

Arkadios Capital
Business Continuity Plan (BCP)

I. Emergency Contact Persons

Arkadios Capital's two emergency contact persons are:

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| Chet Payne COO Office : (404) 445-0035 Cell Phone: (770) 296-5881 Firm E-Mail: cpayne@arkadioscapital.com | Gary Schwartz Chief Compliance Officer Office : (404) 445-0035 Cell Phone: (404) 502-6822 Firm E-Mail: gschwartz@arkadioscapital.com |
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These names will be updated in the event of a material change and our Executive Representative will review them within 17 business days of the end of each quarter.

II. Firm Policy

Arkadios Capital's ("AC" or the "Firm") policy is to respond to a 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 of an SBD, this plan will be implemented to ensure business continuity.

a. Significant Business Disruptions (SBDs)

Our plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only our Firm's ability to communicate and do business, such as a fire in our building. External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a city flood, or a wide-scale, regional disruption.

b. Approval and Execution Authority

Chet Payne, General Securities Principal, is responsible for approving the plan and for conducting the required annual review. Mr. Payne has the authority to execute this BCP.

c. Plan Location and Access

The Firm will maintain copies of its BCP plan and the annual reviews, and the changes that have been made to it for inspection. A hard copy of our plan is kept with the firm's written supervisory procedures manual, which is kept in a binder in our operations office in a locked filing cabinet. An electronic copy of our plan is also located on our server.

III. Business Description

Our firm conducts business in equity, fixed income, government securities, as well as mutual funds, variable annuities, private placements and investment banking. Our firm is an introducing firm and does not perform any type of clearing function for itself or others. Furthermore, we do not hold customer funds or securities. We accept and enter orders. All transactions are sent to our clearing firm, which executes our orders, compares them, allocates them, clears and settles them. Our clearing firm also maintains our customers' accounts, can grant customers access to them, and delivers funds and securities.

In the event that Arkadios Capital ceases operations due to a significant business interruption, our clients may access their accounts by calling the clearing firm.

IV. Office Locations

The Firm's main office is located at 309 East Paces Ferry Rd. Suite 1000, Atlanta, Georgia, 30305. Our main telephone number is (404) 445-0035. Our fax number is (404) 994-6303. Our employees may travel to that office by means of foot, car, or bus.

V. Alternative Physical Location(s) of Employees or Remote Access

In the event of an SBD, we will move our staff from the affected office to either 1700 Frederica Road, Suite 201, St. Simons Island, GA 31522 or 5726 Fayetteville Road, Suite 202, Durham, North Carolina, 27713.

During an SBD in which we relocate staff, Mr. Payne will instruct the local post office to forward all mail directed to the firm's main address to 1700 Frederica Road, Suite 201, St. Simons Island, GA. The same instructions will be given to any commercial express mail companies with whom we transact business (UPS, Federal Express, DHL, etc.)

Should weather or sickness (including epidemics) occur which prohibit employees from coming to work, provisions have been made where staff can work at home and shelter in place. While there are benefits to working together in an office, there is no hard requirement to be in the office should a Supervisor approve of the remote location and feel that productive work can still be accomplished. For severe situations AC can issue a mandatory work-from-home policy. VPN access via Log Me In or Ninja, is monitored by our service provider Bitstream. Both remote services offer dual factor authorization in an effort to protect client personal information.

When any AC teammate is sick or ill they should work from home, and avoid contact with teammates, customers, prospects or business partners.

VI. Customers' Access to Funds and Securities

Our firm does not maintain custody of customers' funds or securities. In the event of an internal or external SBD, if telephone service is available, our registered persons will be able to handle telephone calls from our customers. The firm will make this information available to customers through its disclosure policy.

If SIPC determines that we are unable to meet our obligations to our customers or if our liabilities exceed our assets in violation of Securities Exchange Act Rule 15c3-1, SIPC may seek to appoint a trustee to disburse our assets to customers. We will assist SIPC and the trustee by providing our books and records identifying customer accounts subject to SIPC regulation.

VII. Data Back-Up and Recovery (Hard Copy and Electronic)

Our Firm maintains all books and records in hardcopy format in a secure location in the Firm's main office. Gary Schwartz, CCO, is responsible for the maintenance of these books and records. Our firm keeps all of our documents in hard copy format and copies may also be kept electronically on our server. The firm conducts daily data backups of its electronic records using two channels—1) local backup via attached removable storage and 2) encrypted offsite backup to the Code42 CrashPlan cloud.

In the event of an internal or external SBD that causes the loss of our paper or electronic records, we will physically recover them from our back-up site. If our primary site is inoperable, we will continue operations from our back-up site or an alternate location. For the loss of electronic records, we will electronically recover data from our electronic storage at our main office location; or, if our primary site

is inoperable, we will electronically recover data and continue operations from our back-up site or an alternate location.

VIII. Financial and Operational Assessments

a. Operational Risk

In the event of an SBD, we will immediately identify what means will permit us to communicate with our customers, employees, critical business constituents, critical banks, critical counter-parties, and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options we will employ will include telephone, voice mail and secure e-mail. In addition, we will retrieve our key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic).

b. Financial and Credit Risk

In the event of an SBD, we will determine the value and liquidity of our investments and other assets to evaluate our ability to continue to fund our operations and remain in capital compliance. We will contact our critical banks, clearing firm, and investors to apprise them of our financial status. If we determine that we may be unable to meet our obligations to those counter-parties or otherwise continue to fund our operations, we will request additional financing from our bank or other credit sources to fulfill our obligations to our customers and clients. If we cannot remedy a capital deficiency, we will file appropriate notices with our regulators and immediately take appropriate steps.

IX. Mission Critical Systems

Our firm's "mission critical systems" are those that ensure prompt and accurate processing of securities transactions which include

- Accounting software
- Telephones
- Facsimiles
- Internet Access
- Password lists
- Microsoft Office (including Word, Excel, Powerpoint & Access)

We have primary responsibility for establishing and maintaining our business relationships with our customers and have sole responsibility for our mission critical functions of order taking, order entry, and submitting to the clearing firm any request for distribution of funds. Mission Critical Systems are the processes that allow us to fulfill these functions.

Recovery-time objectives provide concrete goals to plan for and test against. They are not, however, hard and fast deadlines that must be met in every emergency situation, and various external factors surrounding a disruption, such as time of day, scope of disruption, and status of critical infrastructure—particularly telecommunications—can affect actual recovery times. Recovery refers to the restoration of settlement activities after a wide-scale disruption; resumption refers to the capacity to accept and process new transactions and payments after a wide-scale disruption.

A. Our Firm's Mission Critical Systems

i. Order Taking

Currently, our firm receives orders from customers via the telephone, fax or mail. During an SBD, either internal or external, we will continue to take orders via cell phone and internet communication and through any other methods that are available and reliable, and in addition, as communications

permit, we will inform our customers when communications become available to tell them what alternatives they have to send their orders to us. Customers will be informed of alternatives by notices posted the firm's website and/or recorded voice messages at the firm's main office number. If necessary, we will advise our customers to place orders directly with our custodians. Our firm also acts as the facilitator between a buy and sell transaction for our merger and acquisition activities, or facilitates private placement transactions. We may talk to our customers via telephone, e-mail or in person visits by the customer. During an SBD, either internal or external, we do not consider order taking to be a critical element of this plan because we generally do not engage in such order taking activity for these types of activities. Clients should be able to reach us by telephone to facilitate any of their needs. Alternatively, clients will also have direct access to any other business relationships, including any private companies that such clients have done business with.

ii. Order Entry

Currently our firm executes customer orders by placing them electronically with our clearing firm on their trading platforms and back office programs. In the event of a business disruption our clients can contact our clearing firm directly.

iii. Order Execution

In the event of an internal SBD, we will enter and send records to our clearing firm by the fastest alternative means available, including placing orders by fax directly to the clearing firm's trading desk. In the event of an SBD, we will maintain the order in electronic or paper format, and deliver the order to the clearing firm by the fast means available.

X. Alternate Communications Between the Firm and Customers, Employees, and Regulators

A. Customers

We communicate with our customers using the telephone, e-mail, fax, U.S. mail, and in person visits at our firm or at the customer's location. In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party. For example, if we have communicated with a party by e-mail but the Internet is unavailable, we will call them on the telephone and follow up where a record is needed with paper copy in the U.S. mail.

B. Employees

We communicate with our employees using the telephone, e-mail, and in person. In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party. We will also employ a call tree so that senior management can reach all employees quickly during an SBD. The call tree includes all staff home, cell and office phone numbers.

C. Regulators

We are currently a member of FINRA and a fully registered broker-dealer with the SEC. In addition, we are registered with the State of California and other states. We communicate with our regulators using the telephone, e-mail, fax, U.S. mail, and in person. In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party.

XI. Critical Business Constituents, Banks, and Counter-Parties

a. Business constituents

We have contacted our critical business constituents (businesses with which we have an ongoing commercial relationship in support of our operating activities, such as vendors providing us critical services), and determined the extent to which we can continue our business relationship with them in light of the internal or external SBD. We will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services when we need them because of a SBD to them or our Firm.

b. Banks

We have contacted our banks and lenders to determine if they can continue to provide the financing that we will need in light of the internal or external SBD. The bank maintaining our operating account is: Iberiabank, 3625 Cumberland Blvd, Building Two, Atlanta, GA 30339

c. Counter-Parties

We have contacted our critical counter-parties, such as other broker-dealers or institutional customers, to determine if we will be able to carry out our transactions with them in light of the internal or external SBD. Where the transactions cannot be completed, we will work with those counter-parties directly to make alternative arrangements to complete those transactions as soon as possible.

XII. Regulatory Reporting

We now file reports with our regulators using paper copies in the U.S. mail, and electronically using fax, e-mail, and the Internet. In the event of an SBD, we will check with the SEC, FINRA, and other regulators to determine which means of filing are still available to us, and use the means closest in speed and form (written or oral) to our previous filing method. In the event that we cannot contact our regulators, we will continue to file required reports using the communication means available to us.

XIII. Disclosure of Business Continuity Plan

We provide in writing a BCP disclosure statement to customers at the time of a transaction. We also mail the disclosure statement to customers upon request.

XIV. Updates and Annual Review

The Firm will update this plan whenever we have a material change to our operations, structure or business location. In addition, the Firm will review this BCP annually to modify it for any changes in our operations, structure, business, or location.

XV. Senior Manager Approval

I have approved this Business Continuity Plan as reasonably designed to enable the Firm to meet its obligations to customers in the event of an SBD.

Signed: *Gary Schwartz*

Title: Chief Compliance Officer

Date: 03/18/2020

