

Copperwynd Financial LLC has developed and implemented a Business Continuity Plan (“BCP”) that includes redundant data centers and alternate facilities to protect its business processes and technology environment in the event of a significant business disruption. Copperwynd Financial LLC’s policy is to respond to a significant business disruption (SBD) in an effort to safeguard employees’ lives and firm property, make a financial and operational assessment, quickly recover and resume operations, protect the firm’s books and records, and allow our customers to transact business.

The plan addresses business disruptions that may be caused by a local incident or by a regional or market related disaster that applies to many companies. The Plan covers our critical business processes and related employees essential for Copperwynd Financial LLC to continue to conduct business for an interim or temporary period during a business interruption. Every important aspect of Copperwynd Financial LLC’s securities business, including data backup 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, bank and counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business is addressed in this plan.

Copperwynd Financial LLC ‘s goal is to recover its Critical Business Processes with minimal interruption, depending on the nature of the disruption. In a disruption to only our firm or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business within 24 hours.

In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area, and presume to recover and resume business within 24 hours. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer’s prompt access to their funds and securities.

After a significant business disruption, please contact us as you normally do at 480-348-2100 or our website at www.copperwyndfinancial.com. If you cannot access us through either of those means, and you have a brokerage account carried by our clearing firm, you should contact TD Ameritrade via its website www.advsiorclient.com or by telephone at 800-454-9272 for instructions on how it may provide prompt access to your funds and securities including accepting buy and sell orders and issuing checks and wires from your account. If your account is held at a mutual fund or insurance company, you should contact the company directly for access to your securities.

Please be advised that our business continuity plan is subject to change and modification. Our firm will update this plan 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 our plan annually to modify it for any changes. If the plan is modified, we will promptly post the revised summary on our Website www.copperwyndfinancial.com. If you have questions about our business continuity planning or would like a written copy of the summary of our BCP, you can contact David Daughtrey at 480-348-2100 or at ddaughtrey@copperwyndfinancial.com