

# **American Equity Investment Corp.**

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

### **Emergency Contact Persons**

Our firm's two emergency contact persons are: Timothy E. Peoples, 812-945-9888, [tpeoples@investforyou.com](mailto:tpeoples@investforyou.com) and Marion Leonberger, 502-426-1235, [sleonberger@investforyou.com](mailto:sleonberger@investforyou.com). These names will be updated in the event of a material change, and our Executive Representative will review them within 17 business days of the end of each quarter.

### **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, quickly recovering and resuming operations, protecting all of the firm's books and records, and allowing our customers to transact business. In the event that we determine we are unable to continue our business, we will assure customers prompt access to their funds and securities.

### **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. 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.

### **Approval and Execution Authority**

Timothy Peoples, President, a registered principal, is responsible for approving the plan and for conducting the required annual review and 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.

### **Business Description**

Our firm conducts business in mutual funds, variable products and direct participation programs. Our firm does not perform any type of clearing function for itself or others. Furthermore, we do not hold customer funds or securities. All transactions are sent directly to the product sponsor who executes the order and maintains the customer account.



## **Office Locations**

### **Office Location #1**

Our Main office is located at 4222 Grantline Rd., New Albany, Indiana. Its main telephone number is (812) 945-9888.

### **Office Location #2**

Our Location #2 Office is located at 10353 Linn Station Road, Louisville, Kentucky. Its main telephone number is (502) 426-1235.

## **Alternative Physical Location(s) of Employees**

In the event of an SBD at our main office, we will move our staff to temporarily work from the home of Timothy Peoples, President. His telephone number is (812) 945-5615. In the event of an SBD at our 2<sup>nd</sup> location, we will move our staff to the main office.

## **Customers' Access to Funds and Securities**

Our firm does not maintain custody of customers' funds or securities, which are maintained at the fund providers. Clients can contact the investment provider directly to access funds

## **Data Back-Up and Recovery**

Our firm maintains its primary hard copy books and records and its electronic records at 4222 Grantline Road. Tim Peoples, (812) 945-9888, is responsible for the maintenance of these books and records. Our firm maintains the following hard copy document types and forms: Daily Purchase and Sales Log and Check Log, new account forms, copies of applications and year end statements. Our firm keeps an electronic copy of the Daily Log and Check Log.

The firm backs up its electronic records weekly on CD-ROM, and keeps a copy at 12810 Covered Bridge Rd., Sellersburg.

## **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.



## **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.

## **Mission Critical Systems**

Our firm's "mission critical systems" are those that ensure prompt and accurate processing of new business applications, the payment of commissions and general financial books of the company. These areas are backed up off site and are not dependant on our location.

## **Alternate Communications Between the Firm and Customers, Employees, and Regulators**

### A. Customers

We now communicate with our customers using the telephone, fax, U.S. mail, and in person visits at our firm or at the other'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.

### B. Employees

We now communicate with our employees using the telephone, fax, U.S. 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.

### C. Regulators

We are currently a member of the FINRA. We communicate with our regulators using the telephone, e-mail, fax, U.S. 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**

None Apply



## **Disclosure of Business Continuity Plan**

We provide in writing a BCP disclosure statement to customers at account opening. We also mail it to customers upon request. Our disclosure statement is attached.

## **Regulatory Reporting**

Our firm is subject to regulation by FINRA. We now file reports with our regulators using paper copies in the U.S. mail, and electronically using fax, e-mail, and the Internet. In the event of an SBD, we 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 (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.

## **Updates and Annual Review**

Our firm will update this plan whenever we have a material change to our operations, structure, business or location. In addition, our firm will review this BCP annually, on July 1, to modify it for any changes in our operations, structure, business, or location.

## **Senior Manager Approval**

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

Signed: Timothy E. Peoples

Title: President

Date: June 29, 2015