

## FORDHAM FINANCIAL MANAGEMENT, INC.

### **BUSINESS CONTINUITY PLAN**

Securities industry regulations require each member firm to create and maintain a Business Continuity Plan reasonably designed to meet its obligations to its clients and other counter-parties. In accordance with these requirements, Fordham Financial and our clearing firm, Axos Clearing, Inc., have designed a Business Continuity Plan to address possible scenarios to ensure that the impact to you, our client, is minimized in the event of an emergency or disaster.

Fordham Financial Management's Business Continuity Plan is designed to address key areas of concern, including, but not limited to, the following:

- Data back-up and recovery;
- Mission critical systems;
- Financial and operational assessments;
- Alternate means of communication between Fordham and its customers;
- Alternate means of communication between Fordham and its employees;
- Alternate physical locations of employees;
- Critical business constituent, bank and counter-party impact;
- Regulatory reporting;
- Communications with regulators; and
- How Fordham and its clearing firm, Axos Clearing, Inc., will ensure that customers have access to their funds and securities in the event Fordham determines it is unable to continue its business.

As events creating business disruptions may vary in nature and scope, Fordham Financial Management has endeavored to plan for different scenarios that may affect Fordham Financial Management's primary office, a citywide area, or a regional area. Regardless of the scope of disruption, Fordham Financial intends to continue to provide service to its valued clientele.

In the event Fordham Financial's primary office is affected, the Firm will seek to immediately locate alternate office space in the Wall Street area or unaffected area.

In the unlikely event of a citywide or regional disruption, Fordham Financial would take advantage of any available facilities offered by affiliates (such as Axos Clearing, Inc.) that may be located in other geographical regions (including Nebraska).

Fordham has identified several computer applications with mission critical or high criticality ratings. Our primary application provider, Axos Clearing, Inc., conducts successful testing with their application provider. Finally, Axos Clearing, Inc., utilizes data centers which regularly perform disaster recovery testing.

At a minimum, the Fordham Financial Business Continuity Plan is reviewed, updated and tested on an annual basis. Additionally, our primary internal and external application providers periodically conduct testing of their own back-up capabilities to ensure that, in the event of an emergency or significant business disruption, they will be able to provide us with the critical information and applications we need to continue or promptly resume our business. When testing our Plan, we review the recovery time and resumption time period for all mission critical systems.

Making sure that any type of disruption does not unduly impact our Firm or our clients is extremely important to us, and our Business Continuity Plan is designed to allow us to continue to provide the quality service you have come to expect from Fordham Financial Management, Inc.