



**MOA ADVISORY & FINANCIAL
SERVICES CO.**

Business Continuity Plan (BCP)

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Introduction

Purpose

The purpose of this Business Continuity Plan (BCP) is to document the plans for the recovery of our critical business functions and systems in the event of a business disruption, whether internal or external.

Firm Policy

Our firm 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 the firm's books and records, and allowing our clients to transact business. In the event we are unable to continue our business, we will direct our clients to Interactive Brokers for emergency assistance and access to their funds.

Emergency Contact Person

Our firm's emergency contact person is:
Michael Akinosho, Managing Owner & Chief
Compliance Officer
Office Phone: 224-255-7846
Email: michaelakinosho@moaadvisory.com

Approval and Execution Authority

Mr. Michael Akinosho is the Managing Owner and Compliance Officer, he is responsible for reviewing the plan annually and is responsible for approving the plan and has the authority to execute this BCP.

Plan Location and Access

An electronic copy of our plan is saved on the firm's cloud-based server as well as on the company website: www.moaadvisory.com. All employees will receive a hard copy of this document, as well as any subsequent updates, in their Compliance Binder.

Business Description/Location

MOA Advisory & Financial Services Co. (MOA Advisory) is a Registered Investment Advisor (RIA) regulated by the State of Illinois. MOA Advisory offers investment advisory services to individuals, families, profit-sharing plans, trusts, estates, investment companies, pooled investment vehicles, and small businesses in Illinois and other states.

Our firm's office is located at 1654 Nebraska Drive, Elk Grove Village IL 60007. The main phone number is 224-255-7846.

Alternative Physical Location(s) of Employees

In the event of an SBD, our staff can communicate with one another by cell phone and email.

If necessary, associates can work remotely until a safe, suitable alternative location can be established.

Customers' Access to Funds and Securities

Our firm does not maintain custody of customers' funds or securities. In the event of an SBD, if phone service is available, our team members will take client orders or instructions and contact our custodian on their behalf. The custodian maintains its own BCP, and in the event of an SBD, we will work with our clients to make them aware of the BCP and help them navigate the processes to access their funds and securities. Interactive Brokers BCP statement is attached separately.

Data Back-Up and Recovery

All client information (such as name, address, phone, date of birth, social security number, and specific account information including account numbers and positions) are stored in the firm's client database and/or with the custodian. MOA Advisory original client documents as well as MOA Advisory financial information is saved on our local server, which is backed up hourly. At the end of each day, the backups are consolidated, and three copies are saved to the cloud. Operational client documents are transmitted to the custodian electronically. Unless original hard copy documents are required to be obtained, original documents are shredded, and the records are maintained in electronic format. Email data is stored by Google Apps and account is secured by two-factor authentication, Google Authenticator and Google Smart Lock. Electronic records are backed up to network attached storage and to restricted and secure Google Drive.

Financial and Operational Assessments

Operational

In the event of an SBD, MOA Advisory will immediately identify the means that will permit us to communicate with our clients, employees, custodian, and critical business constituents. Although the effects of an SBD will determine the means of alternative communication, the communications options employed will include the firm website, phone and voicemail, secure email, physical mail, etc. In addition, we will retrieve our key activity records as described in the Data Back-Up and Recover section above.

Financial and Credit Risk

In the event of an SBD, we will determine the value and liquidity of our investments and other assets to evaluate our ability to continue to fund our operations and service our clients. We will contact our custodian, clients, and bank to apprise them of our financial status as appropriate. If we determine that we may be unable to meet our obligations to those counterparties or otherwise continue to fund our operations, we will request additional funding from our bank or other credit sources. If we cannot remedy a capital deficiency, we will file appropriate notices with our regulators and immediately take the appropriate steps.

Mission Critical Systems

MOA Advisory's mission critical systems are those that ensure prompt and accurate processing of securities transactions, including order taking, entry, 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. These systems are maintained by Interactive Brokers, LLC as our custodian.

Order Taking/Order Entry

Currently we receive trade instructions from clients via phone or in person, and our firm enters orders electronically. During either an external or internal SBD, we will continue to take those instructions through any of the aforementioned methods that are available and advise our clients accordingly. If clients are unable to communicate with us, they may communicate orders and instructions to their designated custodians directly.

Order Execution

MOA Advisory does not execute client orders. Execution of orders is performed by custodian designated by our clients.

Alternate Communications Between the Firm and Clients, Employees, and Regulators Clients

Currently we communicate with our clients via phone, email, our website, fax, US mail and in-person visits. In the event of an SBD, we will determine which means of communication are still available and use the means closest in speed and form that we have used in the past to communicate with other parties. For example, if we have communicated with a party by email but the internet is unavailable, we will call him/her on the phone and follow up with a paper copy where a record is needed.

Employees

Currently we communicate with our employees via phone, email and in person. In the event of an SBD, we will employ a group text message so that senior management can reach all employees quickly.

Operations. Regulators

We are currently regulated by the State of Illinois. We file reports with our regulators electronically and by US mail when required. In the event of an SBD, we will check with the SEC to determine which means of filing are still available and use the means closest in speed and form to our previous filing method. If we cannot contact our regulators, we will continue to file required reports using the communication means available to us. Illinois Financial & Professional Regulation contact: 1(888) 473-4858.

Critical Business Constituents, Banks, and Counterparties

Business Constituents

Critical business constituents are businesses with which we have an ongoing commercial relationship in support of our operating activities, such as vendors providing us critical services. We 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. Our major suppliers are:

Interactive Brokers, LLC	Custodian	877-442-2757
Comcast	Internet and Fax	800-934-6489
AT&T	Phone	800-901-9878

Banks

We have contacted our bank and lenders to determine if they can continue to provide the financing that we will need in the event of a SBD.

MOA Advisory can apply for an open line of credit with Baxter Credit Union (BCU) that will be used in the event of a working capital need.

Annual Testing

The firm will conduct a comprehensive test of the BCP on an annual basis and the results of the test will be documented and retained on file. The Compliance Officer is responsible for testing and documenting the actual implementation of the BCP. The items tested during the annual testing process will include 1) access to the internet from an alternate location, 2) access to the various services providers, 3) the ability to forward phones to cell phones, and 4) the integrity of backup services.

Disclosure of Business Continuity Plan

We post our BCP on our website and we offer to provide it to our clients upon request.

Updates and Annual Review

MOA Advisory will update this plan whenever we have a material change to our operations, structure, business, or location or to those of our custodian. Additionally, our firm will review this BCP annually and make any necessary adjustments.

For more information regarding our Business Continuity Plan, you may contact us at 224-255-7846 or via email at michaelakinosh@moaadvisory.com.