

## **BUSINESS CONTINUITY PLAN DISCLOSURE (FINRA RULE 3510)**

TradingBlock, a FINRA-member firm, has developed a policy to respond to a Significant Business Disruptions ("SBD") by attempting to safeguard employees' lives, firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of TradingBlock's books and records, and allowing customers to transact business. In the event that TradingBlock determines that it is unable to continue business, TradingBlock will assure customers prompt access to their funds.

TradingBlock has a documented corporate policy requiring the development and annual maintenance of a Business Continuity Plan (hereinafter a "BCP"). Pursuant to this policy, TradingBlock Compliance/Risk Management department has the full-time responsibility of coordinating the development, testing and maintenance of all the procedures outlined in the firm's written BCP. TradingBlock's Compliance/Risk Management department manages contracts with recovery services vendors and is responsible for management reporting on all aspects of continuity. A formal process that includes a continuous review of internal controls enforces the corporate policy on continuity.

TradingBlock's BCP addresses advance preparations and actions to be taken in response to disruptions of various magnitudes. The BCP addresses the potential impact of varying levels of disruptions on employees, equipment, computer and telecommunications systems, and office facilities. While it is impossible to anticipate every type of disruption that could affect TradingBlock's business, the incidents that the BCP covers include, but are not limited to, Terrorist Attacks, Tornado Thunderstorms, Fires, Gas Leaks or Explosions, Power Outages, Bomb Threats, Earthquakes, Telephone or Network Disruptions, Attack by Computer Virus, and Biological Attacks. TradingBlock and/or its vendors maintain back-up systems and power supplies that allow critical computer and telecommunications systems, as well as facility functions, to be maintained in the event of disruptions.

For all SBDs described above, the BCP in place may permit TradingBlock to remain operational and service its customers. The duration of the disruption will depend on the nature and extent of the SBD. In the event of an SBD, where it is not possible to conduct business from TradingBlock office, the company has designated a remote alternate site equipped with sufficient resources to support critical business operations. Telephone service would be rerouted to this site. TradingBlock network data is replicated routinely and stored at a location in a different geographical location from the company's main office, enabling employees to access these systems from the remote site should the local systems become unavailable. Per TradingBlock BCP, the company is generally prepared to restore critical business functionality within a reasonable period of time given the nature of the particular SBD.

TradingBlock reviews and updates its BCP as necessary, at a minimum at least annually, to ensure the company accounts for operational, technology, business and regulatory changes. TradingBlock's BCP is subject to change. A copy of the BCP is available upon request by contact TradingBlock Compliance Department at 312.253.0378.