
Generations Planning Group, LLC
Business Continuity Plan (BCP)

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	ATTACHMENT A TO IFP SECURITIES, LLC BUSINESS CONTINUITY PLAN DISCLOSURE	ERROR! BOOKMARK NOT DEFINED.

I. Introduction

This plan documents the business continuity plan for Generations Planning Group, LLC, an IFP Securities, LLC branch office that conducts business in financial planning, securities, life, disability and long term care insurance. The purpose of this manual is to document the plans for the recovery of our critical business functions and systems in the event of a business disruption.

II. Emergency Contact Persons

IFP Securities, LLC provides FINRA with the contact information for 2 emergency contact persons to fulfill this requirement for all branch office locations under IFP Securities, LLC . These 2 emergency contact persons are registered principles for the IFP Securities, LLC . IFP Securities, LLC stays in compliance by updating this information upon any material change and reviewing the information quarterly to ensure it is up to date.

Rule: FINRA Rule 4370(f); NASD Rule 1160.

Emergency Contacts for this branch are:

Susan Schell (518) 428-9347

Dominick Panetta 518-365-2841

III. Branch Policy

Our branch's policy is to respond to a Significant Business Disruption (SBD) by safeguarding employees' lives and our property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of our branch's books and records, and allowing our customers to transact business. If we determine we are unable to continue our business, we will direct our customers to the IFP Securities, LLC service center at 813-341-0960 for emergency assistance and access to their funds.

A. Significant Business Disruptions (SBDs)

Our plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only our branch'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 branches, 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, especially on the capabilities of IFP Securities, LLC .

B. Approval and Execution Authority

William Hamm, a registered principal, is responsible for approving the plan and for reviewing it annually.

Susan Schell and Dominick Panetta have the authority to execute this BCP.

C. Plan Location and Access

Our branch will maintain copies of its BCP plan and the annual reviews, and the changes that have been made to it for inspection. An electronic copy of our plan is located on:

<https://genplancloud.sharepoint.com/sites/Share/Shared%20Documents/Compliance/Business%2>

Rule: FINRA Rule 4370(b), (d) and (e).

IV. Business Description

State the types of business that your branch conducts.

Our branch office conducts business in: financial planning; securities; life, disability and long term care insurance. We accept and enter orders and service retail and 401(k) clients.

IFP Securities, LLC uses Pershing, LLC to perform all clearing functions and holds customer funds or securities on our behalf. All transactions are sent to Pershing, LLC, which executes our orders, compares them, allocates them, clears and settles them. Pershing, LLC also maintains our customers' accounts, can grant customers access to them, and delivers funds and securities.

IFP Securities, LLC is located at:
3030 N. Rocky Point Dr. W. #700
Tampa, FL 33607

Our contact number for IFP Securities, LLC is:
(813) 341-0960

V. Office Locations

Our office locations are:

A. Office Location #1

Generations Planning Group, LLC, 2020 Western Ave., Albany, NY 12203
518/387-3100

All business functions supporting financial planning; securities; life, disability and long-term care insurance services.

VI. Alternative Physical Location(s) of Employees

In the event of an SBD, we will move our staff from affected office(s) to the closest of our unaffected office location(s). If none of our other office locations is available to receive those staff, we will move them to:

8 Pine Tree Drive, Delmar, NY 12054 or
6183 Johnston Road, Albany, NY 12203
518/439-2945 or 518/365-2841

Rule: FINRA Rule 4370(c)(6).

VII. Customers' Access to Funds and Securities Pershing, LLC maintains custody of customers' funds or securities on our behalf. In the event of an internal or external SBD, if telephone service is available, our registered persons will take customer orders or

instructions and contact IFP Securities, LLC on their behalf, and if our Web access is available, our branch will post on our website that customers may access their funds and securities by contacting IFP Securities, LLC at: (813) 341-0960.

If the Securities Investor Protection Corporation (SIPC) determines that we are unable to meet our obligations to our customers or if our liabilities exceed our assets in violation of Securities Exchange Act Rule 15c3-1, SIPC may seek to appoint a trustee to disburse our assets to customers. We will assist SIPC and the trustee by providing our books and records identifying customer accounts subject to SIPC regulation [and *insert any additional procedures*].

Rules: FINRA Rule 4370(a); Securities Exchange Act Rule 15c3-1; see also 15 U.S.C. § 78eee.

VIII. Data Back-Up and Recovery (Hard Copy and Electronic)

Our branch maintains its primary hard copy books and records at:
Generations Planning Group, LLC, 2020 Western Avenue, Albany, NY 12203

Our branch maintains its primary electronic records at: Generations Planning Group, LLC, 2020 Western Avenue, Albany, NY 12203

Dominick Panetta and/or Susan Schell are responsible for the maintenance of these books and records. Our branch maintains the following document types and forms that are not transmitted to IFP Securities, LLC : product sponsor applications and other forms, client notes, client financial plans, required FINRA compliance files.

Our branch maintains backup hard copy books and records at:
N/A

Our branch backs up electronic records at:
PSIGEN/KOFAX Document Management Software
Responsible Party: Dominick Panetta and Susan Schell. Backup Frequency: ongoing. The document types and forms that are backed up are: all computer electronic files and all client forms.

We back up electronic records daily by automatic back-up (SharePoint) and keep a copy at Generations Planning Group, LLC, 2022 Western Ave, Albany, NY.

In the event of an internal or external SBD that causes the loss of our paper records, we will physically recover them from our back-up site. If our primary site is inoperable, we will continue operations from our back-up site or an alternate location. For the loss of electronic records, we will either physically recover the storage media or electronically recover data from our back-up site, or, if our primary site is inoperable, continue operations from our back-up site or an alternate location.

Rule: FINRA Rule 4370(c)(1).

IX. Financial and Operational Assessments

A. 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. In addition, we will retrieve our key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic). If needed, we will direct customers directly to IFP Securities, LLC at: (813) 341-0960.

Rules: *FINRA Rules 4370(c)(3), (c)(4), (c)(5), (c)(7), (c)(9 & (g)(2)).*

B. 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. We will contact IFP Securities, LLC, critical banks and investors to apprise them of our financial status. If we determine that we may be unable to meet our obligations to those counter-parties or otherwise continue to fund our operations, we will request additional financing from our bank or other credit sources to fulfill our obligations to our customers and clients. If we cannot remedy a capital deficiency, we will file appropriate notices with our regulators and immediately take the appropriate steps.

Rules: *FINRA Rules 4370(c)(3), (c)(8) & (g)(2).*

X. Mission Critical Systems

“Mission critical systems” are those that ensure prompt and accurate processing of securities transactions, including order taking, entry, execution, comparison, allocation, clearance and settlement of securities transactions, the maintenance of customer accounts, access to customer accounts and the delivery of funds and securities.

We have primary responsibility for establishing and maintaining our business relationships with our customers and have sole responsibility for our mission critical functions of order taking, entry and execution. IFP Securities, LLC through Pershing, LLC provides the execution, comparison, allocation, clearance and settlement of securities transactions, maintenance of customer accounts, access to customer accounts and the delivery of funds and securities.

A. Our Branch’s Mission Critical Systems

Order Taking

Currently, we receive orders from customers via telephone, or in person. During an SBD, either internal or external, we will continue to take orders through any of these methods that are available and reliable, and in addition, as communications permit, we will inform our customers when communications become available to tell them what alternatives they have to send their orders to us. If customers are unable to reach the branch to place trades they can contact IFP Securities, LLC’s Service Center at (813) 341-0960.

Order Entry

Currently, we enter orders by recording them on paper and electronically and sending them to IFP Securities, LLC and Pershing, LLC electronically through NETX360 or telephonically. IFP Securities, LLC represents under its BCP, we can expect service restoration within 4 Hours

In the event of an internal SBD, we will enter and send records to IFP Securities, LLC by the fastest alternative means available, which include telephone or secure email. In the event of an external SBD, we will maintain the order in electronic or paper format, and deliver the order to IFP Securities, LLC by the fastest means available when it resumes operations. In addition, during an internal SBD, we may need to refer our customers to deal directly with IFP Securities, LLC for order entry.

Order Execution

IFP Securities, LLC through Pershing, LLC executes orders on our behalf. IFP Securities, LLC and Pershing LLC's offices serve as primary locations for Trade Execution. Each office serves as the backup for the other. There are documented and tested plans in place to provide for a fail-over between the two sites.

Other Services Currently Provided to Customers

In the event of an internal SBD, we would have telephone calls forwarded to cell phone and provide services from our home offices. In the event of an external SBD, we would have telephone calls forwarded to cell phone and provide services from our home offices.

B. Mission Critical Systems Provided by IFP Securities, LLC

Our branch relies on IFP Securities, LLC and Pershing, LLC to provide order execution, order comparison, order allocation, customer account maintenance and/or access and delivery of funds and securities.

IFP Securities, LLC backs up our records at a remote site. IFP Securities, LLC's Tampa offices serve as primary locations for mission-critical processing, including: Operations, Trade Execution and Processing, and the Service Center. Their office serves as the backup for ours. There are documented and tested plans in place to provide for a fail-over between the two sites.

Rules: FINRA Rules 3510(c)(2) & (g)(1).

XI. Alternate Communications Between the Firm and Customers, Employees, and Regulators

A. Customers

We now communicate with our customers using the telephone, email, our website, fax, U.S. mail and in-person visits at our office or another 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. For example, if we have communicated with a party by email but the Internet is unavailable, we will call them on the telephone and follow up where a record is needed with paper copy in the U.S. mail.

Rule: FINRA Rule 4370(c)(4).

B. Employees

We now communicate with our employees using telephone, email, 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. We will also employ a call tree so that senior management can reach all employees quickly during an SBD. The call tree includes all staff home and office phone numbers. We have identified persons, noted below, who live near each other and may reach each other in person:

The person to invoke use of the call tree is: Susan Schell or DJ Panetta to call Carol Vanvalkenburg.

Rule: FINRA Rule 4370(c)(5).

C. Regulators

We communicate with our regulators using telephone, email, 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.

Rule: FINRA Rule 4370(c)(9).

XII. Critical Business Constituents, Banks, and Counter-Parties

A. Business constituents

Critical business constituents are businesses with which we have an ongoing commercial relationship in support of our operating activities such as vendors providing critical services.

IFP Securities, LLC provides most of our critical services. We 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 to them or our firm.

Our other critical business constituents are:

<u>Business Constituent</u>	<u>Services Provided:</u>	<u>Alternatives in the event they are unavailable:</u>
Independent Financial Partners	OSJ, B/D and RIA	IFP Securities, LLC
Magna 5 now Ringsquared	Telephone	Cell Phone
Verizon	Internet	Phones

Rules: FINRA Rule 4370(c)(7).

B. Banks

We have contacted our banks and lenders to determine if they can continue to provide the financing that we will need in light of the internal or external SBD. The bank maintaining our operating account is: M&T Bank.

If our banks and other lenders are unable to provide the financing, we will seek alternative financing immediately from 1st National Bank of Scotia.

Rules: FINRA Rule 4370(c)(7).

C. Counter-Parties

IFP Securities, LLC maintains the relationships with our critical counter-parties on our behalf. Where the transactions cannot be completed, we will work with IFP Securities, LLC or contact those counterparties directly to make alternative arrangements to complete those transactions as soon as possible.

Rules: FINRA Rule 4370(c)(7).

XIII. Regulatory Reporting

Describe how your firm will file its regulatory reports in the event of an SBD.

We are subject to regulation by the SEC, FINRA and NYS Insurance Department, CFP Board of Standards. We now file reports with our regulators using paper copies in the U.S. mail, and electronically using fax, email 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.

Rule: FINRA Rule 4370(c)(8).

XIV. Disclosure of Business Continuity Plan

IFP Securities, LLC has a BCP disclosure statement that is provided to our customers at account opening and attached to this document as "Attachment A". The BCP Disclosure statements is also mailed to customers upon request.

Rule: FINRA Rule 4370(e).

XV. Updates and Annual Review

We will update this plan whenever we have a material change to our operations, structure, business or location or to those of IFP Securities, LLC . In addition, our firm will review this BCP annually to modify it for any changes in our operations, structure, business or location or those of IFP Securities, LLC .

Rule: FINRA Rule 4370(b).

XVI. Senior Manager Approval

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

Rule: FINRA Rule 4370(d).

Signed: *D.J. Panetta and Susan Schell*

Title: Managing Partners

Date: 5/1/2022