



April 23, 2019

William O'Neil Securities, Incorporated ("the Firm") is committed to providing highly reliable service to our clients. Our mission is to resume normal business and client support operations with minimal service impact on our clients, in the shortest time possible. Our business continuity plan focuses on mitigating business disruptions by providing technical redundancy, efficient response and prompt recovery.

The Firm ensures that technology is a priority and supplies a number of options for systems availability that would require, in most cases, the failure of three separate systems to directly impact the equity trading business you conduct with the Firm. In the event of an unexpected disaster or emergency, Diane Canepa, BCP Committee Representative, is your designated, out-of-area alternate contact. She has been provided with the information necessary to assist you. We have tested our procedures to confirm that the Trading Department and Diane are prepared to address the myriad of circumstances that could present themselves in a significant business disruption ("SBD").

Following is the section of our business continuity plan for managing your trading requirements in the event that an SBD renders our trading systems inoperable:

- If an SBD occurs during trading hours we will: 1) notify our clearing firm of the SBD, 2) follow our plan to contact you directly to discuss trade status, and 3) advise you of any transactions left incomplete (partial executions).
- If an SBD occurs during non-trading hours we will: 1) relay an AutEx terminal message to notify you of the SBD and our trade status, and 2) contact you directly to address any special circumstances.

This alternate contact information is confidential and should only be used if you are unable to reach the Trading Department due to an SBD.

Diane Canepa
Primary Telephone: 212.608.6376

We will post any pertinent changes to www.oneilsecurities.com for your reference. Please direct any questions to bcpinfo@oneilsecurities.com.

Sincerely,
Institutional Trading Department