

FINANCO BUSINESS CONTINUITY PLAN DISCLOSURE

Financo has created and implemented a **Business Continuity Plan (BCP)** to expeditiously recover and resume business operations after a **Significant Business Disruption (SBD)** and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our clients to continue transacting business with us. Our BCP is designed to permit us to resume operations as quickly as possible, given the scope and severity of the SBD.

Financo's BCP addresses the following: data backup and recovery; 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; and regulatory reporting. **NOTE:** the firm does not hold customer/client funds or securities nor does it take orders or employ any clearing facility for the purposes of settlement.

Significant Business Disruptions: The BCP takes into account two kinds of SBDs: internal and external. **Internal SBDs** affect only Financo's ability to communicate and do business, such as a fire, loss of electrical power or other material dysfunctionality in our offices or building. **External SBDs** prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a natural disaster, or another event that causes wide-scale disruption in essential services.

Internal SBDs: In the event of a disruption in Financo's business operations due to an internal SBD, Financo will attempt to continue to conduct business as usual by utilizing alternative communication methods (if available), such as the Internet, cell phones, etc., or by moving its operations to an alternative location. If personnel or operations must be moved to an alternate location, Financo anticipates that it will resume regular operations within 24 hours.

External SBDs: In the event of a disruption in Financo's business operations due to an external SBD, we will attempt to continue to conduct business as usual by moving our operations to an alternative location outside the affected area, if possible, or by providing clients with alternative communication arrangements, as indicated below, to conduct business. Financo will attempt to resume business within 24-48 hours and to keep its customers informed regarding relevant events to the best of its ability based on the circumstances.

In all cases, Financo will resume normal business operations as soon as it is able to do so, based on the type and the extent of the SBD. If the SBD is so severe that it prevents us from remaining in business, we will assure our clients' prompt access to our records.

Communications During an SBD: If, during an SBD, you are unable to reach us at our main number (212-593-9000), please try to contact our CFO, Scott Abrams, at 212-593-7385, 908-812-2630 and/or sabrams@financo.com, or our Chief Compliance Officer, Edward McCabe, at emcabe@arc-sysllc.com. If you continue to be unable to reach us, contact **FINRA's NYC District office** at 212-858-4000 for more information on our status and additional instructions:

General Contact information: Any questions regarding Financo's BCP should be addressed to Edward McCabe, Chief Compliance Officer, at emcabe@arc-sysllc.com.