

Abraham & Co., Inc.

Business Continuity Plan

NON-CONFIDENTIAL VERSION

Latest Revision: February 24, 2026

Previous Version: February 29, 2024

Kye Abraham – Chief Compliance Officer

Abraham & Co. Inc., (“Abeco” the “Firm” or “We” or “Our”) has developed the following *Business Continuity Plan* (“BCP” or “Plan”) which describes how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. Abeco does not hold or maintain customer funds and/or securities and relies exclusively upon fully disclosed custodial agreements with its designated financial institution, *Schwab Advisor Services* (“Schwab” or “Custodian”). Schwab sends trade confirmations and account statements directly to all advisory clients.

Varying Disruptions – Significant business disruptions can vary in their scope, such as only our Firm, a single building housing our Firm, the neighborhood in which 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 to only our Firm or a building housing our Firm, we will transfer our operations to a local site (to be determined based on the nature of and duration of the disruption) when needed and expect to recover and resume our mission-critical business functions within twenty-four hours. In a disruption affecting a larger area such as our city, or region, we will transfer our operations to a site outside of the affected area, and recover and resume business as soon as practically possible. In either situation, we plan to continue in business, transfer operations to our clearing firm if necessary, and notify clients, customers and regulators of any significant changes to our business or capabilities. If the significant business disruption is so severe that it prevents us from remaining in business, or substantially disrupts our ability to communicate with our clients and meet their needs for a prolonged period (or if such a disruption appears unavoidable) we will assure our clients prompt access to their funds and securities by contacting our Custodian and informing them of our special circumstances.

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 clients and customers to access to their assets and to transact business. In short, this 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. Under most scenarios we believe we are prepared to resume business – account access for our customers and reporting to regulators – from virtually anywhere there is internet access (wired or wireless) within twenty-four hours of a severe business disruption. We maintain an alternate telephone service provider for emergency contact in addition to cellular phones and a laptop computer with wireless internet access and duplicate software programs for just this purpose. Mission-critical systems, for this Firm are essentially three:

1.) Internet Connections to Email via Wi-Fi Enabled Computers and Smart Devices:

This is accomplished via authorized office computers, tablets, and smart phones that access the internet through the Firm's internal, secure wi-fi multi-channel network known as "Abeco Network." Service for this network, can be accessed from anywhere with any wi-fi enabled, device and the network password.

(Specific account information available in Confidential version only)

Abeco manages its e-mail archiving and encrypted email for secure customer communications through a secure service provider at:

AppRiver/Zix:
220 Cambie Street, 2nd Floor
Vancouver, B.C. V6B 2M9
(866) 932-5338
<https://appriver.com>

Website for Email Archive:
<https://us.exg7.exghost.com/owa/languageselection.aspx>

(Specific account information available in Confidential version only)

2.) Internet Access to Cloud Based Client Documents, Books, and Records via iCloud, Dropbox for Business, Schwab Advisor Services, and DocuSign (client agreements):

This is accomplished via any authorized computers, tablets, and smart phones that access the internet through any secure network.

The cloud-based secure service provider is:

Apple iCloud
<https://www.apple.com/icloud/>

(Specific account information available in Confidential version only)

Dropbox Business
https://www.dropbox.com/official-teams-page?tk=paid_sem_bing_biz_b&camp=333760573&kw=dropbox%20for%20business|e&ad=||c&msclkid=da6753e7d4b3117f772536da89d9f0b4

(Specific account information available in Confidential version only)

**DocuSign for Schwab & Schwab Advisor Services
"Account Management" (Schwab Advisor Center)**
Most client information and agreements are stored here.

(Specific account information available in Confidential version only)

3.) Telephonic Connections to Custodian, Clients, and Service Providers: This is accomplished from anywhere via any wired or wireless telephone on any wi-fi, cellular, or broadband network.

4.) The service provider for the Gig Harbor main (Admin) office is:

Xfinity-Comcast

Acct.0134

800-266-2278

(Specific account information available in Confidential version only)

<https://my.xfinity.com/?cid=cust>

Investment Advisory Clients Account Access & Communications – Our business continuity plan includes data backup and recovery of all investment advisory client accounts and related transaction data and information through a comprehensive encrypted data storage and backup system maintained by our Custodian at multiple locations:

Schwab Corporate Headquarters

211 Main Street, San Francisco, CA 94105

[877-519-1403](tel:877-519-1403)

Schwab Advisor Services Group

7801 Mesquite Bend Drive, Suite 112

Irving, TX 75063-6043

877-774-3892

<http://advisorservices.schwab.com/>

(Specific account information available in Confidential version only)

Most information about Firm advisory clients, profiles, firm billing, and support can be found here.

Our Custodian, who also maintains a separate and detailed business continuity plan, backs up our client account information and important records several times hourly/daily 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 the Custodian that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments within twenty-four hours, or next “trading day” in cases of severe disruption and within four hours for less-severe disruptions. Advisory client orders and requests for funds and/or securities could be made directly to the Custodian in the event that we cannot be reached during any emergency. Customer requests could be delayed during this period depending on the severity of the disruption. Please refer to *Schwab Advisor Services Business Continuity, Incident Management and Disaster Recovery Overview* at:

<https://www.schwab.com/legal/continuity> and a more detailed version can be found on the

Abraham & Co. website at:

https://kyeabraham.us1.advisor.ws/files/schwab_business_continuity_overview_10-23.pdf

All of our client account data can be accessed from *Schwab Advisor Services* through virtually any computer with internet access. Assuming no internet facilities are available we can contact our custodian firm through wired or wireless communications equipment to facilitate customer orders, access to funds and other account related information.

An Alternate Physical Location is a Flexible Option for Our Firm - Depending on the severity of the disruption and other circumstances, the Firm could/would be located virtually anywhere that communications could be established. In which case, we would notify our

customers, regulatory reporting authorities and postal/courier services of any changes to our physical location and/or contact information, assuming such changes are required. It is likely, given most disruption scenarios, that our main telephone can be easily rerouted/forwarded to the emergency numbers and email addresses listed below. Email can be retrieved anywhere internet service can be accessed. The main (Admin) Abeco office number (253) 851-7486 is handled by Comcast/Xfinity (physical land line and VOIP connections) and they can be reached at:

Comcast Digital Voice

Acct.0134

800-266-2278

www.comcast.com

(Specific account information available in Confidential version only)

Our currently designated alternate office location is:

Abraham & Co., Inc.

River View Corporate Center

16201 E. Indiana Ave Suite 2750

Spokane Valley, WA 99216

Darrin McComas – Chief Investment Officer

(509) 995-5513

dmccomas@abrahamco.com

Emergency telephone numbers are carried by Xfinity Wireless (253-381-4667). Our mobile computers (laptops & cell phones) are configured to access the internet anywhere it is available. These systems are used daily and updated as needed as a part of our normal operating procedures. Both systems use the same/similar commercial security software for e-mail, customer account access, banking access, and communication. ***(Access to Firm or client records via unsecured and public wi-fi networks is prohibited).***

Over the past several years, especially during the COVID pandemic, we've developed a good deal of experience with "remote or off-site operations" resulting from our need to stay in touch with our clients and our Custodian whenever our Chief Executive and Chief Compliance Officer, Kye Abraham, or any of our *Investment Adviser Representatives* are out of the office for extended periods. This usually occurs several times during the year and is adequately handled through the use of wireless technology (laptop computer and cell phones) that enables us to routinely handle client requests, execute trades, access customer info., respond to telephone messages, e-mail, etc. Accordingly, we have determined that listing a specific, physical relocation address may not be the most practical way to address this issue considering the indeterminate nature of a disruption. As a matter of course, we continue to perfect our "remote capabilities" as a means of increasing our business efficiency and service to our clients. In the event that our laptop computers or smart phones were unavailable we could contact our key Service Providers via any wired or wireless smart device available and make temporary arrangements until secure mobile devices could be obtained.

Apple iCloud, Dropbox (Business) and Schwab Advisory Services are our primary secure backup and data retrieval services for client account information. All of the Abeco (Admin Office) computers are password protected and backed up by encrypted Apple iCloud servers. Abeco's Apple's iCloud can be accessed by signing in to Abeco's online account at:

<https://www.icloud.com>

(Specific account information available in Confidential version only)

Updated banking information (checking and savings account info and statements) for Abraham & Co. can be accessed through the internet via any remote computer or via physical access of banking records at:

Bank of America.

Main Corporate Acct.#7417

(Specific account information available in Confidential version only)

www.bankofamerica.com

(800) 461-0810

Bookkeeping & Accounting Records which are generated and backed up through “QuickBooks Online” secure storage and as part of Abeco’s automatic backup and record syncing process through iCloud encrypted online backup. CRD or state regulatory personnel are authorized to access this backup information with our username and password(s) as circumstances dictate and as required by regulation. Additionally, our auditors retain certain financial records and can be reached at: Victor Mokuolu CPA PLLC (713) 588-6622 or through email at: ask@vmcpafirm.com

Our auditors maintain detailed financial records which are updated quarterly and annually through our normal independent financial audit or review process. Regulatory reporting during the period of disruption will most likely be carried out by the Chief Compliance Officer or if required, one of the Alternate Plan Administrators through the use of the internet utilizing the remote capabilities discussed elsewhere in this Plan. Alternatively, this reporting could be accomplished manually via mail/courier/fax. Financial records required to make such reports could be secured similarly.

Funding Resources to Maintain Operations During a Disruption

Aside from its banking relationship with Bank of America, Abraham & Co. maintains no banking relationships with any other financial institutions. Credit risk is not applicable as we utilize no borrowing to maintain operations. Regular monthly expenses for telephones, business equipment, office supplies, etc. are fairly minimal and sufficient net capital is maintained to cover these expenses through at least one month of business disruption. All of these accounts can be accessed and managed on-line remotely or through telephone contact.

Contacting Us – If after a significant business disruption, Abeco clients or regulators cannot contact us at our main office number: (253) 851-7486 or via our main e-mail address at: abeco@abrahamco.com they should call our local emergency cell numbers: (253) 381-4667 or (253) 381-4688 or the alternate office location (Spokane Valley) listed above. If we cannot be reached through these means, clients and customers who have needs requiring access to their accounts (funds, securities, order entry and trade-related processes, cash, and security transfer transactions) are directed to contact our Custodian at the phone numbers and email addresses listed above.

Regulatory Contacts – In the event that clients or brokerage customers are unsuccessful in obtaining the information they need from the sources listed above, they should contact Abeco’s regulatory authorities:

Washington State Department of Financial Institutions

(360) 902-8815

Email: IAlicensing@dfi.wa.gov

Additionally, the state departments of financial regulation and authority for each of the states in which the Firm is registered can also be contacted via information readily available on the internet.

Parties Responsible for Executing this Plan and Contact Information – In the event that this Plan, or any of its components must be executed the following persons are tasked with, and have agreed to, this responsibility:

Kye A. Abraham, President & Chief Compliance Officer
3724 47th Street Ct. NW
Gig Harbor, WA

(253) 851-7486 Office Local
(253) 381-4667 Mobile (Emergency 1)
E-Mail Address: abeco@abrahamco.com

In the event that Mr. Abraham cannot be reached, the following “Alternative Plan Administrators” are authorized, and instructed, to implement this “Plan.”

Nanette K. Abraham
3724 47th Street Ct. NW
Gig Harbor, WA 98335
(253) 381-4688 Mobil (Emergency 2)
E-Mail Address: abeco@comcast.net

In the event that neither Mr. or Mrs. Abraham cannot be reached, the following “ ” is authorized to execute this Plan.

Darrin McComas, Chief Investment Officer and Alternate Chief Compliance Officer
River View Corporate Center
16201 E. Indiana Ave Suite 2750
Spokane Valley, WA 99216
Darrin McComas – Chief Investment Officer
(509) 995-5513 Mobile (Emergency 3)
dmccomas@abrahamco.com

Updates to this “Plan” - will be made whenever critical information (banking, off-site records storage, physical location, contact information, etc.) or circumstances change. Kye Abraham will review this Plan at least annually and make any necessary changes that may be required. Contact numbers and backup procedures will be tested at least annually for accuracy and efficacy. Each year, upon completing this review, Mr. Abraham, or the appropriately qualified and designated party will, sign and date this Plan. This process will typically occur toward the end of the first calendar quarter after the annual audit or compliance review has been conducted.

Offsite Storage of this Plan - Copies of this Plan are readily available at multiple locations in Abeco records in the Gig Harbor office thru Apple iCloud encrypted iCloud Server, Abeco’s Dropbox for Business and secure cloud-based systems in the Spokane Valley, WA office. Hard copies are also available at each office location serving Abeco IARs.

For more information – or if you have questions about our business continuity planning, you can contact Kye Abraham directly at (253) 851-7486 or abeco@abraham.com

ATTESTATION PAGE

Attestation:

I have reviewed this “Business Continuity Plan” for Abraham & Co., Inc. and believe that it adequately covers the Abraham & Co. mission-critical systems which would most likely be disrupted by significant business disruptions, both internal and external. For convenience this page may be signed in counterparts and attached hereto.

Abraham & Co., Inc.

President & Chief Compliance Officer

January 30, 2024

I have reviewed this “Business Continuity Plan” for Abraham & Co., Inc. and agree to implement the Plan in the event that the Chief Compliance Officer cannot be reached.

Alternate Plan Administrator (1)

Nanette K. Abraham

January 30, 2024

Alternate Plan Administrator (2)

Darrin McComas

January 30, 2024