

REITZ CAPITAL ADVISORS LLC

Business Continuity Plan

I. Emergency Contact Persons

Reitz Capital Advisors LLC (RCA) emergency contact persons are:

Mark J. Reitz, CFP® 989.482.0365 (cell) or 989.791.3693 (office) mark@reitzfg.com
Joseph A. Reitz, CPA 989.737.3305 (cell) or 989.791.8048 (cell) joereitz@chartermi.net

Our firm will provide FINRA/SEC with the contact information for the two emergency contact persons. Mark J. Reitz will promptly, but no later than 30 days following the change, notify FINRA Contact System (FCS)/SEC of any change in this information and will review, and if necessary update, this information within 17 business days after the end of each calendar quarter.

II. Firm Policy

RCA'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 clients to transact business. In the event we determine we are unable to continue business, we will assure customers prompt access to their funds and securities.

A. Significant Business Disruptions (SBDs)

Our plan assumes two kinds of SBDs, internal and external. Internal SBDs affect only our firm's ability to communicate and conduct business, such as a fire in our building. External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack or a regional disruption. Our response to an external SBD relies more heavily on other organizations and systems, especially on the capabilities of our clearing/custodial firm Charles Schwab & Co. Inc.(Institutional).

B. Approval and Execution Authority

Reitz Capital Advisors Compliance Officer, Mark J. Reitz CFP®, a registered principal, is responsible for approving the Business Continuity Plan (BCP) and for conducting annual reviews of the plan. Mark J. Reitz or, his designate, Joseph A. Reitz have the authority to execute this plan.

C. Plan Location and Access

Reitz Capital Advisors will maintain an electronic version of the BCP and the annual review and revisions for inspection at the firm's address. The electronic version is available for employees to access and they are encouraged to read and ask questions of any part of this plan. The electronic version is located on the shared cloud-based drive in the REITZ CAPITAL ADVISORS LLC\OPERATIONAL Folders & Documents folder.

III. Business Description

Our firm conducts business in equity, fixed income, mutual funds, and insurance products. Our firm is an introducing firm and does not perform any type of clearing function for itself or others. Furthermore, we only have custody of customer funds or securities pursuant to the “Custody Rule” regarding third-party standing letters of authorizations (SLOAs). We accept and enter orders. All transactions are sent to our clearing firm, which executes our orders, compares them, allocates, clears and settles them. Our clearing firm also maintains our customers’ accounts, can grant customers access to them, and delivers funds and securities. RCA services only retail customers. We do not engage in any private placements.

Our clearing firm is listed below:

Charles Schwab & Co., Inc.
Attn: Great Lakes Team
1958 Summit Park Place #400
Orlando, FL 32810-5931
Phone: (888) 423-7070
Fax: (800) 487-4906
www.schwabinstitutional.com

IV. Office Location

Our firm is located at:
5786 Midland Rd.
Freeland, MI 48623
Phone: (989) 791-3693

Our employees travel to this office via car. We engage in order taking and entry at this office.

V. Alternate Physical Location

In the event of an internal or isolated external SBD, we will move our staff from our office location to the home office of Mark J. Reitz, 4248 Gleaner Road, Freeland, MI 48623 which has sufficient space and equipment and is equipped with internet capabilities. Cell phone communication will be utilized at this location.

If it is deemed necessary due to a wide-spread external SBD, we have various options to move our staff, as necessary, based on how wide-spread the external SBD. All of these various options have sufficient space and equipment and are equipped with internet capabilities. Cell phone communication will be utilized at these locations.

Cell phone numbers:
(989) 482-0365 – Mark Reitz
(989) 996-0057 – Marcia Woodbridge
(989) 737-3305 – Joe Reitz

VI. Customers' Access to Funds and Securities

Our customers' funds or securities are maintained at our clearing firm, Charles Schwab & Co., Inc. 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 our clearing firm on their behalf. In addition, if internet access is available, our firm will post on our website, www.reitzfg.com, information regarding how our customers may access their funds and securities by selecting the Charles Schwab login link.

VII. Data Back Up and Recovery (Hard Copy and Electronic)

RCA maintains its primary hard copy and electronic version of its books and records at 5786 Midland Road, Freeland, MI 48623. Mark J. Reitz, Compliance Officer, is responsible for the maintenance of these books and records. Our firm maintains the following document types and forms that are not transmitted to our clearing firm:

- RCA Profile & Suitability documentation
- RCA Investment Management Agreement
- RCA Consultation or Financial Planning Services Client Agreement
- Supplemental new account/maintenance documentation, ie Certificate of Trust Existence, death certificate, POA, written communications, etc.
- Organizational records
- Accounting records
- Personnel supervision records
- Internal control records
- Regulatory records
- Marketing records
- Vendor records

Our firm scans and catalogs all paper documents by client on a cloud-based service with Microsoft through our IT vendor Linked Technologies, Inc. (Linked Technologies) 4324 N. Saginaw Rd., Midland, MI 48640. Internal documents, such as organizational, personnel, vendor, marketing, etc. are also cataloged on the cloud-based service with Microsoft.

In the event of an internal or external SBD that causes the loss of any paper records, we will initially recover electronic records. If our primary site is inoperable, we will continue operations from our backup site or alternate location based upon the type and severity of the SBD.

VIII. 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 clients, employees, critical business partners, bank, and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options we will employ will include our website, direct telephone contact, voice mail, cellular telephones

and secure email. In addition, we will retrieve our key activity records as described in the section above in the Data Back Up and Recovery (Hard Copy and Electronic) section.

B. Financial and Credit Risk

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 our bank, vendors and business constituents to apprise them of our financial status, as necessary. 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 financing from our bank or other credit sources to fulfill our obligations to our clients. If we cannot remedy a capital deficiency, we will file appropriate notices with our regulators and immediately take appropriate steps, including contacting our clients; keeping the employees informed of the financial status of the firm; and determining what operations we are able to perform under the deficiency.

IX. Mission Critical Systems

RCA's "mission critical systems" are those that ensure prompt and accurate processing of order taking and entry of securities transactions. Specifically:

Lenovo and/or Dell	- computers, monitors, keyboards, mice, server
Microsoft Office 365	- cloud-based storage
Internet Explorer	- web access Schwab Advisor Center
Morningstar Office	- asset allocation, portfolio review
LaserApp	- document preparation
Microsoft Office 365	- email encryption, appointments, tasks, spreadsheets, word processing
Advicent Solutions	- financial planning software
Barracuda	- email archiving
Adobe	- email attachment encryption

We have primary responsibility for establishing and maintaining our business relationships with our clients and have sole responsibility for our mission critical functions of order taking and entry. Our clearing firm provides, through contract, 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.

Our clearing firm maintains a Business Continuity Plan and the capacity to execute that plan.

Our clearing firm represents their business continuity program is:

- Aligned with FINRA rules and FFIEC Business Continuity requirements.
- Managed by the Business Continuity and Incident Management team within Corporate Risk Management
- Led and managed by a dedicated group of experienced Business Continuity Professionals Subject to on-going internal and external examiner review
- Reviewed and approved annually by the Audit Committee of the Board of Directors and Senior Management

Our clearing firm represents their comprehensive Business Continuity Plans include, but are not limited to:

- Recovery time objectives and priorities based on a thorough business impact analysis process
- Pre-defined teams and members responsible for coordinating and facilitating business recovery
- Pre-defined recovery strategies, alternative worksites and communications resources
- Multiple, geographically diverse service centers allowing rapid transfer of work to alternate locations.
- Public health crisis and high absenteeism response and mitigation plans
- Pre-determined systems and data recovery requirements
- Identification of internal and external resource dependencies and contingency plans
- Annual employee awareness and training
- Ongoing integrated testing to ensure recovery capabilities of critical infrastructure and business processes.

A. Reitz Capital Advisors LLC Mission Critical Systems

1. Order Taking

Currently, RCA receives orders from customers via telephone and in-person visits. During an SBD, either internal or external, we will continue to take orders through either method that is available and reliable. And, as communications permit, we will inform our clients about available alternatives for placing orders. Customers will be informed of alternatives by telephone, e-mail, recorded message or via our website www.reitzfg.com. If necessary, we will advise our customers to place orders directly with Charles Schwab & Co. As per our normal procedures, we do not accept orders via e-mail.

2. Order Entry

Currently, our firm enters orders by recording them on paper or electronically; and electronically, via Schwab Advisor Center, or by telephone contacting our clearing firm.

In the event of an internal SBD, we will enter orders by the fastest means available, including via Schwab Advisor Center or telephone. In addition, if customers place the order directly with Charles Schwab & Co, our clearing firm will enter the order. In the event of an external SBD, we will maintain the order in electronic or paper format, and deliver the order to the clearing firm by the fastest means available when it resumes operations.

B. Mission Critical Systems Provided by Our Clearing Firm

Our firm relies, by contract, on our clearing firm to provide order execution, order comparison, order allocation, customer account maintenance, delivery of funds and securities, and access to customer accounts.

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

A. Clients

Currently, we communicate with our clients via telephone, e-mail, our website, fax, US mail and in-person visits at our firm or another location. In the event of an SBD, we will assess and access which means of communication are still available to us and use the means closest in speed and form (written or oral) that we have used in the past to communicate with the other party. For example, if we communicated with a party by e-mail, but the internet is unavailable, we will contact them via telephone and follow up where a paper copy is needed by fax or US mail.

B. Employees

We now communicate with our employees using the telephone, e-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) that we have used in the past to communicate with the other party. Based on the small size and familial relationship of our firm a calling tree is unnecessary at this time.

C. Regulators

Reitz Capital Advisors is regulated by the SEC. We are currently members of the following self-regulatory organization (SRO): FINRA. The firm communicates with regulators using the telephone, e-mail, fax, US mail, internet 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) that we have used in the past to communicate with the other party.

XI. Critical Business Partners, Financial Institutions, and Counter-Parties

A. Business Partners

We have contacted our critical business partners (businesses with which we have an ongoing commercial relationship in support of our operating activities) and determined the extent of which we can continue our business relationship with them in light of an internal or external SBD. In the event a business partner can no longer provide the needed products or services, we will quickly establish alternative arrangements. Our major suppliers are:

Charter Spectrum Business Charter Business Support: 800-314-7195	-	Internet
Linked Technologies Inc. Jim Mahoney mahoneyj@linkedtech.com 4324 N. Saginaw Rd Midland, MI 48640 (989) 837-3060	-	IT services/Microsoft 365/email encryption
LaserApp Software 3190 Shelby Street Building D-100	-	Document preparation software

Ontario, CA 91764
(800) 985-2174

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|---|---|--|
| Morningstar
Midwest Sales Group
22 West Washington St
Chicago, IL 60602
(312) 696-6000 | - | Investment portfolio analysis and research |
| Barracuda | - | Email archiving |
| Consumers Energy
www.consumersenergy.com
800-477-5050 | - | Utilities |
| Verizon
www.verizonwireless.com | - | Cell phone service |
| Advicent
www.advicentsolutions.com
10700 W Research Dr #1
Milwaukee, WI 53226
(855) 890-5900 | - | Financial planning software |
| GoDaddy.com
(480)505-8877 | - | domain name registration |
| Laser Connection LLC
www.laser-connection.com
100 E Midland Rd
Auburn, MI 48611
(989) 662-4022 | - | Copier repair |
| Mayan Agency
Tom Mayan
140 W. Saginaw St
Merrill, MI 48637
(989) 643-7207 | - | Commercial insurances |
| Advanced Business Communications
2790 Hospital Rd.
Saginaw, MI 48603
(989) 737-3598 | - | Internal telephone and internet line maintenance |
| Adobe, Inc | - | Email attachment encryption |

Financial Institution

We have received assurances from our financial institution they will continue our business arrangements on the same bases as currently exists in the event of a SBD. The financial institution maintaining our operating account is:

Isabella Bank
399 S. Main Street
Freeland, MI 48623
989-695-2427 (telephone)
989-695-2171 (fax)
www.isbellabank.com

If our financial institution is unable to provide needed financing, we will immediately seek alternative financing from another lender.

B. Counter-Parties

We have contacted our critical counter-parties, such as Charles Schwab to determine if we will be able to carry out our transactions with them in light of an internal or external SBD.

XII. Regulatory Reporting

Reitz Capital Advisors and its advisory representatives are subject to regulation of the SEC, FINRA and the State of Michigan, Licensing and Regulatory Affairs Division. We mainly communicate and file reports with our regulators electronically via the internet and as deemed necessary by telephone, fax, and e-mail. In the event of an SBD, we will check with the SEC, FINRA, and State 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.

XIII. Disclosure of Business Continuity Plan

Our written Business Continuity Plan disclosure statement is provided to clients upon request. We also post the disclosure statement on our website at www.reitzfg.com.

XIV. Updates and Annual Review

Reitz Capital Advisors 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 this BCP annually to modify it for any changes in our operations, structure, business or location or to those of our clearing firm.

XV. Succession Planning

Due to the small size of Reitz Capital Advisors, the two advisory representatives, Mark Reitz and Marcia Woodbridge, have verbally agreed they have the time, expertise and desire to service

each other's clients should the need arise. Currently, each advisory representative assists the others clients during short term absences from the office, such as vacations, personal time off and illnesses. Our fiduciary duty to our clientele always takes precedence. Based upon the advisory representatives knowledge of the others client base, in the event of an advisory representative's major absence due to their disability or death, clients would continue to be served in a similar manner the client is accustomed.


No formal documentation has been executed at this time to address the financial compensation to the surviving family member(s) of a disabled or deceased advisory representative. Again, due to the firm's size the advisory representatives believe an equitable solution can be achieved in this matter. Obviously, as the Advisory firm continues to grow and additional advisory representatives are added to the staff, formalized documentation addressing succession ramifications will be completed.

XVI. Senior Management Approval

I have approved the Business Continuity Plan as reasonably designed to enable our firm to meet its obligations to clients in the event of SBD.

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2/11/2023



2-11-23

Mark J. Reitz, Member

Date