

# HMM Group LL dba M Premier Partners

## Business Continuity Plan (“BCP”)

### Firm Policy

HMM Group LLC dba M Premier Partners (“MPP”) is a Registered Investment Advisory firm involved in the financial management of client accounts, and is committed to safeguarding the interests of our clients and customers in the event of any emergency or Significant Business Disruption (“SBD”). This BCP summarizes MPP’s efforts to mitigate risks inherent with unforeseen business interruptions. The BCP is designed to protect MPP staff members’ well-being, property, making a financial and operational assessment, quickly recovering and resuming operations, protecting MPP’s books and records, and allowing our customers to transact business even in the event of an emergency or SBD.

### Significant Business Disruptions

SBDs can range from small interruptions such as a power outage to major catastrophes such as terrorist attacks and natural disasters. These events affect MPP’s ability to communicate with clients and essential service providers and prevent the operation of the securities markets.

### Office Locations

MPP has one office located at 74-900 Highway 111, Suite 112, Indian Wells, CA 92210. In the event of an SBD, we will move operations to 11 Vista Mirage Way, Rancho Mirage, CA 92270, MPP’s Disaster Recovery Office (“DRO”).

### Disaster Recovery Team (“DRT”):

Name	Title	Cell Phone Number
Mike McConnell	Chief Compliance Officer	949-338-4590
Mark Hayek	Partner	760-831-0373

### Responsibilities

Each Disaster Recovery Team member is responsible for understanding his/her role during a SBD. MPP’s Chief Compliance Officer (“CCO”) has the primary responsibility for implementation and monitoring of the BCP:

- Documenting computer back-up procedures, i.e., frequency, procedure, person(s) responsible, etc.
- Designating back-up storage location(s) and persons responsible to maintain backup data in separate locations.
- Identifying, contacting, listing key or mission critical people in the event of an emergency or disaster, obtaining their names, addresses, e-mail, fax, cell phone and other information and distributing this information to all personnel.
- Designating and arranging recovery location(s) for mission critical persons to meet to continue business, and for obtaining or arranging for adequate systems equipment for these locations.
- Establishing back-up telephone/communication system for clients, personnel and others to contact MPP and for MPP to contact clients.
- Determining and assessing back-up systems and/or recovery plans for key vendors and mission critical service providers.
- Conducting periodic and actual testing and training for mission critical and all personnel.

### When an SBD Occurs During Office Hours

In the event of an emergency during office hours, call 911. The next appropriate course of action will depend on the nature of the emergency. Most types of emergencies will require all staff members to quickly evacuate the building, including fire, bomb threats, etc. If so, gather your belongings, if time safely permits, and promptly exit the building. Certain emergencies, however, may require that staff members remain in-doors, including the release of a hazardous airborne substance in the immediate vicinity of MPP’s principal office. Staff members should, at all times, follow the

instructions of emergency personnel. All staff members are to meet at the designated area indicated below, if safe to do so, following any evacuation of the principal office.

Designated Meeting Area: Front of Building

### **When an SBD Occurs After Office Hours**

In the event of a SBD occurring after business hours, each staff member must be contacted, informed of the nature of the event, and given instructions regarding if, when and where to convene. Any staff member initially discovering an emergency situation at the principal office must contact the MPP's CCO to inform them of the situation. If, for any reason, the CCO cannot be reached, the employee is to contact an alternative DRT Member.

If, for instance, the disruption involves a power failure, a staff member must first notify the CCO or a DRT Member. That person shall contact the utility company to obtain an estimate of when power will be restored to the principal office. Once a plan of action has been decided upon, the DRT Member will contact all employees to notify them of the appropriate course of action.

### **Disruption in Services of Critical Third-Party Vendor**

In the event of a disruption in the services provided by a critical service provider, the CCO will contact the vendor to determine the nature of the problem and an estimate of the restoration of services. If the vendor cannot be reached and services cannot be restored, the CCO will determine an appropriate "work-around" solution. MPP will also reference the vendor's own recovery plan to attempt to determine likely causes of the disruption and the vendor's estimate of the restoration of services therefrom. If continued efforts to contact the vendor and/or to restore services are unsuccessful, the CCO also saves all relevant files on a secured flash drive and via cloud technology. Business will continue to run using personal telephones, cloud technology, and internet services available at the DRO.

### **Client Access to Funds & Securities**

MPP does not maintain custody of client assets. Client assets are held by Charles Schwab ("Schwab"). In the event of an internal or external SBD, if telephone service is available, our staff members will take client orders or instructions and contact Schwab on their behalf.

### **Data Back-Up & Recovery**

MPP maintains books and records in MPP's office location. All books and records are scanned and uploaded onto QuickBooks. All data is backed-up daily. This process is fully automated and is completed via a secure Internet connection. In the event of an internal or external SBD that causes loss of records, MPP will recover them from a cloud based back up.

Email communication is also available on Microsoft's cloud and can be remotely accessed via home computers.

### **Financial & Operational Assessments**

In the event of an SBD, MPP will immediately identify what means will permit us to communicate with clients, staff members, critical business constituents and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options MPP employs will include MPP web site, personal mobile phones and secure email. In addition, we will retrieve key activity records as described in the section above. In the event that MPP is put in a position to raise funds due to a credit issue, MPP will apply for a loan or credit line through one of the banking institutions it currently uses.

### **Mission Critical Systems**

MPP'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. These mission critical systems are available at MPP's DRO.

### **Internet Connection**

In the event MPP's internet is unavailable, MPP's DRO has an internet connection that will enable access to Schwab's online system, as well as the website of regulators and service providers.

### **Telephone System**

In the event that MPP's local telephone service is disrupted, staff members are encouraged to use their personal cellular phones to conduct business until service is restored. MPP has a telephone system in place at the DRO office that MPP's trading office phones can be transferred to in the event of a SBD.

### **Loss of Key Personnel**

Mike McConnell and Mark Hayek, both Partners of MPP, co-manage all MPP's client investment accounts. Should something happen to one of them rendering them incapable of fulfilling assigned duties, the remaining Partner will fulfill the duties of both and will be responsible for notifying clients of the change in duties.

If a member of any key personnel is terminated, incapacitated, or fails to be competent in performing their duties, an emergency meeting will be held by the remaining owners to evaluate the situation and conclude on the best course of action. Shall the key personnel's clients be reassigned to another adviser representative, the client shall be notified in writing of the change along with any required disclosure documents. The remaining owners will also notify all proper regulators and vendors.

### **Disclosure of Business Continuity Plan**

MPP will provide a written copy of this BCP to clients upon request.

### **Updates, Testing & Annual Review**

Each staff member will receive two (2) copies of MPP's BCP. One copy is to be kept at the staff member's work station. The other copy is to be kept at the staff member's home address. MPP will make updates whenever there is a material change to operations, structure, business or location, or to those of Schwab. In addition, MPP will test and review the BCP annually.

### **Senior Management Approval**

I have approved the BCP as reasonably designed to enable MPP to meet its obligations to clients in the event of an SBD.

\_\_\_\_\_  
Chief Compliance Officer

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Date