

FINANCIAL PLANNING HAWAII, INC.

BUSINESS CONTINUITY PLAN*

*** This document is Exhibit B of the FPH Written Supervisory Procedures Manual**

FINANCIAL PLANNING HAWAII, INC. BUSINESS CONTINUITY PLAN

This Financial Planning Hawaii, Inc. Business Continuity Plan is designed to provide all personnel with guidelines to be followed in the event of a major disruption to our business.

FIRM POLICY

Our primary objective is to ensure that everyone in the "Financial Planning Hawaii, Inc.'s Family" is secure. Financial Planning Hawaii, Inc.'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.

Financial Planning Hawaii, Inc.'s plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only the Company's ability to communicate and do business, such as a fire or loss of electrical power in the office or building.

External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a natural disaster, or another event that causes a wide-scale, regional disruption to essential services. The Company's response to an external SBD will rely more heavily on other organizations and systems, especially on the capabilities of product sponsors, federal emergency authorities, local officials and utility companies.

One half of that objective is concerned with an Evacuation Plan, which lays out some "best practices" for everyone's safety. The other half is a Recovery Plan for the future success of Financial Planning Hawaii, Inc., even in the wake of a major disruption. Each of our jobs is dependent on Financial Planning Hawaii, Inc. being able to provide a continuous level of high quality service in spite of the disruption.

The Company operates from the following locations:

Type of Location, Registered or Unregistered	Address and Main Phone Number	Located in a Personal Residence? (Y or N)	Means of Transportation Employees Use to Reach Office	Mission-Critical Systems Taking Place at Office
Registered	220 S. King St., Suite 1410 Honolulu, HI 96813 (808)564-0654	N	Car	Advisory/Planning

The following individuals are responsible for the duties of each position stated below:

Chief Executive Officer:	John Robinson
Chief Compliance Officer:	John Robinson
Executive Representative:	John Robinson

Client Relations Manager:

John Robinson

Disaster Recovery Coordinator (primary contact):

John Robinson

What Constitutes a Major Disruption?

A major disruption is any event that renders us unable to provide our usual level of service without immediate recovery action. A major disruption can fall into one of three categories:

- During business hours, not requiring evacuation (e.g., major systems crash);
- During business hours, requiring evacuation (e.g., an unscheduled fire alarm); or
- Outside of normal business hours, impacting future business activity.

Disaster Relief Team (DR Team)

The CCO has the overall responsibility for the Financial Planning Hawaii, Inc. response to a major disruption. This includes deciding what to do internally (evacuate or not), activating external support and backup, and coordinating the recovery.

What Actions Will be Taken?

Immediate Response: DR Team members will contact the Disaster Recovery Coordinator and a preliminary assessment will be made as to the nature of the major disruption and action to be taken (evacuation, etc.). The Disaster Recovery Coordinator then organizes the response.

Evacuation: Where required, all employees will evacuate the company's facilities and relocate to a back-up facility (see below).

Recovery: The Recovery Plan is implemented (see below).

Backup for Systems

The Disaster Recovery Coordinator is responsible for maintaining backup systems. Our main Financial Planning Hawaii, Inc. location houses our key employees and data that keeps us running. We operate the following systems and backups:

- Data/Computer Backups: All our databases, imaging, shared drives and individual networked drive are backed up nightly, ensuring that we would never lose more than a day's work. In addition, our clients' business activities will not be affected in the event of a computer data disruption at our Company.
- Web-based software applications. The use of web-based financial planning and CRM software assures against the loss of operational capability in the event that Financial Planning Hawaii's computer systems are disabled or destroyed.
- Battery Backups: These are in place to protect our data during a power outage.

- Alarm System: This is managed by an outside company that alerts the necessary authorities in the event of an unauthorized entry or a fire. The automatic fire detection system includes a building-wide sprinkler system.
- Back-up Phone System. In the event of the temporary or permanent destruction of Financial Planning Hawaii's phone system, the phone # for Financial Planning Hawaii currently also rings at CCO John Robinson's residence and is also automatically forwarded to his cell phone. Additionally, client voice mail messages are automatically delivered to email, which may be accessed remotely. Financial Planning Hawaii has also enlisted SystemMetrics to provide sophisticated voice over IP service including telecommunications back-up and recovery systems.

Note: Because Financial Planning Hawaii does not currently engage in ongoing portfolio management and does not take custody or trading authority of client accounts, little critical client data is maintained by the firm, and the temporary or permanent loss of Financial Planning Hawaii's physical location and assets would not likely be significantly disruptive to ongoing operations.

Offsite Data Storage – Intentionally left blank

Staff Relocation

The Disaster Recovery Coordinator is responsible for staff relocation. In the event of an emergency, we have arranged to relocate staff to the personal residence of John Robinson.

Evacuation Plan

If the Coordinator determines that personnel should evacuate the affected location(s), he or she must make an announcement to all personnel as to appropriate procedures. The announcement may be given via personal contact, e-mail, intercom or other methods as appropriate, given the systems available and size of staff and building. This announcement should be short and concise, should calmly identify the situation, and should provide instructions to employees on how to respond. This announcement should be repeated as often as necessary to avoid confusion and to ensure that all employees are aware of the situation. After ensuring the physical safety of Financial Planning Hawaii, Inc. personnel, the Coordinator and the DR Team must then implement this BCP.

If the situation does not merit evacuation, steps should be taken to alert designated persons and the DR Team, of necessary actions to facilitate ongoing operations in the face of limited disruption. In this case, the Coordinator will determine which, if any, procedures in this BCP should be implemented.

Once the Disaster Recovery Coordinator announces the decision to evacuate, the following general procedures will be observed. While much of this plan is common sense, if a dangerous situation exists in a facility, employees should get out immediately, following fire exit procedures. The goal is to make sure that everyone is well informed, to expedite a speedy and safe evacuation, and account for all staff members' well being. While we hope that we will never need to use this plan, it is critical that everyone knows what action to take in the event of an evacuation. Please be sure to review this plan, locate all emergency exits, and direct any questions to your supervisor.

When to Evacuate: Evacuate when you hear the overhead emergency alarm system sound, or when you are otherwise notified to leave the premises.

Immediate Steps to Take Upon Evacuation:

- DO:** Terminate all phone calls immediately;
Take *nearby* personal items: purse, wallet, keys, coat, building key card, etc;
Shut the door behind you if you are the last to leave an office / conference room;
Leave via the nearest emergency exit;
Go directly to your outdoor designated department meeting place;
Report any emergency matters to Relief Team personnel.
- DON'T:** Do not use the elevator;
Do not stop to use the telephone;
Do not shut down your computer.

Recovery Plan

It is impossible to provide for every major disruption contingency. However, it is Financial Planning Hawaii, Inc.'s goal to assist customers and provide them with the necessary information and help they need to service and access their accounts.

In the event of an SBD: (1) If telephone service is available, Financial Planning Hawaii, Inc. employees will make efforts to assist customers in accessing their account, if so requested; and (2) If telephone service is not available, the firm will try other means and methods to assist customers in reaching the necessary parties.

In addition, in the event of an SBD, Financial Planning Hawaii, Inc. will immediately identify any methods available that will permit personnel to communicate with customers, other employees, critical business constituents, critical banks, critical counter-parties, and regulators.

Financial Planning Hawaii, Inc. will contact the Custodian to apprise them of the firm's financial status. If the Financial Planning Hawaii, Inc. determines that it may be unable to meet its obligations to those counter-parties or otherwise continue to fund its operations, Financial Planning Hawaii, Inc. will request additional financing from its bank or from other credit sources to fulfill its obligations to clients. If Financial Planning Hawaii, Inc. cannot remedy a capital deficiency, it will take appropriate steps.

In the event there is suspension or termination of the Financial Planning Hawaii, Inc.'s business, the firm will attempt to notify clients regarding the situation and provide them with instructions for accessing their funds or securities, if applicable, for verifying transactions in process or for conducting future business. Notification will be in a form allowed based on the circumstances permitted by regulatory authorities and may include telephone calls, letters or a posting on the firm's website.

Order Taking- N/A

Critical Business Constituents, Banks, and Counter-Parties

Business constituents

Financial Planning Hawaii, Inc. has contacted its critical business constituents (businesses with which the firm has an ongoing commercial relationship in support of its operating activities, such as vendors providing critical services), and determined the extent to which the firm can continue its business relationship with these businesses in light of the internal or external SBD. The firm 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 that they or our firm is experiencing.

Banks

Financial Planning Hawaii, Inc. has contacted its banks and lenders to determine if they can continue to provide the financing that the firm may need in light of the internal or external SBD.

If Financial Planning Hawaii, Inc.'s banks and other lenders are unable to provide the financing, the firm will seek alternative financing immediately.

Regulators

The Financial Planning Hawaii, Inc. is registered to conduct business in the following state:

STATE of Hawaii

Address: Department of Commerce & Consumer Affairs
Division of Business Registration
335 Merchant Street Room 203
Honolulu, HI 96813
Phone: 808-586-2744

Financial Planning Hawaii, Inc. communicates with applicable regulators using the telephone, e-mail, web site and U.S. mail as applicable to each situation.

In the event of an SBD, Financial Planning Hawaii, Inc. will assess which means of communication are still available, and use the means closest in speed and form (written or oral) to the means that have been used in the past to communicate with the other party.

Disclosure of Business Continuity Plan

The Financial Planning Hawaii, Inc. will disclose in writing a summary of its BCP to clients at account opening or at the time a business relationship is established. The firm will notify clients in writing when material changes are made to the Plan that may affect their business relationship with the firm. Financial Planning Hawaii, Inc. will also mail it to customers upon request.

The summary addresses the possibility of a future SBD and how the firm plans to respond to events of varying scope. In addressing the events of varying scope, the summary:

- Provides specific scenarios of varying severity (e.g., a firm-only business disruption, a disruption to a single building, a disruption to a business district, a city-wide business disruption, and a regional disruption);
- States whether the firm plans to continue business during that scenario and, if so, the planned recovery time; and
- Provides general information on our intended response.

The summary also discloses the existence of back-up facilities and arrangements. A copy of the Financial Planning Hawaii, Inc.'s disclosure statement is included at the back of this Plan.

Updates and Annual Review

The Financial Planning Hawaii, Inc. will update this plan whenever there is a material change to its operations, structure, business or location. The firm's BCP will be reviewed and modified, if necessary, at least annually, but no later than within 12 months of the date on which this Plan was put into effect or previously reviewed, to take into account any changes in the firm's operations, structure, business, or location.

Client Disclosure Statement Regarding Disaster Recovery Procedures

Financial Planning Hawaii, Inc.

Financial Planning Hawaii, Inc. plans to quickly recover and resume business operations after a significant business disruption (SBD) 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 company's Business Continuity Plan (BCP) is designed to permit us to resume operations as quickly as possible, given the scope and severity of the SBD.

The BCP addresses 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.

Our Fund Administrator and Custodian Bank backs up our important records in a geographically separate area. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, we have been advised by our Fund Administrator and Custodian Bank that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments within a resumption time period. Your orders and requests for funds and securities could be delayed during this period.

In addition, the product sponsor maintains all records related to your investments and account holdings and backs up important records in accordance with its business continuity plan. For more information on its contingency plan, please contact the sponsor directly at the telephone number provided on your statements.

Significant Business Disruptions: Financial Planning Hawaii, Inc.'s plan takes into account two kinds of significant business disruptions, internal and external. Internal SBDs affect only the firm's ability to communicate and do business, such as a fire or loss electrical power in the office or building.

External SBDs, such as a terrorist attack, a natural disaster, or another event that causes a wide-scale, regional disruption in essential services, prevent the operation of the securities markets or a number of firms.

Internal SBDs: In the event of a disruption in Financial Planning Hawaii, Inc.'s business operations due to an internal SBD, the firm will attempt to continue to conduct business as usual by utilizing alternative communication methods (if available), such as the Internet, cell phones, etc., or by moving its operations to an alternative location.

If personnel or operations must be moved to an alternate location, the firm anticipates that it will resume regular operations as soon as personnel can access the alternate site.

External SBDs: In the event of a disruption in the Financial Planning Hawaii, Inc.'s business operations due to an external SBD, the firm will attempt to continue to conduct business as usual by moving its operations to an alternative location outside the effected area, if possible, or by providing customers with alternative communication arrangements, as indicated below, to conduct business or to access their funds and securities.

Financial Planning Hawaii, Inc. will attempt to resume business and keep its customers informed regarding relevant events to the best of its ability based on the circumstances.

In all cases, Financial Planning Hawaii, Inc. will resume normal business operations as soon as it is able to do so, based on the type and the extent of the disrupting event.

If the significant business disruption is so severe that it prevents us from remaining in business, we will ensure our customers' prompt access to their funds and securities.

Communications: In the event that you are unable to reach Financial Planning Hawaii, Inc. at our main number, please proceed as follows:

- Contact the firm at the alternate telephone number:
- Contact the product sponsor directly at the number listed on your most recent statement.

Contact information: Any questions regarding Financial Planning Hawaii, Inc.'s Interruption Plans should be addressed to: John Robinson
220 S. King St., Suite 1410
Honolulu, HI 96813
808-564-0654