

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.