



Business Continuity Plan

13317 Perthshire St., Austin, TX 78729

Phone: (512)522-0201

Email: luis@tuyyoplanning.com

www.tuyyoplanning.com

Table of Contents

Business Continuity Policy	3
Emergency Contact Persons	3
Significant Business Disruptions	3
Approval and Execution Authority	3
Business Description.....	4
Office Location(s).....	4
Alternative Physical Location(s) of Employees	4
Clients' Access to Funds and Securities.....	4
Data Back-Up and Recovery.....	4
Mission Critical Systems	5
Alternate Communications between the Firm and Clients, Personnel, and Regulators	6
Critical Business Constituents, Banks, and Counter-Parties	7
Disclosure of Business Continuity Plan.....	8
Approval.....	8
Appendix A - Employee Telephone Lists	9
Appendix B – Vendor List.....	10
Appendix C – Succession Plan.....	11
Appendix D - Clearing Firm Business Continuity Plan Executive Summary.....	12
Appendix E – Regulators	14
Appendix F – Website Disclosure.....	15

Business Continuity Policy

Tuuyo Planning Group, LLC's ("TPG") Business Continuity Policy ("BCP") is to respond to a Significant Business Disruption ("SBD") by first ensuring the safety of its personnel and the firm's property. The firm will conduct a financial and operational assessment to assess the damage caused by the SBD, then begin the recovery process and resume operations to allow our clients to resume transactions. The protection of all of TPG's books and records is of the utmost importance. If the firm determines it is unable to continue business as usual, we will assure clients prompt access to their funds and securities.

Emergency Contact Persons

The firm will provide contact information for two emergency contact persons, including name, title, mailing address, email address, telephone number, and facsimile number. This information will be updated no later than 30 days following a change, and on an annual basis.

The firm's two emergency contacts:

Primary Contact Person

Luis Guardia, Chief Compliance Officer

Work Phone: 713-828-5095

Mobile Phone:

Email: luis@tuuyoplanning.com

Secondary Contact Person would be your Custodian. (Charles Schwab or Betterment if managed by TPG)

Charles Schwab

Schwab Alliance Customer Support: (800) 515-2157

Direct Message: [Schwaballiance.com](https://www.schwaballiance.com)

Betterment Institutional

Work Phone: (646) 600-8263

Email: support@betterment.com

Significant Business Disruptions

TPG's BCP anticipates both internal and external SBD's. Internal SBDs are those which affect only the firm's ability to communicate and do business. 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. The response to an external SBD will rely more heavily on other organizations and systems, including the capabilities of our clearing firm.

Approval and Execution Authority

TPG's Chief Compliance Officer ("CCO") is responsible for approving the plan, conducting the required annual review, and has the authority to execute this BCP.

Plan Location and Access

TPG will maintain copies of its BCP plan and the annual reviews, and any changes that have been made to it for inspection. An electronic version of the plan will be available.

Business Description

TPG conducts business in equity, fixed income, derivative securities, and investment banking. The firm is an introducing firm and does not perform any type of clearing function for itself or others. Furthermore, the firm does not hold client funds or securities. It accepts, enters and executes orders. All transactions are sent to a clearing firm, which compares, allocates, clears, and settles them. The clearing firm also maintains client accounts, can grant clients access to their accounts, and delivers funds and securities. The firm services both retail and institutional clients.

TPG's clearing firm are Charles Schwab located at 211 Main St, San Francisco, CA 94105, 866-855-9102 <https://www.schwab.com> and Betterment Securities located at 61 West 23rd Street, 4th Floor, New York, NY 10010, 888-428-9482, www.betterment.com, support@betterment.com

Office Location(s)

TPG engages in order-taking and entry at this location.

Office Location

13317 Perthshire St.

Austin, TX 78729

Alternative Physical Location(s) of Employees

In the event of an SBD, TPG's personnel will operate electronically away from the affected office(s). Staff can process transactions electronically including execution of client orders and instructions regarding the transmission of funds to and from the clearing firm.

Clients' Access to Funds and Securities

TPG does not maintain custody of clients' funds or securities, which are kept by its clearing firm, Betterment Securities. In the event of either an internal or external SBD, if telephone service is available, TPG's registered investment adviser representatives and associated persons will take client orders or instructions and contact our clearing firm on their behalf. If Web access is available, the firm will post on its website that clients may access their funds and securities by contacting it at 713-828-5095, by going to our website www.tuyyoplanning.com or by emailing us luis@tuyyoplanning.com. The firm will make this information available to clients through its disclosure policy.

Data Back-Up and Recovery

TPG maintains its primary hard copy books and records and its electronic records at 13317 Perthshire St., Austin, TX 78729 and is responsible for the maintenance of these books and records. The firm maintains the following document types and forms which may be transmitted to the clearing firm, but are not required to be forwarded to our clearing firm:

New Account Forms

Client Agreements

Limited Powers of Attorney Forms

Investment Policy Statements

The firm backs up its electronic records daily by encrypted cloud backup services and keeps a copy at Google Vault, iCloud, RightCapital Client Vault, and Wealthbox Cloud.

Currently, a large majority of the systems that the firm utilizes to function as a business are hosted environments which provide for business continuity. With that in mind, the hosting providers'

continuity plans become a large a part of the BCP.

Internally there are safeguards and procedures in place to provide local continuity. These include a large UPS power supply which gives protection for the server and network equipment. Disk to Disk backups are run to provide security of all locally stored client data. These devices and records are rotated offsite weekly. A RAID configuration as well as multiple power supplies within the server are in place to provide for local hardware failure.

The server is updated automatically with hardware patches, software patches, security patches, and other necessary updates. The antivirus product is configured to update constantly, and the version control on the firewall is closely monitored and upgraded as needed. In the event of an internal or external SBD that causes the loss of our paper records, TPG will physically recover them from its backup site. If its primary site is inoperable, it will continue operations from our backup site or an alternate location. For the loss of electronic records, TPG will either physically recover the storage media or electronically retrieve data from our backup site, or, if our primary site is inoperable, continue operations from our backup site or an alternate location.

Operational Risk

Operational risk includes threats or constraints to TPG's ability to maintain communications with clients and to retrieve key activity records through its mission-critical systems.

In the event of an SBD, the firm will immediately identify what means will allow it to communicate with our clients, 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 the firm will employ include the website, telephone voice mail, secure email, etc. Also, the firm 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, TPG will determine the value and liquidity of its investments and other assets to evaluate its ability to continue to fund operations and remain in capital compliance. TPG will contact its clearing firm, critical banks, and investors to apprise them of its financial status. If it is determined that the firm may be unable to meet our obligations to those counter-parties or otherwise continue to fund its operations, the firm will request additional financing from its bank or other credit sources to fulfill its obligations to clients. If the firm cannot remedy a capital deficiency, TPG will file appropriate notices with its regulators and immediately take appropriate steps, including the protection of client assets, and the closing of its operations.

Mission Critical Systems

TPG's "mission-critical systems" are those which ensure prompt and accurate processing of securities transactions, including order taking, entry of securities transactions, the maintenance of client accounts, access to client accounts, access to client plans, and the delivery of funds and securities.

The firm has primary responsibility for establishing and maintaining its business relationships with clients and has sole responsibility for its mission-critical functions of order-taking and entry. Through the contract, its clearing firm provides the execution, comparison, allocation, clearance and settlement of securities transactions, the maintenance of client accounts, access to client accounts, and the delivery of funds and securities.

Our clearing firm contract provides that the clearing firm will maintain a business continuity plan and the capacity to execute that plan. The clearing firm represents that it will advise TPG of any material changes to its plan that might affect TPG's ability to maintain its business, and has presented an executive summary of its plan, (Appendix D). The clearing firm represents, in the event it executes its plan, that it will notify TPG of such execution and provide the firm equal access to services as its other clients. If TPG reasonably determines that the clearing firm has not or cannot put its plan in place quickly enough to meet the firm's needs or is otherwise unable to provide access to such services, the

clearing firm represents that it will assist TPG in seeking services from an alternative source.

TPG's clearing firm represents that it backs up TPG's records at a remote site. The clearing firm represents that it operates a backup operating facility in a geographically separate area with the capability to conduct the same volume of business as its primary site. The clearing firm has also confirmed the effectiveness of its backup arrangements to recover from a wide scale disruption by testing, and it has confirmed that it tests its backup arrangements four times a year.

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, the 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 relates to the capacity to accept and process new transactions and payments after a wide-scale disruption. Our clearing firm has the following SBD recovery time and resumption objectives: recovery time period of fewer than four hours; and resumption time of fewer than four hours.

The CCO will periodically review our clearing firm's capabilities to perform the mission-critical functions the clearing firm has contracted to perform for the firm.

Order Taking

TPG receives orders from clients via telephone or in-person visits by the client. During an SBD, either internal or external, the firm will continue to take orders through any of these methods that are available and reliable. As communications permit, the firm will inform our clients when communications become available to tell them what alternatives they have to send their orders to the firm. Clients will be notified of alternatives by voice messages and by postings on our website. We may advise our clients to place orders directly with us by calling 713-828-5095.

Order Entry

TPG enters orders by recording them electronically and then sending them to our clearing firm electronically through TPG's order entry system. Alternatively, we may place client orders telephonically. We have contacted the clearing firm and have been assured that we can expect order entry and execution services immediately, under their BCP's.

In the event of an internal SBD, TPG will enter and send records to our clearing firm by the fastest alternative means available, which include email, US Mail, overnight courier, and facsimile. In the event of an external SBD, we will maintain the order in electronic or paper format, and deliver the order to the clearing firm by the fastest means available when that firm resumes operations. Also, during an internal SBD, TPG may need to refer our clients to deal directly with the clearing firm for order entry.

Order Execution

TPG currently executes orders by review and release. In the event of an internal SBD, the firm would release all orders to its clearing firm for execution. In the event of an external SBD, the firm would release all orders to the clearing firm for execution.

Alternate Communications between the Firm and Clients, Personnel, and Regulators

Clients

TPG communicates with clients using the telephone, email, video call, our website, facsimile, US mail, and in-person visits to our firm or other location. In the event of an SBD, it will assess which means of communication are still available to use, and choose the means closest in speed and form (written or oral) to the means that it has used in the past to communicate.

Personnel

TPG communicates with its employees and affiliates using the telephone, email, and in person. In the event of an SBD, the firm will assess which means of communication are still available to use, and choose the means closest in speed and form (written or oral) to the means that it has employed in the past to communicate with the other party. The firm currently does not have any employees. At such time that it does, the firm will employ a call tree so that senior management can reach all employees quickly during an SBD. The call tree will include all staff home and office phone numbers.

The person to invoke the use of the call tree is the CCO or delegate.

Caller	Call Recipients
<i>Luis Guardia</i>	<i>Person B, Person C, Person D</i>
<i>Person C</i>	<i>Person E, Person F, Person G.]</i>

Critical Business Constituents, Banks, and Counter-Parties

Business Constituents

TPG has contacted its critical business constituents (businesses with which the firm has an ongoing commercial relationship in support of its operating activities, such as vendors providing us essential services), and determined the extent to which the firm can continue our business relationship with them in the event of an internal or external SBD. TPG will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services when it needs them because of an SBD to them or our firm.

The alternative suppliers are disclosed in Appendix B.

Banks

TPG has contacted our banks and lenders to determine if they can continue to provide the financing that it will need in light of an internal or external SBD. The bank maintaining the firm's operating account is:

BBVA Bank

**13497 N Highway 183
Suite 100
Austin, TX 78750
1-844-228-2872**

If TPG's banks and other lenders are unable to provide the financing, it will seek alternative financing immediately from alternative sources.

Counterparties

TPG has contacted its critical counter-parties, such as other broker-dealers or institutional clients, to determine if it will be able to carry out our transactions with them in the event of an internal or external SBD. Where the transactions cannot be completed, the firm will work with its clearing firm or contact those counterparties directly to make alternative arrangements to complete those transactions as soon as possible.

Disclosure of Business Continuity Plan

TPG will disclose in writing a summary of our BCP to clients at account opening, and annually. It will also post the summary on its website and mail it to clients upon request.

The summary addresses the possibility of a future SBD and how the firm plans to respond to events of varying scope. In dealing with the events of varying scope, this summary (1) provides specific scenarios of varying severity (e.g., a firm-only business disruption, a disruption to a single building, a disruption to a business district, a city-wide business disruption, and a regional disruption); (2) states whether we plan to continue business during that scenario and, if so, our planned recovery time; and (3) provides general information on our intended response. The summary discloses the existence of backup facilities and arrangements.

Contacting Us – If, after a significant business disruption, a client cannot contact us as they usually do, they should call the alternative numbers provided in this document, or go to our website. If they cannot access us through either of those means, they should contact our clearing firm at the contact numbers provided in this document. TPG’s BCP is designed to permit that firm to resume operations as quickly as possible, depending on the scope and severity of the significant business disruption. Since the timing and impact of disasters and disruptions are unpredictable, the firm will have to be flexible in responding to actual events as they occur. In any scenario, the firm plans to continue in business, transfer operations to our clearing firm if necessary, and notify clients through our website www.tuyyoplanning.com or our customer emergency number, 713-828-5095 how to contact us. If the SBD is so severe that it prevents us from remaining in business, we will assure our customer’s prompt access to their funds and securities.

TPG’s clearing firm advises that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments as quickly as possible. Client orders and requests for funds and securities could be delayed during this period.

Updates and Annual Review

TPG’s Chief Compliance Officer or his delegate will update and approve this plan whenever it has a material change to its operations, structure, business or location or to those of its clearing firm. Also, the firm’s Chief Compliance Officer or his delegate will review and approve this BCP annually in the last 2 months of each year to modify it for any changes in our operations, structure, business, or location or those of our clearing firm.

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.

By: 
Name: Luis Guardia
Title: Chief Compliance Officer

Appendix A - Employee Telephone Lists

<i>Employee</i>	Home Phone #	Cellular #	EMAIL	Time Called	Arrival Time	Comment
Luis Guardia		512-522-0201	Luis@tuyyoplanning.com			
Fire, Police, Emergency						

Appendix B – Vendor List

The firm’s suppliers are disclosed below.

Vendor Name	Goods/Service Provided	Contact Name	Address	Phone #
Charles Schwab	Custodian	Customer Support	211 Main St, San Francisco, CA 94105	(800)515-2157
Betterment Securities	Custodian/Clearing	Customer Support	8 W. 24th Street, 6th Floor New York, NY 10010	(646) 600-8263
Betterment Institutional	Third-Party Asset Management	Customer Support	8 W. 24th Street, 6th Floor New York, NY 10010	(646) 600-8263
Right Capital	Financial Planning/ Document Storage	Customer Support	1 Enterprise Dr Shelton, CT 06484	(888) 982-9596, opt. 2

Appendix C – Succession Plan

If Luis Guardia becomes incapacitated or perishes, all business operations fall to the heirs of the estate of the primary principal owner.

All business operations will continue until a determination has been made by the heirs of the estate of primary principal owner to continue operations, sell the advisory business, or cease operations of the advisory business.

Appendix D - Clearing Firm Business Continuity Plan Executive Summary

Executive Summary for Charles Schwab: Securities industry regulations require that brokerage firms inform their clients of their plans to address the possibility of a business disruption that potentially results from power outages, natural disasters, or other events. Charles Schwab & Co., Inc. has a comprehensive business continuity program in place, which is reviewed, updated, and tested on a regular basis. The program provides for continuation of client service within minutes in most cases.

Here are a few examples of what might occur if Schwab were to experience a business disruption of varying magnitude:

- If one of our telephone service centers became unavailable for any reason, calls would be immediately re-routed to our other service centers across the country.
- If we had a power outage in a particular region or business district, telephone and electronic communications would be immediately and seamlessly re-routed to alternate locations for the duration of the outage.
- In the event of a public health crisis that resulted in a high rate of employee absenteeism, Schwab would focus available personnel on critical business functions that directly support client needs. Additionally, we would enact our workforce continuity plan which includes social distancing and other policies to limit exposure.
- Comprehensive plans are maintained to facilitate timely restoration of account services in the unlikely event of a technology disruption. These plans are tested regularly to ensure their viability.

While no contingency plan can eliminate all risk of service interruption or temporarily impeded account access, we continually assess and update our plans to mitigate all reasonable risk.

Hyperlink to Schwab's BCP <https://www.schwab.com/legal/continuity>

Executive Summary for Betterment Securities: SEC and FINRA Rules require investment advisers and broker-dealers to create and maintain a business continuity plan.

In accordance with these rules Betterment LLC and Betterment Securities have both developed a plan that is intended to permit us to continue critical business operations during natural disasters, power outages, or other significant events. While there can be no assurance that service will continue without interruption in all circumstances, the plans do address actions that the firms intend to take in the event that there is a significant disruption. Account access is planned to be restored as the first step,

which would be followed by other critical business operations. If there is a local disruption to the operating facilities of either firm, the respective business continuity plans call for the affected firm to establish operations at an alternate location. We maintain data backup records, located well away from our primary facility so that they would not be affected by a regional disruption. We intend for account access to be available through these records should the primary data center suffer a disruption. Our plan will be reviewed, updated, and tested periodically.

Hyperlink to Betterment's BCP: <https://www.betterment.com/legal/other-disclosures/>

Appendix E – Regulators

TPG is a state registered investment advisory firm. The firm communicates with our regulator using the telephone, email, facsimile, US mail, and in person. In the event of an SBD, the firm will assess which means of communication are still available to use and choose 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.

Appendix F – Website Disclosure

If the firm states it will post a summary of the BCP to its website, use the following disclosure.

Tuyyo Planning Group, LLC (“TPG”) has adopted a Business Continuity Plan (“BCP”) pursuant to the Investment Advisers Act and the rules and guidance of the Securities and Exchange Commission (“SEC”). The purpose of the BCP is to outline how we will respond to events during a significant business disruption (“SBD”). The BCP addresses both internal SBDs, such as a fire in TPG’s office, and external SBDs, such as a natural disaster or widespread power disruption. Please be aware that the timing and impact of disasters and disruptions are unpredictable requiring us to be flexible in responding to actual events as they occur.

Our Business Continuity Plan

In the event of an SBD, we will safeguard employee lives and firm property. We will work to re-establish the systems necessary to quickly recover and resume business operations, protect our books and records, and allow our clients to transact business to the extent reasonable and practical under the circumstances. Our BCP is designed to permit TPG to resume operations as quickly as possible, given the scope and severity of the SBD.

Our Business Continuity Plan addresses: alternate office locations, customer access to funds and securities, financial and operational assessments, data backup and recovery, critical systems, alternative communications with customers, employees, and regulators, and critical business constituents.

Contacting Us and Accessing Your Funds

If after an SBD you cannot contact us as you usually do, you should contact the custodian that issues your account statements directly at <https://www.schwab.com>, https://www.bettermentsecurities.com/sign_in or check our website at www.tuyyoplanning.com.

Varying Disruptions

SBDs can vary in their scope, from only our firm to a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only TPG or a building housing TPG, we will transfer our operations to a local site when needed, and we expect to recover and resume business within a few hours. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area and recover and resume business within one to two business days. In either situation, we plan to continue in business and will notify you through email or our website and will provide information on how to contact us. The ability of TPG to fully function is dependent on outside sources outside of its control, including the availability of electricity, telephones, Internet, transportation, and the functioning of institutions and the markets worldwide. If the SBD is so severe that it prevents us from remaining in business, we will assure our customers’ prompt access to their funds and securities. Nothing in TPG’s BCP or this statement is intended to provide a guarantee or warranty regarding the actions or performance of TPG.

Additional Information

If you have any question about our business continuity planning or are a client and would like to request a copy, please contact us at 512-522-0201 or luis@tuyyoplanning.com.