

**Chaince Securities
Business Continuity Plan
March 2025**

CHAINCE SECURITIES LLC has developed a Business Continuity Plan to provide procedures for response and recovery in the event of a significant business disruption. The purpose of the Plan is to identify responsible personnel in the event of a disaster; safeguard employees' lives and firm property; evaluate the situation and initiate appropriate action; recover and resume operations to allow continuation of business; provide customers with access to their funds and securities; and protect books and records. The Plan was developed considering the types of business conducted, systems critical to support business, and geographic dispersion of offices and personnel.

6.14.1 Designation Of Responsibilities

Our firm’s two emergency contact persons are:

Name	Title or Relationship to Firm
Wilfred Daye	Chief Executive Officer (“CEO”)
Patrick Harris	Chief Compliance Officer

Responsibility
Maintain and update Plan
Approve Plan and Plan revisions; conduct annual review
Annual testing of Plan
Implementation of Plan when a disruption occurs
Quarterly review of Emergency Contact Persons and report changes to regulators
Maintain and distribute Emergency Contact List and provide updates, when necessary
Maintain and update Books and Records Chart
Provide Plan information to customers: <ul style="list-style-type: none"> • At time of account opening • Upon request
Post Plan disclosure on CHAINCE SECURITIES LLC’s web site and update, as required
Review critical third party assurances or disaster plans or plan summaries: <ul style="list-style-type: none"> • At initial engagement of third party • Annually when CHAINCE SECURITIES LLC’s Plan is reviewed

Contact FINRA to provide information about:

- the activation or implementation of the BCP
- if possible, written notification of emergency office locations
- emergency contacts
- requests for extension of deadlines to open inquiries, investigations, or upcoming filings and qualifications examinations or continuing education

6.14.2 Retention And Location Of The Plan

Copies of the current and prior versions of the Business Continuity Plan are retained as follows. Copies are dated as of the effective date of the version of the Plan.

- A current hard copy is retained by Compliance with a record of the senior manager's approval.
- An electronic copy is retained at [when editing this chapter, indicate file name, computer/hard drive location].
- Prior versions (including approvals) are retained by Compliance.

6.14.3 Implementation Of The Plan

The Plan has been designed to be implemented in the event of a disaster that results in a significant business disruption. Whether all or only parts of the Plan are implemented depends on the nature of the disruption. Generally, a significant business disruption would include:

- Destruction of one of CHAINCE SECURITIES LLC's offices or facilities, whether by natural causes or by other means
- Loss of life or major injuries to personnel in an office location that disables that office's ability to conduct business
- Disruption of service from a critical service provider
- Disruption of service due to wide-ranging regional outages such as a power outage
- Disruption of service due to a pandemic

6.14.4 Emergency Response Team

CHAINCE SECURITIES LLC has designated an Emergency Response Team that is responsible for implementing necessary procedures included in this Plan. The Response Team's action will depend on the nature and scope of the disruption. The "first responder" has the primary responsibility for taking action, and the "secondary responder" acts as a back-up in the event the first responder is unable to act.

Action
Contact emergency services such as police, fire department
Establish off-site command center and notify employees
Account for employees in affected areas
Contact employees regarding Plan initiatives
For affected offices, evaluate business disruption and transfer employees and business operations to other locations

Initiate alternative market entry points when CHAINCE SECURITIES LLC's normal access is disabled
Appoint individuals to manage business areas where needed
Assess financial and operations capabilities
Determine financial and credit risk and contact banks and other counter-parties, if necessary, to secure financing to continue operations
Notify regulators in the event of a capital deficiency
Interface with SIPC if liquidation of business is initiated
Contact critical service providers
Transfer mission critical functions that are disrupted
Initiate alternative customer communications systems or procedures
Update CHAINCE SECURITIES LLC's web site to include information about operations and contact information
Notify customers regarding alternative access to funds and securities
Notify trading counterparties of operations and contact information
Recover back-up records when primary records are destroyed or inaccessible
Contact regulators and notify them of contact persons and recovery plans
Identify time-sensitive regulatory requirements and filings

6.14.5 Emergency Contact List

CHAINCE SECURITIES LLC has established an Emergency Contact List that includes the names, phone numbers (cell and land lines), e-mail addresses, and other contact information for individuals critical to CHAINCE SECURITIES LLC's business including key employees, key vendors or service providers, regulators, insurance carriers, banks, attorneys, and other key contacts. A copy of the List is provided to each member of the Response Team and other key personnel. This list will be reviewed and updated on at least an annual basis.

6.14.6 Alternative Business Locations

In the event employees can no longer conduct business at one of CHAINCE SECURITIES LLC's office locations, the following actions may be taken:

- Transfer employees to the closest unaffected office location and notify personnel
- Transfer critical systems to another office or a back-up firm or system
- Transfer business operations to another CHAINCE SECURITIES LLC office unaffected by the disruption
- Transfer business operations to a different broker-dealer or other entity

Considerations that will be made include:

- Geographic diversity in the event of regional service outages
- Accessibility of alternative sites and the ability of employees to travel to the site and methods of relocating employees and living arrangements, if needed
- Number and composition of staff needed and supervisors for alternative sites
- Generator and other back-up sources at alternative sites

- Resources needed at alternative sites (desks, chairs, telephones, equipment, and supplies, *etc.*)
- Moving staff in advance of a significant BCP event, if it can be anticipated
- Whether employees should work from home and what resources they would need

6.14.7 Data Back-Up And Recovery

CHAINCE SECURITIES LLC maintains its books and records in both hard copy and electronic format. The Books and Records chart (Appendix A to the Plan) indicates whether records are maintained in hard copy or electronic form; location of primary records; and back-up site for records.

In the event of an internal or external significant business disruption that causes the loss of CHAINCE SECURITIES LLC's records (whether hard copy or electronic records), back-up records will be recovered from the back-up site.

6.14.8.1 Clearing Firm Back-Up And Recovery

The clearing firm maintains records for CHAINCE SECURITIES LLC under the terms of the clearing agreement. The clearing firm has developed a disaster and recovery plan to recover and retrieve records lost in a disaster affecting CHAINCE SECURITIES LLC and/or the clearing firm. Records retained by the clearing firm are included on CHAINCE SECURITIES LLC's Books and Records chart.

CHAINCE SECURITIES LLC has received assurance from the clearing firm that its plan is consistent with SRO rule requirements and provides adequate protection of customer funds and securities held on behalf of CHAINCE SECURITIES LLC customers and back-up and recovery systems for records retained by the clearing firm. Compliance (or another person designated to review critical third party plans) will review the clearing firm plan or a summary of the plan at least annually when CHAINCE SECURITIES LLC's Plan is reviewed.

6.14.8 Mission Critical Systems

Mission critical systems are systems that are necessary to ensure prompt and accurate processing of securities transactions including order taking, entry, execution, comparison, allocation, clearance and settlement, maintaining customer accounts, and providing access to customer funds and securities.

The Mission Critical Systems chart (Appendix B to the Plan) identifies systems (or generally describes procedures) that are critical to the operation of CHAINCE SECURITIES LLC's business; identifies third parties that provide those systems; and potential alternate procedures or systems for handling these critical functions in the case of a disruption.

6.14.9 Financial And Operational Assessments

The following describes procedures for assessing changes in operational, financial, and credit risk exposures in the event of a significant business disruption.

6.14.9.1 Operational Risk

In the event of a significant business disruption, alternative systems will be implemented to communicate with customers, employees, critical business constituents (banks, counter-parties, *etc.*), regulators, and other key parties depending on the nature and impact of the disruption. Communication systems are described in the section *Alternative Communications*.

6.14.9.2 Financial And Credit Risk

In the event of a significant business disruption, CHAINCE SECURITIES LLC's financial status will be evaluated to determine the need for additional financing or identify capital deficiencies including the following:

- Review the impact of the disruption on CHAINCE SECURITIES LLC's ability to conduct business
- Identify inability to satisfy obligations with counter-parties
- Contact banks or other counter-parties to secure needed additional financing
- Notify regulators of capital deficiencies
- Reduce or cease business as may be required due to capital deficiencies or inability to conduct business
- Transfer business to other financial institutions until CHAINCE SECURITIES LLC may resume conducting business

6.14.10 Alternative Market Entry

CHAINCE SECURITIES LLC may use its clearing firm (if applicable) or other broker-dealers as alternative market entry points when CHAINCE SECURITIES LLC cannot access markets through its own systems.

6.14.11 Alternative Communications

CHAINCE SECURITIES LLC may use a wide range of communication systems to communicate with its customers, employees, counterparties, and regulators including telephone; mail; fax; e-mail; vendor systems (such as Bloomberg); and personal meetings. CHAINCE SECURITIES LLC may establish contracts with multiple telecommunications carriers to provide redundant systems and devices and to provide key employees with technology at remote locations, including home locations. Procedures for instituting alternative communications in the event of a significant business disruption include the following, depending on the nature of the disruption:

- Identify the most expedient remaining means of communication
- Notify employees if an off-site command center has been activated
- Notify employees of alternative communication systems to be used
- Transfer communications to another firm

Determination of what communication system will be used depends on the nature of the disruption and which communication systems (electronic mail, telephone calls, *etc.*) are functional and the availability of personnel in the event telephone contact is necessary.

6.14.11.1 Between Customers And The Firm

In the event of a significant business disruption that disables communications systems, alternative system procedures will be implemented, including the following:

- Identify the most expedient remaining means of communication
- Notify employees regarding how to contact customers
- Contact customers about how to enter orders, how to access accounts and account assets, and other alternative business operations

6.14.11.2 Between The Firm And Its Employees

In addition to the above, CHAINCE SECURITIES LLC has developed a system to enable senior management to contact employees in the event of an emergency. The system may include, depending on geographic dispersion of employees:

- Contact lists maintained by managers at branch offices
- "Call trees" that provide contact initiated at senior management level and pyramiding down to reach affected personnel
- A central list of all personnel and their contact information

6.14.11.3 Between The Firm And Trading Counterparties

Communications between CHAINCE SECURITIES LLC and its trading counterparties regarding conduct of business will be implemented by alternative systems which may include:

- Via a clearing or other alternative business partner
- Phone
- Electronic communications
- Web site postings
- Other alternative means of communicating

6.1.11.4 Firm's Web Site

CHAINCE SECURITIES LLC has established an alternative means of maintaining its web site in the event servers and other systems regularly used are unavailable. The web site will be used to communicate information to customers, counterparties, and others needing access to CHAINCE . It will include information about operations and contact information, including contact information at a clearing firm or other alternative business partner.

6.14.11.5 Between The Firm And Regulators

Communications with regulators will be conducted using the most expedient available communication system. The designated Response Team person will contact regulators regarding any major business disruption and plans for continuing business.

6.14.12 Regulatory Reporting

In the event of a significant business disruption affecting offices responsible for regulatory reporting, regulators will be contacted to determine which means of filing are available under the circumstances to meet filing requirements. In the event CHAINCE SECURITIES LLC cannot contact regulators, required reports will be filed using communications means available.

6.14.13 Business Constituent, Bank, And Counter-Party Impact

This section describes business continuity procedures regarding third parties that are critical to the conduct of CHAINCE SECURITIES LLC's business. In most instances, contracts with critical third parties will include assurances regarding the third party's disaster recovery plans. A disruption impacting

CHAINCE SECURITIES LLC's ability to conduct business may occur either at CHAINCE SECURITIES LLC itself or at the third party.

The Business Constituent, Bank, And Counter-Party chart (Appendix C to the Plan) identifies key parties and potential alternatives in the event of a disruption.

6.14.13.1 Business Constituents

- Determine whether the third party is able to continue providing critical services.
- If not, identify and contact an alternate third party to provide services.

6.14.13.2 Banks And Other Financial Institutions

- Determine whether the bank/financial institution is able to continue providing financing.
- If not, identify and secure alternative financing.

6.14.13.3 Critical Counter-Parties

- Determine whether transactions may be completed with counter-parties.
- If not, contact counter-parties directly (or CHAINCE SECURITIES LLC's clearing firm, if business is introduced) to make alternative arrangements to complete transactions.

6.14.14 Other Obligations To Customers

6.14.14.1 Accepting Customer Orders

In the event CHAINCE SECURITIES LLC's systems for accepting customer orders are disrupted, alternative systems will be communicated to customers and to employees including, where appropriate:

- Accepting orders by telephone or other alternative means
- Communicating orders to trading desks (internal or external) or order execution systems by telephone or other alternative means

6.14.14.2 Prompt Access To Funds And Securities

When customer access to funds and securities is impacted by a significant business disruption, customers will be notified by whatever expedient means is available (telephone, e-mail, *etc.*) regarding who may be contacted to request funds or securities. If CHAINCE SECURITIES LLC is unable to continue business operations, customers will be notified of an alternative financial institution where they may conduct business and access their funds and securities.

6.14.14.2.1 SIPC Liquidation

In the event SIPC liquidation of CHAINCE SECURITIES LLC's business is required, designated personnel will work with the SIPC-appointed trustee to wind down CHAINCE SECURITIES LLC's operations and transfer customer funds and securities.

6.14.14.3 Disclosure Of Business Continuity Plan

[FINRA Rule 4370(e)]

Information about CHAINCE SECURITIES LLC's Business Continuity Plan is provided to customers as follows:

- At the time of account opening
- On CHAINCE SECURITIES LLC's web site
- Upon request, by mail

6.14.15 Emergency Contact Information

[FINRA Rule 4370 and 4517]

CHAINCE SECURITIES LLC has provided FINRA with the names of two emergency contact persons, one who must be a registered principal and member of senior management and a second who may be unregistered (such as CHAINCE SECURITIES LLC's attorney, accountant, or a clearing firm contact) and who has knowledge of CHAINCE SECURITIES LLC's business.

Emergency contact information will be promptly updated, when necessary. Contact information will be reviewed by Compliance (or someone else designated) within 17 business days of the end of each calendar year and a written record of the review will be retained.

6.14.16 Widespread Health Emergencies

A widespread pandemic or any biologically based threat could have significant impact on the ability of CHAINCE SECURITIES LLC to continue conducting business. This section outlines the steps CHAINCE SECURITIES LLC has taken and will take in the event of a widespread pandemic.

6.14.16.1 Preparatory Steps

- Document government resources for information about a pending pandemic
- Engage cybersecurity procedures (see the chapter: *CYBERSECURITY*)
- Identify and document an alternative firm or firms to handle CHAINCE SECURITIES LLC's business for extended periods of time
- Identify and document medical resources to assist employees, including administering vaccinations or other medications
- Stock antibacterial and other hygiene products for use by employees
- Identify alternative work sites
- Identify employees who can telecommute and establish a list of those employees and what computers and technology will be necessary
- Establish supervisory procedures to oversee employees who will telecommute or are relocated to an alternative site

6.14.16.2 Action If A Pandemic Occurs

The following procedures will be followed in the event of a threatened health emergency.

1. The Emergency Response Team will meet to determine the potential seriousness of the threat and what action to be taken as the threat escalates.

2. Determine whether employees should work remotely (see the following section).
3. Notify employees of:
 - available vaccinations or other medication and whether they are mandated
 - necessary conduct such as avoiding personal contact such as handshaking
 - access to antibacterial or other hygiene products to reduce infections and transmission of communicable diseases
 - requirement to stay home and telecommute
 - transfer of business/functions to other firms
 - contact list of key personnel
4. Restrict access to CHAINCE SECURITIES LLC by outsiders (customers, vendors, etc.).
5. The Emergency Response Team will meet or communicate regularly to determine steps to be taken.

6.14.16.3 Remote Work

Responsibility	<ul style="list-style-type: none"> • Designated Supervisor
Resources	<ul style="list-style-type: none"> • BCP • Locations of employees • Regulatory guidance and notices
Frequency	<ul style="list-style-type: none"> • As required
Action	<ul style="list-style-type: none"> • Include remote supervision testing in BCP testing • Provide guidance and resources to supervisors which may include regular meetings with senior leadership and supervisors to provide updates, emphasize importance of escalating issues, contacting Compliance regarding concerns and questions, providing electronic checklists and attestations • Analyze emerging risks via alerts, exception reports, and customer complaints • Request feedback from staff • For remote trading supervision, consider enhanced oversight which may include: <ul style="list-style-type: none"> ○ attestations from traders ○ approval for each trader to work remotely ○ testing trader's remote trading capabilities and review of test results ○ provide supervisors a special supervisory checklist ○ maintain and update daily a list of all remote traders ○ increase frequency of reviews ○ use communication tools possibly including cameras, chat rooms, daily calls, collaboration tools and conference calls ○ record trading staff and review of conversations ○ implement additional central monitoring and reviews • Oversight of customer communications which may include: <ul style="list-style-type: none"> ○ increased email review ○ additional keyword surveillance ○ disable certain features of video conferencing platforms, such as chat, that would be subject to recordkeeping obligations impractical in remote locations • Enable remote branch inspections if on-site inspections are stopped

Record	<ul style="list-style-type: none"> • Records of information provided to supervisors and employees and supervisory reviews • Records of trading supervision • Records of remote staff and locations
---------------	---

If CHAINCE SECURITIES LLC decides that employees will work remotely, procedures include the following:

- Provide back-up contact information and redirect phone lines to facilitate customer communications
- Ask remote staff to report their location to their supervisors, requiring approval prior to making changes to location
- Provide additional support and communication to staff which may include firm-wide calls and video conferences to provide updates; virtual training; communicating clear guidance about firm expectations; provide additional technology tools, if necessary, for remote workers; provide digital collaboration platforms and applications; and disseminate additional guidance and training regarding technology, tools and services in a remote work environment
- Reminding staff about confidentiality of firm and customer information and cybersecurity and fraud risks

6.14.17 Education Of Employees

The Business Continuity Plan is communicated to employees as follows:

- A summary is included in the chapter *GENERAL EMPLOYEE POLICIES* in the section *Emergency Business Recovery Procedures* and is provided to all employees.
- A current copy of the Plan is provided to the Emergency Response Team and key employees with responsibilities for aspects of the Plan. When changes are made to the Plan, new copies will be distributed to these employees.
- The most recent Emergency Contact List is provided to key employees.
- The BCP is included in training of employees.

6.14.18 Updating, Annual Review, And Testing

The Plan will be reviewed on at least an annual basis and revised as needed. Each revision will be approved by the designated senior manager and copies of the revised Plan distributed to the Emergency Response Team and key employees. Some material events require updating the Plan when they occur, including:

- Material changes to CHAINCE SECURITIES LLC's business
- A change in CHAINCE SECURITIES LLC's main office location
- Added office locations
- A change in a major service provider

When the Plan is reviewed, the procedures and accompanying lists and charts will be reviewed and updated as needed including the:

- Plan itself
- Emergency Response Team list
- Emergency Contact List
- Books and Records chart (Appendix A)

- Mission Critical Systems chart (Appendix B)
- Business Constituent, Bank, and Counter-Party chart (Appendix C)
- *Designation Of Offices* section of the chapter *DESIGNATION OF SUPERVISORS AND OFFICES*
- Any other charts or information related to the Plan

When appropriate, CHAINCE SECURITIES LLC will participate in industry-wide testing programs. A written record of the annual review including the date reviewed and name and signature of the reviewer will be retained by Compliance.