



Business Continuity Plan Template

Business Continuity Plan (BCP)

Template Version Updated: 6/22/2023

I. Firm Policy

Our BCP's primary objectives are to continue providing services to our customers, protect the health and safety of our employees, and fulfill our legal and regulatory obligations. 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)

An SBD may affect only our firm (e.g., a fire in our office building or cyber event) or may be widespread affecting several firms or the operation of the securities markets (e.g., a terrorist attack, a natural disaster or a pandemic). Our response will vary depending on the severity of the SBD, which may include greater reliance on other organizations and systems, especially on the capabilities of our clearing firm.

B. Plan Approval and Annual Reviews

[], a member of senior management, is responsible for approving the plan and for conducting the required annual review.

C. Plan Location and Access

Our firm will maintain copies of its BCP and any modifications that have been made to the BCP and the annual reviews for inspection. The BCP is also available to all employees at: [].

II. Business Description

Our firm is an introducing firm that conducts business in equity securities, fixed income securities, and derivatives for:

[Retail Customers]

[Retail and Institutional Customers]

We do not engage in any private placements. We do not perform any type of clearing function or hold customer funds or securities. After an order is accepted and entered by our firm, the order is sent to our clearing firm for execution, clearance and settlement. Our clearing firm also maintains our customers' accounts, can grant customers access to them, and delivers funds and securities.

Our clearing firms are:

| |
|----|
| 1) |
| 2) |
| 3) |
| 4) |

Our contact persons for these clearing firms are:

| |
|----|
| 1) |
| 2) |
| 3) |
| 4) |

Our clearing firms have also given us the following alternative contacts in the event that our primary contact cannot be reached:

| |
|----|
| 1) |
| 2) |
| 3) |
| 4) |

III. Office Locations

A. Office Location #1

| | |
|-----------------------------|--|
| Address | |
| Main Phone Number | |
| Primary Point of Contact | |
| Mission Critical Activities | |
| Alternate Location | |

In the event that Location #1 Office is inaccessible or staff is working remotely due to an SBD, mail will be directed or forwarded to the alternate location or back-up location.

B. Office Location #2

| | |
|-----------------------------|--|
| Address | |
| Main Phone Number | |
| Primary Point of Contact | |
| Mission Critical Activities | |
| Alternate Location | |

In the event that Location #2 Office is inaccessible or staff is working remotely due to an SBD, mail will be directed or forwarded to the alternate location or back-up location.

C. Office Location #3

| | |
|-----------------------------|--|
| Address | |
| Main Phone Number | |
| Primary Point of Contact | |
| Mission Critical Activities | |
| Alternate Location | |

In the event that Location #3 Office is inaccessible or staff is working remotely due to an SBD, mail will be directed or forwarded to the alternate location or back-up location.

IV. Alternate Physical Location(s) of Employees

In the event of an SBD impacting our ability to operate in a location, staff in the affected office(s) will move to the closest of our unaffected office location(s) or our back-up location at [].

If the alternate office location or back-up location is unavailable or infeasible (e.g., due to the inability to employ social distancing during a pandemic), staff may temporarily work from a remote location (e.g., staff may work from home because of health and safety reasons during a pandemic). In this event, we will maintain a list of employee working locations and contact information.

The risk of cybersecurity events may be increased due to use of remote offices or telework arrangements. We will remain vigilant in our surveillance against cyber threats and take steps to reduce the risk of cyber events. These steps may include: (1) ensuring that virtual private networks (VPN) and other remote access systems are properly patched with available security updates; (2) checking that system entitlements are current; (3) employing the use of multi-factor authentication for associated persons who access systems remotely; and (4) reminding associated persons of cyber risks through education and other exercises that promote heightened vigilance.

V. Customers' Access to Funds and Securities

Our firm does not maintain custody of customers' funds or securities. Our clearing firms listed below maintain custody of customers' funds or securities. If telephone or internet service is available during an SBD, our registered persons will take customer orders or instructions (including instructions to transfer customer accounts in the event our firm determines that it is unable to continue its business) and contact our clearing firm on their behalf. If registered persons are unable to service customers' orders or instructions, our firm will [post on our website or customer portal or send an email to customers notifying customers that they] may access their funds and securities by contacting the relevant clearing firm below. The firm will make this information available to customers through its disclosure policy.

| Firm Name | Backup Contact Info (For Clients) |
|-----------|-----------------------------------|
| | |
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| | |

VI. Data Back-Up and Recovery

Our firm maintains its primary or original books and records as described below. The individual below is responsible for the maintenance of these books and records. Our firm exclusively maintains the following document types and forms that are not transmitted to our clearing firm.

| | |
|--------------------|--|
| Form of Storage | |
| Location | |
| Person Responsible | |
| Document Types | |

Describe the form of storage (paper, digital, or both), state the location where records are kept, give the name, title, and phone number of the person responsible for this, and list document types and forms stored (Such as new account forms, etc.)

Our firm maintains its back-up copy of books and records as described below. The person named below is responsible for the maintenance of the back-up copy of our books and records.

| | |
|--------------------|--|
| Form of Storage | |
| Location | |
| Person Responsible | |

If our firm backs up its paper books and records by copying and physically taking the paper copies to our back-up site, we do so as described below:

| | |
|-------------------------|--|
| Frequency (time period) | |
| Location | |

The firm backs up its electronic books and records as described below:

| | |
|-------------------------|--|
| Frequency (time period) | |
| Location (Or service) | |

In the event of an SBD that causes the loss of our primary or original paper books and records, we will physically recover paper copies of them from our back-up site or restore them from digital backups. For the loss of our primary or original electronic books and records, we will obtain electronic copies of them from our back-up site or physically recover the electronic storage media from our back-up site.

VII. Financial and Operational Assessments

Describe your firm's procedures to identify changes in its operational, financial and credit risk exposures in the event of an SBD. Your firm should periodically assess the changes in these exposures and quickly make such an assessment in connection with an SBD.

A. Operational Risk

In the event of an SBD, we will identify whether there are any limitations on our ability to communicate with our customers, employees, critical business constituents, critical banks, critical counter-parties and regulators. Depending on the limitations, we will employ alternate modes of communication, including our website, phone or email, to communicate with customers, employees, critical business constituents, critical banks, critical counter-parties and regulators.

If registered persons are unable to service customers, our firm will notify customers that they may access their funds and securities by contacting the clearing firm(s) through the following procedure:

In addition, we will retrieve our key activity records as described in the section above, Data Back-Up and Recovery.

B. Financial and Credit Risk

Financial risk involves the firm's ability to fund operations and maintain adequate financing and sufficient capital. The firm also may face credit risk (where its investments may erode from the lack of liquidity in the broader market), which would also hinder the ability of the firm's counterparties to fulfill their obligations.

In the event of an SBD impacting our financial position, 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 clearing firm, 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 appropriate steps, as described below:

VIII. Mission Critical Systems

Our firm's "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. More specifically, these systems include:

| Mission Critical System | Function | Provider | Contact Information |
|--------------------------------|-----------------|-----------------|----------------------------|
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Our firm establishes and maintains our business relationships with our customers and performs the mission critical functions of order taking and entry and execution. 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 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 business or customers. 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.

A. Our Firm's Mission Critical Systems

1. Order Taking

Currently, our firm receives orders from customers via the following:

State all that apply (e.g., phone, fax, email, website, in-person visits by the customer, etc.)

During an SBD, we will continue to take orders through any of these methods that are available and reliable. As communications permit, we will inform our customers what alternative methods are available for sending orders. Customers will be informed of alternatives by phone, email or posting on the firm's website. If necessary, we will advise our customers to place orders directly with our clearing firm with the following contact information:

2. Order Entry

Currently, our firm records and places customer orders through our clearing firm(s) with the following procedure:

In the event of an SBD impacting normal order entry, we will enter and send orders to our clearing firm by the fastest alternative means available, which include the following:

In the event of our clearing firm experiences an SBD impacting order entry, 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, our contract with the clearing firm provides that customers may be referred to the clearing firm for direct order entry.

3. Other Services Currently Provided to Customers

In addition to those services listed above in this section, we also provide the following services:

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In the event of an SBD, we would maintain continuity in these services as follows:

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B. Mission Critical Systems Provided by Our Clearing Firm

Our firm has contracted with our clearing firm to provide order execution, order comparison, order allocation, customer account maintenance or access and delivery of funds and securities.

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

A. Customers

In the event of an SBD, we will identify whether there are any limitations on our ability to communicate with customers. Depending on the limitations, we will employ alternate modes of communication, including the following:

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We will use these means to communicate with customers. When an alternate mode of communication is used we will consider any increased risk of cybersecurity events stemming from the alternate mode.

X. Critical Business Constituents, Banks and Counter-Parties

A. Business Constituents

In the event of an SBD related to our critical business constituents (businesses with which we have an ongoing commercial relationship in support of our operating activities, such as vendors providing us critical services), we will contact our critical business constituents and determine the extent to which we can continue our business relationship with them in light of the SBD. Our critical business constituents are:

| Service/Product | Supplier's Name, Address and Phone Number | Any Alternate Supplier's Name, Address, and Phone Number |
|-----------------|---|--|
| | | |
| | | |
| | | |
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We will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services when we need them because the business constituent is experiencing its own SBD or we are experiencing ours own.

B. Banks

In the event of an SBD related to our financing, we will contact our banks and lenders to determine if they can continue to provide the financing. The bank maintaining our operating account is:

(bank name, address, phone number and contact)

The bank maintaining our Proprietary Account of Introducing Brokers/Dealers (PAIB account) is:

(list bank name, address, phone number and contact).

If our banks and other lenders are unable to provide the financing, we will seek alternative financing immediately from:

(bank/lender name, address and phone numbers)

C. Counter-Parties

In the event of an SBD related to our financing, we will contact our critical counter-parties, such as other broker-dealers or institutional customers, to determine if we will be able to carry out our transactions with them in light of the SBD. Where the transactions cannot be completed, we will work with our clearing firm or contact those counter-parties directly to make alternative arrangements to complete those transactions as soon as possible.

XI. Regulatory Reporting

We fulfill our regulatory reporting obligations in cooperation with Great Valley Advisor Group using paper copies in the U.S. mail, or electronic means as appropriate.

In the event of an SBD, we will identify whether there are any limitations on our ability to fulfill our regulatory reporting obligations. Depending on the limitations, we will employ alternate modes of communication, including our website, phone or email, to communicate with regulators in fulfilling our regulatory reporting obligations.

XII. Updates and Annual Review

Our firm 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 determine whether any modifications are necessary due to changes in our operations, structure, business or location or those of our clearing firm. As part of our annual review, we will conduct a firm-wide test of our BCP.

XIII. Senior Manager Approval

Approve the firm's BCP by signing below.

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

Signed: _____

Title: _____

Date: _____

Testing Pages

Testing your BCP confirms that your Plan will minimize disruptions to your business and ensure successful recovery of services for your Clients.

Please find a test checklist on the next page.

How to perform your test:

Recovery Strategy Execution (Alternative Physical Location)

- Person or Group simulates a “real life” event
- Use a scenario that could impact your organization to execute the step by step plan specific to the documented recovery strategy (leverage another office location or utilize a home location)
- Relocate required staff to the selected recovery location
- Document which staff relocated
- Verify connectivity is in place (phone & network), and that you can transact business as required to support clients
- Ensure communication strategies are useful, timely and accurate
- Utilize recovery location from 1-4 hours
- Demonstrate areas of success and identifies single points of failure and opportunities to update your plan

Test Checklist

Date: _____ Test Approver (Name, Title): _____

Strategy

Location used: Alternative Office Home office

Staff Included

State which staff members were included in the test:

Narrative Description of Test & Outcome

Test Checklist (Check boxes where Yes applies)

How long did the Test last?

Were issues with network/phone access tested for?

Were you able to perform business as usual?

Did all participants understand the Plan?

Were all participants able to be contacted quickly?

Did the Plan provide for all roles needed to maintain operations?

Have backups been identified for all responsibilities?

Are all contact details complete, current, and accurate?

Does the Plan identify essential suppliers or third party vendors?

Revision History

| Date | Name | Revision Summary |
|------|------|------------------|
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Test History

| Date | Test Approver | Results Summary |
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