

## BUSINESS CONTINUITY PLAN (BCP)

Alpha Architect has developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

- 1) **Contacting Us** - If after a significant business disruption you cannot contact us as you usually do, you should reference the contact information table (below), or go to our web site at <http://www.Alpha Architect.com> for additional contact information and updates.
- 2) **Contact Information:** (215) 882-9983 or [info@AlphaArchitect.com](mailto:info@AlphaArchitect.com)
- 3) **Our Business Continuity Plan** - We plan to quickly recover and resume business operations after a significant business disruption (SBD) and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data back-up and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

Our primary clearing firm, Interactive Brokers LLC, 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 a reasonable time period based on the degree of disruption and magnitude to the general financial community. Your orders and requests for funds and securities could be delayed during this period.

- 4) **Approval and Execution Authority** – The Chief Compliance Officer is responsible for approving the plan and for conducting the required annual review. The Chief Operations Officer has the authority to execute this BCP.
- 5) **Plan Location and Access** – Our firm will maintain copies of its BCP plan and the annual reviews, and the changes that have been made to it for inspection. An electronic copy of our plan is located on our shared drive and is accessible by all three emergency contact persons. In addition, our office locations listed below will also maintain hard copies of the BCP.
- 6) **Business Description** – Alpha Architect is a registered investment advisor. Alpha Architect primarily uses Interactive Brokers LLC for trading and custody of customer funds and securities. Alpha Architect may accept and enter orders on behalf of customers. All transactions are sent to Interactive Brokers, which executes our orders, compares them, allocates them, clears and settles them. Interactive Brokers also maintains our customers' accounts, can grant customers access to them, and delivers funds and securities.
- 7) **Office Locations** – 213 Foxcroft Road, Broomall, PA 19008
- 8) **Alternative Locations** – In the event of an SBD, which makes the main office location unavailable, all managers will have adequate systems available at their residences for re-location.
- 9) **Customer Access to Funds and Securities** – Alpha Architect does not maintain custody of customers' funds or securities, which are maintained at our clearing firm, National Financial Services LLC (of which Interactive Brokers is wholly owned subsidiary). In the event of an internal or external SBD, if telephone service is available, our registered persons will take customer orders or instructions and contact our clearing firm on their behalf, or clients will be directed to contact one of the office locations listed above for access to their accounts. Customers may also contact Interactive Brokers at the number listed below.
- 10) **Data Back-up and Recovery (Hard Copy and Electronic)** – Alpha Architect maintains its primary hard copy books and records and its electronic records at our main office address at 213 Foxcroft Road, Broomall, PA 19008. The Chief Compliance Officer is responsible for the maintenance of these books and records. Our firm maintains the following document types and forms that are not transmitted to Interactive Brokers: client agreements, fee schedules, and investment proposals.

Our firm maintains many of its back-up hard copy books and records on servers that can be accessed remotely. These records are scanned and the images are stored electronically. The Chief Compliance Officer is responsible for the maintenance of these back-up books and records.

In the event of an internal or external SBD that causes the loss of our paper records, we will be able to access the electronic records at any one of our remote sites. If our primary site is inoperable, we will continue operations from our back-up site or an alternate location. If the electronic records become inaccessible, then the paper original will be recopied and stored in an alternate electronic format.

#### 11) **Financial and Operational Assessments –**

*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 counter-parties, and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options we will employ will include voice mail or posting a message to client advisory web site home pages or through Interactive Brokers. In addition, we will retrieve our key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic).

*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 our clearing firm, 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 appropriate steps, including notifying our clients that our business is closing. At that time, clients will have the opportunity to transfer their accounts. Alpha Architect does not hold customer funds or securities; therefore at all times the clients will be able to have access to their account assets.

#### 12) **Mission Critical Systems –** Alpha Architect’s “mission critical systems” are those that ensure prompt and accurate processing of securities transactions, including order taking, entry, execution, comparison, allocation, clearance and settlement of securities transactions, the maintenance of customer accounts, access to customer accounts, and the delivery of funds and securities. In addition, a key system is the managing of client accounts on a day-to day basis to ensure that the original objectives of the clients are being met.

We have primary responsibility for establishing and maintaining our business relationships with our customers. Interactive Brokers provides, through agreement, the 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.

Alpha Architect’s agreement with Interactive Brokers is that they will maintain a business continuity plan and the capacity to execute that plan. Interactive Brokers represents that it will advise us of any material changes to its plan that might affect our ability to maintain our business. In the event that Interactive Brokers executes its plan, it represents that it will notify us of such execution and provide us with equal access to services as its other customers. If we reasonably determine that Interactive Brokers has not or cannot put its plan in place quickly enough to meet our needs, or is otherwise unable to provide access to such services, Interactive Brokers represents that it will assist us in seeking services from an alternative source.

Interactive Brokers represents that it backs up our records at a remote site. Interactive Brokers represents that it operates a back-up operating facility in a geographically separate area with the capability to conduct the same volume of business as its primary site. Interactive Brokers has also confirmed the effectiveness of its back-up arrangements to recover from a wide scale disruption by testing, which it performs on a regular basis.

Recovery-time objectives provide concrete goals to plan for and test against. They are not, however, hard and fast deadlines that must be met in every emergency situation, and various external factors surrounding a disruption, such as time of day, scope of disruption, and status of critical infrastructure—particularly telecommunications—can affect actual recovery times. Recovery refers to the restoration of clearing and settlement activities after a wide-scale disruption; resumption refers to the capacity to accept and process new transactions and payments after a wide-scale disruption.

#### Designated Mission Critical Systems:

Order Taking: During an SBD, either internal or external, we will continue to take orders through any of method (phone, email, internet, fax) that are available and reliable, and in addition, as communications permit, we will inform our customers

when communications become available to tell them what alternatives they have to send their orders to us. Customers will be informed of alternatives by voicemail, email notice or by posting a notice to the client's advisory web site. If necessary, we will advise our customers to place orders directly with Interactive Brokers at the number listed above.

Order Entry: Currently, client orders are entered electronically into the Interactive Brokers system for routing to the proper markets. If the electronic system is unavailable, orders may be placed telephonically. The order entry systems will be available to Alpha Architect employees or advisors from each remote location.

In the event of an internal SBD, we will enter and send records to Interactive Brokers by the fastest alternative means available, which include electronic or telephonic means. In the event of an external SBD, we will maintain the order in electronic or paper format, and deliver the order to Interactive Brokers by the fastest means available when it resumes operations.

Interactive Brokers Provided Systems: Alpha Architect relies, by agreement, on Interactive Brokers to provide order execution, order comparison, order allocation, and the maintenance of customer accounts, delivery of funds and securities, and access to customer accounts.

### 13) **Alternative Communications –**

Customers: Alpha Architect communicates with our customers using the telephone, e-mail, our advisory website, fax, U.S. mail, and in person visits at our firm or at other office locations. 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.

Employees: Alpha Architect currently communicates with our employees and advisors using the telephone, e-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. We will insure that senior management reaches all employees quickly during an SBD. A list of all employees emergency contact information will be maintained with each employee and the COO or CCO will be responsible for calling all employees to advise them of an SBD.

Regulators: Alpha Architect is an SEC registered investment advisor. We communicate with our regulators using the telephone, e-mail, 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.

Alpha Architect will continue to maintain records as required by the SEC, including our Form ADV. This form is available on line and can be accessed and updated remotely.

Counterparties: Employees will maintain a list of all vendors, banking relationships and other emergency contact information which may be needed in the event of an SBD. We will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services when we need them because of a SBD to them or our firm.

14) **BCP Disclosure** - Alpha Architect will have its BCP disclosure statement posted on the firm's web site ([Alpha Architect.com](http://AlphaArchitect.com)) where it can be viewed or printed. New clients can elect to receive the BCP Disclosure Statement in hard copy at the time the account is opened.

15) **Updates and Annual Review** - Alpha Architect 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.

**For more information** - If you have questions about our business continuity planning, you can contact us at (215) 882-9983 or [info@AlphaArchitect.com](mailto:info@AlphaArchitect.com) with the subject "BCP".