

NetWorth Asset Management, Inc.
Disaster Recovery
Business Continuity Planning Guidelines

Purpose

NetWorth Asset Management, Inc. (NWAM) has established a disaster recovery and business continuity plan. The purpose of this plan is to provide a blueprint to enable our firm to operate in emergency or disastrous situations. Should an emergency affect our ability to operate, our goal is to resume our services in a minimum amount of time, with minimum disruption at a minimum cost.

Guidelines

Step 1 – Establish a Team

- a. Our team includes member representatives from the following areas:

Senior Management	Roger A. Hubley; Sigrid A. Hubley, Amy E. Bethke
Technology	TechGen Consulting, Inc.
Compliance	Roger A. Hubley; Lindquist & Vennum*
Operations	Roger A. Hubley
Accounting & Administration	Curtis Sharp, CPA**
- b. This team has regular meetings to establish clear tasks and business responsibilities of its members.

Step 2 – Analyze and define what needs to be done

- a. Identify potential disaster recovery scenarios. Some of these disaster recovery scenarios are hurricanes, risk prone environments (like airports and power plants), tornados, loss of key personnel due to death or health problems and other unforeseen events.
- b. Identify critical functions and activities that need to be protected. This includes portfolio accounting, accounting, trading, reconciliation, books, records and information contained in client records. NWAM has implemented standards where we back up its data on a daily basis. Our back up is enhanced through independent storage companies which such as; Intercarolina Financial Services and Intercarolina Advisory Services*** and National Financial Services.
- c. Curtis Sharp is the staff person responsible for the accounting and administration within NWAM. Curtis Sharp, CPA is the current paid outside professional of NWAM. He can provide accounting and administrative services upon our request.
- d. In the event of a disaster, our communication plan will be implemented. Members of our team are instructed to use their personal cell phone, home phones, neighbor's phone, internet (e-mail) systems, wireless technologies or any available form of communication to contact the other members of the team. These communication methods will also be used to keep in touch with industry contacts, regulators and families of the team. A current list of

employees, phone numbers and addresses has been compiled, maintained and distributed to our team, consultants and employees of NWAM.

- e. We have established alternative facilities to continue operations and conduct business on a normal basis. The alternative facilities are as follows:

Primary Location--870 Bald Eagle Drive, Suite 5B, Marco Island, FL 34145

Second Location---277 Coon Rapids Blvd, Suite 414, Minneapolis, MN 55433

Third Location---159 Pine Crest Lane, Lansdale, PA 19446

- f. The use of third parties is employed to make use of their expertise and technology. Our current third parties are Investigo and TechGen Consulting, Inc. Investigo is responsible for client portfolio accounting. They have established their own back-up systems for disaster related problems of their own. TechGen Consulting, Inc. is responsible for the maintenance of the NWAM server and computer systems. They have implemented their own disaster back up plan to continue our service without interruption.
- g. In the event that NWAM needs to implement a third party provider, we have asked Intercarolina Financial Services and Intercarolina Advisory Services to help us coordinate our disaster recovery efforts.
- h. All of our back-up providers will be paid for their services provided during a disaster recovery time period. NWAM will make every effort to expend time and money to assure that our disaster recovery is a success.
- i. The implementation of this disaster recovery plan was November 15, 2006.

Step 3 – Example Scenario (This has been communicated and tested for effectiveness)

Scenario -- Hurricane strikes the Marco Island Home Office!

- a. Events Manager (Roger Hubley) -- contacts the Minneapolis NWAM office
- b. Notify TechGen Consulting, Inc. and Intercarolina Financial Services and Intercarolina Advisory Services (the Broker-Dealer).
- c. Switch back up trading platform to the Minneapolis NWAM office.
- d. Confirm trading platform operation on the back up platform.

Recovery --

- a. Determine the frequency of required back up. The Minneapolis NWAM office is to “mirror” the technology that was used by the Marco Island NWAM office.
- b. Diagnose the problem with the primary system.
- c. Await notification that data stream and the proper links have been restored. The back-up system will be continued until the primary office systems in Marco Island have been completely restored.

Resumption --

- a. Primary systems are back on-line and ready to start functioning the next morning.
- b. The back-up system is ready to assume its mission critical role.

Step 4 – Test, revise and maintain the Disaster Recovery Plan

- a. Members of the NWAM Disaster Recovery Plan will perform periodic tests or dry runs of various scenarios to be assured of the effectiveness of our own plan.
- b. The NWAM disaster recovery plan will be revised from time to time. Members of the team will have annual meetings to consider revisions and improvements of our disaster recovery plan.
- c. The plan will be maintained and distributed via e-mail, our internet website and regular U.S. Post Office mail.

* Lindquist & Vennum, LLC is the law firm that represents NWAM.

They provide FINRA and SEC legal support for our compliance needs.

** Curtis Sharp, CPA is the accountant for NWAM. Curtis is capable of providing accounting services and administrative services when we request his help.

*** Intercarolina Financial Services and Intercarolina Advisory Services is the Broker-Dealer that NWAM uses for placing trades and performing investment services for its investment clients.