



BUSINESS CONTINUITY & SUCCESSION PLAN (BCSP)

Divvi Wealth Management
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Table of Contents

- I. Introduction
- II. Emergency Contact Persons
- III. Firm Policy
- IV. Business Description
- V. Office Locations
- VI. Alternative Physical Location(s) of Personnel
- VII. Customers' Access to Funds and Securities
- VIII. Data Back-up and Recovery (Hard Copy and Electronic)
- IX. Information and Cybersecurity
- X. Financial and Operational Assessments
- XI. Mission Critical Systems
- XII. Our Firm's Mission Critical Systems
- XIII. Mission Critical Systems Provided by Our Custodial Firms
- XIV. Alternate Communications Between the Firm and Customers, Employees and Regulators
- XV. Critical Business Partners, Vendors and Counterparties
- XVI. Succession Plan
- XVII. Disclosure of Business Continuity Plan
- XVIII. Updates and Annual Review
- XIX. Senior Manager Approval

Introduction

The following constitutes Divvi Wealth Management's (DWM) Business Continuity & Succession Plan (BCSP)

Emergency Contact Persons

DWM's emergency contact persons are:

- | | | |
|-------------------|--|--------------|
| • Kirby DeMoss | kirby@divviwealth.com | 816.651.3205 |
| • Matthew Waldman | matthew@divviwealth.com | 816.810.1260 |
| • Eric Blattner | eric@divviwealth.com | 913.426.1399 |

This information will be updated in the event of a material change and a Senior Manager will review it annually.

Firm Policy

DWM's policy is to respond to a Significant Business Disruption ("SBD") by safeguarding employees' lives and firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of DWM's books and records, and allowing our customers to transact business. In the event that DWM determines we are unable to continue our business, we will assure customers prompt access to their funds and securities via the service team at the appropriate clearing firm.

Significant Business Disruptions

Our plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only DWM's ability to communicate and do business, such as fire in our building, death or incapacitation of a principal. In the event Kirby DeMoss becomes incapacitated or upon his death, Matthew Waldman will notify all critical business constituents as well as all regulators who have jurisdiction over the business of DWM within 24 hours. Matthew Waldman will make sure that the credit demands of DWM are met. Notification shall be given to all clients of DWM within five (5) business days from the death or incapacitation of any key persons of DWM. 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. Our response to an external SBD relies more heavily on other organizations and systems, especially on the capabilities of the Client's respective clearing firm.

Approval and Execution Authority

Kirby DeMoss, Chief Compliance Officer, is responsible for approving the plan and for conducting the required annual review. Kirby DeMoss has the authority to execute this BCP.

Plan Location and Access

DWM will maintain copies of its BCP plan and the annual review, and the changes that have been made to it for inspection in the firm's books and records. Both an electronic copy and paper copy of our plan is located in a secure location. All personnel are required to complete a signed acknowledgement reflecting receipt of the plan and procedures. This acknowledgement is maintained in everyone's personnel files.

Business Description

Divvi Wealth Management LLC dba Divvi Wealth Management (“DWM”) was founded in 2021 and became registered as an investment advisor with the State of Missouri in 2022. The majority owner of DWM is Colligo Group LLC. Kirby DeMoss, Matthew Waldman, and Eric Blattner are all co-owners of Colligo Group LLC. Kirby DeMoss is the Chief Compliance Officer of DWM.

DWM provides investment advisory services to individuals and businesses. DWM does not hold customer funds or securities. All funds and securities are held at one of two primary custodians, Charles Schwab and Altruist. The custodians execute our orders, compares them, allocates them, clears and settles them. The custodians also maintain our client’s accounts, can grant client access to them and can deliver funds and securities.

Office Locations

DWM’s main office is located at 1520 Clay Street, Suite D5, North Kansas City, MO 64116. Its main telephone number is 816-237-8137.

Alternative Physical Location(s) of Personnel

In the event of an SBD, DWM will move business operations to 8708 N Sycamore Ave, Kansas City, MO 64157. Its main telephone number is 816-810-1260.

Customers’ Access to Funds and Securities

DWM does not hold client funds or securities. Client funds and securities are held with two primary custodians, Charles Schwab and Co., Inc. and Altruist Financial, LLC. In the event of an internal or external SBD, Divvi personnel will be available via phone to help complete any customer orders or instructions on behalf of the client with the custodian. For further options of access to funds and securities, customers may utilize the below contact information for the appropriate custodian.

Charles Schwab and Co., Inc.

Clients may contact Schwab Alliance through its website at <http://schwaballiance.com>, or by telephone at 800-515-2157. Schwab can instruct clients how to gain prompt access to their funds and securities, including placing buy or sell orders, issuing checks and wires from their accounts, or transferring funds via pre-established electronic transfer capabilities to client accounts at other institutions. Schwab’s business continuity plan is available at: <http://www.schwab.com/public/schwab/nn/continuity.html>

Altruist Financial, LLC

Clients may contact Altruist through its website at <http://app.altruist.com>, or via email at support@altruist.com. Altruist can instruct clients how to gain prompt access to their funds and securities, including placing buy or sell orders, issuing checks and wires from their accounts, or transferring funds via pre-established electronic transfer capabilities to client accounts at other institutions.

Altruist’s business continuity plan is available at:

<https://altruist.com/m/Business-Continuity-Plan-Disclosure-Statement-2023.04.06.pdf>



Data Back-up and Recovery (Hard Copy and Electronic)

DWM maintains its primary books and records in electronic storage. Any hard copy records are located at its office located at 1520 N Clay Street, Suite D5, North Kansas City, Missouri, 64116. Kirby DeMoss, Chief Compliance Officer, (816)651-3205, is responsible for the maintenance of these primary books and records. DWM maintains the following document types and forms that are not transmitted to a custodian: client agreements, investment policy statements, written financial plans, investment model portfolios, and client-specific documents such as tax-returns, estate planning documents and/or other DWM specific client or firm acknowledgements. All onsite documents are scanned and stored electronically in DWM's chosen cloud-based data storage solution.

DWM maintains its back-up books and records in its cloud-based storage solution noted above. These records are redundant electronic documents that are accessible to DWM from any location with a secure internet connection. Kirby DeMoss is responsible for the maintenance of these back-up books and records.

In the event of an internal or external SBD that causes loss of DWM's paper records, the firm will recover them through the utilization of the associated electronic back-ups located in the firm's cloud storage solution. In the event of the loss of electronic records, DWM will restore electronic data records via the record's originating system.

Information and Cybersecurity

DWM has considered that the risk of cyber events (e.g., systems being compromised through phishing attacks or other malicious attacks) may be increased due to use of remote offices, offsite meetings, etc. DWM remains vigilant in our surveillance against cyber threats and takes steps to reduce the risk of cyber events.

These steps may include:

- Ensuring that remote access systems are properly patched with available security updates
- Checking that system entitlements are current for all employees
- Employing the use of multi-factor authentication for associated persons who access systems remotely
- Maintaining an updated anti-virus software and password management tool on all employee computers
- Reminding associated persons of cyber risks through education and other exercises that promote heightened vigilance

In the event of a suspected information or cybersecurity related event, DWM and/or its employees will:

- Immediately inform Chief Compliance Officer, Kirby DeMoss (816.651.3205)
- Immediately notify all employees of the threat or incident and take appropriate action with employees to ensure the threat is mitigated or the event is isolated to the best of its ability.
- Assess the impact of the threat or event and notify regulatory authorities in accordance with current regulations
- Determine client impact of the event and notify impacted clients within the timeframe outlined by regulatory authorities
- Perform a post-event assessment to understand the methodology of the event, determine root cause of any resulting failures and outline necessary next steps to eliminate or reduce the potential of future similar threats

Financial and Operational Assessments

Operational Risk

In the event of an SBD, DWM will immediately identify what means will permit us to communicate with our clients, employees, critical business constituents, critical banks, critical counterparties, and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options DWM will include our website (divviwealth.com), telephone voice

mail (816.237.8137), and secure e-mail (invest@divviwealth.com). In addition, DWM will retrieve our key activity records as described in the section above, Data Back-Up and Recovery.

Financial and Credit Risk

In the event of an SBD, DWM will determine the value and liquidity of our investments and other assets to evaluate our ability to continue to fund our operations and remain in compliance with any net capital requirements. We will contact our clearing firm, critical banks, to apprise them of our financial status. If DWM determines that we may be unable to meet our obligations to those counterparties or otherwise continue to fund our operations, we will request additional financing from our bank or other credit sources to fulfill our obligations to our customers and clients. If we cannot remedy a capital deficiency, we will file appropriate notices with our regulators. Given DWM is a registered investment advisor, and it does not maintain possession of customer funds or securities, the firm's financial and credit risk is minimal in the event of an SBD.

Mission Critical Systems

DWM's "mission critical systems" are those that ensure prompt and accurate customer account information, including but not limited to, the maintenance of customer accounts, access to customer accounts and the status and availability of funds and securities. More specifically, these systems include Charles Schwab & Co., Inc., Altruist Financial LLC and internet connected workstation computers.

We have primary responsibility for establishing and maintaining our business relationships with our customers and have sole responsibility for our mission critical functions of current customer account information. Our custodians provide, through contracts, the execution, comparison, allocation, clearance and settlement of securities transactions, maintenance of customer accounts, access to customer accounts and the delivery of funds and securities.

Our custodial contracts provide that our custodial firms will maintain business continuity plans and the capacity to execute those plans. Our custodians represent that they will advise us of any material changes to their plans that might affect our ability to maintain our business and have presented us with an executive summary of their plan. If our custodian(s) executes their plan, they represent that they will notify us of such execution and provide us equal access to services as its other customers. If we reasonably determine that our custodial firm(s) has not or cannot put their plan in place quickly enough to meet our needs or is otherwise unable to provide access to such services, our custodian(s) represents that it will assist us in seeking services from an alternative source.

Our custodial firms represent that they back up our records at a remote site. Our custodial firms represent that they operate back-up operating facilities in geographically separate areas with the capability to conduct the same volume of business as their primary site. Our custodial firms have also confirmed the effectiveness of their back-up arrangements to recover from a wide scale disruption by testing.

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, and various external factors surrounding a disruption, such as time of day, 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 refers to the capacity to accept and process new transactions and payments after a wide-scale disruption. Our custodians have the following SBD recovery time for a limited scope disruption: 24 hours, and a catastrophic disaster recovery time of greater than 24 hours.

Our Firm's Mission Critical Systems

Order Taking

Currently, DWM receives orders from customers via telephone and in-person visits by the customer. During an SBD, either internal or external, the firm will continue to take orders through any of these methods that are available and reliable, and in addition, as communications permit, we will inform our customers when communications become available to tell them what alternatives they must send their orders to DWM. Customers will be informed of alternatives by phone or email and via DWM's website. If necessary, the firm will advise clients to place orders directly with the appropriate custodial firm.

Order Entry

Currently, DWM firm enters orders by recording them electronically and sending them to our custodial firm electronically or telephonically. In the event of an internal SBD, the firm will enter and send records to our custodial firm by the fastest alternative means available, which includes by telephone or email. In the event of an external SBD, DWM will maintain the order in electronic or paper format and deliver the order to the custodial firm by the fastest means available when it resumes operations. In addition, during an internal SBD, we may need to refer our customers to deal directly with the custodial firm for order entry.

Mission Critical Systems Provided by Our Custodial Firms

Our firm relies, by contract, on our clearing firms to provide order execution, order comparison, order allocation, maintenance of customer accounts, delivery of funds and securities and access to customer accounts.

Alternate Communications Between the Firm and Customers, Employees and Regulators

Customers

DWM currently communicates with customers using telephone, email, website, U.S. mail, commercial mail services and in-person visits. In the event of an SBD, DWM will assess which means of communication are still available and use the means closest in speed and form (written or oral) to the means that DWM used in the past to communicate with the other party. For example, if Advisor has primarily communicated with a party by email, but the Internet is unavailable, DWM will call the customer on the telephone and follow up, where a record is needed, with paper copy in the U.S. mail.

Employees

DWM currently communicates with our employees via telephone, e-mail and in person. In the event of an SBD, we will assess which means of communication are still available and use the means closest in speed and form (written or oral) to the means used in the past to communicate with the other party. Kirby DeMoss is responsible for contacting all employees and providing instructions in the event of an SBD.

Regulators

DWM is subject to regulation by Missouri state regulators and other jurisdictions where it may conduct business. We now file reports with our regulators using paper copies in the U.S. mail, and/or electronically using e-mail and the Internet. In the event of an SBD, DWM will check with the SEC, FINRA, and other regulators to determine which means of filing are still available to us and use the means closest in speed and form to our previous filing method. If DWM cannot contact our regulators, we will continue to file required reports using the communication means available to us.

Critical Business Partners, Vendors and Counterparties

DWM has contacted our critical business constituents (businesses with which we have an ongoing commercial relationship in support of our operating activities, such as vendors providing us critical services), and determined the extent to which we can continue our business relationship with them considering the internal or external SBD. DWM will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services when we need them because of an SBD to them or DWM. Our major suppliers/vendors/affiliates are:

<i>Company Name</i>	<i>City, State</i>	<i>Phone</i>	<i>Services Provided</i>
Charles Schwab	Phoenix, AZ	877.774.3892	Custodial Services
Altruist	Venice, CA	888.510.4660	Custodial Services
Chase	Liberty, MO	800.935.9935	Business Banking
Complysci	New York, New York	212.327.1533	Compliance Consulting
Orion	Omaha, NE	407.845.1700	Advisor and Client Portal
Missouri – Securities Div	Jefferson City, MO	573.522.3534	State Regulator

Succession Plan

DWM ensures the business will remain able to adapt to events that may arise related to its managing partners. These events may include but are not limited to death, disability, and retirement. The following is an overview of DWM’s succession plan considerations:

Temporary and Short-term Absences (periods between two weeks and 120 days)

Temporary and short-term absences would not trigger the succession plan. Key functions of all firm roles are cross trained among other managing partners to maintain normal business activities and operations.

In the event of the death or disability of an employee or key member, the role is temporarily filled by an existing employee while the managing partners determine the need for a reorganizational plan. If a managing partner is unable to fulfill their role, the other managing partners will determine who will perform those duties. If the CCO is unable to fulfill their role, Matthew Waldman will assume CCO responsibilities.

Long-term Absences, Death or Disability (periods of more than 120 days)

If it is anticipated the employee will return, a plan will be drafted to address the needs of the business to ensure ongoing business activities and servicing of clients occurs with limited or no disruption. Permanent absences, most commonly the result of death or retirement, would prompt the completion of a formal and comprehensive succession plan.

Disclosure of Business Continuity Plan

DWM posts its Business Continuity Plan (BCP) on its website and makes the BCP available to customers and prospective customers upon request via their preference of mail or email.

Updates and Annual Review

DWM will review annually and update this plan whenever DWM has a material change to our operations, structure, location, or business. The most recent update of the plan was made on October 9th, 2023.





Senior Manager Approval

I have approved this Business Continuity & Succession Plan (BCSP) as reasonably designed to enable our firm to meet its obligations to customers in the event of an SBD.

Signed: _____

Title: Chief Compliance Officer

Date: _____

Employee Acknowledgments

I have received and understand this BCSP.

Signed: _____ Title: _____ Date: _____

Signed: _____ Title: _____ Date: _____

Signed: _____ Title: _____ Date: _____

Signed: _____ Title: _____ Date: _____

Signed: _____ Title: _____ Date: _____

