



M.S. HOWELLS & CO.

# Business Continuity Plan

M.S. Howells & Co. (the "Firm") has developed a Business Continuity Plan to respond to events that could significantly disrupt our business. Since the timing and impact of disasters and disruptions are unpredictable, we are flexible in responding to actual events as they occur. Therefore, we are providing you with this general information regarding our Business Continuity Plan.

**Contacting Us:** If we experience a significant business disruption and you cannot contact us through our main line 1 (480) 563-2000, please call our alternate emergency contacts:

<b>Operations:</b>	Katrina Santa Maria	.....	1 (602) 330-6244
<b>Trading:</b>	Brian McClive	.....	1 (248) 342-7851
<b>All Other Inquiries:</b>	Stephen Howells	.....	1 (480) 463-4151

Alternatively, you may visit our website at [www.mshowells.com](http://www.mshowells.com). If you cannot access us through either of those means, you should contact the clearing firm for instructions on how you may execute orders for your account(s), obtain access to your funds or securities, or request funds. The respective clearing firm contact information is as follows:

**Pershing, LLC** ..... 1 (800) 443-4342 or 1 (201) 413-3635

**Our Business Continuity Plan:** In the event of a business disruption, we plan to quickly recover and resume business operations. We will respond by safeguarding our employees, property, and data, 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 the Firm to resume operations as quickly as possible, given the scope and severity of a significant business disruption.

**Our Business Continuity Plan addresses:** data backup and recovery; all mission critical systems; employee safety; 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 have prompt access to their funds and securities if there is a business interruption.

Our clearing firm backs up our important records and data in a geographically dispersed area and has its own Business Continuity Plan. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, our clearing relationships have advised that their objective is to restore their own operations and be able to complete existing transactions and accept new transactions and payments within a reasonable period of time. Your orders and requests for funds and securities could be delayed during this period.

**Varying Disruptions:** Significant business disruptions can vary in scope, such as only affecting our Firm or the building, business district, city, or the whole region where our Firm is located. 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 our building, we will transfer our operations to a local site as needed and expect to recover and resume business within 24 hours. In a disruption affecting our business district, city or region, we will transfer our operations to a site outside the affected area and recover and resume business within 48 hours. In either situation, we plan to continue with our business or, if necessary, transfer our operation off-site. Customers will be notified through our website [www.mshowells.com](http://www.mshowells.com). If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customers of prompt access to their funds and securities.

**For more information:** If you have questions about our Business Continuity Plan, please contact us at (480) 563-2000.