

Business Continuity Plan Disclosure

Firm policy

Beta Capital Securities LLC's ("Beta" or the "Firm") Business Continuity Plan (BCP) is to respond to a Significant Business Disruption (SBD) by safeguarding employees' lives and Firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of the Firm's books and records, and allowing our customers to continue conducting 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. Our BCP addresses mission critical systems, financial and operational assessments, alternative communications with customers, employees and regulatory and alternate physical locations, amongst others, consistent with applicable regulations, including FINRA Rule 4370.

Our plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only our Firm's ability to communicate and do business, such as a fire in our building. External SBDs prevent the operation of the securities markets of a significant number of Firms, such as a terrorist attack, a city flood, hurricane or a wide scale, regional disruption. Our BCP is also designed to be robust enough to cover business disruptions that are widespread events (as outlined previously) that impact the financial industry in an entire city or geographic region.

Our Firm conducts business in equity, fixed income, and derivative securities. Our Firm is self-clearing and as such performs clearing functions for itself. Furthermore, client assets are segregated and adhere to SEC, FINRA and NFA regulations. Beta is a highly regulated entity and is supervised by the Securities Exchange Commission (SEC), Financial Industry Regulatory Authority (FINRA) and National Futures Association (NFA). As such, client assets and funds are segregated as part of its ongoing efforts to protect all customers. BCS has contracted Broadridge BPO to assist with the clearing and settlement of our transactions. Our Firm has designated certain management personnel responsible for the implementation and ongoing enhancement of our BCP and strategy. We will ensure that we have the ability to continue operations and activities from a number of alternative resources and sites.

Communication in the event of a disruption

Our plan addresses disruptions of varying scope and magnitude including:

- Disruption of service at any of our service centers will result in calls, orders, and electronic communications being rerouted to an alternative location.
- A significant disruption in our primary data center will result in a transition to systems at an alternate data center. Our data centers are each supported by backup generators and are located in different regions of the country with different power grids.

Our Firm's mission critical systems

Order Taking and Execution

During an SBD, either internal or external, we will continue to take orders through any of these methods that are available and reliable, and in addition, as communications permit, we will inform our customers when communications become available to tell them what alternatives they have

to send their orders to us. Customers will be informed of alternatives by telephone, fax, e-mail, in person or any other method available. We execute all order via telephone or through electronic medium. In the event of a SBD, we would move to our alternate location and proceed to take and place order via telephone or through electronic medium.

Customers' access to funds and securities

During a SBD, you may contact the Firm at +1 (305) 358-8844, or contact your registered representative directly. These lines and other critical Firm telephone numbers will be redirected to alternative numbers in order to be able to service your account. If you cannot access us through these means, you should contact our backoffice provider, Broadridge Solutions:

BROADRIDGE MANAGED SERVICES

Two Gateway Center, 283-299 Market Street

07102, Newark, NJ

Phone: +1 (201) 714-3000, +1 (800) 353-0103

The Firm maintains custody of customers' funds and securities which are primarily maintained at the following depository banks and institutions:

BMO Harris Bank N.A

115 S. LaSalle Street

60603, Chicago, IL

Phone: +1 (312) 461-2109, +1 (888) 340-2265

Fax: +1 (312) 765-8353

DTCC

55 Water Street – 1 Sub Level

10041, New York, NY

Phone: +1 (813) 470-1254, +1 (888) 382-2721

EUROCLEAR

1 Boulevard du Roi Albert II

1210 Brussels, Belgium

Phone: +1 (646) 835-5411

ALLFUNDS BANK

2 Fitzroy Place, 8 Mortimer Street

W1T 3JJ, London, UK

Phone: +44 (0)20 7758 5004

In the event of an internal or external SBD, if telephone service or an internet connection is available, our registered representative will take customer orders or instructions and contact our

executing broker/dealers and then contact Business Process Outsourcing partner “Broadridge” to provide trade information.

Other

This plan shall be updated in the event of any material change and shall, at a minimum, be reviewed annually to determine whether any modifications are necessary.

Disclaimer

Beta’s comprehensive business continuity strategy is designed to enable us to meet our existing obligations to our clients and customers even in the event of an emergency or significant business disruption; however, it is not infallible. The plan is designed to work in many different emergency situations; but these events are, by their nature, unpredictable and it is impossible to anticipate every scenario that could cause a business disruption. Furthermore, although we are confident in our own preparedness, Beta Capital Securities LLC has no control over the various entities that we must rely upon in the event of an emergency. Our business continuity plan is subject to change without notice. In the event that this BCP is modified, the updated document will be promptly posted on the Beta Capital Securities LLC website www.creand.us or www.creditandorragroup.us.en. For further information, please contact compliance@creand.us

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