

Family Investors Company

Business Continuity Plan (“BCP”) 2020

I. Emergency Contact Persons

Family Investors Company has complied with this requirement and has communicated emergency contact information to the FINRA (www.finra.org).

In addition, the Emergency Contact Persons have the home phone, cell phone and home email addresses of each employee.

This information will be updated in the event of a material change, and the Executive Representative will review them within 17 business days of the end of each quarter.

II. Firm Policy

Family Investors Company 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 customers to transact business. In the event that we determine we are unable to continue our business; we will assure customers prompt access to their funds and securities.

A. Significant Business Disruptions (SBDs)

Our plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only our firm’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 firms, 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 our clearing firm and the mutual fund companies with whom we conduct business.

B. Approval and Execution Authority

Peter J. Chemidlin, President and a registered principal, is responsible for approving the plan and for conducting the required annual review.

Peter J. Chemidlin, President and a registered principal, has the authority to execute this BCP.

III. Business Description

Our firm conducts business in mutual funds, variable annuities, equity, and fixed income securities. Our firm is an introducing firm and does not perform any type of clearing function for itself or others. Furthermore, we do not hold customer funds or securities. We accept and enter individual stock and bond orders. Mutual fund and variable annuity business are sent directly to the fund or insurance companies where the individual client records are maintained. All stock and bond transactions are sent to our clearing firm, National Financial Services, which executes our orders, compares them, allocates them, clears and settles them. Our clearing firm also maintains our customers' accounts, can grant customers access to them, and delivers funds and securities. Our firm services only retail customers. We do not engage in any private placements.

The Family Investors Company clearing firm is:

National Financial Services
200 Liberty Street
New York, NY 10281

and our contact person at that clearing firm is:

Tom Griffin
Phone: 617-392-2957
Email: tom.griffin@fmr.com

IV. Office Location

Family Investors Company only has one office. It is located at:

265 South Avenue
Fanwood, NJ 07023
Phone: 908-322-1800.
FAX: 908-322-1816
Email: info@familyinvestors.com

Mailing address is:

265 South Avenue
PO Box 100
Fanwood, NJ 07023

Employees may travel to this office by means of foot, bicycle, car, or train. We engage in order taking and entry at this location.

V. Alternative Physical Location(s) of Employees

In the event of an SBD, we will move our staff from affected office, however if you need to get in touch with us please call 908-322-1800 and you will be connected with one of our staff. If you need to visit our office you will be instructed where to go. office to the home of Darraugh A. Valli, Vice President, located at:

5 Fenimore Drive

All personnel will be expected to ensure their cellular telephones are on their person in the event of a significant business disruption.

If inclement weather forces us to refrain from driving for safety sake, all telephone lines will be forwarded to the home of Darraugh A. Valli. Darraugh Valli will make the decision as to whether this is implemented. (Darraugh is a registered principal).

VI. Customers' Access to Funds and Securities

Family Investors Company does not maintain custody of customers' funds or securities. They are maintained at our clearing firm, National Financial Services. 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 National Financial Services on their behalf, and if our Web access is available, our firm will post on our Web site that customers may access their funds and securities by contacting National Financial Services. Mutual fund holdings can be accessed by calling the mutual fund companies, or clients owning variable annuities can contact the insurance company since clients have full access to their accounts and can request redemptions directly. The firm will make this information available to customers through its disclosure policy.

Variable annuity and mutual fund positions are maintained at the mutual fund company with whom we conduct business. A list of the companies we deal with and their telephone numbers are available upon request or can be found on the client statements and confirmations which are sent directly to each client by the mutual fund or variable annuity company.

If SIPC determines that we are unable to meet our obligations to our customers or if our liabilities ever exceed our assets (Family Investors Company does not carry any sizeable liabilities) 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.

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

Family Investors Company maintains its primary hard copy books and records at the physical office. All electronic documents are backed up to the server and an additional backup is off site.

The firm backs up its electronic records daily to its server and to an offsite data storage facility.

The Family Investors Company technical support firm CMIT Solutions can access and download the electronic records of Family Investors Company should the need arise.

In the event of an internal or external SBD that causes the loss of our 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.

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 customers, employees, critical business constituents, critical banks, critical counter-parties, 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: www.familyinvestors.com, or telephone voice mail 908-322-1800. In addition, we will retrieve our key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic).

IX. Mission Critical Systems

Our firm's "mission critical systems" are those that ensure prompt and accurate processing of securities transactions, including order taking, entry, allocation, and access to customer accounts. More specifically, these systems include: internet connection to National Financial Services, DST Vision, telephone service and FAX transmission.

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 and entry. Our clearing firm provides, through contract, the 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.

Our clearing firm contract provides that our clearing firm will maintain a business continuity plan and the capacity to execute that plan. Our clearing firm represents that it will advise us of any material changes to its plan that might affect our ability to maintain our business [and presented us with an executive summary of its plan, which is attached]. In the event our clearing firm executes its plan, it represents that it will notify us of such execution and provide us equal access to services as its other customers. If we reasonably determine that our clearing firm has not or cannot put its plan in place quickly enough to meet our needs, or is otherwise unable to provide access to such services, our clearing firm represents that it will assist us in seeking services from an alternative source.

Our clearing firm represents that it backs up our records at a remote site. Our clearing firm represents that it operates a back-up operating facility in a geographically separate area with the capability to conduct the same volume of business as its primary site. Our clearing firm has also confirmed the effectiveness of its back-up arrangements to recover from a wide scale disruption by testing, and it has confirmed that it tests its back-up arrangements.

In addition, the mutual fund and variable annuity companies with whom we conduct business represent they each have a back-up operating facility in a geographically separate area with the capability to conduct the same volume of business as its primary site. These companies have also confirmed the effectiveness of their back-up arrangements to recover from a wide scale disruption by testing, and they confirmed that they test their back-up arrangements daily.

Recovery-time objectives provide concrete goals to plan for and test against. They are not, however, hard and fast deadlines that must be met in every emergency situation, and various external factors surrounding a disruption, such as time of day, scope of disruption, and status of critical infrastructure—particularly telecommunications—can affect actual recovery times. Recovery refers to the restoration of clearing and settlement activities after a wide-scale disruption; resumption refers to the capacity to accept and process new transactions and payments after a wide-scale disruption. Our clearing firm has the following SBD recovery time and resumption objectives: recovery time period of 24 hours and resumption time period of 1 hour as per National Financial Services.

A. Our Firm's Mission Critical Systems

1. Order Taking

Currently, our firm receives orders from customers via telephone or by in person visits by the customer. 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. Customers will be informed of alternatives by voice mail. If necessary, we will advise our customers to place orders directly with our clearing firm, National Financial Services, at 800-877-2410 Option #1 or with the mutual fund company or with the variable annuity company at the telephone number listed on their statements.

2. Order Entry

National Financial Services - Currently, our firm enters orders by recording them on paper and electronically sending them to National Financial Services electronically or telephonically.

In the event of an internal SBD, we will enter and send records to our clearing firm by the fastest alternative means available. 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. In addition, during an internal SBD, we may need to refer our customers to deal directly with our clearing firm for order entry.

Mutual fund and/or Variable Annuity - Currently, Family Investors Company or the client can call and initiate a transaction.

A. Mission Critical Systems Provided by National Financial Services (Our Clearing Firm)

Our firm relies, by contract, on National Financial Services (our stock and bond clearing firm) to provide order execution, order comparison, order allocation, and the maintenance of customer accounts, delivery of funds and securities, and access to customer accounts. National Financial Services has affirmed to Family Investors Company that it has a Business Continuity Plan in place.

B. Mission Critical Systems Provided by Others

Family Investors Company relies on the various mutual fund and/or variable annuity companies with whom we conduct business to provide the services of purchasing or selling mutual funds and/or variable annuities upon receipt of instructions by Family Investors Company or the client. We have endeavored to obtain assurances from all the companies with whom we do business that they too have a Business Continuity Plan in effect.

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

A. Customers

We communicate with our customers using the telephone, e-mail, our Web site, fax, U.S. mail, and in person visits at our firm or at the other's 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 e-mail 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.

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) 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: Peter J. Chemidlin

Caller	Call Recipients
Peter J. Chemidlin	Darraugh Valli, Matthew Chemidlin
Darraugh Valli	Lynn Galgano, Steve Goldberg, Janet Lesce, Walter Kapuscinski, Susan Tomljanovic,

C. Regulators

We are currently members of the following SROs: FINRA, MSRB and SIPC. In the event of an SBD, we will communicate with our regulators using the telephone, e-mail, fax, U.S. mail, and, should all other methods fail, 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.

Herewith is our summary:

"Family Investors Company maintains a business continuity plan designed to respond reasonably and effectively to events of varying scope. Plans define critical functions and an alternate work locations, resource requirements and assets related to restoring business operations with minimal impact. This plan is reviewed and maintained on at least an annual basis to ensure that information is current and recovery strategies support our operations."

XI. Updates and Annual Review

Family Investors Company 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, on July 1st or earlier, to modify it for any changes in our operations, structure, business, or location or those of our clearing firm.