

Hardy Financial Planning, Inc. (HFP)

Business Continuity Plan (BCP)

Introduction

Thomas Hardy, president of Hardy Financial Planning, Inc. (HFP) is responsible for the issuance and dissemination of all policies, procedures and directives in place to govern the conduct of this firm. The President ensures that all new regulatory requirements are put into place and maintains this Business Continuity Plan (BCP) in a current manner.

Hardy Financial Planning, Inc. created this plan as a means to ensure that any disruptions to our customers are minimized should an emergency or significant business disruption occur.

I. Emergency Contact Persons

Our firm's two emergency contact persons are: Thomas Hardy, President, 734-678-0580 hardyfinancialplanning@comcast.net and Michael Hardy, Vice President, 909-969-0959, mikehardy@55capital.com.

In the event that neither Thomas Hardy nor Michael Hardy can be reached, customers, key personnel, employees, vendors, service providers, third-party custodians and regulators dealing with HFP may contact Carol Hurwitz, 734-668-6793, carol.l.hurwitz@gmail.com.

These names will be updated in the event of a material change, and our President will review them within 17 business days of the end of each quarter.

II. Firm Policy

Our firm's policy is to respond to a Significant Business Disruption (SBD) by safeguarding employees' lives and firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of the firm's books and records and the records of all of our customers, and allowing our customers to transact business with a minimum of disruption and without harm. In the event that we determine we are unable to continue our business, we will assist customers who need assistance in finding alternate financial advisors.

A. Significant Business Disruptions (SBDs)

Our plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only our firm's ability to communicate and do business, such as a fire in our building or death or inability of the President to continue operations. External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a city flood, or a wide-scale, regional disruption.

B. Approval and Execution Authority

Thomas Hardy, President, is responsible for approving the plan and for conducting the required annual review. Thomas Hardy, President, has the authority to execute this BCP.

C. Plan Location and Access

Our firm will maintain copies of its BCP plan and the annual reviews, and the changes that have been made to it for inspection. One electronic copy of our plan is located on HFP's iMac in the folder named "HFP Business Continuity Plan". Another copy is located on a Time Machine backup drive. The iMac and the Time Machine backup are located at 4462 Hillside Ct. Ann Arbor, MI (company office and residence of President). A third electronic copy is located at Backblaze.com. A copy of the current BCP is also located on the company website hardyfp.com.

III. Business Description

Hardy Financial Planning, Inc. is a registered investment advisory firm conducting business as an investment advisor to individuals, companies, and small retirement plans. Services involve developing and implementing investment plans for clients as an advisor. Our firm does not perform any type of clearing function for itself or others. Furthermore, we do not hold customer funds or securities. We accept and enter orders. All transactions are placed directly with the brokerage firm, which executes the orders. The brokerage firm maintains our customers' accounts, can grant customers access to them, and deliver funds and securities.

We do not act as a broker. Our firm does not hold client funds or securities. All client assets are held at a custodian broker. Most of our client securities are held at Charles Schwab and clients can contact their brokerage companies directly by phone or on-line. Our firm deals only in publicly traded securities. We do not advise on any private placements or other non-publicly traded investments.

IV. Office Location

Our firm has one office: 4462 Hillside Ct., Ann Arbor, MI 48105 (the residence of the President). Its mailing address is 3588 Plymouth Rd. #305, Ann Arbor, MI 48105.

If prevented from using that office as a result of an SBD, we will promptly establish another location for operating in Washtenaw County, Michigan and will give notice of that new location in the time and manner described in Article VIII.

V. Customer Access to Funds and Securities

Our firm does not maintain custody of customers' funds or securities. All client assets are held at the client's custodian broker (primarily Schwab). All clients have direct access to their funds and securities on-line through their broker's websites and by phone. All of these organizations maintain their own BCP and, in the event of an internal or external SBD, we will work with our clients to make them aware of the BCP and help them navigate the processes to access their funds and securities.

In the event the Securities Investor Protection Corporation (SIPC) should determine that any custodian is unable to meet their obligations to customers, SIPC may seek to appoint a trustee to disburse the custodian's assets to customers. We will assist SIPC and the trustee by providing our books and records identifying customer accounts subject to SIPC regulation.

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

Our firm maintains copies of all electronic records including email communications, backed up in real-time. One electronic copy these records is located on HFP's iMac in the folder named "Hardy Financial Planning, Inc." with email records saved in its email system. Another copy of firm records and emails is located on an Apple "Time Machine" backup drive. The iMac and the Time Machine backups are located at 4462 Hillside Ct. Ann Arbor, MI (company office and residence of the President). A third electronic copy is located at a cloud-based storage platform Backblaze.com. Thomas Hardy, President, phone 734-678-0580, is responsible for the maintenance of these records. Hard copy files are maintained at 4462 Hillside Ct. Ann Arbor, MI (company office and residence of the President). In the event of an internal or external SBD that causes the loss of our paper records, we will physically recover client records from the custodian firms. Critical records have electronic versions and can be recovered from the electronic records above.

VII. 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 clients and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options we will employ will include telephone, telephone voice mail, fax, email, text messaging, U.S. mail, and in person visits. In addition, we will retrieve our key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic).

B. Financial & Credit Risk

Hardy Financial Planning holds no client assets and invoices asset and portfolio management clients in-arrears. Although financial planning clients normally pay ½ of the price for financial planning projects in advance (typically in the range of \$1,000 to \$3,000), since per Michigan regulations HFP maintains a minimum of \$10,000 in its corporate checking account at all times, in the event of an SBD there is negligible financial risk to clients due to lack of liquidity of HFP.

C. Death or Inability of President to Conduct Business

In the event of the death or disability of the President, the Vice President will take all actions necessary to continue its business to the extent required to enable its customers remain as customers of HFP or to transition to another registered investment advisory firm and, if the business of HPC is to be discontinued, to wind down the business in a deliberate and orderly manner. This would include communicating with clients and regulatory authorities and assisting clients in finding alternative sources of financial advice and services. Carol Hurwitz has signature authority over HFP's PNC account.

VII. Mission Critical Systems

A. Order Taking, Entry and Execution

Currently our firm receives orders from customers by telephone or email and enters orders using the brokerage firm's on-line order entry system, and those orders are executed by the brokerage firm. In the event of an SBD we would refer customers to deal directly with their brokerage firm.

B. Mission Critical Systems Provided by Brokers

As stated previously within this plan, our firm relies on third parties to provide all brokerage and other services and, in effect, is able to utilize our third parties' backup systems, which are superior to anything our firm has.

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

Promptly following the occurrence of an SBD, we will give notice of that SBD to all customers, key personnel, employees, vendors, service providers, third-party custodians and regulators dealing HFP by the following means of communication then available.

A. Customers

We now communicate with our customers using the telephone, fax, email, text messaging, U.S. mail, and in person visits. 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 e-mail but the Internet is unavailable, we will call them on the telephone and follow up where a record is needed with paper copy in the U.S. mail.

B. Employees

Since Hardy Financial Planning, Inc. has no employees other than Thomas Hardy, there is no need for an employee communication strategy. Although Vice President Michael Hardy is not an employee, communications with the Vice President are by telephone, text messaging, 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.

C. Regulators

Hardy Financial Planning is currently registered as an investment advisory firm with the Michigan Department of Licensing and Regulatory Affairs. We communicate with our regulators using the telephone, e-mail, 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.

IX. Critical Business Constituents

A. Business Constituents

Our only critical business constituents are PNC Bank and the brokerage firms (primarily Charles Schwab) that hold client assets and undertake trades for clients. The relationships are between each client and the brokerage firm the client has chosen. If an SBD impacted the client's brokerage firm the client may need to reestablish a relationship with an alternative brokerage firm. Our firm would assist the client in this endeavor if the client so wished.

Given the size and type of business we operate, there are few other important or relevant business constituents. However, we will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services when we need them because of a SBD to them or our firm.

B. Banks

See above. Our current bank is PNC Bank. We will quickly establish alternative arrangements if PNC Bank can no longer provide the services when we need them because of a SBD to them or our firm.

X. Regulatory Reporting

Our firm is subject to regulation by the SEC and the State of Michigan. We now file reports with our regulators using paper copies in the U.S. mail, and electronically using fax, e-mail, and the Internet. In the event of an SBD, we will check with the SEC and the State of Michigan 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. State of Michigan contact: Heather Miller 517-335-2395.

XI. Disclosure of Business Continuity Plan

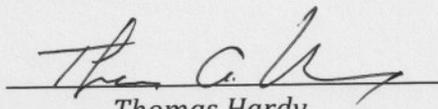
We post our BCP on our website (hardyfp.com) and we disclose in writing our BCP to customers at account opening and annually. We also mail or email it to clients upon request.

XII. Updates and Annual Review

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

XII. Senior Manager Approval

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

Signed: 
Thomas Hardy

Title: President

Date: 1/3/2020