

Business Continuity and Disaster Recovery Plan

Allred Capital Management

Background

Investment advisers owe a fiduciary duty to their clients to have disaster recovery plans in place in the event of a natural disaster, accident, death, or other event that would disrupt the normal business flow of the adviser and the services it provides to its clients.

A disaster recovery plan must detail the steps that an adviser and each of its Associated Persons will take in the event of a disaster. This plan, including all contact information for clients, Associated Persons, regulators, custodians, and service providers, should be updated regularly and each revision should be communicated to Associated Persons as applicable.

Policies and Procedures

The Company's Disaster Recovery Plan is an essential part of its operations. All Associated Persons are responsible for understanding their role in the event of a disaster or major disruption. The CCO ("Primary Disaster Recovery Coordinator") has the overall responsibility for the firm's response to a major disruption, is responsible for ensuring that the Company's Disaster Recovery Plan is tested annually and is updated when regulatory or operational changes occur. The Primary Disaster Recovery Coordinator may designate one or more persons to assist with their duties.

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 in their entirety or the operations of specific firms critical to our operations, resulting from events such as a pandemic, terrorist attack, a city flood, or a wide-scale, regional disruption. Our response to an external SBD relies more heavily on other organizations and systems, especially on the capabilities of our clearing firm.

If the major disruption does not affect the physical location of the business, meaning the business can continue to operate from that location, the Primary Disaster Recovery Coordinator, or designee, will determine the steps necessary to resolve the disruption. If the disruption is systems related, this may include contacting the Company's offsite data storage provider, Microsoft, to determine next steps and expected length of time for resolution. The Company's Email Retention provider, Proof Point, may also be contacted. In the event the disruption does not prevent Associated Persons from working remotely, Associated Persons may be required to use these systems and/or to travel to the designated offsite location as named below as deemed necessary. The below list is not exhaustive. Specifically, if the location listed below is not available, Associated Persons may be asked to work remotely from alternate locations.

If the major disruption affects the physical location of the business and Associated Persons either cannot get into the building or must evacuate the building, the Primary Disaster Recovery Coordinator will determine the steps necessary to resolve the service disruption. This may include contacting the Company's offsite data storage provider and email retention provider. The Primary Disaster Recovery Coordinator and/or designee will notify all critical Associated Persons of next steps and provide direction to each Associated Person as to whether or not they will be required to report to the designated offsite location. The designated office location to conduct business on behalf of the Company is located at: 854 Pelican Lane, Coppell, TX 75019.

In the event of an office building evacuation, all Associated Persons should immediately leave the building. Go immediately to our designated meeting location, so that the Disaster Recovery Coordinator(s) may confirm everyone is safe and accounted for. If a building evacuation occurs and an Associated Person is on the phone, the Associated Person should inform the caller that the building is under mandatory evacuation, you'll have to reschedule the call for another time, and immediately terminate the call.

Because every building and situation has unique characteristics and circumstances, below are some general guidelines to follow for building evacuation:

1. Do NOT use the elevators.
2. Make yourself aware of the closest exit, and go to it.
3. Instruct others in your area to also leave the building.
4. Sound any alarms, e.g. fire alarms, if needed.
5. Proceed to the designated meeting location.

Main Office Number and Website

Main office number: 214-965-7695.

Website address(es): www.allredcapitalmanagement.com. This website can be updated remotely and will be updated, as needed, to provide direction to clients who wish to contact the Company. Clients may also be contacted directly, via phone or email, if necessary and possible.

Notification of Proper Authorities

After an emergency has been declared, the Primary Disaster Recovery Coordinator, or designee, will notify the proper regulatory authorities of the nature of the emergency, and the temporary location of the firm, and notify the local public utilities, the telephone company, the post office and any other vendor as deemed necessary.

Telephone Service/Fax

In the event the Company's primary telephone line is disrupted, phone and fax lines will be forwarded to 817-874-2211 to the extent available.

Temporary Operation Location/Recovery Site

If the primary office is inaccessible, the Company will temporarily relocate to the following address(es):

854 Pelican Lane, Coppell, TX 75019

Client data is easily accessible at any remote location with Internet access. Client data, including e-mail correspondence and pertinent books and records, is backed up and archived Daily. The archive is maintained away from the Company's primary business location to allow for retrieval of client records where the primary office location is not accessible.

Equipment/Hardware

The Company will maintain a list of all equipment, hardware and software, used by the Company. The list shall provide identifying information for the item, including the serial number, the manufacturers and serial/registration number as applicable. The CCO will notify the Company's insurance company of any damage.

If the Company's computer system is deemed unusable for any reason, the Company will procure another computer at that time. Time constraints for the purchase, delivery, and installation of a computer will depend on a number of outside factors such as the retailer, delivery services, and the consultant hired to install the computer, but it is expected that the Company will only be without a computer for a maximum of two business days. Once the new computer is installed, the last backup will be restored to the new system.

Mail Service

If the Company is unable to receive mail at its business office, the Company will either forward mail to an alternate location, or submitting a mail hold request to the post office.

Client Information and Client Trading Records

Original client agreements, contracts, profiles, and other documentation related to each client as well as trading records, brokerage statements and confirmations are maintained at the principal place of business for the appropriate time that is required by law.

Copies of pertinent client information shall be kept at a secure off-site location. If it is not practical to keep paper copies, electronic facsimiles may be kept in a format that is easily retrievable, i.e., pdf, tif, gif, with a vetted cloud provider, etc., and in a timely manner. Periodically, the CCO will review these disaster recovery plans pertaining to client's records to assure that these records will be adequately maintained in the event of a disaster or emergency.

Custodian

Copies of certain client records are also maintained by the custodian(s) holding the client's assets. The Company can access client records from the custodian as needed. If a client needed immediate access to their account, and for any reason could not contact the Company, the client could contact his or her custodian(s) directly.

Key Personnel Succession

Should something happen to Allred Capital Management where the individual is no longer available to service client accounts, clients will be contacted by the attorney, accountant, or spouse of Allred Capital Management. In such an event, the client may also contact the following party regarding access to their files and information:

Stanley Eugene Allred, 214-965-7696

Copies of certain client records are also maintained by the custodian(s) holding the client's assets. If a client needed immediate access to their account, and for any reason could not contact the Company, the client could contact their custodian(s) directly.

Client Contact

If a disaster occurs that requires client contact, every effort will be made by the Company to contact all clients. This may be done by phone calls, emails, general mailing, posting a message on the Company website, or by other means. A list of all clients is maintained in the Company's account management system and can also be received by contacting the relevant account custodian.

Financial Data

The Company's financial information is stored in a Financial file that is included in the backup procedures discussed above.

Updates and Annual Review

The Company will update this plan whenever there is a material change to the Company's operations, structure, business or location or to those of our custodian (or any other critical service providers). In addition, the Company will test the plan, at least annually, and update the plan as needed, to ensure the plan remains consistent with the Company's policy and overall business operations.

Contacting Access Persons

Should Associated Persons not be at work when the major disruption occurs, Associated Persons will need to be contacted. The Company maintains a list of its associated persons and contact information as part of human resources records.

The Disaster Recovery Coordinator is responsible for retaining an accessible copy of the most current Associated Persons list as maintained by human resources at a location other than the Company's primary business office.

Key Vendors

A list of principal service providers is provided below. The Disaster Recovery Coordinator is responsible for retaining a physical copy of the most current version of the following chart at a location other than the Company's primary business office.

Key vendors identified:

Product/Service: Internet Service Provider	
Vendor Name: Cogent	
Contact Person: Customer Service	Phone No.: 877-726-4368
Product/Service: Telephone Service Provider	
Vendor Name: Redgap	
Contact Person: Erik Smatresk	Direct No.: 214-550-1018
E-Mail: support@redgap.com	General Phone No.: 214-550-1040
Product/Service: Information Technology Service Provider	
Vendor Name: ByteFlo, LLC	
Contact Person: Adam Newberry	Phone No.: 817-675-4023
E-Mail: Adam@byteflo.com	
Product/Service: Text Messaging Archive Service Provider	
Vendor Name: TeleMessage	
Contact Person: Erin Phipps	Phone No.: 978-263-1015 x225
E-Mail: erinp@telemesssage.com	Cell Phone: 781-414-1899
Product/Service: Client Custodian	
Vendor Name: Raymond James Financial Services, Inc.	
Contact Person: Leah Orlandi+IAD Service Team	Phone No.: 727-567-7407
E-Mail: iadservice@raymondjames.com	
Product/Service: Payroll Service Provider	
Vendor Name: ADP Payroll	
Contact Person: Shannon Zaloudek	Phone No.: 314-616-4281
E-Mail: shannon.zaloudek@adp.com	
Product/Service: Compliance	
Vendor Name: Foreside Financial Group	
Contact Person: Myles Blechner	Phone No.: 603-216-8977
E-Mail: mblechner@foreside.com	
Karen Hoff	561-330-3878
E-Mail: khoff@foreside.com	
Product/Service: 401(k) Service Provider	
Vendor Name: July Business Services	
Contact Person: Diana Perri	Phone No.: 888-333-5859 Ext 3174
E-Mail: dperri@julyservices.com	254-296-4015 Ext 3174

Product/Service: Office Leasing	
Vendor Name: Trammell Crow Center	
Contact Person: Shannon Oder E-Mail: soder@streamrealty.com	Phone No.: 214-963-4145
Product/Service: Parking Service Provider	
Vendor Name: Platinum Parking	
Contact Person: Luis Martinez E-Mail: lmartinez@platinumparking.us	Phone No.: 214-786-3866
Product/Service: Insurance	
Vendor Name: Fidelity Bonds + Errors & Omissions Insurance - Windamer Insurance	
Contact Person: Scott H. Shannon E-Mail: sshannon@windinsgroup.com	Phone No.: 704-247-3038
Vendor Name: Health Insurance - Hailey Painter	
Contact Person: Haily Smith E-Mail: haily.smith@hotmail.com	Phone No.:
Vendor Name: Home, Life & Auto Insurance - Farmers Insurance	
Contact Person: Harrison Knox E-Mail:	Phone No.: 214-540-8110
Product/Service: Bank	
Vendor Name: Chase Bank	
Contact Person: Customer Service Address: 2200 Ross Avenue, Dallas, TX 75201	Phone No.: 214-965-2925
Product/Service: Franchise Tax Filing-Accounting Consultant	
Vendor Name: Weaver LLC	
Contact Person: Justin W. Reeves, CPA E-Mail: justin.reeves@weaver.com Address: 2300 N Field Street - Suite 1000 Dallas, TX 75201	Phone No.: 972-448-92467