

# **Business Continuity Plan**

November 2022

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# Overview

As part of its fiduciary duty to its clients and as a matter of best business practices, Savest Financial has adopted policies and procedures for disaster recovery and for continuing Savest Financial's business in the event of an emergency or a disaster such as a bombing, fire, flood, earthquake, power failure or any other event that may disable the firm or prevent access to our office(s).

In the event of a disaster, it is the Firm policy to safeguard employees, ensure that client account records are protected, minimize risk to the Firm employees and facilities, and resume the firm's business in as quickly and orderly a manner as possible. These policies are, to the extent practicable, designed to address those specific types of disasters that Savest Financial might reasonably face given its business and location.

# **Mission Critical Person and Emergency Contacts**

In the event of an emergency or disaster, the following persons may be reached through the phone numbers and emails provided:

#### **Savest Financial**

**Ginika Nnamoko, Chief Compliance Officer** Email: <u>ginika@savest-financial.com</u> Phone Number: +2349058304314

Nathan Nwokoro, Chief Executive Officer Email: <u>nathan@savest-financial.com</u> Phone: +2348084059710

#### Brokerage

Questrade Canada Address: 5700 Yonge Street, Unit G1 (Ground Floor), Toronto, ON M2M 4K2 Canada Phone Number: +18882984515 Email: <u>support@questrade.com</u>

#### Custodian

United Bank for Africa (UBA) - Global Investor Services (GIS) Address: 57 Marina, Lagos Island. Lagos, Nigeria Phone Number: +23412808825 Email: <u>globalinvestorservices@ubagroup.com</u>

### **Services Description**

As a licensed investment advisor, Savest Financial may introduce and assist in the execution of equity, fixed income, and alternative asset transactions. Savest Financial does not hold clients' funds and securities.

Trade settlement and custody of clients' assets is the responsibility of brokers and custodians, selected based on the recommendation of the investment committee at Savest Financial or as directed by clients. Clients can access their funds and securities with brokers and custodians independent of Savest Financial.

Fixed-income services are provided by UBA Global Investors Services, while Questrade provides equity investment services.

### **Office Location**

Suite A01, The Statement Suites,

Plot 1002 Central Business District,

Abuja,

Nigeria.

# **Relocation of Operations / Temporary Facilities**

In the event of an emergency or a disaster that impacts the primary office location, all Firm operations will be done electronically from a remote location, under the supervision of the Chief Compliance Officer.

# **Recovery Effort at Impacted Location**

The Chief Compliance Officer will coordinate the Firm's insurance claim concerning the Firm's impacted primary location and will coordinate the Firm's business data and property to salvage recovery operations.

### **Resumption of Trading**

Until full electronic trading capabilities are restored at the Firm's primary offices or until they are fully enabled at the temporary facility, the portfolio managers will continue client transactions by telephone/email from the temporary facility under the supervision of the Chief Compliance Officer.

### **Death or Incapacity of Managing Director**

In the event of the death or incapacity of the firm's Managing Director, in a timely fashion the remaining partners of Savest Financial will:

• Give clients notice of the demise/incapacity of the Managing Director.

• Explain to the clients the redundancy in process and investment philosophy and assure clients that the same level of care and fiduciary duty will be practiced at the firm even in absence of the Managing Director.

• Assist clients in transitioning to another advisor or elsewhere should the clients decide to transfer assets to another firm;

#### **Protection of Electronic Data Systems**

All Firm employees are required to save their computer data to the "Google Drive" server and not to their individually assigned desktop computer's the hard drive. This information is accessible from any computer that has 'synced' with the office PC or is also available from any internet connection remotely. Furthermore, employees each have access to the cloud-based secure data depository on a need-basis.

# Access to Client Account Data

If a disaster destroys the office computer system, all client portfolio records can be accessed remotely through internet connections with the client custodians and/or the firm's cloud-based file storage system.

# **Protection of Hard Copy Records**

It is the practice of the Firm to scan and keep all relevant documents in 'soft copy' form to ensure proper backup and security of information. The Firm uses a file synchronization process for the cloud-based secure file system.

#### **Communications with Clients**

Prompt client communications are vital to reassuring clients of the safety of their assets and of the ongoing viability of the Firm. The Client Service Manager maintains a current list of contact information for all clients. Once staff safety issues are stabilized and the office premises are secured or an alternate location is established, the Client Service Manager, the Chief Compliance Officer, and other designated staff will contact all Savest Financial clients, apprise them of the disaster recovery effort, and provide them with alternate contact information, when available. Client contact will be via telephone, email, fax, or mail as required by the circumstances.

#### **Communications with Vendors**

The Client Service Manager maintains a current list of contact information for all major vendors of the Firm - the Custodian and Vendor Emergency Contact List. The accuracy of the contact information on the current list is verified on a quarterly basis. The Supervisor and Client Service Manager will prioritize vendor contacts as required.

Name	Designation	Phone Number	Alternative Phone Number	Official Email	Alternative Email
Nathan Nwokoro	CEO	+2348084059710	+2348065612177	nathan@savest- financial.com	kcinathan@gm ail.com
Shehu Shittu	Executive Director	+2348121043888	+2347030312425	shehushittu@g mail.com	
Chidalu Echem	Client Service Manager	+2348161526338	+2348127149270	chidalu@savest -financial.com	echemce13289 @gmail.com
Raphael Ameh	Business Development Officer	+2348036132880		raphael@savest -financial.com	
Ginika Nnamoko	Chief Compliance Officer	+2349058304314	+2348176904893	ginika@savest-f inancial.com	

#### Appendix 1 - Staff List

#### Appendix 2 - Vendor List

Name	Service Provided	Contact Person	Address	Phone Number	Email
UBA GIS	Custodian	Customer Service	57 Marina, Lagos Island. Lagos, Nigeria.	+23412808825	globalinvestors ervices@ubagr oup.com
Questrade Canada	Brokerage	Customer Service	5700 Yonge Street, Unit G1 (Ground Floor), Toronto, ON M2M 4K2 Canada.	+18882984515	<u>support@quest</u> <u>rade.com</u>