



**VANDERBILT  
FINANCIAL GROUP**

## **Business Continuity Plan (“BCP”)**

Vanderbilt Financial Group has developed a **Business Continuity Plan** on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

**Contacting Us** – If after a significant business disruption you cannot contact us as you usually do at (631) 845-5101, you should check our website [www.VanderbiltSecurities.com](http://www.VanderbiltSecurities.com) for an alternative. If your mutual fund, annuity, or insurance product is held directly, please see your most recent statement for direct contact information.

**Our Business Continuity Plan** – We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm’s books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data back-up and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

**Brokerage Account Access** - Our clearing firm, National Financial Services LLC., backs up their important records in a geographically separate area. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, we have been advised by our clearing firm that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments within 12 hours. Your orders and requests for funds and securities could be delayed during this period.

**Mutual Fund / Insurance Company Direct Business** – You may always contact the mutual fund or insurance company directly to facilitate transactions or acquire account balances. Please see your most recent statement for direct contact information.

**Varying Disruptions** – Significant business disruptions can vary in their scope, such as only our firm, 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 our firm or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business as quickly as possible. 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 as quickly as possible. In either situation, we plan to continue in business, transfer operations to a local site if necessary, and notify you through our web site or our customer number how to contact us. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer’s prompt access to their funds and securities.

**For more information** – If you have questions about our Business Continuity Plan, you can contact our Compliance Department at 125 Froehlich Farm Boulevard, Woodbury, NY 11797 or (631) 845-5100.

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Clearing Agent: National Financial Services, LLC