Business Continuity and Disaster Recovery Plan (“Plan”)

CAPITAL WEALTH PLANNING, LLC
1016 Collier Center Way, Suite 200
Naples, Florida 34110
(239) 593-2100

Emergency Contact Persons

If, after a significant business disruption, you cannot contact us as you usually do at (239) 593-2100, you should go to our web site at http://www.capitalwealthplanning.com. Our firm’s two emergency contact persons are: Kevin Simpson, (239) 593-2100, Cell (239) 290-4351, ksimpson@capitalwealthplanning.com and Brian Bruneau, (860) 803-7747, Cell (239) 776-4603, brian@capitalwealthplanning.com. These names will be updated in the event of a material change.

If you cannot access us through the website, you should contact our primary custodial firm, Charles Schwab, at (800) 435-4000 or www.schwab.com for instructions on how it may provide access to funds. If your assets are held another custodian, you should contact it.

Firm Policy

Our firm’s policy is to respond to a Significant Business Disruption (SBD) by safeguarding employees’ lives and firm property, making a financial and operational assessment, protecting all the firm’s books and records, and quickly recovering and resuming operations. Attached hereto is Exhibit 1, Initial Employee Acknowledgement and Exhibit 2, Annual Employee Acknowledgement.

Updates and Annual Review

The firm will update this Plan whenever the firm has a material change to its operations, structure, business or location. In addition, the firm will review this Plan annually to modify it for any changes in the firm’s operations, structure, business or location.

A) Testing

Testing the firm’s Plan is a priority, and it is critical to ensuring the overall effectiveness of the firm’s ability to respond to a natural disaster, a fire, an electrical power failure, or to an attack. The firm will test its Plan on an annual basis to determine the firm’s ability to maintain its mission critical operations outside the firm’s principal place of business.

The firm will conduct the following:
• Testing the operating systems and utilities (infrastructure test);
• Testing of all critical applications (application level test);
• Data transfer between applications (integrated testing); and
• Testing the complete environment and workload (stress test).

**Significant Business Disruptions (SBDs)**

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 in our building or loss of our data center. External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, an earthquake, hurricane or a wide-scale, regional disruption.

**Approval and Execution Authority**

Kevin Simpson, Manager and Chief Investment Officer, is responsible for approving the plan and Brian Bruneau, Chief Compliance Officer, for conducting the required annual review. Kevin Simpson has the authority to execute this BCP.

**Plan Location and Access**

Our firm will maintain copies of its BCP plan and the annual reviews, and the changes that have been made to it for inspection. An electronic copy of our plan is located on the following share: http://www.capitalwealthplanning.com. Additionally, a hard copy of our plan is located in our office.

**Business Description**

Our firm conducts an investment advisory business focused on covered call writing, among other things. We do not perform any type of clearing function for ourselves or for others. Furthermore, we do not hold customer funds or securities. Using our methodology, we execute orders on behalf of our clients. Or orders are electronically submitted or called in to our executing brokers and ultimately to various exchanges.

**Business Locations**

The Company’s personnel are located at 1016 Collier Center Way, Suite 101, Naples, Florida 34110. Its main telephone number is (239) 593-2100. Our employees may travel to that office by means of car, bus, or walking.
**Alternative Physical Location(s) of Employees**

In the event that we are forced to leave our building during the course of a business day, all employees will promptly evacuate the building and meet at 29111 Amarone Court, Naples, Florida 34110. The phone number is (239) 431-8166. We will meet by the front door.

In the event of a severe SBD, we will move our staff from affected offices to Swan and Dolphin Hotel, 1500 Epcot Resort Boulevard, Lake Buena Vista, Florida 34820. The main telephone number is (407) 934-4000.

**Customers’ Access to Funds**

Our firm does not maintain custody of customers’ funds or securities, which are maintained at their own custodial firm. In the event of an internal or external SBD, if telephone service is available, our registered persons will take customer instructions and contact our clearing firm on their behalf, and if our web access is available, our firm will post on our web site ([http://www.capitalwealthplanning.com](http://www.capitalwealthplanning.com)).

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

Our firm maintains its primary hard copy books and records and its electronic records at 1016 Collier Way, Suite 101, Naples, Florida 34110. Brian Bruneau, (239) 593-2100, is responsible for the maintenance of these books and records.

Our firm has a near complete inventory of crucial documents maintained at this location. The Company has copied and stored essential non-electronic files off-site. Electronic data are backed up daily by TeamLogicIT (TLIT), a high-availability provider of data storage services, headquartered in Naples, Florida.

In the event of an internal or external SBD that causes the loss of our paper records, we will physically recover them from our backup. For the loss of electronic records, we will electronically recover data from our backup.

Additionally, our individual office desktop and laptop computers have specific "critical folders" which are backed up daily by TLIT. Data is securely stored in-house at 1016 Collier Center Way. Continuance of the backup service is based upon a monthly fee as part of our service contract with TLIT. Files can be restored on-site or off-site as needed.
Financial and Operational Assessments

Operational Risk

In the event of an SBD, we will immediately identify what means will permit us to communicate with our customers, employees, critical business constituents, critical banks, critical counter-parties, and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options we will employ will include our website, telephone voice mail, and secure e-mail. In addition, we will retrieve our key activity records as described above in the section Data Back-Up and Recovery.

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 remain in capital compliance. We will contact our custodian, critical banks, and investors to apprise them of our financial status. If we determine that we may be unable to meet our obligations to those counter-parties 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 and immediately take appropriate steps.

Mission Critical Systems

Our firm’s “mission critical systems” are those that ensure prompt and accurate trading, including data collection, signal generation, execution, and allocation of securities transactions, the maintenance of customer accounts, access to customer accounts, and the delivery of funds. More specifically, these systems include Internet-based portals of custodians/executing brokers with real-time quotes, which provides our traders with market data and enables the firm to generate trade orders, and Charles Schwab or other executing broker/custodian automated order management system, which allows us to electronically execute orders and to access our trading accounts.

We have primary responsibility for our mission critical systems. Orion, Charles Schwab, Wells Fargo, and our other custodial partners will provide secondary support for issues related to their systems.

Our clearing firm represents that it will advise us of any material changes to its plan that might affect our ability to maintain our business. In the event of our custodial firm executes its plan, it represents that it will notify us of such execution and provide us equal access to services as its other customers. If we reasonably determine that our clearing
Our firm has not or cannot put its plan in place quickly enough to meet our needs, or is otherwise unable to provide access to such services, our clearing firm represents that it will assist us in seeking services from an alternative source.

Our firm has confirmed the effectiveness of its 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 situation, 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 trading activities after a wide-scale disruption. Our firm has the following SBD recovery time objective: recovery time period of within one business day.

Our Firm’s Mission Critical Systems

Our firm maintains a full redundancy for web-based systems failures. Hotwire Fusion FiberOptic connections are used to access real-time data from interfaces with all of our executing brokers. Key production data is electronically backed up and stored daily by TLIT.

In the event of an SBD that affects our IT facility, we will check with the facility to determine the extent of the disruption and determine how to best address the disruption.

The Firm’s IT contact is TeamLogicIT. Their main telephone number for is (239) 288-0531. Our firm’s primary contact at TeamLogicIT is William Emmons. His direct telephone number is (239) 288-0531. Other critical providers are attached hereto as Exhibit 3 Telephone Service Directory, Exhibit 4 Internet and E-Mail Service Directory, and Exhibit 5 Service Provider Directory.

Data Collection

Our firm currently collects data from Hotwire Fusion via fiber optic service. In the event of a SBD that affects access or to our dedicated Internet, we will switch to our backup internet provider, Comcast. If the outage to both providers is deemed to be significant we will communicate with our executing brokers via telephone. If the SBD is such that telephones are not available, we will identify alternative means of communications and possibly discontinue trading until communication is available.

Training

The firm will address the following topics as part of this Plan’s training program:
• An explanation of the legal and regulatory requirements for the firm to maintain this Plan;
• The importance of the Plan to the economic viability of the firm;
• Introduction of the Emergency Response Team members (Kevin and Jeff) and their respective roles within the Emergency Response Team;
• Each associated person’s responsibilities regarding the implementation of the Plan in the event of a SBD; and
• Any other relevant issues.

Attached as Exhibit 6 is the Firm’s Training Log.

Order Execution

Our firm currently executes orders electronically using the executing brokers systems over a fiber optic service with a cable modem backup service. In the event of an SBD that affects our order execution systems, we will determine the best method with which to communicate with our custodial, including phone and manually execute orders until we can re-establish our order execution system.

Other Services Currently Provided to Customers

Our firm currently provides performance statements upon request and the Form ADV annually to our clients via e-mail or U.S mail. In the event of a SBD that prevents us from communicating with our clients in this manner, we will determine the most appropriate manner in which to communicate with our clients.

Mission Critical Systems Provided by Our Custodial

Our custodians currently provide our firm with order execution, statement generation, routing to the appropriate exchanges, and cash management to clients. In the event of an SBD that prevents our clearing firm from providing these services, we will determine how to work with our clearing firm to close our positions.

Alternate Communications between the Firm and Customer, Employees, and Regulators

Customers

We now communicate with our customers using the telephone, e-mail, our web site, fax, U.S. mail, and in-person visits at our firm or at the customer’s location. In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party. For example, if we have communicated with a party by e-mail but the Internet is unavailable, we will call them on the telephone and follow up where a record is required with paper copy by U.S. mail.
Employees

We now communicate with our employees using the telephone, e-mail, and in-person. In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party. We will also employ a call tree so that senior management can reach all employees quickly during an SBD. The call tree includes all staff home, office, and mobile phone numbers. We have identified persons, noted below, who live near each other and may reach each other in person.

The person to invoke the call tree is Kevin Simpson or Brian Bruneau as the alternate.

<table>
<thead>
<tr>
<th>Call Recipient</th>
<th>Home</th>
<th>Mobile</th>
<th>Office</th>
<th>E-Mail</th>
</tr>
</thead>
<tbody>
<tr>
<td>Kevin Simpson</td>
<td>(239) 431-8166</td>
<td>(239) 290-4351</td>
<td>(239) 593-2100</td>
<td><a href="mailto:ksimpson@capitalwealthplanning.com">ksimpson@capitalwealthplanning.com</a></td>
</tr>
<tr>
<td>Joanna Irons</td>
<td>(239) 431-8166</td>
<td>(239) 272-1551</td>
<td>(239) 593-2100</td>
<td><a href="mailto:jirons@capitalwealthplanning.com">jirons@capitalwealthplanning.com</a></td>
</tr>
<tr>
<td>Josh Smith</td>
<td>None</td>
<td>(513) 509-5993</td>
<td>(239) 593-2100</td>
<td><a href="mailto:jsmith@capitalwealthplanning.com">jsmith@capitalwealthplanning.com</a></td>
</tr>
<tr>
<td>Brian Bruneau</td>
<td>None</td>
<td>(860) 803-7747</td>
<td>(239) 593-2100</td>
<td><a href="mailto:Bbruneau@capitalwealthplanning.com">Bbruneau@capitalwealthplanning.com</a></td>
</tr>
<tr>
<td>John Watkins</td>
<td>N/A</td>
<td>(239)851-6030</td>
<td>(239) 593-2100</td>
<td><a href="mailto:jwatkins@capitalwealthplanning.com">jwatkins@capitalwealthplanning.com</a></td>
</tr>
<tr>
<td>Josh Miller</td>
<td>N/A</td>
<td>(239)404-0890</td>
<td>(239) 593-2100</td>
<td><a href="mailto:jmiller@capitalwealthplanning.com">jmiller@capitalwealthplanning.com</a></td>
</tr>
<tr>
<td>Ryland Mathews</td>
<td>N/A</td>
<td>(954) 850-9888</td>
<td>(239) 593-2100</td>
<td><a href="mailto:rmathews@capitalwealthplanning.com">rmathews@capitalwealthplanning.com</a></td>
</tr>
<tr>
<td>Jodi Philips</td>
<td>N/A</td>
<td>(317) 308-1603</td>
<td>(239) 593-2100</td>
<td><a href="mailto:jodi@capitalwealthplanning.com">jodi@capitalwealthplanning.com</a></td>
</tr>
</tbody>
</table>
Regulators

We are currently regulated by the Securities and Exchange Commission (“SEC”) and to a lesser extent by the Florida Office of Financial Regulation (“OFR”). We communicate with our regulators using the telephone, e-mail, fax, US mail, and in person. In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party.

Critical Business Constituents, Banks, and Counter-Parties

Business Constituents

We have 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 in light of the internal or external SBD. 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 a SBD to them or our firm.

Banks

The bank maintaining our business checking account is Bank of America, 796 5th Avenue South, Naples, Florida 34102, (239) 436-1960, (800) 432-1000; American Momentum Bank, 301 5th Avenue South, Naples, Florida 34102, (239) 434-7945, (866) 530-2265; and First Florida Integrity Bank, 895 5th Avenue South, Naples, FL 34102, (239) 919-5199. If our banks are unable to provide us access to our accounts, we will seek alternative financing immediately from our custodial partners.

Counter-Parties

We have contacted our critical counter-parties, such as our clearing firm, to determine if we will be able to carry out our transactions with them in light or an internal or external SBD. Whereas transactions cannot be completed electronically through our production-trading platform, we have made alternative arrangements to complete those transactions as soon as possible, such as by phone.

Regulatory Reporting

Our firm is subject to regulation by the Securities and Exchange Commission (“SEC”) and Florida Office of Financial Regulation (“OFR”). We now file reports with our regulator using paper copies in the U.S. mail, and electronically using fax, e-mail, and the
The firm currently files Form ADV Part 1 (including any Annual Updating Amendment or Other-Than-Annual Updating Amendment) and Form U-4 for its registered investment adviser representatives via the Investment Adviser Registration Depository. In the event of an SBD, we will check with the regulators to determine which means of filing are still available to us, and use the means closest in speed and form (written or oral) to our previous filing method. In the event that we cannot contact our regulators, we will continue to file required reports using the communication means available to us.

SEC
801 Brickell Avenue, Suite 1800
Miami, Florida 33131
(305) 982-6300

OFR
200 E. Gaines Street
Tallahassee, Florida 32399
(850) 487-9687

Disclosure of Business Continuity Plan

We provide in writing a BCP disclosure statement to our customers upon request.

Updates and Annual Review

Our firm will update this whenever we have a material change to our operations, structure, business or location or to those of our clearing firm. In addition, our firm will review this BCP annually to modify it to reflect changes in our operation, structure, business, location, or to reflect changes in our clearing firm.

Senior Manager Approval

I have approved this Business Continuity Plan as reasonably designed to enable our firm to meet its obligation to customers in the event of an SBD.

Signed: Kevin Simpson

Title: Manager

Date: February 8, 2017
CWP Business Continuity Disclosure Statement

CWP 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.

Contacting Us – If, after a significant business disruption, you cannot contact us as you usually do at (239) 593-2100, you should go to our website at http://www.capitalwealthplanning.com. If you cannot access us through either of those means, you should contact Kevin Simpson at (239) 290-4351 for instructions.

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, band and counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds if we are unable to continue our business.

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 and expect to continue business. In a disruption affecting the building housing our firm’s systems, we will immediately work with our clearing firm to close all active positions, transfer our systems to a site outside of the affected area, and recover and resume business as soon as possible. In either situation, we plan to notify customers through our web site at http://www.capitalwealthplanning.com. If a significant business disruption is so severe that it prevents us from remaining in business, we will work with our clearing firm to ensure our customer’s access to their funds.

For more information – If you have questions about our business continuity planning, you can contact us at Capital Wealth Planning, LLC, 1016 Collier Center Way, Suite 200, Naples, Florida 34110, (239) 593-2100, Brian@capitalwealthplanning.com.