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## Business Continuity Plan – Disclosure

JMS Capital Group has developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

**Contacting Us** – If after a significant business disruption you cannot contact us as you usually do at 412.415.1177 or [info@jmscapitalgroup.com](mailto:info@jmscapitalgroup.com), you should go to our website at [www.jmscapitalgroup.com](http://www.jmscapitalgroup.com) for emergency information. If you cannot access us through that means, you should contact the custodian of your assets for instructions on how it may assist you, e.g., provide prompt access to funds and securities, enter orders and process other trade-related, cash and security transfer transactions. *See reverse of this page for contact info.*

**Our Business Continuity Plan** – We plan to quickly recover and resume business operations after a significant business disruption and respond 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, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data backup 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 IT company, Apogee IT Services, maintains our important 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 our IT company that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments within 4 hours. Your orders and requests for funds and securities could be delayed during this period.

**Varying Disruptions** – Significant business disruptions can vary in their scope, such as only the floor our firm is located on, a single building containing our firm, the business district where our firm is located, the city where we are located, or the whole 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 4 hours. 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 24 hours. In either situation, we plan to continue in business, transfer operations to our employees via remote locations, if necessary, and notify you through our website how to contact us. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer's prompt access to their funds and securities.

**For more information** – If you have questions about our business continuity planning, you can contact us at 412.415.1177 or [info@jmscapitalgroup.com](mailto:info@jmscapitalgroup.com).

**In the event of an emergency, you may wish to directly contact the custodian of your assets for assistance, e.g., provide prompt access to funds and securities, enter orders and process other trade-related, cash and security transfer transactions.**

<b>Custodian</b>	<b>Phone Number</b>	<b>Website</b>
ADP	800-929-2170	mykplan.com
American Funds	800-421-0180	americanfunds.com
Charles Schwab	800-515-2157	client.schwab.com
GreatWest / Empower	855-756-4738	empower-retirement.com
Jefferson National / Nationwide	866-667-0561	nationwideadvisory.com
Mid-Atlantic Capital Group	412-391-7077	wealthscapeinvestor.com/midatlantic
SunWestTrust	800-642-7167	sunwesttrust.com