

# BUSINESS CONTINUITY PLAN

## INTL Fillmore Advisors, LLC

Version: 1.1

Approved by: Brandon Zerbe (Global Business Resiliency Manager)

Dated: September 2023

*The following version of the business continuity plan is approved for external distribution. For confidentiality reasons details regarding specific departmental continuity strategies and staff details is annexed but is available but for internal use only.*

### **Firm Disclosure:**

Stone X (“the Company”) and its affiliates have established a global business resiliency (“BR”) planning policy and program to assess and manage the effects of an emergency or significant business disruption on its operations to provide resiliency of critical business functions. Since the timing and impact of disasters and disruptions is unpredictable, the company needs to be flexible in responding to actual events as they occur. The company’s business resiliency plans address: data backup and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location for employees; counter-party impact; regulatory reporting; and assuring customers prompt service.

Business Continuity Planning is a discipline that sits under the Business Resiliency umbrella. The Business Continuity planning program begins with a review of each department and an analysis of its business resiliency risk via a Business Impact Analysis (“BIA”). This BIA process encompasses all aspects of the Company’s key business functions. The analysis defines, for each business process, its department, department manager, the process criticality/recovery time objective, applications and third parties required to perform the process, alternate processing strategies, financial or legal/regulatory impacts, etc. This information is all used and built into department level Business Continuity Plans (“BCP”).

The BCP process recognises that during a disruption, it might not be practical to recover all business functions, simultaneously. The BIA identifies business functions that are critical (including support operations and related IT systems) and the potential losses (in monetary and non-monetary terms) should their operations be disrupted. The BIA serves to highlight the relative priorities and criticalities among the various business functions and help determine their recovery strategies and recovery time objectives.

The department level BCPs are reviewed and updated as significant business changes occur, and regulatory sign off takes place annually. The BCP is designed to account for the actions the

company will take in the event of disruptions that can vary in terms of scope and severity. The company BCP encompass alternate processing strategies for 7 major disruptions buckets: Loss of Applications, Phones, Staff, Power, Building, Critical third parties and Pandemic. By utilizing this type of methodology, the company feels that it can respond to various incidents and continue critical business processes. This includes incidents involving an office building where any of the company's offices may reside. It also includes information regarding staff unavailability, where staff members may be unable to work at their normal business location, and the resources required to maintain operational effectiveness during disruptions.

The company is diversely dispersed with its regional and out-of-region office locations to back up critical functions, data and system applications including alternative manual procedures identified to enable continued functionality. The BCPs have been reasonably designed to allow the company to continue its business operations and safeguard the interests of its clients. The company expects to meet its client obligations within the day. While the company's BCPs have been reasonably designed to allow for operation during emergency incidents of varying scope, such potential incidents are unpredictable. The company's BCPs are subject to change without notice. Nothing contained in this document, or any other company approved BCP amends or changes any of the terms set forth in any agreements between the company and any of its customers.

The company maintains copies of its BCP plans, their respective annual reviews, and any material changes made to such plans, available to inspection. Copies of BCPs are sent via email to all plan owners and team members following updates. An electronic copy of this plan is located on the internal StoneX Business Resiliency SharePoint Site.

For further information, please feel free to contact us at: [DG-BusinessResiliency@stonex.com](mailto:DG-BusinessResiliency@stonex.com)

## **Overview of INTL Fillmore Advisors, LLC**

INTL Fillmore Advisors will conduct business in global equities, listed options and FX. Our firm is an introducing firm and does not perform any type of clearing function for itself or others; INTL Fillmore Advisors does not hold customer funds or securities. We accept and enter orders. All transactions are sent to our clearing firm, which compares, allocates, clears and settles them.

### **Locations:**

INTL Fillmore Advisors, LLC operates from the following office locations:

- 1441 Ute Blvd, Suite 280, Park City, UT 84098, USA 1-407-741-5300
- 230 Park Avenue 10th Floor, New York, NY 10169, USA 1-212-485-3500
- 10000 Avalon Boulevard, Suite 520, Alpharetta, GA USA 1-404-836-7000
- 230 S La Salle St Ste 10-500, Chicago, IL 60604
- 329 N Park Ave Ste 350, Winter Park, FL 32789

## Regulators:

INTL Fillmore Advisors, LLC is subject to regulation by:

- FINRA – Financial Industry Regulatory Authority
- NFA – National Futures Association
- SEC – U.S. Securities and Exchange Commission
- CTFC – Commodity Trade Futures Commission

In the event of a significant business disruption, the Crisis Management Team (“CMT”) will check with the regulators to determine which means of regulatory 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 we cannot contact our regulators, we will continue to file required reports using the communication means available to us.

## Initiating Escalation

There are two scenarios for initiating escalation as part of the BCP invocation process:

### *a) Disruptions Directly Impacting INTL Fillmore Advisors, LLC*

These are disruptions which have directly impacted the operations of INTL Fillmore Advisors, LLC thereby rendering it unable to provide its clients with the delivery of the full services required as per INTL Fillmore Advisors, LLC contractual obligations. BCPs anticipate two kinds of disruptions, internal and external. Internal disruptions affect only our firm’s ability to communicate and do business, such as a fire, flooding, or extended power outage in our building. External disruptions prevent the operation of the securities markets for a number of firms, such as terrorist attacks, city floods, or a wide-scale regional disruption. Our response to an external significant business disruption relies more heavily on other organizations and systems, especially where we have third party dependencies.

### *b) Disruptions Impacting StoneX Group Entities which are INTL Fillmore Advisors, LLC Intra-group Service Providers*

INTL Fillmore Advisors, LLC operates within a global infrastructure and business setup that carries an inherent reliance on and from other intra-group entities, including the location and operation of critical systems, business functions and resources.

## Trigger Criteria

The trigger framework below identifies the set of pre-defined criteria which may trigger the activation of the BCP, allowing the firm to successfully monitor, escalate, and activate the appropriate range of responses for an emerging disruption event. The trigger framework also reflects the different severity levels of disruption which determines the level and type of response required. This response is dependent, on the circumstances surrounding the

disruption event. The framework considers any event, both internal and external, with the potential to have an impact on INTL Fillmore Advisors, LLC operational delivery.

<b>S/N</b>	<b>Nature of Disruption</b>	<b>Description of Disruption</b>	<b>Minor</b>	<b>Major/Severe</b>	<b>Critical</b>
<b>1.</b>	Loss of IT/ Applications	An infrastructure incident can include the loss of key systems and applications, internet access, or any other IT related issues.	Unavailable access to non-critical systems.	Unavailable access to critical systems	Unavailable access critical systems for a prolonged period of time
<b>2.</b>	Loss of Phones / Communications	An infrastructure incident relating to the sudden loss of ability to use phones or communications systems/devices.	Intermittent and/or partial loss of use of communication devices/systems.	Total loss of communication due to internal issues	Total loss of communication due to breakdown in utilities provider services.
<b>3.</b>	Loss of Staff	A staff incident means a sudden loss of staff which renders either key members unavailable or causes a significant staff shortage.	Staff departure is sudden with slight impact to continuity of critical functions.	Staff departure is sudden with some impact to continuity of some critical function(s).	Staff departure is sudden whereby the provision of services to customer is disrupted.
<b>4.</b>	Loss of Power	An infrastructure incident such as power cut, which causes loss of power to our office.	Intermittent and/or partial loss of use of power source in the office site.	Total loss of power source at office site due to internal issues	Total loss of communication due to breakdown in utilities provider services.
<b>5.</b>	Loss of Use of Premises	A premises incident can include flood, fire, restriction of access, or any other disaster that renders our	Less than 50% of the office staff are able to access the office.	More than 75% of the office staff are unable to access the office.	Access to office site is unavailable due to external systematic factors.

		office inaccessible.			
6.	Pandemic	Disruptions to operations resulting from exposure of region/employee (s) to a pandemic disease incident.	Less than 50% of the office staff are permitted or able to work for the office site.	Less than 25% of the office staff are permitted or able to work for the office site.	Working from the office site is prohibited by governmental regulations or staff health concerns.

## Crisis Management Team

In the event of a significant business disruption, the BCP is invoked by the INTL Fillmore Advisors, LLC Crisis Management Team (“CMT”). This team is made up of INTL Fillmore Advisors, LLC senior management as well as representatives of the various key departments (such as IT, HR, Facilities etc.) who will likely be required to initiate actions and implement the relevant BCP recovery strategy. The CMT’s responsibilities are, but not limited to:

- (i) Characterizing the nature of the business disruption.
  - (ii) Determining the level of severity of the business disruption.
  - (iii) Recommending the relevant business recovery strategy to be adopted within the BCP.
  - (iv) Communicating with stakeholders, including employees, clearing firms, counterparties, and regulators.
  - (v) Approving and allocating any resources to support with continuity and recovery efforts.
- The invocation of the BCP is initiated on the direction of the CMT. Upon confirmation of the course of action to be taken, the CMT is invoked to implement the BCP in accordance with the strategy proposed most suitable for the situation at hand.
  - The first person contacted in the CMT is responsible for arranging for contact to be made with all other CMT members. The said person will need to provide details of the Conference Call Facility or Command Centre to be used by the CMT and agree on a time to convene. If internet connection is available, this can be facilitated via Microsoft Teams.

## Critical Business Functions

INTL Fillmore Advisors, LLC critical business functions are those that ensure prompt and accurate processing of securities transactions. This includes order taking, entry, execution, clearance, settlement, the maintenance of client accounts, access to client accounts, and the delivery of funds and securities

INTL Fillmore Advisors, LLC has the primary responsibility for establishing and maintaining our business relationships with our clients and have sole responsibility for our mission critical functions of order taking and entry. INTL Fillmore Advisors' clearing brokers, and BofA Securities, provide clearing and settlement services, maintenance of client accounts, and the delivery of funds and securities.

INTL Fillmore Advisors' various contractual relationships with its clearing brokers and vendors will ensure that the clearing brokers and vendors maintain business continuity plans and the capacity to execute those plans. INTL Fillmore Advisors' clearing brokers and vendors represent that they will advise INTL Fillmore Advisors of any changes to their plans that could affect INTL Fillmore Advisors' business activities. If INTL Fillmore Advisors' clearing brokers or any of its vendors were to execute their business continuity plan, they represent that they will notify INTL Fillmore Advisors of such execution and provide INTL Fillmore Advisors with the same service as their other clients.

INTL Fillmore Advisors' SLAs with clearing firms provides that our clearing firms will maintain a business continuity plan and the capacity to execute that plan. Our clearing firms represents that they will advise us of any material changes to their plan that might affect our ability to maintain our business and has presented us with an executive summary of their plan. In the event our clearing firms execute their plans, they represent that they will notify us of such execution and provide us equal access to services provided to their other clients. If we reasonably determine that our clearing firms have not or cannot put their plans in place quickly enough to meet our needs or is otherwise unable to provide access to such services, our clearing firms represent that they will assist us in seeking services from an alternative source.

## Summary of Continuity Strategies

Detailed continuity strategies are documented in divisional level business continuity plans (internal use only). Below is a summary of the key strategies we deploy when INTL Fillmore Advisors, LLC experiences the various disruption scenarios we plan for.

### Loss of Premises/Building

- **Loss of Use of Office Premises (short-term):** This would be a scenario where INTL Fillmore Advisors, LLC office premises are not accessible. This could be caused by any event that would prevent staff from accessing the office such as a hazard identified by the building management, civil unrest, local traffic disruptions, fire/flood etc. In this scenario, all staff are equipped to work remotely via VPN or remote access to desktops within the office. Where appropriate, communications lines are diverted to company issued mobile devices, or handed over to the alternate teams and clients will be notified to engage through generic correspondence email/telephone addresses which may be supported by the INTL Fillmore Advisors, LLC or alternate teams.

- **Loss of Use of Office Premises (long-term):** This would be a scenario where INTL Fillmore Advisors, LLC premises are not accessible due to systematic issues such as traffic access, pandemic or other reasons as directed by authorities. Depending on the nature of the disruption, INTL Fillmore Advisors, LLC will employ one or more of the following staff relocation strategies:
  - Primary: All staff have the ability to work remotely. Staff equipped with work laptop computers and remote connectivity software will be asked to work from home.
  - Staff repositioning to unaffected workspace.
  - Staff relocated to other branch offices not impacted by disruption where the necessary resources and infrastructure are available to support critical functions.
  - If none of our other locations are available to receive staff, we will consider the option to move them to a temporary location determined by the CMT.

## Loss of Phones

- When telephony services are affected, this will impact the ability of clients to contact the front office desks and client services. All telephony, voice mail, and call manager services are configured for high availability. When primary telephony servers fail in INTL Fillmore Advisors, LLC, users are automatically migrated over to the secondary servers which are identical in configuration. Departmental BCPs also document specific continuity strategies for loss of communications (including email and instant messenger applications) which includes, but is not limited to, utilization of alternative means of communications subject to regulatory requirements (such as the ability to record calls).

## Loss of Staff

- **Immediate Loss of Key Staff:** Where possible INTL Fillmore Advisors, LLC departments have identified alternate personnel to key staff, or 'handover offices' have been identified and briefed on their roles & responsibilities in a BCP invocation scenario involving loss of key staff. Where possible all critical personnel, holding key positions, have staff holding their alternate appointments/teams and have the ability to take over functions when necessary. This alternate role replacements would be for immediate, temporary status pending a confirmation of suitability for a long-term appointment.
- **Loss of Key Staff Through Natural Attrition:** There is typically a transition period prior to the key staff having to serve out the "notice period". The recruitment process for replacement either internally or externally should be robust enough to ensure suitable replacement candidates can be appointed at least within the "notice period" and/or complemented with the alternate temporary cover.

## Loss of Power

- **Immediate Loss of Power Utilities (long-term):** In a loss of power scenario, the CMT will establish the extent of the power outage and area affected. In the case of an extended outage (45 mins+) the team may consider whether staff can remotely continue working or if critical activities need to be redeployed to other StoneX office teams.

- **Immediate Loss of Power Utilities (short-term):** If the power outage is anticipated to be short term (<45 mins), staff may be asked to stand by until power is restored. In this scenario, staff working on laptops may be able to work off the internal laptop battery for the duration of the outage. If internet access is affected by loss of power, staff can use their company mobile phones as a tethering device and gain access to the system via VPN.

## Loss of IT/Applications

- **Connectivity:** INTL Fillmore Advisors, LLC has built in resiliency into network architecture. When primary connectivity fails, the IT team will redirect all internet/leased line traffic to the secondary lines via network operations to be carried out by the Global Network team.
- **Applications:** When software applications running on staff laptops are temporarily disrupted, the ability to receive and engage in communications with clients may be affected. This could include communications applications with customers: email, chat applications or CRM (e.g. Salesforce) for client static data access. Staff may use company issued smart handphones with alternative chat applications and should notify their customers to communicate through this channel until the access to their mobile applications are restored.

## Pandemic

- **Multi-Scenario Impact:** Where a Pandemic has been declared by the relevant authorities, the impact would be determined primarily by the directives imposed by the authorities. In most cases, the resultant impact would be:
  - Loss of Access to Office Premises (long-term); and
  - Inability to conduct face-to-face meetings with staff and Clients; and
  - The welfare of the staff of INTL Fillmore Advisors, LLC in terms of their health and safety.
- The business recovery strategies highlighted above in scenarios “2. Loss of Phone/Communications”, “3. Loss of Key Staff” and “5. Loss of Use of Office Premises” would apply depending on the level of severity. The key considerations would be that customers must still be able to conduct their “trading” and “communicate with staff” for BAU service support.
- Our firm pandemic plan is defined at group level in the *StoneX Global Pandemic Plan*





NASDAQ: SNEX  
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### **Updates and Review**

INTL Fillmore Advisors, LLC will update BCPs whenever we have a material change to our operations, structure, business, staff, or locations. In addition, the firm will initiate a review of all BCPs, annually, and will modify plans with material changes to operations, staff, structure, business, or location or those of our clearing firm.