

FNBB Capital Markets, LLC Business Continuity Plan Notification

Business continuity planning (“BCP”)

FNBB Capital Markets, LLC (“FNBB”) policy is to respond to a future 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 transact business. In the event that we determine we are unable to continue our business, we will assure customers prompt access to any funds or securities due to them. We have developed a Business Continuity Plan that details the efforts we will make to address any SBD, whether it is internal or external in nature. This document summarizes the plan and the actions we will take to address any SBD quickly and efficiently.

Business continuity contacts

In the event of an SBD, all of our employees will be immediately notified by one of our emergency contact persons. William Billingsley, FNBB’s CEO and Kathy Carter, Registered Principal have been designated as FNBB’s emergency contact persons.

Contact	Phone	Email
William Billingsley	205-262-2605	wbillingsley@bankers-bank.com
Kathy Carter	205-262-2522	kcarter@bankers-bank.com

Contacting Us

If after a significant business disruption you cannot contact us as you usually do at 205-262-2522, you should call our alternative number 866-405-6864. If you cannot access us through either of those means, you should contact our clearing firm, Southwest Securities at 214-859-5135 [www.southwestsecurities.com] for instructions on how it may provide you with prompt access to your funds and securities enter orders and process other trade-related, cash, and security transfer transactions.

SBD scenarios

A variety of scenarios have been considered in the development of the BCP. To highlight several of these, the following chart illustrates the severity of the SBD to any of our offices and the planned response, including response and resumption objectives.

SBD scenario	Temporary Internal SBD (Loss of power, fire, bomb threat, HVAC failure, etc.)	Internal SBD (loss of power, phone, data/internet service building-wide)	External SBD (loss of power, phone, data/internet service — regional)
Characteristics	Internal systems outage, forced to evacuate building for less than 4 hours.	Internal systems outage, forced to evacuate building for indeterminate amount of time.	Due to external factors: systems outage, power outage, forced to evacuate building for indeterminate amount of time.
Response	Send Emergency contact persons to the closet unaffected office location to resume operations. Staff awaits instructions.	Resume operations from closet office site or if none available move staff to the back up location as soon as possible. All mission critical employees will report to the alternative site.	Resume operations from the closet operational office if none available then move staff to the back up location as soon as possible. Notify customers and other key contacts of status. All mission critical employees will report to the alternative site.
Resumption Time	90 - 120 minutes	24 Hours	24 Hours

IT backup and storage

FNBB backs up its electronic records daily at 2 PM to our server located at First National Banker’s bank in Baton Rouge, LA. In addition, our clearing firm backs up our transactional and other records in a geographically separate area. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, we have been advised by our clearing firm that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments within 24 hours. Your orders and requests for funds and securities could be delayed during this period.

Business continuity

FNBB is committed to responding to an SBD efficiently and effectively in order to resume business as normal as quickly as possible. We will do everything in our power to communicate with our customers, counterparties and other mission critical partners, the status of our operations as frequently as we deem necessary. We plan to continue in business, transfer operations to our clearing firm if necessary, and notify you through our customer emergency number as to how to contact us. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer’s prompt access to their funds and securities.

This plan is subject to modification. Customers may alternatively obtain updated summaries by requesting a written copy by mail.