

**VECTORGLOBAL WMG, Inc.**

**Business Continuity Plan (BCP)**

**2021**

# VectorGlobal WMG Business Continuity Plan

This document addresses VectorGlobal WMG Inc.'s (the "Firm") Business Continuity Plan. The purpose of this plan is to ensure the Firm's uninterrupted operations and/or restoration of its business and operations in the most efficient and timely manner in case of an internal or external Significant Business Disruption ("SBD").

A disruption can be caused by any accidental, natural or man-made malicious event that disrupts normal operations or services for a significant period of time. If a disaster situation arises, a communication chain among the "Emergency Contact Team" will be initiated.

## Emergency Contact Persons

Our firms' emergency contact persons are:

Carlos Gadala-Maria	CEO	305-799-3204	<a href="mailto:cgadala-maria@vectorglobalwmg.com">cgadala-maria@vectorglobalwmg.com</a>
Juan Luis Osorio	CFO	786-483-6097	<a href="mailto:jlosorio@vectorglobalwmg.com">jlosorio@vectorglobalwmg.com</a>
Santiago Santos	CCO	954-609-5432	<a href="mailto:ssantos@vectorglobalwmg.com">ssantos@vectorglobalwmg.com</a>
Oscar Mejia	AML Officer, PFO	786-897-9056	<a href="mailto:omejia@vectorglobalwmg.com">omejia@vectorglobalwmg.com</a>

These names will be updated in the event of a material change. Our Executive Representative will promptly notify FINRA of any change in this information through FINRA Contact System at <https://www.finra.org/industry/finra-contact-system> (but no later than 30 days following the change) and will review, and if necessary update, this information within 17 business days after the end of each calendar year.

*Rule: FINRA Rule 4370(f); NASD Rule 1160. II.*

## Firm Policy

Our firm's policy is to respond to a Significant Business Disruption ("SBD") by safeguarding employees' lives and firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all the Firm's books and records, and allowing our customers to transact business. If we determine we are unable to continue our business, we will assure customers prompt access to their funds and securities.

## Significant Business Disruptions

Our plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only our firms' ability to communicate and do business, such as a fire in our building or a cyber-attack. External SBDs prevent the operation of the securities markets of several 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 firms.

## Approval and Execution Authority

Carlos Gadala-Maria (CEO) a registered principal is responsible for approving the plan. Santiago Santos (CCO) is responsible for conducting the annual review. Carlos Gadala-Maria has the authority to execute this BCP.

## Plan Location and Access

Our firm maintains copies of its BCP plan, annual reviews, and changes that have been made to it for inspection. An electronic copy of our plan is located in each office and on the VectorGlobal WMG's main server. Our offsite backups are maintained at the offices of B2B Cloud Solutions at 12485 SW 137<sup>th</sup> Ave, Suite 210, Miami, FL 33186.

## Business Description

Our firm conducts business in equity, fixed income, and derivative 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 orders and execute fixed income transactions. Our clearing firms execute our equity and derivative orders. Our clearing firms compare, allocate, clear and settle all transactions. Our clearing firms also maintain our clients' accounts, can grant customers access to their accounts and deliver funds and securities. Our firm primarily services retail and institutional customers domiciled in Latin America.

Our clearing firm is Pershing LLC, a subsidiary of The Bank of New York Mellon Corporation located at One Pershing Plaza, Jersey City, NJ 07399 telephone 888-367-2563, website [www.pershing.com](http://www.pershing.com), and our contact person at that clearing firm is Joel Rivera — Lead Analyst - Global Client Relationships, telephone 321-249-4453, email [Joel.Rivera@pershing.com](mailto:Joel.Rivera@pershing.com). Should Mr. Rivera be unavailable, we may contact her supervisor Karen Dotson at 321-249-4702 or to [Karen.Dotson@pershing.com](mailto:Karen.Dotson@pershing.com).

## Office Locations

VectorGlobal WMG Inc. has U.S. offices located in Miami, FL; The Woodlands, TX; and Basking Ridge, NJ.

### Miami FL.

Our Miami, FL office is located at 1001 Brickell Bay Drive, Suite 1900, Miami, FL 33131; its main telephone number is 305-350-3350. Our employees may travel to our office by means of foot, car, train, bus, boat and plane. We engage in order taking and entry at this location.

## Basking Ridge, NJ

Our Basking Ridge office is located at 233 Mt. Airy Road, Suite 146, Basking Ridge, New Jersey 07920; the main telephone number is 201-499-7320. Our employees may travel to our office by means of foot, car, subway, train, bus, boat and plane. We engage in order taking at this location.

## The Woodlands, TX

Our Texas office is located at 1330 Lake Robbins Drive, Suite 440, The Woodlands, TX 77380; its main telephone number is 281-298-3163. Our employees may travel to our office by means of foot, car, subway, train, bus, boat and plane. We engage in order taking at this location.

## Alternative Physical Location(s) of Employees

In the event of an SBD, we will move designated key employees from affected office(s) to a Regus workplace recovery site designated by management. The full list of Regus Workplace Recovery Sites is available at [www.regus.com/workplace-recovery](http://www.regus.com/workplace-recovery). Additional staff will also relocate to a predetermined, unaffected location or will work from their homes.

The primary backup office location will be the Orlando, FL Regus Virtual Office located at:

Address: 6900 Tavistock Lakes Blvd., Suite 400, Orlando, FL 32827

Phone: 321-424-6500

If this location is deemed unsafe for any reason, the secondary backup office location will be the Tampa, FL Regus Virtual Office located at:

Address: 2202 N Westshore Blvd., Suite 200, Tampa, FL 33607

Phone: 813-639-7500

## Employee Relocation / Remote Team

In the event of a SBD, Team A has agreed to relocate to the primary or secondary backup office location. Each employee will be responsible for bringing all materials needed to conduct business as usual (computer, monitors, power cables, chargers, cell phone with Jive app installed.) Once the BCP has been engaged, Teams will follow the plan as written.

### TEAM A

Operation: Shelby Torres

Compliance: Oscar Mejia

Trading: Eric Urena

Mutual Funds: Philip Gadala-Maria

## TEAM B

Team B will NOT be required to relocate, but will be expected to work remotely from the nearest safe area and remain in contact with Team A. Each employee will be responsible for bringing all materials needed to conduct business as usual (computer, monitors, power cables, chargers, cell phone with Jive app installed.) Once the BCP has been engaged, Teams will follow the plan as written.

Operations: Luis Sicco

Compliance: Santiago Santos

Trading: Melvin Saballos and Aaron Brito

As soon as the Miami office building is deemed safe to reenter, the following person(s) will return to the office to reboot the servers and any other critical systems:

IT Technicians (B2B Cloud Solutions)

Juan Manuel de los Reyes

Andrea Narbona

*Rule: FINRA Rule 4370(c) (6).*

## Customers' Access to Funds and Securities

Our firm does not maintain custody of customer's funds or securities, which are maintained by our clearing firm, Pershing LLC, a subsidiary of The Bank of New York Mellon Corporation. 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 firms on their behalf. If we cannot be reached, our customers may call Pershing LLC directly at 888-367-2563 for liquidating orders, check requests, and wire requests only. 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.

*Rules: FINRA Rule 4370(a); Securities Exchange Act Rule 15c3-1; see also 15 U.S.C. § 78eee. Data Back-Up and Recovery (Hard Copy and Electronic)*

## Data Back-Up and Recovery (Hard Copy and Electronic)

Our firm maintains its primary books and records electronically, which are backed up daily on its servers maintained in Florida as well as the offsite backup location hosted by B2B Cloud Solutions at 12485 SW 137<sup>th</sup> Ave, Suite 210, Miami, FL 33186. The Firm has outsourced its IT requirements to B2B Cloud Solutions who maintains our electronic equipment.

Juan Luis Osorio, CFO, is responsible for the maintenance of financial books and records, and all information and communication systems including electronic back up of the Firm's server. Our firm maintains the following document types and forms that are not transmitted to our clearing firms: Financial records; client instructions regarding wire movements (not third-party); supplemental incorporating documents for entities; client correspondence; e-mail; and employment records.

Order tickets and blotters are maintained by our clearing firms in electronic form. Our firm prints and maintains copies of order tickets and blotters, with signature approval by firm principals, in paper form at its headquarters in Miami, FL.

Our firm maintains the original paper account opening documentation and relies on our clearing firm Pershing LLC to maintain an electronic record that is accessible via its Internet application. Each employee is responsible for storing all specific business records on the main server where it is backed up daily.

With respect to e-mail, the Firm utilizes the services of Global Relay Communications Inc. located at 286 Madison Avenue, 7th Floor, New York, NY 10017, telephone 866-484-6630. Our contact is Kevin Zhang and his email are [Kevin.Zhang@globalrelay.net](mailto:Kevin.Zhang@globalrelay.net). The company's web site is [www.globalrelay.com](http://www.globalrelay.com). Global Relay, which provides access for supervisory review and creates electronic backup copies for the Firm, outsources the hosting of our firm's e-mail addresses to AppRiver. Upon request, Global Relay delivers additional copies on electronic media to the Firm.

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 alternate location noted for the SBD area. For the loss of electronic records, we will either physically recover the storage media or electronically recover data from B2B Cloud Solutions which will ship the imaging server to any location in the continental US.

*Rule: FINRA Rule 4370(c) (1).*

## Financial and Operational Assessments

### Operational Risk

In the event of an SBD, we will immediately identify what means will permit us to communicate with our customers, employees, business constituents, banks, counterparties, and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options we will employ will include telephone, cell phone, and telephone voice mail, secure e-mail via Global Relay or

Bloomberg. In addition, we will retrieve our key activity records as described in section the [Data Back-Up and Recovery \(Hard Copy and Electronic\)](#) section above.

*Rules: FINRA Rules 4370(c) (3), (c) (4), (c) (5), (c) (7), (c) (9 & (g) (2).*

## 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. Typically, our firm executes fixed income transactions on a riskless principal basis and maintains little or no inventory which serves to minimize these concerns. The Firm will contact both clearing firm's 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 financing from our parent company sources to fulfill our obligations to our clients. If we cannot remedy a capital deficiency, we will file appropriate notices with FINRA and immediately take the appropriate steps.

*Rules: FINRA Rules 4370(c) (3), (c) (8) & (g) (2).*

## Mission Critical Systems

Our firms' "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. Our clearing firm's trading system is through NetX360 (Pershing LLC).

Other mission critical systems include: local and long distance telephone service via contracts with Jive and Vonage; TRACE fixed income reporting to FINRA via Internet; Bloomberg services for electronic execution of fixed income transactions for market data services and fixed income information, and email/instant messaging with other dealers; cloud based accounting software provided by Sage Intacct; and with respect to e-mail via contract with Global Relay and AppRiver that host our firm's e-mail addresses, provide access for supervisory review, and create electronic backup copies.

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, order entry, and fixed income execution. Our clearing firm's contract provides execution (other than fixed income), 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's 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. 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 are 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 several remote sites. Our clearing firm represents that it operates a back-up operating facility in geographically separate areas with the capability to conduct the same volume of business as its primary site. Our clearing firm has also confirmed the effectiveness of their back-up arrangements to recover from a wide scale disruption by testing, and they have confirmed that they test their back-up arrangements periodically.

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, and various external factor 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’s SBD recovery time and resumption objectives range between real time and four to twelve business hours.

## Our Firm’s Mission Critical Systems

### 1. Order Taking

Currently, our firm receives orders from customers via telephone or by their duly appointed agent. During an SBD, either internal or external, we will continue to take orders via available and reliable telephone or cell phone service, and in addition, as communications permit, we will inform our customers when communications become available to tell them what alternatives they must send their orders to us. Customers will be informed of alternatives by telephone, e-mail or a web site posting. If necessary, we will advise our customers to place orders directly with our clearing firm 888-367-2563 (Pershing LLC).

### 2. Order Entry

Currently, our firm enters orders by recording them electronically and sending them to our clearing firm 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, which include cell phone, e-mail or by messenger. In the event of an external SBD, we will maintain the orders in electronic or paper format and deliver the order to the clearing firm or over the counter dealer by the fastest means available when it resumes operations.



### 3. Order Execution

We currently execute fixed income orders in the over the counter market by telephone with other dealers or electronically through a Bloomberg terminal. In the event of an internal or external SBD, we will utilize available standard telephone or cell phone service, e-mail and Internet access.

### 4. Other Services Currently Provided to Customers

In addition to those services listed above in this section, the client or duly appointed representative can access their accounts via the websites provided by Pershing, [www.netxinvestor.com](http://www.netxinvestor.com) and [www.netx360.com](http://www.netx360.com), respectively. Clients or duly appointed representatives can place stock orders via web access to their accounts.

### Mission Critical Systems Provided by Our Clearing Firm

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

*Rules: FINRA Rules 3510(c) (2) & (g) (1).*

## Alternate Communications between the Firm and Customers, Employees, and Regulators

### Customers

We now communicate with our client's using the telephone, e-mail, fax, U.S. mail, overnight courier and personal visits at our firm or at the client'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 a paper copy via the U.S. mail.

*Rule: FINRA Rule 4370(c) (4).*

## Employees – Call Tree

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 our employees. We will also utilize a call tree so that senior management can reach all employees quickly during an SBD. The call tree for our three U.S. offices includes office and cell phone numbers.

The individuals authorized to invoke use of the call tree are Carlos Gadala-Maria, Juan Luis Osorio, Oscar Mejia, and Santiago Santos. The call tree is as follows:

### **CEO - Carlos Gadala-Maria will call:**

Juan Luis Osorio, Santiago Santos, Oscar Mejia, Eduardo Vale, Claudia Batlle, Eric Urena, and Luis Sicco.

All Mexico Links and their assistants (Maria Pia Acevez, Lorenzo Guzman, Gibran Abdala)

### **CFO - Juan Luis Osorio will call:**

Irella Solano, Geraldine Martinez, Genaro Immediato, Adriana Lopez

### **CCO - Santiago Santos will call:**

Maria Wright, Enrique Lara

### **BROKERS / LATAM – Eduardo Vale will call:**

Monica Cleves, Pablo Alvarez, Carlos Morales.

All Venezuela FAs, Chile FAs, Colombia FAs, Ecuador FAs, Peru FAs, and Panama FAs

### **TRADING - Eric Urena will call:**

Melvin Saballos, Carlos Rivera (NJ,) Aaron Brito, Alejandra Rivera

### **FAMILY OFFICE - Claudia Batlle will call:**

Eduardo Arriaga, Asset Team

### **OPERATIONS - Luis Sicco will call:**

Shelby Torres, Dulce Hernandez, Elluz Gomez, Paola Quintero, Karina Barboza

**TEXAS - Antonio Fernandez will call:**

Brenda Garcia, Paulina Merino

*Rule: FINRA Rule 4370(c) (5).*

## Regulators

The Self-Regulatory Organization (SRO) that we are currently members of is FINRA. We communicate with FINRA using the telephone, e-mail, Internet, 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 communicate with FINRA.

*Rule: FINRA Rule 4370(c) (9).*

## Critical Business Constituents, Banks, and Counter-Parties

### Business Constituents

We have contacted 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), and determined the extent to which we can continue our business relationship with them considering an internal or external SBD. We will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services because of an SBD to them or our firm. Our major suppliers are shown in the list below.

*Rules: FINRA Rule 4370(c) (7).*

### Vendor Contact Information

VENDOR NAME	PURPOSE AND ACCT. NUMBER	MAIN CONTACT	PHONE NUMBER
B2B Cloud Solutions	IT Support for all offices	Frank Fernandez, Partner	(Direct) 305-216-7400 <a href="mailto:Ff@b2bcloudsolutions.com">Ff@b2bcloudsolutions.com</a> (Help Desk) 305-593-9934 <a href="mailto:Support@b2bcloudsolutions.com">Support@b2bcloudsolutions.com</a>

Jive Communications	VOIP / phones for: Miami, Texas, New Jersey CN-709063-1811	N/A	866-768-5429
Vonage	Phones for: Chile, Colombia, Ecuador, Panama, Peru, Venezuela Acct#: 1008151292 Pin: 8842	N/A	866-243-4357
Verizon Internet	Primary ISP (Miami)	Akash Ray	703-694-6266 <a href="mailto:Akash.Ray@verizon.com">Akash.Ray@verizon.com</a>
Bloomberg	Counterparty communication and trading Miami: 30175466	Tatiara Malagoli	212-617-0537 <a href="mailto:Tmalagoli@bloomberg.net">Tmalagoli@bloomberg.net</a>
Pershing LLC	Clearing and execution (JVE)	Joel Rivera	321-249-4453 <a href="mailto:Joel.Rivera@pershing.com">Joel.Rivera@pershing.com</a>
Global Relay (e-mail)	Email archiving and review	Kevin Zhang	866-484-6630 <a href="mailto:support@globalrelay.net">support@globalrelay.net</a>
SAP Concur	Expense reports	Steph Deming	952-995-8638 <a href="mailto:Steph.Deming@sap.com">Steph.Deming@sap.com</a>
Sage Intacct	Accounting software	Luke Beck-Fridell	408-709-4909 <a href="mailto:Lbeckfridell@intacct.com">Lbeckfridell@intacct.com</a>
Brickell Bay Office Tower	Miami Office management	Ulysses Rivera	305-536-1001 <a href="mailto:Info@1001brickellbay.com">Info@1001brickellbay.com</a>
Patrinely Group	Houston Office management	Danica Hunt	281-362-8848 <a href="mailto:Dhunt@patrinely.com">Dhunt@patrinely.com</a>
ALEO Consultants / SIAC Vector	Custom Pershing integrations	Alejandro Ramos	713-852-7978 <a href="mailto:Aramos@aleoconsultants.com">Aramos@aleoconsultants.com</a>
Orion	Advisory account management (VGIAG)	Collin Yates	402-896-7199 <a href="mailto:collin.yates@orion.com">collin.yates@orion.com</a>
Lucid Site Designs	Website Maintenance	Mark Gadala	305-842-3594 <a href="mailto:Mark@lucidsitedesigns.com">Mark@lucidsitedesigns.com</a>

## Banks

We have contacted our banks and lenders to determine if they can continue to provide the financing that we will need considering an internal or external SBD. The bank maintaining our operating account is Citibank, N.A., 399 Park Avenue, New York, NY 10043, contact Thomas Christopher Jr. at 203-975-6920.

Our clearing firm is Pershing LLC, a subsidiary of The Bank of New York Mellon Corporation located at One Pershing Plaza, Jersey City, NJ 07399 telephone 888-367-2563, website [www.pershing.com](http://www.pershing.com), and our contact person at that clearing firm is Patricia Gray — Lead Analyst - Global Client Relationships, telephone 321-249-4453, email [Joel.Rivera@pershing.com](mailto:Joel.Rivera@pershing.com). Should Mr. Rivera be unavailable, we may contact her supervisor Kren Dotson by phone: 321-249-4702 or email, [karen.dotson@pershing.com](mailto:karen.dotson@pershing.com)

*Rules: FINRA Rule 4370(c)(7).*

## 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 considering an 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 any open transactions as soon as possible.

*Rules: FINRA Rule 4370(c)(7).*

## Regulatory Reporting

Our firm is subject to regulation by the SEC, FINRA, and various states. We now file reports with our regulators electronically using the Internet and using paper copies via the U.S. mail. 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 use the means closest in speed and form (written or oral) to our previous filing method. If we cannot contact our regulators, we will continue to file required reports using the communication means available to us.

*Rule: FINRA Rule 4370(c)(8).*

### **SEC Headquarters**

Address: 100 F Street, NE Washington, DC 20549

Phone: (202) 942-8088

<http://www.sec.gov/>

## **FINRA**

Address: 1735 K Street, Washington DC, 20006

Phone: FINRA Call Center: (301) 590-6500

<http://www.finra.org/index.htm>

Customer Complaint statistics are filed electronically on a quarterly basis via Internet at

<http://www.finra.org/Industry/Compliance/RegulatoryFilings/CustomerComplaints>

FOCUS Reports are filed electronically on a monthly basis via Internet at

<https://firms.finra.org/efocus>

Original paper copies of audited year-end financial statements are sent by overnight courier to the SEC both in Miami and Washington D.C.

### **Securities and Exchange Commission**

801 Brickell Avenue, Suite 1800

Miami, FL 33131

### **Securities and Exchange Commission Registrations Branch**

Mail Stop 8031 100 F Street, NE

Washington, DC 20549

As of 2011 FINRA receives audited financials electronically only.

## **Disclosure of Business Continuity Plan**

We will disclose a written summary of our BCP to customers at account opening and annually. We will also mail it to customers upon request. Our current disclosure statement is attached. Our summary addresses the possibility of a future SBD and how we plan to respond to events of varying scope.

In addressing the events of varying scope, our summary (1) provides specific scenarios of varying severity (e.g., a firm-only business disruption, a disruption to a single building, a disruption to a business district, a city-wide business disruption, and a regional disruption); (2) states whether we plan to continue business during that scenario and, if so, our planned recovery time; and (3)

provides general information on our intended response. Our summary discloses the operating areas covered and the existence of back-up facilities and arrangements. Alternative telephone numbers will be provided when available as well as how to contact our clearing firm and the services they might provide to customers in the event of a significant business disruption.

*Rule: FINRA Rule 4370(e).*

## 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 conduct a full text of this plan every Spring (May 1<sup>st</sup>) to ensure all parties involved in the execution of the plan and all employees understand the requirements and steps involved.

*Rule: FINRA Rule 4370(b).*

## SIPC

Should the firm be unable to recover from a disaster, the firm will follow SIPC liquidation procedures.

### **Securities Investor Protection Corporation**

805 15th Street, N.W. Suite 800

Washington, D.C. 20005-2215

Phone: (202) 371-8300

<http://www.sipc.org>

Email: [askspic@spic.org](mailto:askspic@spic.org)

For any questions regarding this Business Continuity Plan, please contact our Compliance department at 305-350-3350.

# Senior Manager Approval

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

*Rule: FINRA Rule 4370(d).*

Signature: Carlos Gadala-Maria

CEO & President  
Title: \_\_\_\_\_

05/21/2021  
Date: \_\_\_\_\_