to move her or him unless they are in immediate danger.

Watch out for broken debris, fallen electrical wires and damaged gas lines. If you smell gas, get everyone out of the building. Do not try to enter damaged buildings. If you can, clean up any flammable liquids that have spilled. And don't forget one of the best ways to protect your health after a disaster: Wash or sanitize your hands as often as possible.



## Appendix F to The BIG Inc BCP

### How to get ready for floods

Many people think floods only occur during hurricanes or in areas that are close to sea level. But floods can also happen in surprising places. While most local communities do their best to prepare for floods, it is critical that people do their part to protect themselves, their families and their homes

### Before a Flood

Storing supplies is important for any type of emergency. In a flood, you will either have to take shelter in your home or quickly evacuate to a shelter. So here are a few tips to help you create a plan and organize supplies.

#### How to get ready for floods

##### Planning

- Find out if your local community has evacuation plans in case of a flood, including shelter locations, evacuation routes and emergency alert systems. Find out which roads are close to waterways, so you can avoid these in the event of an evacuation.
- Identify an out-of-state contact person in case you are separated from your family and local phone lines are jammed. Make sure everyone in your family knows the name and phone number of this person. n Tell the police department and fire department ahead of time if you have a person living in your home who would need special assistance during a flood.
- Keep up to date on tetanus shots in case you are hurt during a flood. (Adults need a tetanus booster shot every 10 years.)
- Consider buying flood insurance, especially if you live in a high-risk area.
- If you have a basement, move valuable items off the floor.

##### Stockpiling

- Whether you have to evacuate or stay in your home, begin by stocking up on bottled water – both gallons and smaller portable water bottles. Flood water will be full of bacteria and may poison the water supply in your home. Stock one gallon of bottled water per day per person in your house, and plan on at least three days of supplies.
- Store all supplies in a high place in your home, such as a second floor, in an attic or on a high shelf.
- Store non-perishable food in waterproof containers. If you store cans, ensure that you have a manual can opener handy.
- Make sure to store a portable first-aid kit, waterproof gloves and boots, insect repellent and a battery-powered radio.
- Store any other essential items, such as diapers or medication, in waterproof containers.
- Prepare a smaller stockpile kit in a backpack that you can take with you in case of evacuation.

## During a flood

If evacuating, make sure to turn off the electricity (through the fuse box) as well as gas and water supplies before leaving. Cars, even SUVs, can float when flooding is deep enough! If your car gets stuck in a flood, do not open the car door. Try to climb out car windows, if possible. And do not try to cross flooded areas — the water may be deeper and moving more swiftly than it appears.

If you are sheltering in your home, you should sanitize sinks and bathtubs with bleach and fill them with water as soon as flood warnings are announced, so you have a clean source of water. Stay out of flood waters as much as possible.

## After a Flood

- During cleanup, wear gloves and regularly wash hands in clean water (boiled, if from the tap) with soap.
- Do not allow children to play in flood water! It can have high levels of bacteria and cause illness. Throw away any toys that have touched flood water.
- Do not flush your toilet if flood waters are still covering your septic tank.
- Once the flood waters have been drained from your home, do not try to remove any mold yourself. Call your local health department and ask for a professional in your area to do it.
- You can make a cleaning disinfectant from one cup of bleach combined with five gallons of clean, boiled water. Try to clean any walls, floors or furniture that have had contact with flood waters.
- Upholstered furniture and mattresses should be air dried in the sun and sprayed with disinfectant, if possible.
- Steam clean rugs and replace filters in ventilation systems.
- Flooded items that cannot be cleaned and dried within 24-48 hours should be discarded.
- Protect yourself against mosquitoes that show up during floods and may carry viruses: Wear long-sleeved clothing and avoid being outdoors during dusk and dawn.



# Schedule 1 to The BIG Inc BCP

## CDC - Business Pandemic Checklist

### BUSINESS PANDEMIC INFLUENZA PLANNING CHECKLIST



In the event of pandemic influenza, businesses will play a key role in protecting employees' health and safety as well as limiting the negative impact to the economy and society. Planning for pandemic influenza is critical. To assist you in your efforts, the Department of Health and Human Services (HHS) and the Centers for Disease Control and Prevention (CDC) have developed the following checklist for large businesses. It identifies important, specific activities large businesses can do now to prepare, many of which will also help you in other emergencies. Further information can be found at [www.pandemicflu.gov](http://www.pandemicflu.gov) and [www.cdc.gov/business](http://www.cdc.gov/business).

#### 1.1 Plan for the impact of a pandemic on your business:

Completed	In Progress	Not Started	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Identify a pandemic coordinator and/or team with defined roles and responsibilities for preparedness and response planning. The planning process should include input from labor representatives.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Identify essential employees and other critical inputs (e.g. raw materials, suppliers, sub-contractor services/products, and logistics) required to maintain business operations by location and function during a pandemic.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Train and prepare ancillary workforce (e.g. contractors, employees in other job titles/descriptions, retirees).
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Develop and plan for scenarios likely to result in an increase or decrease in demand for your products and/or services during a pandemic (e.g. effect of restriction on mass gatherings, need for hygiene supplies).
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Determine potential impact of a pandemic on company business financials using multiple possible scenarios that affect different product lines and/or production sites.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Determine potential impact of a pandemic on business-related domestic and international travel (e.g. quarantines, border closures).
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Find up-to-date, reliable pandemic information from community public health, emergency management, and other sources and make sustainable links.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Establish an emergency communications plan and revise periodically. This plan includes identification of key contacts (with back-ups), chain of communications (including suppliers and customers), and processes for tracking and communicating business and employee status.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Implement an exercise/drill to test your plan, and revise periodically.

#### 1.2 Plan for the impact of a pandemic on your employees and customers:

Completed	In Progress	Not Started	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Forecast and allow for employee absences during a pandemic due to factors such as personal illness, family member illness, community containment measures and quarantines, school and/or business closures, and public transportation closures.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Implement guidelines to modify the frequency and type of face-to-face contact (e.g. hand-shaking, seating in meetings, office layout, shared workstations) among employees and between employees and customers (refer to CDC recommendations).
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Encourage and track annual influenza vaccination for employees.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Evaluate employee access to and availability of healthcare services during a pandemic, and improve services as needed.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Evaluate employee access to and availability of mental health and social services during a pandemic, including corporate, community, and faith-based resources, and improve services as needed.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Identify employees and key customers with special needs, and incorporate the requirements of such persons into your preparedness plan.

December 6, 2005  
Version 3.6







### 1.3 Establish policies to be implemented during a pandemic:

Completed	In Progress	Not Started	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Establish policies for employee compensation and sick-leave absences unique to a pandemic (e.g. non-punitive, liberal leave), including policies on when a previously ill person is no longer infectious and can return to work after illness.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Establish policies for flexible worksite (e.g. telecommuting) and flexible work hours (e.g. staggered shifts).
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Establish policies for preventing influenza spread at the worksite (e.g. promoting respiratory hygiene/cough etiquette, and prompt exclusion of people with influenza symptoms).
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Establish policies for employees who have been exposed to pandemic influenza, are suspected to be ill, or become ill at the worksite (e.g. infection control response, immediate mandatory sick leave).
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Establish policies for restricting travel to affected geographic areas (consider both domestic and international sites), evacuating employees working in or near an affected area when an outbreak begins, and guidance for employees returning from affected areas (refer to CDC travel recommendations).
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Set up authorities, triggers, and procedures for activating and terminating the company's response plan, altering business operations (e.g. shutting down operations in affected areas), and transferring business knowledge to key employees.

### 1.4 Allocate resources to protect your employees and customers during a pandemic:

Completed	In Progress	Not Started	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Provide sufficient and accessible infection control supplies (e.g. hand-hygiene products, tissues and receptacles for their disposal) in all business locations.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Enhance communications and information technology infrastructures as needed to support employee telecommuting and remote customer access.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Ensure availability of medical consultation and advice for emergency response.

### 1.5 Communicate to and educate your employees:

Completed	In Progress	Not Started	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Develop and disseminate programs and materials covering pandemic fundamentals (e.g. signs and symptoms of influenza, modes of transmission), personal and family protection and response strategies (e.g. hand hygiene, coughing/sneezing etiquette, contingency plans).
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Anticipate employee fear and anxiety, rumors and misinformation and plan communications accordingly.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Ensure that communications are culturally and linguistically appropriate.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Disseminate information to employees about your pandemic preparedness and response plan.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Provide information for the at-home care of ill employees and family members.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Develop platforms (e.g. hotlines, dedicated websites) for communicating pandemic status and actions to employees, vendors, suppliers, and customers inside and outside the worksite in a consistent and timely way, including redundancies in the emergency contact system.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Identify community sources for timely and accurate pandemic information (domestic and international) and resources for obtaining counter-measures (e.g. vaccines and antivirals).

### 1.6 Coordinate with external organizations and help your community:

Completed	In Progress	Not Started	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Collaborate with insurers, health plans, and major local healthcare facilities to share your pandemic plans and understand their capabilities and plans.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Collaborate with federal, state, and local public health agencies and/or emergency responders to participate in their planning processes, share your pandemic plans, and understand their capabilities and plans.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Communicate with local and/or state public health agencies and/or emergency responders about the assets and/or services your business could contribute to the community.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Share best practices with other businesses in your communities, chambers of commerce, and associations to improve community response efforts.





The Broughton Investment Group, Inc.

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MEMORANDUM

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TO: BROUGHTON INVESTMENT GROUP CLIENT  
FROM: TONY ACKERMAN  
SUBJECT: CORONAVIRUS (COVID-19) OUTBREAK IN U.S.  
DATE: MARCH 16, 2020  
CC: PAUL K. BROUGHTON

As we continue to keep a close eye on the coronavirus (COVID-19) outbreak in the United States, we are taking proactive steps to help ensure the safety of our employees and maintain security and work continuity with our clients. For all those that have been impacted directly by the virus, our thoughts are with you.

Beginning today, we are implementing an optional work from home policy for our office in Houston, Texas. We will continue to regularly evaluate the situation for our company's additional offices in San Antonio, TX and Miami, FL. With that said, we have a robust business continuity plan in place that will enable our professionals to work remotely and continue to provide you with the level of service you have come to expect. All of our communications and systems are available in a secure manner online for our team's use.

Should you experience a business disruption because of the coronavirus (COVID-19) outbreak, please do not hesitate to reach out your Advisor or me, Tony Ackerman Vice President Houston, at [ackerman@thebroughtoninvestmentgroup.com](mailto:ackerman@thebroughtoninvestmentgroup.com) to discuss in more detail. We are here to help!

Thanks

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