

# BUSINESS CONTINUITY PLAN

## **Firm Policy**

NFA Rule 2-38 and FINRA Rule 4370 require, respectively, that each NFA and FINRA Member establish and maintain a written business continuity and disaster recovery plan that outline procedures to be followed in the event of an emergency or Significant Business Disruption (“SBD”). The plan should be reasonably designed to enable the Member to continue operating, to quickly reestablish operations, or to transfer its business to another Member with minimal disruption to its customers, other Members, and the commodity futures markets.

Phillip Capital Inc. (“PCI” or the “Firm”) has developed and adopted this Business Continuity Plan (“BCP”) in an effort to provide an immediate and appropriate response to foreseeable emergency situations, protect employees, minimize disruptions to client services, portfolio management, and trading activities, protect the assets of PCI and its clients, and allow 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.

### ➤ **Significant Business Disruptions (SBDs)**

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 financial markets or a 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 non-PCI organizations and systems.

### ➤ **Approval and Execution Authority**

Cameron Frazier (Director and Co-CEO), a registered principal, is responsible for approving the plan and for conducting the required annual review. Either Cameron Frazier, Lynette Lim (Director and President), or their designee have the authority to execute this BCP.

### ➤ **Plan Location and Access**

PCI will maintain copies of its BCP plan and the annual reviews, and the changes that have been made to it for inspection. An electronic copy of our plan is located on the Firm’s Box drive.

## **Business Description**

Our Firm conducts business in futures, securities (e.g., equities, options, fixed income), and derivative securities. Our Firm is self-clearing and performs clearing functions for others. PCI holds customer funds and securities. We maintain our customers’ accounts (and/or futures guaranteed introduced broker accounts) and accept and enter orders. All transactions are executed on respective exchanges or through executing brokers; PCI also compares, allocates (where applicable), clears and settles trades. We provide our customers online access to their accounts and receive/deliver funds and securities. Our Firm services both institutional and retail customers.

➤ **Office Locations**

PCI currently has two suites located on the same floor of the Chicago Board of Trade. Its main telephone number is 312-356-9000. Our employees may travel to this office by means of foot, car, subway, train, or bus.

**Anticipated Threats**

Disasters and emergencies are, by their nature, difficult to predict. Nonetheless, PCI believes it is most important that the BCP contemplate the following potential internal or external SBDs:

- Electrical outages;
- Gas leak;
- Loss of internet connectivity or computer viruses;
- Snow or ice storms;
- Fire;
- Flood or other water damage;
- Tornado;
- Terrorist attack;
- Burglary;
- Medical emergency at PCI facilities; and
- Incapacitation of key personnel.

**Business Continuity Team**

The highest ranking employee who is available at the time of an emergency (the “Emergency Coordinator”) will oversee the implementation of the BCP. During a prolonged emergency, the acting Emergency Coordinator should seek to involve higher ranking employees who can assume the role of Emergency Coordinator. Each of the following individuals share the following contact information:

- Address: Chicago Board of Trade, 141 W. Jackson, 30<sup>th</sup> floor Ste. 3050, Chicago, IL 60604
- Facsimile: 312-356-9005

<b>Ranking (For BCP Purposes)</b>	<b>Name</b>	<b>Title</b>	<b>Email address</b>	<b>Office Phone Number</b>	<b>Cell Phone Number</b>
1	Cameron Frazier* #	CFO, Co-CEO & Director	cameron@phillipcapital.com	312-356-9001	650-804-6334
2	Lynette Lim* #	President, Co-CEO & Director	lynette@phillipcapital.com	312-356-9003	650-391-5657
3	George Cocokios# (Futures)	VP – Futures Operations	george@phillipcapital.com	312-356-9004	708-533-2329
4	Steven Milcarek* #	Senior Operations Manager-Securities	steven@phillipcapital.com	312-374-2475	708-602-4945

\*Registered securities principal  
#Senior Manager

The Firm’s Compliance Department provides FINRA with the contact information for the two emergency contact persons (including name, title, mailing address, email addressed, telephone numbers and facsimile numbers) through the FINRA Contact System (“FCS”). Specifically, Carl

Kunz (Chief Compliance Officer-Securities) will promptly notify FINRA of any change in this information through FCS (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.

### **Identification and Assessment**

If any employee becomes aware of a situation that may require implementation of the BCP, he or she must notify the highest ranking employee on the preceding list who is immediately available.

Upon receiving such notification, the Emergency Coordinator must assess the situation, including any imminent danger to employees or other people and any threat to PCI's facilities or operations. If appropriate, the Emergency Coordinator should call 911 as soon as it is safe to do so.

#### **➤ 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 may include but not be limited to: our website, telephone voice mail, secure email. In addition, we will retrieve our key activity records as described in the Protection and Recovery section (hard copy and electronic).

#### **➤ 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 depositories, 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 & immediately take appropriate steps, including contacting SIPC (if/as appropriate).

### **Evacuation or Sheltering-in-Place**

If PCI's employees are in danger, the Emergency Coordinator must determine whether employees should evacuate the building or shelter-in-place. The Emergency Coordinator will notify all employees who are onsite of the situation.

If the Emergency Coordinator calls for an evacuation, PCI's employees should meet near the large red sculpture to the east side of the post office which is diagonally opposite the CBOT building at South Clark and Jackson Blvd. If this evacuation site is unsafe, then employees should go to their homes and wait for a call from the Emergency Coordinator. If it is safer to shelter-in-place, then employees should move to an area of the building that offers the most protection from the threat and await further instruction.

### **Mission Critical Business Systems/Functions**

Our Firm's mission critical business systems/functions are those that ensure prompt and accurate processing of futures and securities transactions (including order taking, entry, execution,

comparison, allocation, clearance and settlement of futures and securities transactions); the maintenance of customer accounts; access to customer accounts; and the delivery of funds and securities. More specifically, these systems include those listed in the table below.

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 situation, and various external factors 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.

<b>Critical Business Function</b>	<b>Anticipated Impact of a Disruption</b>	<b>Required Systems and Resources</b>	<b>Critical Internal and External Interfaces</b>	<b>Relevant Deadlines</b>	<b>Target Recovery Time</b>
Submitting Exchange Reports (PCS, Large Trader, etc.)	More than ½ day could result in suspension.	CQ System (via internet), CME secure FTP site.	Internet, Telephone (issues, escalation)	Multiple (daily)	30 minutes
Daily customer seg funds and capital computation	Possible suspension	CQ system (via internet), bank online access, general ledger, CME document direct	Internet, Telephone (issues, escalation)	Customer seg (noon following day), capital (daily)	30 minutes
Maintaining accounting current ledger	Possible suspension	CQ system, general ledger,	Internet	Continuous	4 hours
Monitoring post-trade risk (customer equity)	Higher risk of customer debit accounts	Bloomberg, CQ system, Globex, Margin call list (Excel)	Internet, Telephone (issues, escalation)	Continuous	10 minutes
Enabling customer trading on Globex	Loss of customers	Globex (GC2)	Internet	Continuous	10 min
Making and monitoring margin calls.	Higher risk of customer debit accounts, possible capital haircuts	CQ system (equity breach report), Excel, recording phone line	Internet, email (margin calls), telephone	Daily	30 minutes
Variation payments to exchange	Suspension from Exchange	CME Document Direct, Harris Directline	Internet, telephone, online banking	Multiple (Daily)	10 minute
Protection of company capital and customer funds	Possible suspension from exchange and loss of customers	Bloomberg (credit ratings, market movements, news), Television, bank security features, office security (checks)	Internet	NA	10 minutes
Processing incoming/outgoing customer funds	Loss of customers, possible capital haircuts	CQ, bank online systems, bank branches (checks)	Internet, telephone, mail	At least daily	4 hours
Suspicious activity monitoring and reporting (AML)	Regulator action	Online bank access, email, SARSF	Internet	30 days	24 hours
Maintenance of records	Possible regulator action	Office file server, file server offsite backup, paper file cabinets	Internet (backups)	Continuous	2 hours
Balancing (positions)	Market risk from out of balance positions	CME document direct, CQ system, Excel	Internet	10am daily	1 hour

Providing statements to customers	Possible loss of customers and regulator action	CQ system, email	Internet, mail, fax (possible)	Daily	1 hour
Monitoring for deliveries	Financial exposure (settlement), disciplinary action by exchange or regulator	CQ system, email, document direct, Firmsoft, Prysm	Internet	Ad hoc (exchange schedule)	1 hour
Monitoring option expirations	Financial exposure (settlement), disciplinary action by exchange or regulator	CQ system, email, document direct, Firmsoft, Prysm	Internet	Daily	1 hour
MOS processing	Margins build up for trades that should have been submitted for MOS	CME FEC, CQ system	Internet	Daily	2 hours
Close outs	Margins build up and could result in large variation pay	CQ system	Internet	Daily	1 hour
Securities Order Entry (OMS)	Inability to execute customer orders/exposure to market risk	FlexTrade OMS	FIX line/possible internet backup	continuous	10 minutes
Securities Orders Execution (EMS)	Inability to report executed trades	FlexTrade OMS	FIX line/possible internet backup	daily	½ hour – end of day
Securities Safekeeping	risk of using customer securities for other use instead of segregated	Shadow	internet	continuous	½ hour
Trade comparison	risk of uncomparing trades/market exposure	Shadow/OMS/NSCC	internet	continuous	½ hour
Settlement	risk of receiving items not for PCI, not delivered items for PCI	Shadow	internet	continuous	1 hour
Corporate actions	risk off missing announcements	DTCC/Shadow/Market Data Vendor	internet	daily	1 day

### **Alternate Work Sites**

If the Emergency Coordinator determines that PCI's facilities will be unusable for an extended period, employees should work at the designated alternative work site located at 1530 S State Street, #816, Chicago, IL 60605 or from their homes. The backup work location maintains back-up work stations that include internet access, and a printer and related supplies. PCI telephones can be forwarded (e.g., to employees' respective cell phone) by contacting the Firm's telephone service provider (noted below). Fax capabilities are available nearby as well as access to all networks, systems, and software that is necessary to carry out the daily operations of the Firm, including web-based access the CQ back-office system. Key employees (including Business Continuity Team) generally have backup computers stored offsite or travel with their primary computer (laptop), providing remote access to mission critical business systems (if/as applicable).

Further, this location has communication capabilities, including telephone and email. Internet access is via wi-fi from (2) different providers. Additionally, employees are able to access their PCI email accounts via Webmail through PCI's exchange hosting service. To accomplish this, the following steps must be taken:

1. Access either [www.outlook.office365.com](http://www.outlook.office365.com) or [www.login.microsoftonline.com](http://www.login.microsoftonline.com);
2. Login with PCI email address (i.e., @phillipusa.com) and password.

To access records retained on Box, Inc., the following steps must be taken:

1. Access [www.box.com](http://www.box.com);
2. Login with Box user name (i.e., @phillipusa.com) and password.

PCI employees will have access to their Outlook Inbox, Sent Folder, Calendar and selected PCI records (depending on previously authorized permissions). However, folders that have been established on an employee's hard disk (if any) will not be accessible.

### **Protection and Recovery of Documents**

Employees should only seek to preserve documents during an emergency if it is safe to do so.

Electronic documents are backed up in real-time via a servers located in a separate location via its vendors Global Relay, Box, Inc., Autonomy Inc. (an HP Company), and Amazon. PCI's computer systems are also protected from a power failure by ten electrical feeds from six ComEd substations with automatic transfer. The following individuals are familiar with PCI's electronic backups and can reconstitute records from the backup if necessary:

<b>Name</b>	<b>Cell Phone Number</b>	<b>Outside Email Address</b>
Lynette Lim	650-391-5657	<a href="mailto:mavtjuen@gmail.com">mavtjuen@gmail.com</a>
Cameron Frazier	650-804-6334	<a href="mailto:cfrazier@chicagobooth.edu">cfrazier@chicagobooth.edu</a>
George Cocokios	708-533-2329	<a href="mailto:george41@sbcglobal.net">george41@sbcglobal.net</a>
Janet Goodridge	708-305-3600	<a href="mailto:janet.goodridge@gmail.com">janet.goodridge@gmail.com</a>

Critical paper documents (maintained at the Firm's main (sole) office) are also scanned and maintained in electronic form, negating the need for duplicate, off-site hard-copies. Cameron Frazier (312-356-9001) is responsible for the maintenance of these books and records. A list of the books and records maintained by PCI are contained in Firm's Compliance Manual. We back up our electronic records at least daily.

In the event of an internal or external SBD that causes the loss of our paper records (if any), we will physically recover appropriate records them from the respective document source. 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.

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

PCI's third-party vendors may provide critical support services following a disaster.

➤ **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 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.

➤ **Banks**

We have contacted our banks 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 Harris Bank. If Harris Bank and other lenders are unable to provide the financing, we will seek alternative financing immediately.

➤ **Counter-Parties**

We have contacted our critical counterparties, 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 those counterparties directly to make alternative arrangements to complete those transactions as soon as possible.

In the event of a disruption or disaster, the Emergency Coordinator will contact vendors as appropriate. Third-party service providers also keep copies of certain documents, as described below:

Third-Party Service Provider	Documents Retained & Instructions	Contact Information
PFPL	Back office system data	Teo Lay Beng ( <i>Primary</i> ) <a href="mailto:laybeng@phillip.com.sg">laybeng@phillip.com.sg</a> 011-65-6531-1761  Che Chern Teyu ( <i>Secondary</i> ) <a href="mailto:teyucc@phillip.com.sg">teyucc@phillip.com.sg</a> 011-65-9489-2522
Harris Bank	Settlement banking records	Nick Buckingham ( <i>Primary</i> ) <a href="mailto:nick.buckingham@harrisbank.com">nick.buckingham@harrisbank.com</a> 312-461-4657  Linda Haven ( <i>Secondary</i> ) <a href="mailto:Linda.haven@harrisbank.com">Linda.haven@harrisbank.com</a> 312-461-3993
Citibank	Operating banking records	Stephen Lawandy <a href="mailto:stephen.a.lawandy@citi.com">stephen.a.lawandy@citi.com</a> 212-816-5224
Greenberg Traurig, LLC	Corporate and Futures legal records	Jeffrey Henderson <a href="mailto:hendersonj@gtlaw.com">hendersonj@gtlaw.com</a> 312-456-8453
Paychex	Payroll records	Linda Niles <a href="mailto:lnilles@paychex.com">lnilles@paychex.com</a> 630-505-0400 ext. 49441
Ryan and Juraska	Tax and financial audit records	Al Juraska <a href="mailto:al@ryanjuraska.com">al@ryanjuraska.com</a> 312-922-0062
United Healthcare	Staff health/dental insurance records	Patrice Pratts <a href="mailto:patrice.pratts@uhc.com">patrice.pratts@uhc.com</a>

		909-986-2135 Dan Shaner (Agent) dshaner@shaneragency.com (219) 769-4012
Serpe Insurance	Insurance policies	Bruce Farris <a href="mailto:brucef@serpeinsurance.com">brucef@serpeinsurance.com</a> 773-871-0829
Guava Tech	Server Hosting	Mike Jackson (Primary) <a href="mailto:mikej@guavatech.com">mikej@guavatech.com</a> 312-604-4550  Mike Beling (Secondary) <a href="mailto:mikeb@guavatech.com">mikeb@guavatech.com</a> 312-604-4444
CQG (futures execution vendor)	Contact PFPL trade desk to place order 1-855-POEMS88	Troy Wood <a href="mailto:twood@cqg.com">twood@cqg.com</a> 312-939-1588
CTS (futures execution vendor)	Contact PFPL trade desk to place order 1-855-POEMS88	Brian Murphy <a href="mailto:brian@ctsfutures.com">brian@ctsfutures.com</a> 866-379-1289 ext. 5414
PATS (futures execution vendor)	Contact PFPL trade desk to place order 1-855-POEMS88	Phillip Futures Pte Ltd (Hosts the PATS servers) +65 (6531) 1788 (24 hour)
Rithmic (futures execution vendor)	Contact PFPL trade desk to place order 1-855-POEMS88	<a href="mailto:operations@rithmic.com">operations@rithmic.com</a> (877) 408-0008
Trading Technologies (futures execution vendor)	Contact PFPL trade desk to place order 1-855-POEMS88	Lance Baity <a href="mailto:Lance.baity@tradingtechnologies.com">Lance.baity@tradingtechnologies.com</a> 312-698-6056
CME	Futures Exchange	CME Clearing Services (312) 207-2525 <a href="mailto:ccs@cmegroup.com">ccs@cmegroup.com</a> CME Clearing Financial Unit <a href="mailto:chfin@cmegroup.com">chfin@cmegroup.com</a> (312) 207-2594 Audit Contact – Doug MacCallum T 312 930 3238 <a href="mailto:doug.maccallum@cmegroup.com">doug.maccallum@cmegroup.com</a>
FINRA Coordinator	Regulator	Maryanne McKeon <a href="mailto:MaryanneMcKeon@finra.org">MaryanneMcKeon@finra.org</a> (646) 315-8742
CFTC Coordinator	Regulator	Dervin, Tamara M. <a href="mailto:TDervin@CFTC.gov">TDervin@CFTC.gov</a> (312) 596-0582
ICE US	Daily Reporting	Danny Vohasek (312) 836-6723 <a href="mailto:dan.vohasek@theice.com">dan.vohasek@theice.com</a> Helpdesk 770.738.2101
OCC	Daily Reporting	Miles Harvey <a href="mailto:mharvey@theocc.com">mharvey@theocc.com</a> 817-562-3547
Shadow Systems	Securities Back Office	Main Number – 732-225-6800 Donald J Marino <a href="mailto:dmarino@ShadowFinancial.Com">dmarino@ShadowFinancial.Com</a> 732-225-6800  Chris Bell <a href="mailto:cbell@ShadowFinancial.Com">cbell@ShadowFinancial.Com</a> 732-384-6023
FlexTrade	Securities Order Management System	Brian Stucka <a href="mailto:Brian.Stucka@flextrade.com">Brian.Stucka@flextrade.com</a> 312-878-2995 Cell: 847-863-5204
Global Relay	Email retention (current)	Tyler Jacobsen <a href="mailto:Tyler.Jacobsen@globalrelay.net">Tyler.Jacobsen@globalrelay.net</a> 866-484-6630
Box, Inc.	Electronic record retention (current)	Wesley Hagman <a href="mailto:whagman@box.com">whagman@box.com</a> 512-717-3566

Autonomy (LiveVault)	Email retention	Richard J. Pedone <a href="mailto:Rich.Pedone@livevault.com">Rich.Pedone@livevault.com</a> 508-422-7424
Amazon (Glacier)	Electronic record retention (pre-Sept 2017)	<a href="https://console.aws.amazon.com/support/">https://console.aws.amazon.com/support/</a>
EDI	Securities Settlement Market Data	Michael Hyland <a href="mailto:m.hyland@exchange-data.com">m.hyland@exchange-data.com</a> 732-618-2854
Bloomberg	Securities Settlement Market Data	Kristian Brennan <a href="mailto:Kbrennan8@bloomberg.net">Kbrennan8@bloomberg.net</a> 646-324-3504
First Communications, LLC	Telephone service	Business Care Department <a href="mailto:businesscare@firstcomm.com">businesscare@firstcomm.com</a> 888-426-6340

### **Contacting Employees**

In the event of a prolonged disruption, the Emergency Coordinator will oversee PCI's efforts to contact all employees. PCI will seek to confirm the safety of each employee and will convey information about any alternate work arrangements. The following table lists all Employees' personal contact information. Inform the Compliance Officer if any of the information is incorrect or outdated.

In the event of a business disruption outside of normal business hours, the PCI Emergency Coordinator will implement a call tree. The coordinator will confirm the safety of each employee & will convey information about alternate work arrangements if the employee is able to participate.

<b>PCI Manager</b>	<b>Manger to Contact</b>	<b>Cell Phone and/or Home Phone Numbers</b>	<b>Personal (non-PCI) Email Address</b>
Cameron Frazier		650-804-6334	<a href="mailto:cfrazier@chicagobooth.edu">cfrazier@chicagobooth.edu</a>
	Carl Kunz	708-212-3641	<a href="mailto:ckunz@yahoo.com">ckunz@yahoo.com</a>
	Derek Carter	312-860-3116	<a href="mailto:derecar@juno.com">derecar@juno.com</a>
	Steven Milcarek	708-602-4945	<a href="mailto:smilcarek@sbcglobal.net">smilcarek@sbcglobal.net</a>
	George Cocokios	708-533-2329	<a href="mailto:george41@sbcglobal.net">george41@sbcglobal.net</a>
	Janet Goodridge	708-305-3600	<a href="mailto:janet.goodridge@gmail.com">janet.goodridge@gmail.com</a>
	Laura Chia	312-972-7607	<a href="mailto:lauraclp@hotmail.com">lauraclp@hotmail.com</a>
	Cyrus Bowman	773-294-1024	<a href="mailto:Cywavne1@gmail.com">Cywavne1@gmail.com</a>
	Anthony Hormanski	630-926-0378	<a href="mailto:Ajh60515@yahoo.com">Ajh60515@yahoo.com</a>
	Filippo Lecchini	773-814-0943	<a href="mailto:flecchini@gmail.com">flecchini@gmail.com</a>
	John Verde	219-926-3708	<a href="mailto:jverde09@gmail.com">jverde09@gmail.com</a>
	David Klotz	312-375-1859	<a href="mailto:Dklotz25@gmail.com">Dklotz25@gmail.com</a>
	Paul Raskin	765-720-3604	<a href="mailto:praskin@gmail.com">praskin@gmail.com</a>
	Kevin Horath	730-302-0774	<a href="mailto:k_horvath@sbcglobal.net">k_horvath@sbcglobal.net</a>
Lynette Lim		650-391-5657	<a href="mailto:maytjuen@gmail.com">maytjuen@gmail.com</a>
	Michael Beyer	773-383-5706	<a href="mailto:michaelwbeyer@hotmail.com">michaelwbeyer@hotmail.com</a>
Steven Milcarek		708-602-4945	<a href="mailto:smilcarek@sbcglobal.net">smilcarek@sbcglobal.net</a>
	William Webber	708-574-8326	<a href="mailto:webber9@sbcglobal.net">webber9@sbcglobal.net</a>
	Peter Medaugh	312-752-6213	<a href="mailto:Aby3girl@gmail.com">Aby3girl@gmail.com</a>
	Obonne Obiaya	650-804-6334	<a href="mailto:oobiaya@gmail.com">oobiaya@gmail.com</a>
	Araceli Vega	773-948-0685	<a href="mailto:Msvegal1@yahoo.com">Msvegal1@yahoo.com</a>
	Cynthia DeAngelo	630-880-3590	<a href="mailto:thedeagelos@aol.com">thedeagelos@aol.com</a>
Janet Goodridge		708-305-3600	<a href="mailto:janet.goodridge@gmail.com">janet.goodridge@gmail.com</a>
	Colleen Kelly	708-250-2283	<a href="mailto:colleen.ann.kelly@gmail.com">colleen.ann.kelly@gmail.com</a>
George Cocokios		708-533-2329	<a href="mailto:george41@sbcglobal.net">george41@sbcglobal.net</a>
	Bobby Turner	708-516-3681	<a href="mailto:Bobbyt11@aol.com">Bobbyt11@aol.com</a>

	Susanne Bartecki	219-776-0536	<a href="mailto:Susanne.bartecki@yahoo.com">Susanne.bartecki@yahoo.com</a>
David Klotz		312-375-1859	<a href="mailto:Dklotz25@gmail.com">Dklotz25@gmail.com</a>
	Stephen Kosanovich	847-877-5015	<a href="mailto:skos@comcast.net">skos@comcast.net</a>
	Joe Evans	708-606-0080	<a href="mailto:Evans.joseph.j@gmail.com">Evans.joseph.j@gmail.com</a>
	Jeff Gilfillan	312-231-5177	<a href="mailto:jeffgilfillan@yahoo.com">jeffgilfillan@yahoo.com</a>
Paul Raskin		765-720-3604	<a href="mailto:praskin@gmail.com">praskin@gmail.com</a>
	Rhemy Wilgus	847-452-1599	<a href="mailto:rhemywilgus@gmail.com">rhemywilgus@gmail.com</a>
	Jennifer Hyland	630-853-5978	<a href="mailto:jenniferhyland3@yahoo.com">jenniferhyland3@yahoo.com</a>
	Jim Hall	630-800-9282	<a href="mailto:jrhall0108@yahoo.com">jrhall0108@yahoo.com</a>
	Narendra Bontha	+65 8444 6345	<a href="mailto:narendra.bontha@gmail.com">narendra.bontha@gmail.com</a>
	John Renato dela Paz	+65 8444 6345	<a href="mailto:jrenato@phillip.com.sg">jrenato@phillip.com.sg</a>
Laura Chia		312-972-7607	<a href="mailto:lauraclp@hotmail.com">lauraclp@hotmail.com</a>
	Haotian Zheng	615-767-1345	<a href="mailto:adamzheng_mba@hotmail.com">adamzheng_mba@hotmail.com</a>
	Armeke Holmes	708-527-6163	<a href="mailto:armeke@gmail.com">armeke@gmail.com</a>

### **Contacting Clients/Customer Access to Funds and Securities**

In the event of a prolonged disruption, the Emergency Coordinator will oversee PCI's efforts to contact all clients. PCI will seek to convey the nature of the disruption, any expected impact on clients, and the estimated amount of time it will take to recover from the disruption. All key employees will have access to a group email list which can mass email our current clients in the event of a prolonged error.

PCI maintains custody of customers' funds and securities; funds are maintained and segregated (as required) in appropriate accounts at Harris Bank, securities positions are maintained and segregated at DTCC. In the event of an internal or external SBD, if telephone service is available, our registered persons will assist our customers with transactions or instructions (if/as necessary), and if our Web access is available, our Firm will post on our website appropriate contact information for customers that may need to inquire about and/or access their funds and securities. 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.

### **Contacting Regulators**

We are currently members of the following self-regulatory organizations ("SRO"), and are also regulated by: SEC, FINRA, NFA & Illinois Securities Department. PCI files reports with our SROs via U.S. mail, and electronically using fax, email and the Internet. In the event of an SBD, we will check with the SEC, FINRA, NFA 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. In the event that we cannot contact our regulators, we will continue to file required reports using the communication means available to us. We communicate with our regulators using telephone, email, fax, U.S. 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.

**Disclosure of Business Continuity Plan**

Attached is our written BCP disclosure statement we provide customers at account opening. We also post the disclosure statement on our website and can transmit it to customers upon request.

**Annual Testing and Evaluation**

PCI will test the BCP to evaluate its effectiveness periodically. Cameron Frazier, who oversees BCP testing, will ensure that PCI documents the following:

- When each test is conducted;
- What tests are performed;
- Who is involved in the testing;
- The results of the testing;
- Any corrective action to resolve issues identified during testing; and
- The individuals who are responsible for implementing any corrective act

**Senior Manager Approval**

I have approved (per *FINRA Rule 4370(d)*) this Business Continuity Plan as reasonably designed to enable our Firm to meet its obligations to customers in the event of an SBD.

Signed: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

## BCP Disclosure Statement

### Introduction

In this Business Continuity Planning Disclosure Statement, learn how Phillip Capital Inc. ("PCI") works to mitigate risks inherent in unforeseen business interruptions.

### With Business Continuity in Mind

PCI has created its business continuity plan to reasonably insure its critical business operations continue to function as developed. The plan includes monitoring and testing of business processes to identify risks that could cause unanticipated business disruptions.

PCI monitoring and testing has enabled (and continues to enable) us to implement prioritized recovery procedures for its various business operations, since some processes have more urgent restoration requirements than others. The Firm develops processes with business continuity in mind, embedding needed resources and knowledge into our day-to-day operations.

### A Dedicated Team

PCI established the Business Continuity Team, a dedicated group of professionals that oversees the firm's business continuity management strategy. This team works closely with business units and the Information Technology department to maintain and test business continuity. Business continuity plans are created using a multi-hazards approach, including baseline requirements and strategies that address incidents of varying scope.

To assess recovery capability, the Firm conducts detailed periodic testing. In addition, PCI reviews recovery plans on a regular basis to ensure they are compliant with standards and are maintained according to industry guidelines. The Business Continuity Team assists the business to design plans to allow for continued operations of critical business functions, including providing clients with prompt access to their funds and securities.

### Leading Incident Management

The Business Continuity Team is comprised of senior management representing key areas of the firm manages incidents that might affect the Firm's associates and clients. A key function of the team is to assess and direct PCI's response to an incident, ensuring the safety and security of all associates and continuity of critical processes.

To diminish risks posed significant disruptions, PCI (and/or its business partners) maintains system redundancies and/or off-site back-up of business critical systems and records. In the event of an emergency at our main office, business critical staff can be relocated to an off-site location to facilitate business continuity.

In the event of a disruption, communications occur in several ways. Consistent and timely messages are disseminated to associates, clients, business partners, regulators and the media (if/as appropriate).

### PCI Keeps Clients Informed

In the event of a business disruption, clients can obtain information about the status of their accounts and access to their funds and securities via PCI's website [www.phillipcapital.com](http://www.phillipcapital.com) or by contacting PCI Client Services at 1-312-356-9000 or email [info@phillipcapital.com](mailto:info@phillipcapital.com). For questions or more information about Business Continuity at PCI, contact Cameron Frazier at (312) 356-9000.

### The Nature of Events: Limitations Disclaimer

Due to the unpredictable nature of events causing significant business disruptions, PCI does not guarantee that systems will always be available or recoverable after such events. Also, the firm's business continuity plans are subject to modification.