

Summit Brokerage Services, Inc. (Summit Brokerage Services) understands the importance of ensuring our customers have continued access to their funds and securities in the event our home office operations are impacted by a disaster. As a result, we have developed and maintain a business continuity plan that describes the means by which Summit Brokerage Services' home office operations in Boca Raton, FL will respond to future significant business disruptions of varying degrees of severity.

Summit Brokerage Services' home office operations in Boca Raton, FL are equipped for resumption of business in the event a significant business disruption affects the building, business district, city and/or the region. We will continue to conduct business during those disruptions and may choose to relocate key personnel and services to our designated backup facilities. Relocations of critical functions will be completed within four hours of the significant business disruption.

In the event of a significant business disruption resulting from a reduction in work force due to a pandemic situation, Summit Brokerage Services has developed a comprehensive pandemic response plan

to minimize the exposure and spread of a virus in the workplace. The plan involves social distancing and other measures to avoid close physical proximity in the workplace. Social distancing includes, but is not limited to, requesting employees to work remotely, invoking swing shifts and may require suspension of some non-critical functions.

Summit Brokerage Services' data center is located in a different region of the country. In addition, several of our critical functions are performed in our affiliated offices located in Des Moines, IA and El Segundo, CA, and our brokerage business is operated by our clearing firms that are also located in different regions of the country. All of these providers—our affiliated offices in Des Moines, IA and in El Segundo, CA; our clearing firms; and our data center—have complete business continuity plans designed to allow them to continue operations in the event they experience a significant business disruption. Their plans include redundancies, alternate facilities and recovery time objectives that support our plan.

In the event of a significant business disruption at Summit Brokerage Services' main location in Boca Raton, FL,

customers may contact their Summit Brokerage Services representative directly, our home office at 800.226.2660, or refer to our public website at [www.summitbrokerage.com](http://www.summitbrokerage.com). However, if you cannot reach us at that number, you should contact our clearing firms, First Clearing, LLC\* at 877.496.3223 or Pershing LLC at 201.413.3635, for instructions on how they can provide prompt access to funds and securities, enter orders and process other trade-related cash and security transfer transactions. Please be advised that while we have detailed plans in place, we cannot guarantee we will be able to recover as quickly as outlined above under all possible circumstances. Our recovery time objective may be negatively impacted by the unavailability of third parties and/or other circumstances beyond our control.

Our business continuity plan is reviewed and tested throughout the year and is subject to modification. To obtain the most current version of this summary, you may refer to our website at [www.summitbrokerage.com](http://www.summitbrokerage.com) or contact your Summit Brokerage Services representative to request an updated summary be delivered by mail.

\*Account(s) carried by First Clearing. First Clearing is a trade name used by Wells Fargo Clearing Services, LLC, a registered broker-dealer and non-bank affiliate of Wells Fargo & Company.

---

Summit Brokerage Services, Inc. and its affiliates have developed a business continuity plan outlining how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we are flexible in responding to actual events as they occur.

### **Contacting Us**

During a significant business disruption you should be able to contact us as you usually do at 888.966.9078. However, if you cannot reach us at that number, you should contact our clearing firm, First Clearing, LLC\* at 877.496.3223 or Pershing LLC at 201.413.3635 for instructions on how they can provide prompt access to funds and securities, enter orders and process other trade-related cash and security transfer transactions.

### **Our Business Continuity Plan**

We plan to quickly recover and resume business operations after a significant business disruption by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our business continuity plan is designed

to permit our firm to resume operations as quickly as possible, subject to the scope and severity of the significant business disruption.

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

Our clearing firms, First Clearing, LLC and Pershing LLC, back up our 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 First Clearing and Pershing that their internal objective is to restore their own operations and be able to complete existing transactions and accept new transactions and payments within in a timely manner. Your orders and requests for funds and securities could be delayed during this period.

### **Varying Disruptions**

Significant business disruptions can vary in their scope, whether it affects only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or an entire region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or a building housing our firm, we will transfer our operations to a local site when needed, and expect to recover and resume business within one day. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area, and recover and resume business within one day. In both cases, we plan to continue in business and post pertinent information on our website, [www.Summitbrokerage.com](http://www.Summitbrokerage.com). If the significant business disruption is so severe that it prevents us from remaining in business, we will facilitate our customers' prompt access to their funds and securities.

If you have questions about our business continuity planning, please contact us at 888.966.9078.

\*Account(s) carried by First Clearing. First Clearing is a trade name used by Wells Fargo Clearing Services, LLC, a registered broker-dealer and non-bank affiliate of Wells Fargo & Company.