

## Business Continuity Plan Summary

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1st Global and our affiliates recognize the importance of safeguarding our clients' assets and protecting our clients' account information in the event of a Significant Business Disruption ("SBD") of our normal day-to-day operations due to a natural and/or man-made disaster. 1st Global has developed a Business Continuity Plan ("BCP") to enable the firm to recover from both internal and external disruptions of varying lengths and scope. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur.

It is the policy of 1st Global to respond to a SBD by safeguarding employees' lives and firm property, making a financial and operational assessment, quickly recovering and resuming operations and allowing our clients to transact business.

Our BCP is developed to include the ability to recover from situations that effect one or more of the following:

- our primary location,
- a single building housing our firm,
- the business district where our firm is located,
- the city where we are located, or
- the entire region.

Within each of these areas, the severity of the disruption can also vary from minimal to severe. Additionally, in any of the above situations, we plan to continue our business, transfer our critical functions to our clearing firm for brokerage business or advise clients to contact the product sponsor directly for retail direct and insurance business, if necessary. Please note that we have no control over the clearing firm's or product sponsors' ability to respond appropriately to clients during a disaster.

If necessary, in a disruption to our firm or a building housing our firm, we will transfer our operations to an alternate location and expect to resume critical functions of order taking, order entry, account maintenance and providing access to funds and securities within four (4) hours with other service-related functions being operational within one (1) business day. In a SBD affecting our business district, entire city or region, we will transfer our operations to a geographically separate location that is not within the district, city or region and expect to resume operations within ten (10) to twenty (20) days. However, while we have a detailed BCP in place, we cannot guarantee the recovery times above as we may not be able to anticipate the ramifications or outcomes of all disasters. In the event that your 1st Global Financial Advisor ceases operations due to a significant business interruption, you may call (877) 959-8400 for emergency assistance.

1st Global does not maintain custody of client funds or securities and therefore, relies on our critical business constituents, such as our clearing firm, National Financial Services LLC, for processing client transactions, maintaining client accounts and providing prompt access to clients' funds and securities.

Our BCP addresses all of the following:

- data backup and recovery;
- all mission critical systems;
- financial and operational assessments;
- alternative communications with clients, employees and regulators;
- alternate physical location of employees;
- critical supplier, contractor, bank and counter-party impact;
- regulatory reporting; and
- assures our clients prompt access to their funds and securities, if we are unable to continue our business.

1st Global's BCP Summary is subject to modification, without notice. A current copy and updates to 1st Global's BCP Summary are posted on the firm's website at [www.1stglobal.com](http://www.1stglobal.com) or may be requested from 1st Global Capital Corp., Attn: BCP Specialist, 12750 Merit Drive #1200, Dallas, TX 75251.

This BCP applies to 1st Global Capital Corp., member FINRA/SIPC and all of its affiliated companies including: 1st Global Advisors, Inc., 1st Global Retirement Services, Inc., 1st Global Insurance Services, Inc. and other 1st Global insurance agencies as established to meet state requirements.