

# Business Continuity Plan

## **Statement Concerning the Business Continuity Plan of First Liberties Securities, Inc. dba First Liberties Financial \***

The following information pertains to First Liberties Securities, Inc.'s (FLS) business continuity plan. FLS clears its securities business through RBC Clearing and Custody, a division of RBC Capital Markets LLC ("RBC"), and RBC carries accounts and maintains assets of FLS's clients. RBC backs up important records for FLS in a geographically separate area. While every emergency situation poses unique problems based on external factors, FLS has been advised by RBC that its objective is to remain operational during different types of business disruptions. If RBC was unable to remain operational, it is possible that your orders and requests for funds and securities could be temporarily delayed during this period. RBC provides certain information about its business continuity plan separately.

FLS has developed a flexible business continuity plan to accommodate different types of significant business disruptions. FLS's business continuity plan addresses the following elements: data back up 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 assuring that clients have prompt access to their funds and securities if the Firm is unable to continue a securities business.

Business disruptions, by their nature, can vary greatly in size, scope and duration. FLS has planned for three different "types" of business disruption, and these are as follows: a single building disruption, a localized disruption and a regional disruption. It is the intent of FLS to remain operational during business disruptions of all three types, and for an indefinite duration of time.

FLS maintains geographically distinct offices, all of which can be used as a backup facility to house mission critical persons and functions. In all types of business disruptions plans exist for relocation to a backup facility of mission critical persons and functions. It is believed that the only type of business disruption that could force FLS to become non-operational would be a wide reaching national disruption as noted above. If such a wide reaching national disruption occurred, and it became impossible for FLS to remain operational, it is expected that RBC would be able to execute securities transactions, process payments for securities transactions, and process requests for funds and securities.

If after a significant business disruption you cannot contact a FLS representative as you customarily would, you should go to the Firm's web site at [www.firstlibertiesfinancial.com](http://www.firstlibertiesfinancial.com). If you cannot reach the Firm via this means, you should contact FLS at 917-639-5453 or at [www.firstlibertiesfinancial.com](http://www.firstlibertiesfinancial.com) for instructions on how you may execute securities transactions, remit payment for securities transactions, or request funds or securities.

\* Please note that FLS's business continuity plans are subject to modification. Changes will be available upon request and will also be posted on FLS's website at [www.firstlibertiesfinancial.com](http://www.firstlibertiesfinancial.com).