

SDDCO Brokerage Advisors LLC

MEMBER: FINRA/SIPC

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The
SDDCO
Group

Business Continuity Plan Summary Disclosure

Overview

SDDCO Brokerage Advisors LLC (“**SDDCO-BA**,” the “**Firm**”) has created and implemented a business continuity plan (“**BCP**”) in an effort to mitigate the effects related to unforeseen business interruptions. This BCP is designed to enable the Firm to continue business operations in the event of an emergency or significant business disruption (“**SBD**”).

Communications and Locations of Employees During a Disruption

In the event of an SBD, SDDCO-BA will communicate with its employees in several different ways. The Firm will employ a calling tree, which would be implemented by management in the event of an SBD. The BCP also addresses the relocation of staff to alternative back-up location(s) where necessary, from which representatives may be able to run the Firm’s private fund marketing, corporate advisory, trading, and consulting business lines for an interim period of time. Recovery time for most of the Firm’s communications and software applications, and relocation to the alternate location, is expected to range from immediate to 24-48 hours depending upon the facts and circumstance on the ground. But these recovery times can be materially dependent upon the Firm’s use of outside vendors providing Internet services, communications systems, hosting solutions, and other technologies and facilities.

Communications with Customers

SDDCO-BA is currently able to communicate with its customers in any number of ways, including the telephone; email; fax; U.S. mail, hand delivery and overnight mail; as well as in person. In the event of an SBD, SDDCO-BA will assess which means of communication are still available and use the most efficient and effective means at hand. Additionally, if all traditional means of communication are not available, SDDCO-BA may seek to post emergency contact information and instructions on the web site of its affiliate, the SDDCO Group (www.sddco.com); or where possible, appropriate, and applicable, on the web sites of its business partners, including: Ansonia Partners, LLC (www.ansoniapartnersllc.com); Barron International Group (www.barronintl.com); Berkshire Property Advisors, LLC (www.berkshire-group.com); Eight Seven Capital, LLC (www.eightsevencapital.com); Hentschel & Company LLC (www.hentschelco.com); Royall Capital Holdings, LLC (www.royallcapital.com); and SKY Harbor Capital Management, LLC (www.skyhcm.com).

Books & Records

SDDCO-BA maintains its hard copy books and records and electronic records at its Main and Branch Offices, and back-up books and records at alternate locations. If records are lost as the result of a business disruption or for any other reason, SDDCO-BA has the means to physically recover most data from both physical and electronic back-up locations.

Vendors and Counterparties

SDDCO-BA’s BCP relies primarily upon the recovery and restoration of services provided by various critical business constituents and counterparties, both at its primary and alternate locations. SDDCO-BA has considered the extent to which the Firm may be able to depend upon these business relationships during an SBD as a part of its decision to do business with the vendor or counterparty. Where possible the Firm has engaged and/or vetted alternate arrangements in order to avoid business disruptions in the case of a business constituent not being able to provide needed goods or services in an emergency.

Disclosure

SDDCO-BA’s BCP is designed to address the continued operation of the Firm in the event of one of many different kinds of emergency situations or SBDs that could occur. However, all risks of business interruption cannot be eliminated and SDDCO-BA cannot guarantee that systems will always be available or recoverable following an SBD. Furthermore, SDDCO-BA has no control over and must rely upon the disaster recovery plans of its various critical business constituents, branches, managers, vendors, clearing firms and counterparties. In the event that material changes are made to this BCP, SDDCO-BA will make available an updated copy to all of its clients.

The information contained in this disclosure is provided by SDDCO-BA for informational purposes only, and nothing contained herein shall be construed to amend, supplement or otherwise modify any of the terms and conditions set forth in any customer agreement or other contract between you and SDDCO-BA.