

DINOSAUR FINANCIAL GROUP, LLC BUSINESS CONTINUITY PLAN (BCP)

I. Emergency Contact Persons

Our firm's emergency contact persons are Mr. Elliot Grossman, Senior Vice President and Mr. Michael Alamo, General Counsel and Chief Compliance Officer. Mr. Elliot Grossman can be reached at 917-991-0043 and Mr. Michael Alamo can be reached at 212-448-9944 ext.1308 (office), 917-327-3780 (cell). Their e-mail addresses are elliot.grossman@gmail.com and mjalamo@hotmail.com. These names will be updated in the event of a material change, and our Executive Representative will review them within 17 business days of the end of each quarter.

Our firm will maintain copies of its BCP and the annual reviews, and the changes that have been made to it for inspection. We have given FINRA/District 10 a copy of our plan.

II. Firm Policy

Our firm's policy is to respond to a Significant Business Disruption (SBD) by safeguarding employee's 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 Disruption

Our plan anticipates two kinds of SBD's, internal and external. Internal SBD's affect only our firms' ability to communicate and do business, such as a fire in our building.

External SBD's prevent the operation of the securities markets or 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.

B. Approval and Execution Authority

The Firm's president Mr. Glenn Grossman has designated Michael Alamo as the registered Principal authorized to approve the plan, execute the plan and conduct the required annual review.

C. Plan Location and Access

Our firm will maintain copies of its BCP and the annual reviews, and the changes that have been made to it for inspection. An electronic copy of our plan is located on rcann@dinogroup.com/works, whose address is: Black Diamond Systems 124 Harbourton - Woodsville Road, Lambertsville, NJ 08530-3015.

III. Business Description

Dinosaur Financial Group, LLC is a broker/dealer conducting business in investment banking, asset management, sales in equities, options, fixed-income (domestic & international); futures, OTC derivatives and prime brokerage/hedge fund services. The firm has expanded its business lines to include foreign equity transactions, 15a-6 and market making business.

Dinosaur Financial Group LLC is an introducing firm of APEX Clearing Corporation, Electronic Transaction Clearing, Industrial Commercial Bank of China, RBC Correspondent Services and Wedbush Securities. We do not perform any type of clearing function for our own firm or others. Furthermore, we do not hold customer funds or securities. We accept and enter orders. All transactions are sent to our clearing firms, which compares them, allocates them, clears and settles them. Our clearing firms also maintain our customers' accounts, can grant customers access to them and deliver funds and securities. Our firm services retail and institutional customers.

Our Clearing Firm's addresses are:

APEX Clearing Corporation, located at 350 North Paul Street #1300, Dallas, Texas 75201. The phone number is 214-765-1100.

Electronic Transaction Clearing, located at 660 S. Figueroa St., Los Angeles, CA 90017. The phone number is 213-402-1570.

Industrial Commercial Bank of China Financial Services LLC, located at 1633 Broadway, New York, NY 10019. The phone number is 212-993-7300.

RBC Correspondent Services, located at 60 South 6th Street, Minneapolis, MN 55402. In case of a disruption of business calls please contact our Clifton Park Office at 518-348-0060.

Wedbush Securities, located at 1000 Wilshire Blvd, Los Angeles, CA 90017. The phone number is 888-933-2847.

IV. OFFICE LOCATIONS

Our main office is located at 470 Park Avenue South, 9th floor, South Tower, New York, NY 10016. Our main telephone number is 212-448-9944. Our employees may travel to this office by means of foot, car, subway, train, and bus. We engage in order taking and entry at this location.

The Firm currently maintains five OSJ Branch locations:

Andrew G. Guzzetti
Managing Director
DLG Wealth Management, LLC
6 Executive Park Drive
Clifton Park, NY 12065
518 348 0060 x249
518 348 0107 (F)

Brian T. Mayer
Managing Director
RMR Wealth Management, LLC
One Battery Park Plaza, 31st Floor
New York, New York 10004
212 785 4377
212 202 6097 (F)

Thomas Shaw
Managing Director, Fixed Income
Dinosaur Financial Group, LLC
289 Route 33 East
Bldg A, Ste 7
Manalapan, NJ 07726
732-851-7778
732-851-7787 (F)

Mery Nelcha
Branch Manager
Dinosaur Financial Group LLC
848 Brickell Avenue
Miami, FL 33131
305-982-8534
305-982-8536 (F)

Gregory Wilson Day
Branch Manager
Dinosaur Financial Group LLC
4419 46th Avenue
St. Petersburg, FL
727-800-6233

V. ALTERNATIVE PHYSICAL LOCATIONS OF EMPLOYEES

In the event of an SBD, we will move our staff from affected offices to the closest of our unaffected office locations (see below) If none of the locations below cannot accept our employees we will direct certain employees to perform order taking and entry from their homes.

Andrew G. Guzzetti
Managing Director

Brian T. Mayer
Managing Director

DLG Wealth Management
6 Executive Park Drive
Clifton Park, NY 12065
518 348 0060 x249
518 348 0107 (F)

RMR Wealth Management, LLC
One Battery Park Plaza, 31st Floor
New York, New York 10004
212 785 4377
212 202 6097 (F)

Thomas Shaw
Managing Director, Fixed Income

Mery Nelcha
Branch Manager

Dinosaur Financial Group LLC
289 Route 33 East
Bldg A, Ste 7
Manalapan, NJ 07726
732-851-7778
732-851-7787 (F)

Dinosaur Financial Group LLC
848 Brickell Avenue
#Ph-2
Miami, FL 33131
305-982-8534
305-982-8536

If any of the above offices are unavailable, we will arrange to have our employees go to any of our other offices located in downtown New York, Miami, Clifton Park, Manalapan and St. Petersburg.

VI. CUSTOMERS' ACCESS TO FUNDS AND SECURITIES

Our firm does not maintain custody of customers' funds or securities, which are maintained at our clearing firms. 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 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 Glenn Grossman. The firm will make this information available to customers through its disclosure policy.

If 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.

VII. DATA BACK-UP AND RECOVERY (HARD AND ELECTRONIC COPY)

Our firm maintains its primary hard copy books and records and its electronic records at 470 Park Avenue South, NY, NY 10016. Venisha Frith, VP, is responsible for the maintenance of these books and records. Our firm maintains the following types and forms that are not transmitted to our clearing firm.

Payroll Records
Financials
Employment Records (Effective November 2015)

Financials, which includes the general ledger and banking records, are maintained on quick books. These books are backed up by electronic computer backup, off-site.

These records are also maintained by our outside technician rcann@dinogroup.com/works

Payroll is performed and maintained by an outside vendor called PayServ.

Employment records will be maintained by an outside vendor called Agile

All active records are backed up monthly or as a change occurs, such as with employment records. The firm backs up its electronic records daily by computer and keeps a copy remotely with **Crashplan.com** whose headquarters address is located at 1 SE Main St, Minneapolis, MN 55414

Email is maintained by Google and is located in a remote location.

Email archiving is maintained by SMARSH. com

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.

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 web site, telephone and clearing agent capabilities. In addition, we will retrieve our key activity records as described in the section above, Data Back-Up and Recovery (hard copy and electronic).

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 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 including:

Notification to the clearing agents, the clearing agents maintain a deposit on file.

Calculate immediate assets on hand; determine the time frame availability for liquidations of investments. Notification to the appropriate regulators as soon as it is determined that the firm cannot meet its obligations.

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, and the delivery of funds and securities.

Sterling trader
Bloomberg, order execution

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 firms provide, through contract, the 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 contracts provide that our clearing firms will maintain a business continuity plan and the capacity to execute that plan. Our clearing firms represent that they will advise us of any material changes to their plans that might affect our ability to maintain our business and presented us with an executive summaries of their plans. In the event our clearing firms execute their plans, they represent that they will notify us of such execution and provide us equal access to services as their other customers. If we reasonably determine that our clearing firms have not or cannot put their plans into place quickly enough to meet our needs, or are otherwise unable to provide access to such services, our Clearing firms represent that they will assist us in seeking services from an alternative source.

Our clearing firms represent that they back up our records at a remote site. Our clearing firms represent that they operate a back-up operating facility in a geographically separate area with the capability to conduct the same volume of business as their primary sites. Our clearing firms have also confirmed the effectiveness of their back-up arrangements to recover from a wide-scale disruption by testing.

A. Our Firm's Mission Critical Systems

1. Order Taking

Currently, our Firm receives orders from customers via telephone or 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 as communications permit, we will inform our customers when communications become available to tell them what alternatives they have to send orders to us. Customers will be informed of alternatives by phone. If necessary, we will advise our customers to place orders directly with our clearing agent.

2. Order Entry

Currently, our firm enters orders by recording them electronically (and on rare occasion on paper) and sending them to our clearing firms electronically or telephonically.

In the event of an internal SBD, we will enter and send records to our clearing firms by the fastest alternative means available, telephone, fax, email and/or messenger service. 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.

3. Order Execution

We currently execute orders by electronic entry to Bloomberg, Sterling Trader. In the event of an internal SBO, we would contact Bloomberg and Sterling Trader via telephone or email. In the event of an external SBO, we would resume normal execution as soon as practical with Bloomberg and Sterling Trader. If either vendor were inoperable, then we would execute orders with our clearing agent as soon as they are able to take the order(s).

IX. ALTERNATE COMMUNICATIONS BETWEEN THE FIRM, CUSTOMERS EMPLOYEES AND REGULATORS.

A. Customers

We now communicate with our customers using the telephone, e-mail, fax and U.S. mail. 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. If normal communication is by phone, then if applicable we will use the Internet. If necessary we will overnight the communications.

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.

The following persons have been given a list of all employees' names, addresses and phone numbers. Each person will contact 50 percent of the list for the main office employees located at 470 Park Avenue.

Glenn Grossman, President
Elliot Grossman, Managing Director

The following persons have been given a list of all employees' names, addresses and phone numbers. Each person will contact 50 percent of the list for the main office employees located at our three OSJ branch offices located at 6 Executive Drive, One Battery Plaza and Manalapan, NJ.

Andrew Guzzetti, Managing Director, Wendy Elliot, Branch Manager
Brian Mayer, Managing Director, Lore Gordon, Branch Manager
Thomas Shaw, Managing Director, Fixed Income

C. Regulators

We are members regulated by the following: FINRA, SEC, MSRB and NFA. We communicate with our regulators using the telephone, e-mail, fax and U.S. mail. 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.

XI. CRITICAL BUSINESS CONSTITUENTS, BANKS & COUNTER-PARTIES

A. Business constituents

We have contacted our critical business constituents and determined the extent to which we can continue our business relationship with them in light of the internal or external SBD. 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 major suppliers are Sterling Trader and Bloomberg. Alternative suppliers will be Wedbush Securities, Industrial Commercial Bank of China Financial Services, Electronic Transaction Clearing, RBC Correspondent Service, APEX Clearing Corp.

B. Banks

We have contacted our bank 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:

Signature Bank
261 Madison Ave
New York, NY 10016
Tel: 646-822-1342
Contact: Steven Deneff

TD Bank
475 Park Avenue
New York, NY 10016
Tel: 212-634-2920

C. Counter-Parties

We have contacted 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 internal or external 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

XII. REGULATORY REPORTING

Our Firm is subject to regulation by: The SEC, FINRA, NFA, MSRB and State Regulators. We now file reports with our regulators using paper copies in the U.S. mail, electronically using fax, e-mail 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 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. The Firm's FINRA contact is Patricia MacGeorge District 10, 212-858-4225.

XIII. DISCLOSURE OF BUSINESS CONTINUITY PLAN

The Firm's accounts will be notified of the summary of the plan via their representative or online at the time the account is opened. The clearing agent provides a copy of their summary to all of our clients. We also post the summary on our Web site and mail it to customers upon request. Our clearing firm's summaries are also posted on our Website, Dinogroup.com


Our disclosure statement and the clearing firms' disclosure statement are attached to this plan.

XIV. 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 firms. In addition, our firms will review this BCP annually, if applicable to modify it for any changes in our operations, structure, business, or location or those of our clearing firm.

XV. SENIOR MANAGER APPROVAL

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: 
Michael Alamo

Title: General Counsel/CCO

Date: 8/16/2016

Effective Changes:

Reviewed and updated: 09/10/08

Updated XIII – removed the word retail inserted accounts. 11/26/08

Updated for NFS, branches and phone numbers and managers
and employment records 03/29/10

Updated for Electricmail.com email archive removed
Smarsh systems email archives 08/2010

Sterling Trader added

** Penson Financial has changed back office systems 01/2012 01/2012 to Broad Ridge Clearing.
Testing with Broad Ridge Clearing was tested and in effect.

Broad Ridge Clearing is now APEX Clearing.

Reviewed and Updated 5/8/13

In addition the firm has entered into a clearing arrangement with Wedbush Securities Inc. in
2012. Fully effective 3/2013.

Apex Clearing arrangement ending 6/6/2013

Employment records are now scanned to primus and then quarterly to a CD

Added Electronic Transaction Clearing 2/18/2014

Removed NFS as Clearing Agent November 9, 2014

Removed Interactive Brokers as Clearing Agent May 19, 2015

Added Industrial Commercial Bank of China Financial Services (ICBC) as Clearing Agent
December 2, 2015

Added Apex as a Clearing Company, added St. Peterburg OSJ, updated Firm Contacts, updated
e-mail and electronic back-up service providers August 16, 2016

DINOSAUR FINANCIAL GROUP, LLC BUSINESS CONTINUITY PLAN 2016

Dinosaur Financial Group, LLC has developed a Business Continuity Plan regarding 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. With that in mind, we are providing you with this information on our business continuity plan.

Contacting Us – If, after a significant business disruption, you cannot call us as you usually do at 212-448- 9944 or email your contact(s) at his/her/their email address(es), you may call our alternative number 917-251-6895 or go to our web site at www.dinogroup.com. If you cannot access us through either of those means, you should contact our clearing firms, Wedbush Securities, Inc. at 1-888-933-2874 or www.wedbush.com, or our Clifton Park Office at 518-348-0060 for clients with accounts held by RBC Correspondent Services, a division of RBC Capital Markets, LLC, or our Miami Office (305-982-8533) for clients with accounts held at APEX Clearing (Note: RBC Correspondent Services and APEX Clearing **will not accept** any client calls directly).

Our Business Continuity Plan – After a significant business disruption we intend to expeditiously recover and resume business operations, while safeguarding our employees and property, making a financial and operational assessment of the disruption, protecting the firm's books and records, and doing all that we can to permit our firm to resume operations as quickly as possible, taking into account the scope and severity of the significant business disruption.

Our Business Continuity Plan addresses data back-up and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees and regulators; alternate physical location of employees; critical supplier, contractor, bank and counterparty impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

Our clearing firms back up our important records 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, our clearing firms have advised us that their objective is to restore their own operations and be able to complete existing transactions and accept new transactions and payments anywhere from immediately to the next day. Your orders and requests for funds and securities could be delayed during this period.

Varying disruptions - Significant business disruptions can vary in their scope, possibly affecting only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the significance 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 when needed and expect to recover and resume business within 24 to 48 hours. In a disruption affecting our business district, city or region, we will transfer our operations to a site outside the affected area, and recover and resume business within 24 to 72 hours. In either situation, we plan to continue in business. Except for RBC Correspondent Services and APEX Clearing, we will transfer operations to our clearing firm(s), if necessary, and notify people through our website (www.dinogroup.com) or our customer emergency number, 917-251-9851, as to how to contact us. **RBC's operations will be transferred to our Clifton Park Office (518-348-0060) and APEX Clearing operations will be transferred to our Miami Office (305-982-8533)** If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customers' prompt access to their funds and securities.

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WEBBUSH

Regulatory Disclosures

USA Patriot Act

To help the government fight the funding of terrorism and money laundering activities, Federal law requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account. What this means for you: When you open an account, we will ask for your name, address, date of birth and other information that will allow us to identify you. We may also ask to see your driver's license or other identifying documents.

Securities and Exchange Commission Rule 605/606

Securities and Exchange Commission Rule ("SEC") 605 requires market centers that trade National Market System securities to make available to the public monthly electronic reports that include uniform statistical measures of execution quality. These reports are available as electronic data files downloadable in a raw form appropriate for advanced analytics. Please be aware that the majority of the order flow executed by Webbush Securities is not covered by NMS Rule 605 due to special handling requests by clients. The execution results from this order flow will not appear in the data and may differ substantially from the results.

Download NMS Rule 605 reports by [clicking here](#).

(By clicking this link, you will be leaving the Webbush Securities website)

Securities and Exchange Commission Rule ("SEC") 606 requires broker dealers that route client orders in certain equity and option securities to make available to the public quarterly reports that represent a general overview of their routing practices. Upon written request, Webbush Securities will provide the market center location to which your specific equity and/or option order was routed for execution, and/or a copy of our website information.

The most recent quarterly report is available by [clicking here](#).

U.S. Commodity Futures Trading Commission Rule 355

The Commodity Futures Trading Commission requires each futures commission merchant to make publicly available on its Web site firm specific disclosures and financial information to assist you with your assessment and selection of a futures commission merchant. Information regarding this futures commission merchant may be obtained by [clicking here](#).

FINRA BrokerCheck Hotline

The Financial Industry Regulatory Authority, Inc. offers investors information and education through the FINRA BrokerCheck Hotline at 800-289-9999 and FINRA website at www.finra.org. Available is an investor brochure that includes information describing FINRA BrokerCheck.

Privacy Statement

At Webbush Securities, protection of your privacy has been a long-standing policy. We do not sell our current or former customer's personal information to third parties. We collect certain "nonpublic personal information" about you from:

- Information we receive from you on applications or other forms;
- Information about your transactions; and
- Information we receive from non-affiliated third parties, including consumer and industry reporting agencies.

Webbush Securities does not disclose your nonpublic personal information to anyone except as described as follows. On a confidential basis, we may share the information we collect with companies that perform services to maintain your account information on our behalf. For example, we share information with third parties that assist us with data processing, preparing monthly statements, or companies that help us service our products. With your approval, we may share information within the affiliated Webbush companies to improve your experience with us and better serve your financial needs.

Webbush Securities restricts access to your personal and account information to those employees who need to know that information to provide services to you. We maintain physical and electronic safeguards to protect your nonpublic personal information.

To download the current Webbush Securities Privacy Statement, [click here](#).

Important Disclosures For Investors Using Margin

Webbush Securities (WS) is a registered broker-dealer and a member of the New York Stock Exchange ("NYSE"); consequently, WS must adhere to NYSE margin rules and rules promulgated by the Securities & Exchange Commission ("SEC"). Margin represents the equity in your accounts. Account equity generally is the difference between the current market value of the securities in your account less the amount you owe. While it is not our practice to change

our minimum margin requirements without prior notice, WS can, at any given time and without advanced warning, increase the amount of equity a margin account must maintain.

The minimum equity requirements vary depending on different factors, such as liquidity and price stability of the collateral. If the equity in an account falls or is falling, WS generally will issue a margin call for additional funds or collateral. In the event that you receive a margin call and are unable to meet it within the required timeframe, WS will decide whether an extension of time can be granted. Failure to satisfy a demand for additional margin could result in the involuntary liquidation of collateral held in your account. The consequences of a forced liquidation may be a loss greater than the initial deposit you made into your margin account. In addition, if liquidation doesn't provide the funds necessary to meet the firm maintenance margin requirement, you must meet the deficiency. If your account holdings include SEC Rule 144 restricted or affiliate securities, such securities can be sold by WS under the provisions of SEC Rule 144 and related SEC interpretations governing our rights as pledgee in the event of default.

Accordingly, we want to take this opportunity to help you better understand the liquidation provision of the Margin Agreement. This provision covers the liquidation rights WS has over all assets held in your account as collateral for amounts due WS for loans, short positions, losses, or other charges in your account.

Generally before liquidating assets held as collateral, it is our practice (but not our obligation) to attempt to give prior notification whenever additional funds are required in order to protect the loans or other amounts due us. However, prior notification is not always a viable option because of adverse conditions in the market. Consequently, we might take action to sell positions (or buy in short positions) in your accounts without any prior notification to you, or we might elect not to sell or buy in positions to avoid aggravating an unfavorable market situation. Frequently, concentrated positions or positions causing the margin call could be sold before the liquidation of other securities held in your accounts. WS chooses which securities that serve as collateral for a margin account will be liquidated.

Please be aware that your margin agreement gives WS unlimited discretion to take action to protect itself against losses. Involuntary liquidation of assets is a significant risk factor which you should seriously reconsider and reevaluate from time to time, because it might result in material losses to you or other unforeseen negative consequences. We suggest you monitor your accounts frequently and be alert to prevailing market conditions, especially respecting concentrated positions, so that you can take preventive action in avoiding involuntary liquidations.

While it is not our intention to discourage you from using margin for buying and selling securities or for borrowing to satisfy your other business and personal needs, we believe that it is in your self-interest to focus on the market risks associated with all margin loans in order for you to make an informed decision.

Interest on Cash Balances in Securities Accounts

Wedbush Securities pays interest on free credit balances left on deposit with us for investment or reinvestment purposes, unless you advise us otherwise. The interest paid by us is a floating rate with periodic adjustments. Interest amounts of less than \$1.00 per month will not be credited.

Business Continuity Plan Information

Wedbush Securities ("Wedbush") is committed to protecting the interests of clients at all times. Wedbush has developed a plan to provide for business continuity (Continuity Plan) in the event that business is disrupted. The Continuity Plan addresses all critical business processes, including providing clients with the ability to buy and/or sell and providing access to securities and funds.

The Continuity Plan addresses interruptions that are either localized or regional in scope, whether short or long term, regardless of the cause. The Continuity Plan is reviewed and tested annually and has been approved by senior management.

Wedbush maintains multiple sales offices that are geographically dispersed. In the event of a disruption that affects your local sales office, you will be able to contact other offices where our professionals will have access to your account information and can provide you the normal level of services. Contact information for each sales office is posted on the website under "Office Locations." You may also continue to view your account information and process your activity using ClientLink over the Internet.

Should a disruption occur at our headquarters in Los Angeles, California, some operational functions may be temporarily disrupted while staff relocate to predetermined alternative sites.

Wedbush has information technology services that are housed and operate concurrently in dual, geographically dispersed sites. Either site is capable of supporting all critical functions should one site be disabled. Information is also backed up and stored at a third location at predetermined intervals. Any business disruption at Wedbush will not result in the loss of your account information, securities or money.

Your account information and transaction history are also stored at our data processing provider that has its own business continuity plan that is regularly tested. Your securities and funds are held at banks, custodians and other providers of services to the securities industry that each have their own successfully tested business continuity capabilities. These facilities are all located remotely from Wedbush's corporate data processing sites. In the event that a disruption occurs that affects Wedbush, relevant information, including contact information, will be prominently displayed on the website.

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Introduction

Federal regulations state and internal corporate policies require that APEX Clearing Corporation (**APEX Clearing**) develop **Business Continuity Planning and Disaster Recovery Programs**. These programs must be continually reviewed and updated. While developing and maintaining these plans, APEX Clearing must consider the organizational, managerial and technical environments in which disaster recovery plans will be implemented and assess the types and likely parameters of disasters most likely to occur and their resultant impacts on the Company's ability to perform its critical business processes.

APEX Clearing's Business Continuity Plan is intended to provide a framework for reconstructing vital operations to ensure the safety of employees and the resumption of time-sensitive operations and services in the event of an emergency. At the same time, it is intended to be a guide to maintain flexibility and not a series of defined instructions. The nature of the interruption will determine how the business continuation plan is applied.

Scope of Business Continuity and Disaster Recovery

The goal of these procedures is to restore the firm's critical functions and essential and necessary systems as quickly as possible, based on priority.

Many of the applications which are critical to maintaining Apex business functions are not hosted by Apex; rather they are hosted by business partners such as Broadridge, DTCC, BONY, and PEAK6. In those cases, our business continuity and disaster recovery responsibilities are to ensure we have connectivity to these parties and the required applications are available.

Business Continuity Strategy

The Firm employs an 'always-on' technology architecture that provides near-seamless continuity in the event of a myriad of failure scenarios. This focus on continuity enables the Firm to be unaffected by the vast majority of potentially catastrophic localized events such as a fire in an office building or data center. To maintain continuity for both our physical infrastructure and software architecture, the Firm maintains multiple data centers. If an event occurs that threatens the Firm's Business Continuity, any one data center can take over all critical and necessary functions with little or no intervention, as they are always available and highly fault-tolerant. In the event a business continuity event does impact the availability of a critical computing service, the Firm will follow the Disaster Recovery Strategy to restore the impacted service(s).

Disaster Recovery Strategy

In the event of a disaster, the Firm's immediate concern is for the safety of its employees. Once steps have been taken to protect its employees, the Firm identifies the scope of the incident. If the emergency appears to affect a primary data center, another critical facility or service, or if access to a



critical firm facility is prohibited, a Firm Officer will declare a disaster, which initiates the recovery procedures. Once access to the facility is permitted, a damage assessment is made to determine the estimated length of the outage. If access to the facility is precluded, then the estimate must include the time until the effect of the disaster on the facility can be evaluated.

Alternate Communication

APEX may use a wide range of communication systems to communicate with its customers, employees, counter-parties, and regulators including, but not limited to: telephone; mail; fax; e-mail; instant message; APEX website; vendor systems (such as Bloomberg); and personal meetings. In a disaster scenario where one of the two APEX data centers is unavailable, communication systems exist in the alternate data center.

Alternate Locations

Apex employees are equipped to work from home in the event a damaged facility cannot be entered. Apex maintains office space in Dallas, Chicago, New York and Portland. Employees may be temporarily transported to alternate locations if needed.

Financial and Operational Assessments

Apex has set forth procedures for operational, financial, and credit risk exposures in the event of a significant business disruption. The stated procedures are below:

Operational Risk

In the event of a significant business disruption APEX will evaluate the situation and establish which communication system will be most effective to communicate with customers and critical business constituents.

Responsibility for daily account servicing and operations is shared between APEX Business Operations and Broadridge. Work may be shifted between the entities if one location is temporarily unavailable. Broadridge has a separate Business Continuity Plan in the event their office is unavailable.

Financial and Credit Risk

In the event of a significant business disruption, APEX will review its financial status to determine the appropriate measures. The determination will be based upon

- impact of the disruption to conducting business
- the ability to satisfy obligations with counter-parties
- contacting banks or other counter-parties to secure financing as needed
- current state of capital and the ability to support business requirements

A disruption impacting APEX's ability to conduct business may occur either at APEX itself or at the third party. A critical third party may be in the form of a Business constituent, Bank and/or Counter-party.



APEX will secure business continuity procedures for third parties that are critical to the conduct of APEX's business. All contracts with critical third parties will include assurances regarding the third party's disaster recovery plans and a determination will be made as to whether the third party is able to continue providing critical services.

Prompt Access to Funds and Securities

When a customer's access to funds and securities is impacted by a significant business disruption, customers will be notified by whatever expedient means is available (telephone, e-mail, etc.). If APEX is unable to continue business operations, customers will be notified of an alternative financial institution where they may conduct business and access their funds and securities promptly.

Regulatory Reporting

In the event of a significant business disruption affecting offices responsible for regulatory reporting, regulators will be contacted to determine which means of filing are available under the circumstances to meet filing requirements. In the event APEX cannot contact regulators, required reports will be filed using available communications means.

Plan Testing

Testing the Business Continuity Plan and validating the recovery procedures is an essential element of preparedness. APEX carries out partial tests of individual components and recovery plans of specific functions on a regular basis and performs comprehensive tests of our continuity and recovery capabilities on an annual basis.



[Legal/Disclosures](#) > [RBC Correspondent Services Disclosures](#) > [RBC Correspondent Services and Regulatory Disclosures](#) > [Business Continuity Plan](#)

Business Continuity Plan

Business Continuity Plan

To our Clients and Prospective Clients:

RBC Capital Markets, LLC ("RBCCM LLC" or the "Firm") is committed to protecting its employees, clients and their assets at all times, including during emergencies or significant business disruptions. The Firm's Enterprise Business Continuity Program has been developed to provide a reasonable, but not absolute, assurance of business continuity in the event of a disruption to the Firm's normal operations.

As part of this commitment, and in compliance with internal policies and industry regulations, the Firm has developed and implemented Business Continuity Plans (the "Plans") for its business units. Each Plan is developed by identifying each business unit's critical risks and documenting the functional requirements needed to reestablish essential business operations. The Plans document the actions and procedures to be followed before, during, and after a prolonged service outage resulting from the loss of operational facilities, critical information systems, or essential personnel. In instances by which business processes require recovery from a significant operational disruption, the Plans include off-site recovery environments, work-area displacement agreements, and/ or work-from-home arrangements.

The Firm conducts annual disaster recovery exercises, designed to ensure computing systems and networks are built with sufficient redundancies. The Firm also requires all business units conduct an annual contact exercise to ensure personnel, particularly recovery team personnel and their alternates, can be contacted at any time, on short notice. In addition, Plans are tested throughout the year in an effort to ensure that the Firm and its clients are provided with a recovery solution most conducive to their needs.

The Firm relies on the availability, capacity, and reliability of information technology. Each primary computer center has a corresponding back-up/disaster recovery site that is established away from the Firm's primary facilities. The Firm's computer centers are equipped with stand-alone electrical power and cooling capabilities sufficient to run for several weeks without relying on utility power. In an effort to ensure that applications are restored within a period of time acceptable to the business, applications have been prioritized, and their recovery requirements are based off of that prioritization.

The Firm's incident management team is responsible for the coordination of communication and response procedures in the event of a disruption or possible disruption to normal operations. Included in the incident management team's responsibilities is the communication of the Plans with regulatory agencies and key business partners. Members of the incident management team, and its procedures and protocols, have been documented in the Plans. Pertinent updates to this disclosure statement will be posted on the Firm's websites, as required by applicable law or regulation. Hard copies of the disclosure statement can be obtained by contacting your representative of the Firm.

The Plans are confidential and proprietary in nature and are therefore not made available for public distribution.

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Disclosures

Business Continuity Disclosure Statement

Electronic Transaction Clearing, Inc. ("ETC") is committed to protecting the interests of clients at all times. ETC has developed a plan to provide for business continuity (Continuity Plan) in the event that business is disrupted. The Continuity Plan addresses all critical business processes, including providing clients with the ability to buy and/or sell and providing access to securities and funds.

The Continuity Plan addresses interruptions that are either localized or regional in scope regardless of the cause. The Continuity Plan is reviewed and tested annually and has been approved by senior management.

Should a disruption occur at our headquarters in Los Angeles, California, some operational functions may be temporarily disrupted while staff relocates to predetermined alternative sites.

ETC has Information Technology services that are housed and operate concurrently in dual, geographically disperse sites. Either site is capable of supporting all critical functions should one site be disabled. Any business disruption at ETC will not result in the loss of your account information, securities or money.

Your securities and funds are held at banks, custodians and other providers of services to the securities industry that each have their own successfully tested business continuity capabilities. These facilities are all located remotely from ETC's corporate data processing sites.

In the event that a disruption occurs that affects ETC, relevant information, including contact information, will be prominently displayed on the website.

Order Routing Policy

Rule 11Ac1-6 under the Securities Exchange Act of 1934 requires all broker-dealers that route customer orders in equity and option securities to make publicly available quarterly reports that disclose the venues to which it routes "non-directed" orders in covered securities. ETC does not route "non-directed" orders. All routing decisions are made by ETC's clients.



About ETC

ETC was founded in late 2007 by a group of innovative clearing and trading... see more



Our Culture

The ETC Brand is known for its innovation, efficiency and transparency – all three of which allow ETC to deliver... see more



News & Perspectives

Perspectives and opinions that impact us and our clients

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ICBCFS

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 New York, New York 10019
FAQ Telephone (212)993-7300

ICBCFS
Disaster Recovery Site
Toll Free Phone Number
888-528-1402

ICBCFS – Disaster Recovery and Business Continuity Information

SYSTEM REDUNDANCY

Industrial and Commercial Bank of China Financial Services, LLC is located in New York, NY and maintains a dedicated disaster recovery site at Carlstadt, NJ. Mission critical systems and core infrastructure in our New York data center facility are replicated (Mirrored) which includes network infrastructure and data replication to our fully redundant disaster recovery site. In addition, critical network connectivity to third party partners, vendors and clients are duplicated in our alternate dedicated site.

All data systems deployed in our primary data centers in New York are protected by Universal Power Supply (UPS) and backup diesel power generators and are tested monthly. Daily backups of data are processed and secured off site by top rated data recovery storage providers. A secondary copy of daily data backups media are also kept in-house to comply with record retention guidelines.

Business Continuity

ICBCFS business continuity processes is managed and overseen by dedicated experienced staff that comprised of representative within our Technology, Operations, Compliance, Client Services and Senior Management. There are many different assessments that determine disaster recovery protocols:

- Fire
- Natural Disaster
- Power Failure (Blackouts)
- Terrorist attacks
- Organized or deliberate disruptions
- System and/ or equipment failures
- Human error
- Computer viruses
- Legal issues
- Worker Strikes
- Pandemic (Avian Flu)

A good plan takes into account many different factors. The most important are:

- Critical business applications and technology requirements in-place in the event of a declared site closure or disaster
- Department sitting arrangement on our dedicated space
- Telephone Tree – to notify all key personnel which includes customers and third party providers of the problem and assign them tasks focused toward the recovery plan.
- Transportation – transporting people to the actual disaster site
- Disaster Recovery Facilities

Employee Relocation Sites

In the event of a site closure or a declared disaster, ICBCFS has a comprehensive employee rendezvous point as part of the relocation. This plan provides specific direction on where critical personnel will function from if an event occurs. The relocation sites are tested on a daily basis and full system test that includes personnel from all respective areas are routinely scheduled throughout the calendar year. In addition to standard testing, employees frequently or randomly work from the alternate site on a regular business day to test the authenticity of each systems/services as close to or not identical to production.

Systems

Part of the business continuity plan are detailed tasks covering all facets for disaster recovery and site functionality. These tasks are used as a reference in the event of site closure or a declared disaster. Each task is comprised of several sections: Infrastructure Network connectivity, Application delivery, Voice broadcast system, phone, recorders and fax, Printing, Remote access, Market data, Backup services and Revert actions.

Internal/External Call Trees

ICBCFS business continuity plan incorporates a call tree system that serves as core communications on the first stages of an event. This method allows us to re-group to contact other staff members and critical team facilitators in the case of an emergency declaration. Each employee carries an Emergency Contact Card which they could dial a toll free number to contact or listen to important firm wide messages.

ICBCFS Client Notification

In the event of an emergency being declared, PDS utilizes a vendor, COA Secure, to issue a Voice Blast to its clients notifying of the emergency and communicating to them the numbers they can be contacted on. In addition, all clients, when they start up, are given a website (<http://pdsdrinfo.com>) that contains the contents of this document, as well as any additional real time information, as it becomes available.

Third Party Applications

Third party applications are tested as part of our BCP plan and we are active in all industry tests throughout the year. For all third party applications at our disaster recovery site we maintain an identical network infrastructure connectivity running parallel with our production site. Complete with redundant account setup so there is no need for human interaction to enable this application and connections in case of site closure or a declared disaster.

Example of partners with established connectivity:

DTCC
 LOANET
 SLAC/FICC
 Bank of New York
 BrokerTec
 FNRA
 Bloomberg
 ICAP
 Euroclear

Crisis Management

Business continuity has always been regarded at the highest level of importance-among all employees and senior management at ICBCFS. These plans were actively tested and implemented during the tragic attacks of September 11, 2001 and the North East Blackout of August 14, 2003.

Industrial and Commercial Bank of China Financial Services, LLC
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ICBCFS Disaster Recovery Site Rev. 2 11/02/10

Website powered by Network Solutions®

BCP Information Services