

## **BAC Florida Investments' Business Continuity Plan Disclosure**

BAC Florida Investments ("BFI") has developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

**Contacting Us** – If after a significant business disruption you cannot contact us as you usually do at **(305) 523-6510**, you should go to our web site at <http://www.bacinvestments.com> for additional information. If you cannot access us through either of those means, you should contact our clearing firm, Pershing LLC, at **(201) 413-3635** for recorded instructions on how to process limited trade-related transactions, cash disbursements, and security transfers. Please refer to the Pershing Client Support section of this disclosure.

**Our Business Continuity Plan** – We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, 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 our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data backup and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counterparty impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

Our clearing firm, Pershing LLC, backs up our important records in a geographically separate area. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, we have been advised by our clearing firm that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments within four (4) hours. Your orders and requests for funds and securities could be delayed during this period.

**Varying Disruptions** – Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business

district where our firm is located, the city where we are located, or the whole region. 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 a building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business within twelve (12) hours. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area, and recover and resume business within three business days. In either situation, we plan to continue in business, transfer operations to our clearing firm if necessary, and notify you through email or our web site <http://www.bacinvestments.com> on how to contact us. Our emergency number is 305-523-6510. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer's prompt access to their funds and securities.

**For more information** – If you have questions about our business continuity planning, you can contact us at (305) 523-6510 or for additional information about how to request funds and/or securities when BFI cannot be contacted due to a significant business interruption, please visit the Pershing web site at <https://www.pershing.com/global-assets/pdf/disclosures/per-business-continuity.pdf> or call (201) 413-3635 for recorded instructions. If you cannot access the instructions from the web site or previously noted telephone number, Pershing may be contacted at (213) 624-6100 extension 500 as an alternate telephone number for recorded instructions.

### **PERSHING CLIENT SUPPORT**

In the event that BAC Florida Investments experiences a significant business interruption, Pershing will process limited trade-related transactions, cash disbursements, and security transfers on your behalf.

#### **Trades**

Pershing will process the following closing security transactions:

- Sale of security position held long in the client's account
- Buy of security to close-out short security position

Pershing will process closing security transactions upon receipt of written instructions that must include the following information:

- Client brokerage account number
- Client name (as registered on the brokerage account)
- Security description, including symbol or CUSIP® number
- Number of shares

Note: All orders will be handled as market orders



Instructions to Pershing must be in writing and transmitted via facsimile or postal service as follows:

**Pershing LLC  
P.O. Box 2065  
Jersey City, New Jersey 07303-2065  
Fax number (201) 413-5368**

Please note that this fax number is for business interruption-related issues only, and should not be used for any other purposes, such as change of address notices, account transfers, and credit verification. Information received on this fax that is unrelated to business interruption issues will not be acted upon.

### **Cash Disbursements**

Pershing will process cash disbursements upon receipt of signed written instructions that must include the following information:

- Client brokerage account number
- Client name (as registered on the brokerage account)
- Exact amount to be disbursed
- Indicate method of disbursement (as follows) and provide the information indicated:

### **Check**

- Indicate name and address of record check is to be mailed to

### **Federal Funds**

- Indicate receiving bank name, ABA number, and receiving bank account number

**NOTE:** The receiving bank account name and brokerage account name must be identical unless we have a letter of authorization on file indicating alternate instructions.

Instructions to Pershing must be in writing and transmitted via facsimile or postal service as follows:

**Pershing LLC  
P.O. Box 2065  
Jersey City, New Jersey 07303-2065  
Fax number (201) 413-5368**

Please note that this fax number is for business interruption-related issues only, and should not be used for any other purposes, such as change of address notices, account transfers, and credit verification. Information

received on this fax that is unrelated to business interruption issues will not be acted upon.

### **Securities Transfers**

Pershing will process security transfer requests upon written instructions that must include the following information:

- Client brokerage account number
- Client name (as registered on the brokerage account)
- Description of security(ies) to be transferred, including symbol(s) or CUSIP number(s)
- Quantity to be transferred
- Receiving account information for securities, as follows:
- Transfer to another brokerage account at Pershing
- Provide receiving account number at Pershing (name and address on both accounts must be the same)

### **Transfer to another financial organization**

- Name of the receiving financial organization
- DTC number (if the receiving financial organization is a registered broker-dealer)
- Name of the receiving financial organization

Instructions to Pershing must be in writing and transmitted via facsimile or postal service as follows:

**Pershing LLC  
P.O. Box 2065  
Jersey City, New Jersey 07303-2065  
Fax number (201) 413-5368**

Please note that this fax number is for business interruption-related issues only, and should not be used for any other purposes, such as change of address notices, account transfers, and credit verification. Information received on this fax that is unrelated to business interruption issues will not be acted upon.

**BAC Florida Investments. 2333 Ponce de Leon Blvd., Suite 700, Coral Gables, FL 33134  
Tel: 305.523.6510 Fax: 305.375.0362  
Member FINRA/SIPC**