

Business Continuity Planning

Securities industry regulations require each broker-dealer to create and maintain a business continuity plan tailored to the size and need of the member and reasonably designed to enable the member to meet its existing obligations to its clients or other counterparties. In accordance with these requirements, First Western Advisors has designed a business continuity plan to address possible scenarios in efforts to minimize any service impact to our clients. Since the timing and impact of disasters and disruptions is unpredictable, flexibility will be required in responding to actual events as they occur.

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.

In keeping with the regulatory requirements, our business continuity plan is designed to address key areas of concern, including, but not limited to, the following:

- Data backup and recovery
- Mission critical systems
- Financial and operational assessments
- Alternative communications with customers, employees
- Communications with 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 clearing firm, National Financial Services (NFS), 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 clearing firm that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments within a short period of time. Your orders and requests for funds and securities could be delayed during this period.

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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 affecting 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 a period of approximately 4 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 recover and resume business with the same approximate time frame mentioned above. First Western Advisors has established a recovery site approximately 20 miles from its headquarters that can be used to restore time sensitive functions as soon as key employees are relocated to the facility.

In either situation, we plan to continue in business, transfer operations to our clearing firm if necessary, and notify you through our website at <http://www.fwainvest.com>. First Western Advisors clients can access their accounts in various ways, including, but not limited to our telephone number at 801-930-650 for instructions for account assistance including access to funds and securities, entering orders and processing other trade-related cash and security transfer transactions. If you are an online customer, you can access your account information through NFS' online services at <https://mystreetscape.com>. Additional information will also be posted to our website at <http://www.fwainvest.com>.

These alternative access methods are provided so that our clients are able to maintain consistent and constant access to their accounts. 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.

At a minimum, First Western Advisors' business continuity plan is reviewed, updated, and tested on an annual basis. Additionally, our primary internal and external application providers periodically conduct testing of their own back-up capabilities to ensure that, in the event of an emergency or significant business disruption, they will be able to provide us with the critical information and applications we need to continue or promptly resume our business.

Making sure that any type of disruption does not unduly impact our clients is extremely important to us, and our business continuity plan is designed to allow us to continue to provide the quality service you have come to expect from First Western Advisors.

For more information — if you have questions about our business continuity planning, you can contact us at 801-930-6500 or at info@fwainvest.com.