Brighton Securities Corp.
Brighton Securities Capital Management

Business Continuity Plan

Rev 02/2022

Emergency Contacts

Our firm's emergency contact persons are:

George T. Conboy
Chief Executive Officer/Chairman
1209 Clover St.
Rochester, NY 14610
gtconboy@brightonsecurities.com
(585) 820-8530

Danielle Wilkins
Chief Administrative Officer
9 Wood Lily Lane
Fairport, NY
dwilkins@brightonsecurities.com
(585) 305-9975

Lori Alberts
Chief Compliance Officer
17 ½ Little Spring Run
Fairport, NY 14450
lalberts@brightonsecurities.com
585-690-9047

These names will be updated in the event of a material change, and our Executive Representative will review them within 15 business days of the end of each quarter.

Firm Policy

Our firm's 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 that we determine we are unable to continue our business, we will assure customers' prompt access to their funds and securities.

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. Our response to an external SBD relies more heavily on other organizations and systems, especially on the capabilities of our clearing firm.

Approval and Execution Authority

George T. Conboy, CEO/Chairman, is a registered principal. He is responsible for approving the plan and ensuring the required annual review is conducted. Mr. Conboy has the authority to execute this BCP.

Plan Location and Access

Our firm will maintain copies of its Business Continuity Plan, the annual reviews, and updates. An electronic copy of our plan is located in the 'IT Dept\Important Documents' on the 'F' Drive.

Business Description

Our firm conducts business in equity, fixed income, and derivative securities. Our firm is an introducing firm and does not perform any type of clearing function for itself or others. Furthermore, the firm does not hold customer funds or securities; it accepts and enters orders. All transactions are sent directly to mutual fund or insurance companies or to our clearing firm, which executes orders, compares them, allocates them, clears and settles them. The mutual fund, insurance companies, and our clearing firms maintains customers' accounts, can grant customers access to them, and delivers information. Mutual Fund and insurance companies contact information can be found on the client statements or online and our firm services principally retail customers.

Our clearing firms are:
First Clearing, LLC
1 North Jefferson Ave.
St. Louis, MO. 63103
www.firstclearing.com
888-322.2532

Charles Schwab Corporation
211 Main St.
San Francisco, CA 94105
https://www.schwab.com/
877-774-3892

Our primary contact persons at First Clearing L.L.C. are:

Andrea Hansen
Correspondent Services
314-875-8460
Andrea.hansen@firstclearing.com

Karen Behrens
Correspondent Services
314-875-8429
Karen.Behrens@firstclearing.com

Johnny Tiet
Correspondent Services
(314) 875-8424
johnny.tiet@firstclearing.com

Our primary contact with Charles Schwab is:
Customer Help Line
877-774-3892

Office Locations

Our offices are located at:

1703 Monroe Avenue
Rochester, New York 14618
(585) 473-3590

212 East Main Street
Batavia, NY 14020
(585) 344-1850

14 Market Street
Lockport, NY 14094
(716) 304-2102

172 Lake Street
Hamburg, NY 14075
716-649-9800

1966 Hillview Street
Sarasota, FL 34239
941-359-2604

324 West Main Street
Falconer, NY 14733
716-720-5816

10080 Whitewood Road
Brecksville, OH 44141
440-838-1700

10007 Wilshire Ave, NE
Albuquerque, NM 87122
505.440.8593

460 St. Michaels Drive
Suite 1101
Santa Fe, NM 87505

11118 Travis Gulch Drive
Charlotte, NC 28277

Our employees travel to their respective office in their personal vehicle. Order taking and entry occur at these locations.

Alternative Physical Location(s) of Employees

In the event of an SBD, we will move our staff from the affected office to our other location or at the employee home with Brighton issued equipment

Customers' Access to Funds and Securities

Our firm does not maintain custody of customers' funds or securities; these are accessed through our clearing firms, First Clearing and Charles Schwab. In the event of an internal or external SBD, if telephone service is available, our registered persons will take customer orders or instructions and contact our clearing firms on their behalf. If our Web access is available, our firm will post pertinent information on our Web site so that customers may access their funds and securities. Clients will be provided a number to call our clearing firms directly if we are unable to take calls. The firm will make this information available to customers through its disclosure policy.

In the event of an external SBD with FCC, FCC has provided Brighton Securities with a backup system to process transactions

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.

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

Our firm maintains its primary hard copy books and records at 1703 Monroe Avenue, Rochester, NY 14618. Lori Alberts, 585-340-2235 is responsible for the maintenance of these books and records. Our electronic records are split amongst multiple cloud based data solutions. Our client forms are stored with Artisan Software Inc. at 7676 Hazard Center Drive, Suite 1540, San Diego, CA 92108 with multiple cloud redundancies at other hosted sites. The account manager who works with Brighton Securities is Carol Haynes, 619.725.1350. Internal electronic records are stored on a hosted server with LMT Technology Solutions at 4 Commercial St 4th floor, Rochester, NY 14614. They too have multiple redundancies for the hosted server at various cloud locations. The account

manager who works with Brighton Securities is Garett Black 585.784.7470 x1. Our Contact Management system is with Redtail Technology, whom have 3 data centers two in Sacramento California and one in Phoenix Arizona, all three which use Amazon Web Services and Amazon Web Services backup best practices. Redtail can be contacted at 800.206.5030. Our Capital Management business uses Morningstar Office as a cloud based trading platform that works bout of our clearing firms. This is administered by Morningstar Inc. with data centers around the globe. Our firm maintains the following document types and forms, some of which are also transmitted to our clearing firms:

- New Account Forms
- Customer Identification Forms
- Exchange Paperwork
- Corporate Resolutions
- Not for Profit and Partnership Agreements

Our firm maintains its back-up hard copy books and records on offsite servers. Our firm backs up its paper records by scanning them to our servers. All clearing and trade information is maintained by our clearing firms, First Clearing and Charles Schwab.

The firm's back-up plan is as follows:

- All servers which are onsite in Rochester are backed up using LMT's Storagecraft hardware device and online backups.
- The onsite Storagecraft server send complete backups of every server to the LMT server farm once daily at 3am.
- Any back-up data can be retrieved within 24 hours. Physical server hardware with information can be sent within 48 hours.
- E-mail servers are hosted externally, and e-mails can be accessed outside the office. We use Microsoft Office 365 as a host.
- All e-mail is archived at the firm's e-mail archive provider, Smarsh.
- All client documents are stored on Artisan's cloud servers with redundant geographic locations.
- All other electronic documents are stored on our hosted server from LMT.
- LMT has fail over redundancies in case of physical server failure in their main data center or any of their geographically separated backup data centers with a 99.99% uptime SLA.
- Other client data lies with the respective clearing firms and vendor cloud storage facilities.

In the event of an internal or external SBD that causes the loss of our paper 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 either physically recover the storage media or electronically recover data from our back-up site, or, if our primary site is inoperable, continue operations from our back-up site or an alternate location.

Financial and Operational Assessments

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 employ will include telephone, secure email, and our website. In addition, we will retrieve our key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic).

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 clearing firms, critical banks, 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, from our principal shareholders, 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.

Mission Critical Systems

Our firm's "mission critical systems" are those that ensure prompt and accurate processing of securities transactions, including order taking, entry, execution, comparison, allocation, clearance and settlement of securities transactions, the

maintenance of customer accounts, access to customer accounts, and the delivery of funds and securities.

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 and entry. Our clearing firms provide, through contract, the execution, comparison, allocation, clearance and settlement of securities transactions, the maintenance of customer accounts, access to customer accounts, and the delivery of funds and securities.

Our clearing firms' contracts provides that each clearing firm will maintain a business continuity plan and the capacity to execute that plan. Our clearing firms represent that it will advise us of any material changes to its plan that might affect our ability to maintain our business. In the event our clearing firms executes their plans, it represents that it will notify us of such execution and provide to us equal access to services as it provides to its other customers. If we reasonably determine that our clearing firms have not or cannot put their plan in place quickly enough to meet our needs or is otherwise unable to provide access to such services, our clearing firms represent that it will assist us in seeking services from an alternative source.

Our clearing firms represent that they back up our records at a remote site. Our clearing firms represent that they operate a back-up operating facilities in a geographically separate area with the capability to conduct the same volume of business as their primary sites. Our clearing firms have also confirmed the effectiveness of their back-up arrangements to recover from a wide scale disruption by testing, and it has confirmed that it tests its back-up arrangements at least two or three times per year.

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 clearing and 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.

Our Firm's Mission Critical Systems

I. Order Taking

Currently, our firm receives orders from customers via telephone, e-mail, or in person. During an SBD, either internal or external, we will continue to take orders through any of these methods if phone service or email is available. Our firm will post notice on our website, that should customers not be able to reach us by these methods, they can reach our clearing firms directly.

II. Order Entry

Currently, our firm enters orders electronically by sending them to our clearing firm. Alternatively, we can place customer orders over the phone to First Clearing's trading desk should the electronic system fail.

In the event of an external SBD, we will maintain the order in electronic or paper format and deliver the order to the clearing firm by the fastest means available when it resumes operations. In addition, during an internal SBD, we may need to refer our customers to deal directly with our clearing firm for order entry.

Mission Critical Systems Provided by Our Clearing Firms

In the unlikely event of a citywide or regional disruption, FCC has established a recovery site approximately 150 miles from its headquarters that can be used to restore time sensitive functions as soon as key employees are relocated to the facility. Additionally, as a subsidiary of a large financial institution, FCC would intend to take advantage of any available facilities of other affiliates that may be located in other geographical regions. In the event that any such disruption occurs, they have developed alternative service arrangements, systems, locations and contingency plans to ensure that any service is quickly restored.

FCC has identified several computer applications with Mission Critical or High criticality ratings and has documented this within the business continuity plans. The primary application provider, Thomson Reuters Beta Systems Inc. has

conducted successful testing with FCC, generally two or three times per year since November 2000. Finally, through its parent company, FCC utilizes data centers which regularly perform disaster recovery testing.

Schwab BC Plans include but are not limited to: Recovery time objectives and priorities based on a thorough business impact analysis process. Predefined teams and members responsible for coordinating and facilitating business recovery. Multiple, geographically diverse service centers allowing rapid transfer of work to alternate locations. Public health crisis and high absenteeism response and mitigation plans. Predetermined systems and data recovery requirements. Identification of internal and external resource dependencies and contingency plans. Annual employee awareness and business continuity training. Ongoing integrated testing to validate recovery capabilities of critical infrastructure and business processes. To mitigate against the risks associated with an outage of outsourced operations and/or technology, Schwab Business Continuity and Technology Recovery performs vendor due diligence, as well. As part of the vendor due diligence process, service providers' business continuity and technology recovery programs are reviewed to validate that critical outsourced services provided to Schwab can be restored within acceptable timeframes. Technology is a critical component in Business Continuity Planning, and Schwab is proactive in protecting its Information Technology environment. Primary and back-up data centers are designed and maintained with multiple power and site environmental control paths and redundant components. Site locations are subject to few traditional natural hazards. In the event of a utility company supply failure, uninterruptible power sources (UPS) are intended to provide electricity to key servers, databases, and critical systems until such time as redundant diesel-powered generators supply the facility's electrical load demand. Multiple UPS units and generators are available to provide critical infrastructure component redundancy for a variety of potential events, including a utility company delivery failure. Standard safeguards include: Redundant communication lines, State-of-the-art data centers - controlled access, with redundant environments, 24x7x365 facility and security monitoring (both on-site and off-site) and support staff, Real time data mirroring and nightly backups with off-site storage. In addition, Schwab's Business Continuity, Technology Recovery, Security, and Corporate Real Estate groups have developed collaborative emergency response procedures for each location and take a proactive approach to integrating with local police, fire departments, government agencies, and key vendors. While no contingency plan can eliminate all risks associated with service interruptions, we continually assess, test, and update our Business Continuity and Technology Recovery Plans and Program to

mitigate all reasonable risk. The recovery systems and processes are reviewed and tested at least annually.

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

A. Customers

We now communicate with our customers using the telephone, e-mail, our Web site, SMS text message, fax, U.S. mail, and in person visits at our firm or at other locations. 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 where a record is necessary; follow up with paper copy in the U.S. mail.

B. Employees

We now communicate with our employees using the telephone, e-mail, SMS text message, instant message, 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. 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 and office phone numbers. We have identified persons, noted below, who live near each other and may reach each other in person:

The person to invoke use of the call tree is:

Caller	Call Recipients
George T. Conboy	*Lori Alberts, Danielle Wilkins*
Danielle Wilkins	*Staff*
Lori Alberts	*Registered Representatives*

C. Regulators

We are currently members of FINRA and SIPC. We communicate with our regulator 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.

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 an 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. Our critical business constituents are:

- LMT Technology Solutions Inc.
- Astranetworks
- Evolve IP
- Smarsh
- Artisan Software
- Redtail CRM
- Morningstar Office

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 check writing, investment and clearing accounts is:

Genesee Regional Bank
1850 South Winton Rd
Rochester, NY 14618
(585) 249-1540

Five Star Bank
1940 Monroe Avenue
Rochester, NY 14618

585-417-3930

C. Counter-Parties

Where transactions cannot be completed with critical counter-parties, we will work with our clearing firms or contact those counter-parties directly to make alternative arrangements to complete those transactions as soon as possible.

Regulatory Reporting

Our firm is subject to regulation by: SEC, FINRA, MSRB, and SIPC. We now file reports with our regulators electronically. 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.

Disclosure of Business Continuity Plan

We will post the summary on our Web site and mail it to customers upon request. Our summary addresses the possibility of a future SBD and our plan to respond to events of varying scope. The summary (1) provides specific scenarios of varying severity (e.g., a firm-only business disruption, a disruption to a business district, a city-wide business disruption, and a regional disruption); (2) states whether we plan to continue business during that scenario and, if so, our planned recovery time; and (3) general information on our intended response. Our summary also discloses the existence of back-up arrangements.

Updates and Annual Review

Our firm will update this plan whenever we have a material change to our operations, structure, business or location or to those of our clearing firms. In addition, the Chief Compliance Officer will review the BCP annually to ensure modifications are made as needed.

Senior Manager Approval

I have approved this Business Continuity Plan as reasonably designed to enable Brighton Securities to meet its obligations to customers in the event of a Significant Business Disruption (SBD)

Signed: _____

George T. Conboy, CEO/Chairman

Date: 2-14-22