



Business Continuity Plan – Summary and Disclosures

Securities industry regulations require that brokerage and investment advisor firms inform their clients of their plans to address the possibility of a business disruption that potentially results from a power outage, natural disaster, or other event. Alpha Investment Management has developed a business continuity plan (“BCP”) on how we will respond to events that significantly disrupt our business. This plan provides for continuation of client services in the event of various types of interruptions, such as those at our facilities as well as the services we provide.

Although we obviously cannot plan for, or guarantee against all contingencies, we have developed this plan in an effort to stem off and/or prepare for most contingencies. To conform with regulatory expectations, Alpha Investment Management’s plan is designed so that we can meet our present obligations to our clients in the event of an unplanned interruption in business, such as in an emergency or a Significant Business Disruption (“SBD”).

In order to facilitate this, we will strive to respond to a SBD by safeguarding employees’ lives and firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of the firm’s books and records, and allowing our clients to transact business with us. Alpha Investment Management never takes possession of client funds. Our clients always have direct access to their funds and account records through their custodians and are not dependent on our firm for access to their funds or account records. Thus an emergency or disruption at the level of Alpha Investment Management, Inc. will never place a client’s funds at risk.

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 or power outage in our building. External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a city flood, earthquake, 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 custodians and clearing firms.

Key points to our plan include:

- Operational assessments
- Provisions for rapid resumption of mission critical systems
- Back up arrangements for material relationships with business constituents, custodians and appraisals of counter-party impact
- Back up system for recovery of data
- Alternate means for communications for use between employees and the firm, as well as between clients and the firm
- Instructions for communications with regulators and regulatory reporting requirements in the event of a disaster
- Description of the alternate physical locations of employees
- Assurance for clients' prompt access to their funds in the event the firm determines it is unable to continue its business
- Provisions for updating the plan
- Provisions for periodic testing of the plan
- Notification of relevant provisions of the plan to clients of the firm

No contingency plan can eliminate all risk of service interruption or temporarily impeded account access. Nevertheless, we assess and update our plans to mitigate risks to the extent reasonable. In creating our BCP, certain assumptions have been made such as alternative facilities being accessible, sufficient personnel being available, and external organizations including custodians, securities markets and government agencies being operational. If these assumptions are not valid under particular circumstances, we will evaluate possibilities for minimizing the disruption to services as feasible at that time and will promptly provide clients with information about how to access their funds. In an effort to provide support and updated information, clients may contact us via phone at 877-229-9400. In addition, for alternative access they may contact the Custodians(s) that hold their account(s) directly to access their funds in the event of an emergency.

We will review, update and test our Business Continuity Plan as needed in the event of changes to our business processes, technology and staff at a minimum annually. We will also provide a copy of a summary to our clients on an annual basis. If you have any questions about our Business Continuity Plan, please contact us directly at 877-229-9400 or via email sent to diane@alphaim.net.