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Business Continuity Plan

Madison Global Partners ("MGP")
Business Continuity Plan ("BCP")

November 3, 2026

This revision changes are new employees and the addition to Charles Schwab in multiple locations.

August 13, 2024

This revised BCP from December 2023 was updated mainly due to the MGP change to sub-clearing firm to Dinosaur Financial Group, LLC. In addition to minor changes such as contact information of MGP registered personnel.

This document outlines small introducing firms in fulfilling their obligations under FINRA Rule 4370 (Business Continuity Plans and Emergency Contact Information) as well as meet federal securities laws, state laws, or other applicable federal or state regulatory requirements. This document provides a BCP plan and updates to this plan may be warranted. The obligation to develop a business continuity plan (BCP) is not a "one-size-fits-all" requirement and may be changed to reflect future changes and needs of the firm and other factors such as coronavirus pandemic (Covid 19) and economic turmoil such as wars currently in Ukraine and Israel. MGP has multiple clients that may have dual citizenship in the USA and Israel.

Updates

MGP will seek additional guidance on certain regulatory obligations should review the FINRA BCP Topic Page./and/or review for additional applicable rule updates.

Overview of Rule 4370 (Business Continuity Plans and Emergency Contact Information)

Rule 4370 requires a member firm to create, maintain, annually review and update upon any material change a written BCP identifying procedures relating to an emergency or significant business disruption. These procedures are "reasonably designed to enable the member to meet its existing obligations to customers." MGP needs to conduct its own risk analysis to determine where critical impact points and exposures exist within the firm

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and with its counterparties and suppliers, significant business disruptions for purposes of business continuity planning may include, among other things, natural disasters, pandemics, terrorist attacks, wars and cyber events. In addition, member firms that heavily leverage technology for their business systems and infrastructure may have an increased risk of significant business disruptions associated with cyber events and technology-related disruptions. Each member firm has flexibility to tailor the BCP to the size and needs of its business, provided that the plan addresses the enumerated minimum elements described below to the extent applicable and necessary to the firm.

In addition, Rule 4370 requires each member firm to provide (and promptly update upon any material change) to FINRA prescribed emergency contact information for the member firm. The rule also requires each member firm to disclose (at a minimum, in writing at account opening, by posting on its website, and by mailing upon request) to its customers how the BCP addresses the possibility of a future significant business disruption and how the member firm plans to respond to events of varying scope.

Critical Elements

At a minimum, a BCP must address these elements, to the extent applicable and necessary:

(1) Data back-up and recovery (hard copy and electronic);
(2) All mission critical systems;
(3) Financial and operational assessments;
(4) Alternate communications between customers and the member;
(5) Alternate communications between the member and its employees;
(6) Alternate physical location of employees;
(7) Critical business constituent, bank and counter-party impact;
(8) Regulatory reporting;
(9) Communications with regulators; and
(10) How the firm will assure customers' prompt access to their funds and securities in the event that the member determines that it is unable to continue its business.

To the extent that these categories are not applicable, you must document in the BCP the rationale for their exclusion. Keep in mind that the above-listed elements are not exhaustive; you should address other key areas for your plan to be complete and thorough, based on your firm's business and operations.

FINRA Rule 4370(c) requires that firms relying on another entity for elements of their BCP or mission-critical systems must address that relationship in their plan. If your firm conducts a different type of business (*e.g.*, conducts only a "direct application" business involving mutual funds and variable insurance products held directly at the issuer), you must modify the template to describe the entities you rely on and the nature of those relationships.

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For additional information, FINRA's dedicated BCP Topic Page summarizes the requirements of FINRA Rule 4370 and provides other information to aid firms. Guidance and temporary regulatory relief related to business continuity planning during the COVID-19 pandemic is available on FINRA's dedicated COVID-19 Topic Page. Firms relying on third-party providers to provide services in connection with their BCPs should review *Notice to Members* *05-48* (July 2005) and *Regulatory Notice* 21-29 (August 2021).

I. Emergency Contact Persons

MGP has listed two emergency contact persons (below) listed on FINRA Contact System *FINRA Contact System (FCS)*. In addition, Operations Manager Michael Kaplan at (516) 680-8950. MGP must use FCS to update the contact information promptly (but no later than 30-days following any change in the information) and annually review and update, if necessary, the information within 17 business days after the end of each calendar year.

MGP two emergency contact persons are:

Name	Title or Relationship to Firm	Mailing Address	Email Address	Phone Number	Cell Number
Anton Joseph Gerdes Jr. (CRD #1010083)	CEO/CCO/AMLCO	350 Vanderbilt Pkwy Suite 205 Hauppauge, NY 11788	Anton@madisonglobalpartners.com	(631) 240-4155	(516) 672-9711
David Stanley Kaplan (CRD #1176065)	Managing Partner	Same as above	Davidkaplan@madisonglobalpartners.com	(631) 240-4199	(516) 617-0454

MGP will provide FINRA with the contact information for the two emergency contact people: MGP fax number is (631) 521 7343 found on the FINRA Contact System (FCS). Anton Gerdes, CCO will promptly notify FINRA of any change in this information through FCS (but no later than 30-days following the change) and will review, and if necessary, update, this information within 17 business days after the end of each calendar year.

Rule: FINRA Rule 4370(f); FINRA Rule 4517. See also FINRA's Regulatory Filing Systems for the FCS.

II. Firm Policy

This Firm Policy is to state MGP's objectives for business continuity in the event of an emergency or significant business disruption (SBD), including MGP's obligation to assure customers access to their funds and securities in the event of a significant business disruption. This policy is available on Teams to all employees and will be e-mailed to all employees. Scott Neville with the authority given by Anton Gerdes to review the firm's

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policy and have Anton approve any changes made. This BCP's primary objectives are to continue providing services to our customers, protect the health and safety of our employees, and fulfill our legal and regulatory obligations. In the event that we determine we are unable to continue our business we will assure customers prompt access to their funds and securities.

A. Significant Business Disruptions (SBDs)

An SBD may affect only our firm (*e.g.*, a fire in our office building or cyber event) or may be widespread affecting several firms or the operation of the securities markets (*e.g.*, a terrorist attack, a natural disaster or a pandemic). MGP response will vary depending on the severity of the SBD, which may include greater reliance on other organizations and systems, especially on the capabilities of our clearing firm.

The following chart is to give a few examples of potential events that would affect the regular business practices of the firm including but not limited to:

Significant Business Disruption	Potential Systems Down / Maintenance Required
Fire	Computers, Servers, Paper Documents, Power
Natural Disaster	Computers, Servers, Paper Documents, Power
War	Too Many Potential Systems to list
Cyber Attack	All electronic based systems; computer, phone, internet, fax, television.
Pandemic	Personnel, Shift in Daily Business Practice / Work from Home
Power Outage	Computers, Servers
Other	Any systems can face significant business disruption. The firm must fix whatever potential disruptions arise and find a remedy promptly.

UPDATE: On or around July 19, 2024, RBC, one of two MGP clearing firms, RBC was affected due to a reportedly massive faulty software update by a security company CrowdStrike (symbol: "CRWD"), that impacted some Windows computers throughout the world. MGP clearing firm RBC was affected by the outage on July 19, 2024. RBC updated MGP throughout July 19, 2024, with multiple e-mail notification via Nexus@RBC.com notifying MGP with updates and work-around and that RBC was back up and running on July 19, 2024.

MGP, as per this policy gave updates notified employees with text messages and e-mails to MGP staff as per this plan.

B. Plan Approval and Annual Reviews

Anton Gerdes, CCO and CEO, a registered principal and member of senior management, is responsible for approving the plan and for conducting the required annual review.

Rule: FINRA Rule 4370(b) and (d).

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C. Plan Location and Access

Consistent with FINRA Rule 4511 (General Requirements), MGP will maintain copies of its BCP, any modifications that have been made to the BCP, the annual reviews for inspection, and the BCP will be made available promptly upon request to FINRA staff. The BCP is also available to all employees on Compliance Manuals.

Rule: FINRA Rule 4370(a); FINRA Rule 4511.

III. Business Description

MGP is a FINRA registered member firm. The firm conducts and is approved for the following business lines.

- equity securities,
- over the counter securities,
- broker or dealer selling corporate debt securities,
- underwriter or selling group participant (corporate securities other than mutual funds),
- mutual fund retailer,
- US government securities broker,
- Broker or dealer selling variable life insurance and/or annuities,
- put and call broker or dealer or option writer,
- non-exchange member arranging for transactions in listed securities by exchange member,
- private placements of securities and other – research,
- investment banking.

Madison Global Partners does not perform any type of clearing function or hold customer funds or securities. After an order is accepted and entered by our firm, the order is sent to our clearing firm for execution, clearance and settlement. Our clearing firm also maintains our customers' accounts, can grant customers access to them, and delivers funds and securities.

On an exception basis there have been minimal instances of clients giving a check to their financial advisor for the benefit of their investment accounts to which operations deposit the check for the client. Clients can deposit their own checks via the RBC Connect Application or by mailing their check directly to RBC.

Our three clearing firms are;

1) Interactive Brokers LLC (CRD #36418) at One Pickwick Plaza Greenwich, Ct 06830 (866-694-2757 and service@interactivebrokers.com, www.interactivebrokers.com) with contact person of (Nicholas George, +1 203 422 8986, ngeorge@interactivebrokers.com)

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2) RBC Capital Markets, LLC at 60 South Sixth St. Minneapolis, MN 55402 RBC Phone List, www.rbc.com] and our contact person at that clearing firm is (Nick DeGidio, 212-858-7000). Our clearing firm has also given us the following alternative contact in the event that our primary contact cannot be reached: in addition to these contacts above there are several people available at IBKR and RBC who can help the firm with a given task.

3) Charles Schwab 3000 Schwab Way Westlake, TX 76262 1- 800 435 4000. The contact person is Jonathan Kirkpatrick at 1-877-687-4083 jonathan.kirkpatrick@schwab.com Business Development Officer. The alternative contact number is: 877 774 3892.

IV. Office Locations

MGP address is 350 Vanderbilt Motor Parkway, Suite 205 Hauppauge, NY 11788. This location maintains critical systems at this location

A. Office Location #1

Our Location #1 Office is located at 350 Vanderbilt Motor Parkway, Suite 205 Hauppauge, NY 11788. Its main phone number is (631) 240-4155. Anton Gerdes at (516) 672-9711 / anton@madisonglobalpartners.com and/or David Kaplan (516) 617- 0454 / Davidkaplan@madisonglobalpartners.com. MGP rely on their personal automobiles to travel to the office. We engage in order taking and entry at this location. The alternate location or back-up location is ShareSync through Jordan and Assoc. Eric Sachs (631) 271-9478. In the event that Location #1 Office is inaccessible, or staff is working remotely due to an SBD, mail will be directed or forwarded to the alternate location or back-up location.

B. Office Location #2

Our Location #2 Office is located at 14 East 38th Street New York NY 10016. Its main phone number is 646-690-0330 and the office manager is Anton Gerdes, anton@madisonglobalpartners.com, 631-240-4155. Our employees rely on public transportation and/or drive to this office.

V. Alternate Physical Location(s) of Employees

If the main office location is unavailable or infeasible (*e.g.*, due to the inability to employ social distancing during a pandemic), staff may temporarily work from a remote location (*e.g.*, staff may work from home because of health and safety reasons during a pandemic). In this event, we will maintain a list of employees working locations and contact information.

Anton Gerdes: 9 Salt Meadow Rd Babylon, NY 11702 (516) 672 9711

- Anton's Home will be the primary satellite office, where mail that would be delivered to the main office is forwarded to his home as he is the CEO/CCO. Anton's home is also outfitted with the same cyber security technology as the main office.

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Alan Sasserath 15 Bowdon Road, Greenlawn, NY 11740 (631) 252-4198
Albert Chase: 9025 213th St Queens Village, NY 11428 (917) 312-2040
Barry Sahgal: 1148 Fifth Avenue #11B New York, NY 10128 (646) 552-3748
Brian Rockowitz: 49 Shady Lane Huntington, NY 11743 (516) 449-6548
Christopher Voccola: 4023 Flatts Main Street Apt 409 Indian Land, SC 29707 (516) 749-5540
David Kaplan: 16 Yale Dr Manhasset, NY 11030 (516) 617-0454
David Lerner: 1235 Mara Ct Atlantic Beach, NY 11509 (516) 242-4566
Drew Gordon: 30 Cedar Ridge Lane Dix Hills, NY 11746 (631) 626-1656
Eric Nelkin: 16 King Street Port Jefferson Station, NY 11776 (631) 428-8314
John Cierski: 10 Intervale Rd Setauket, NY 11733 (631) 897-0635
Melissa Araujo 164 South Path Calverton, NY 11933 (631) 438-6380
Michael Kaplan: 16 Yale Dr. Manhasset, NY 11030 (516) 680-8950
Robert Kaplan: 8 Morehead Drive Rye, NY 10580 (917) 655-1437
Scott Neville: 29 Silver Lane Levittown, NY 11756 (516) 317-6861
Steven Garber: 150-35 77th St. Flushing, NY 11368 (347) 617-8281

The risk of cybersecurity events may be increased due to use of remote offices or telework arrangements. MGP will remain vigilant in our surveillance against cyber threats and take steps to reduce the risk of cyber events. These steps may include:
(1) ensuring that virtual private networks (VPN) and other remote access systems are properly patched with available security updates;
(2) checking that system entitlements are current;
(3) employing the use of multi-factor authentication for associated persons who access systems remotely; and
(4) reminding associated persons of cyber risks through education and other exercises that promote heightened vigilance.

Rule: FINRA Rule 4370(c)(6).

VI. Customers' Access to Funds and Securities

MGP does not maintain custody of customers' funds or securities and in the event of an SBD, including in the event MGP determines that it is unable to continue its business, RBC and Interactive Brokers hold all MGP client funds and securities and the process to facilitate access to them as follows:

MGP does not maintain custody of customers' funds or securities. Our clearing firms, RBC, Interactive Brokers and Charles Schwab maintain custody of customers' funds or securities. If telephone or internet service is available during an SBD, our registered persons will take customer orders or instructions (including instructions to transfer customer accounts in the event our firm determines that it is unable to continue its business) and contact our clearing firm on their behalf. If registered persons are unable to service customers' orders or instructions, MGP will post on our website or send an email to customers notifying customers that they may access their funds and securities by contacting RBC Client Support Services 1-800-933-9946, IBKR 866-694-2757, Schwab

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Alliance 800-515-2157. The firm will make this information available to customers through its disclosure policy.

Rule: FINRA Rule 4370(a).

VII. Data Back-Up and Recovery

MGP primary or original books and records at and the location of MGP firm's back-up copy of books and records.

MGP maintains its primary or original books and records in both electronic and paper form at 350 Motor Parkway Suite 205 Hauppauge, NY 11788. Anton Gerdes, CCO at (516) 672 9711 is responsible for the maintenance of these books and records. MGP maintains the following document types and forms not transmitted to our clearing firm. MGP may or may not have some or all the following document types in electronic or paper form at its main office at 350 Motor Parkway Hauppauge NY 11788.

RBC

- CORP - Corporate Resolution
- MRGN - Margin/Express Credit Agreement
- OPTA - Option Agreement
- TFRD - W-9
- UACH - ACH Setup and Change
- UACT - Account Transfer
- UADB - Additional Bene Form
- UADD - IRA Addendum
- UAOD - Affidavit of Domicile
- UAUF - Account Update Form
- UBBC - 403B Beneficiary Change
- UBDP - 403(B)(7) Distribution by Participant
- UBPA - 403(B) Participation Adoption
- UBSV - 403(B)(7) Service Request
- UCAF - Corporate New Account
- UCIP - Cert of Investment Powers: Corporate.
- UCMP - Cust. Pension Plan Adoption Agreement
- UCPS - Cust. Profit Sharing Plan Adoption Agreement
- UCPT - Certification of Investment Powers Trust
- UCUF - Client Update Form
- UDVP - DVP Statement Suppression Authorization
- UECR - Excess Contribution Removal
- UEPE - Employer Participant Acct
- UFIN - Legal Entity Certification
- UFTA - Full Trading Auth
- UIAA - IRA Adoption Agreement
- UIAC - Investment Access Account Application

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- UIBC - IRA Beneficiary Change
- UICK - IRA/SEP Check writing
- UIDI - IRA/SEP Distribution
- UINA - Institutional NA App
- UINS - Institutional NA Info
- UISV - IRA/SEP/SIMPLE Service Request
- UJCP - Joint Acct Comm Prop
- UJRS - Joint Acct WROS
- UJTC - Joint Acct Ten In Comm
- ULTA - Limited Trading Auth
- UNAC - New Account Agreement
- UODD - On Demand Distribution
- UOFC - Offshore Certification
- UOTJ - One Time Journal Form
- UPAC - Participant Account Information
- UPDB - Custodial PSP Distribution by Participant
- UPDP - Custodial PSP Distribution by Participant
- UPSA - Cust Pension/Profit Sharing Bene. Designation.
- UPSV - Cust Pension/Profit Sharing Service Req.
- UQAC - Qualified Plan Acct Info
- URCR - Recurring 3rd Party Check Request
- URIA - Roth IRA Adoption Agreement
- URJF - Recurring Journal Form
- URSV - Roth Service Request
- USAA - Prototype SEP Adoption Agreement
- USCA - Standard Checking
- USDF - Simple IRA Deferral Form
- USIR - Custodial Simple IRA Adoption Agreement
- USKP - Stock Powers
- USRP - Prototype Simple Retire Plan Adopt Agreement
- UTAC - Plan Account Information
- UTBA - Self TRUSTEE 401k Beneficiary Designation
- UTDD - Transfer on Death Distribution
- UTDP - TOD Per Stirpes Distribution
- UTKA - Self-Trustee PSP Adoption Agreement
- UTMA - Self-TRUSTEE MPP Adopt Agreement
- UTOA - Self-Trustee 401(K) Adopt Agreement
- UTOD - Transfer on Death (TOD) Agreement
- UTPA - Self-Trustee Std Profit Sharing Plan Agreement
- UOPT - Client Opt-Out Form

Client Personal Identifiable Information

- Name
- Account Number

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- Social Security Number
- Date of Birth
- Address
- Contact Information (i.e., Phone, Email)
- Employment
- Financial Status (i.e., Net Worth, Annual Income/Expense, Client's Brokerage Statements)
- Banking Information

Agreements & Record

- Clearing Agreements
- Fidelity Bonds Coverage (All Business Lines)
- E&O Insurance Coverage (Advisory and Insurance)
- 3rd Party Vendor Agreements (Microsoft, Jordan and Assoc., Internet Service Providers, Employee/Contractor Personal Identifiable Information, Madison Global Specific Operational Form)
- Former Audit Documents (SEC, FINRA, Blue Sky, NYS Dept. of Insurance)

MGP maintains its back-up copy of books and records in paper and electronic form at the 350 Motor Parkway Suite 205 Hauppauge NY 11788. Eric Sachs IT Manager 631-271-9478 ext. 5 as a backup Brett Sachs 631-271-9478 ext. 2 is responsible for the maintenance of the back-up copy of our books and records.
MGP backs up its paper books and records by copying and physically taking the paper copies to our back-up site. We back up our paper books and records on an as needed basis. The firm backs up its electronic books and records daily on an as needed basis. This is done by Eric Sachs IT Manager, and an electronic copy is kept at our back-up site.

In the event of an SBD that causes the loss of our primary or original paper books and records, we will physically recover paper copies of them from our back-up site. For the loss of our primary or original electronic books and records, we will obtain electronic copies of them from our back-up site or physically recover the electronic storage media from our back-up site. Backup copies of our data is backed up to Advisor Vault 1-866-732-1407 ext. 3 maintained by Jordan and Associates Eric Sachs 1-631-271-9478 ext. 5 eric@jtjsys.com. In the event of an SBD that causes the loss of our primary or original books and records, we will obtain the back-up copy of books and records from that recordkeeping service. If our primary site is inoperable, we will continue operations from our back-up site or an alternate location.

Rule: FINRA Rule 4370(c)(1).

VIII. Financial and Operational Assessments

A. Operational Risk

In the event of an SBD, MGP will identify whether there are any limitations on our ability to communicate with our customers, employees, critical business constituents,

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critical banks, critical counter-parties and regulators. Depending on the limitations, MGP will employ alternate modes of communication, including [our website, phone or email], to communicate with customers, employees, critical business constituents, critical banks, critical counter-parties and regulators. If registered persons are unable to service customers, MGP will post on our website or send an email to customers notifying customers that they may access their funds and securities by contacting; bcp@madisonglobalpartners.com, info@madisonglobalpartners.com, brokername@madisonglobalpartners.com. In addition, we will retrieve our key activity records as described in the section above, Data Back-Up and Recovery.

Rule: FINRA Rules 4370(c)(3), (c)(4), (c)(5), (c)(7), (c)(9) and (g)(2).

B. Financial and Credit Risk

In the event of an SBD impacting MGP financial position, MGP 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 firm, 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 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 and immediately take appropriate steps, including first notifying FINRA, then infusing capital.

Rule: FINRA Rules 4370(c)(3), (c)(8) and (g)(2).

IX. 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. More specifically, these systems include:

Mission Critical System	Function	Provider	Contact Information
RBC Clearing and Custody Portal	Trading, Receipt and Distribution of Customer Funds and Securities	RBC Capital Markets	Client Support Services 1-800-933-9946 cas@rbc.com
Interactive Brokers Trader Workstation	Trading, Receipt and Distribution of Customer Funds and Securities	Interactive Brokers	General Help 1-866-694-2757 service@interactivebrokers.com
Charles Schwab ThinkPipes	Trading, Receipt and Distribution of Customer Funds and Securities	Charles Schwab	Jonathan Kirkpatrick 1-877-687-4083 jonathan.kirkpatrick@schwab.com Business Development Officer General Line: 877 774 3892

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Microsoft Teams	Notetaking and Document Retrieval Backup	Microsoft365 through Jordan and Assoc.	Eric Sachs 1-631-271-9478 ext.5 eric@jtjsys.com
Internet Service Providers	Provide Web Services for the Firm	Optimum (Primary) Verizon (Secondary)	Optimum (1-866-347-4784) Chatbot @ business.optimum.net Verizon (1-800-465-4054) (no email address)
Phone Systems	Communication with customers and other outside entities	Elevate through Jordan and Assoc.	Eric Sachs 1-631-271-9478 ext.5 eric@jtjsys.com
Dinosaur Financial Group LLC	RBC Sub-Clearing Arrangement	Dinosaur Financial Group LLC	Hank Acosta (BOM) 917 386 6252 Hacosta@dinogroup.com Dwayne Brydie (OPS) Dbrydie@dinogroup.com Elliott Grossman (MD) 917 386 6212 (D)/ 917 991 0043(C) egrossman@dinogroup.com

MGP establishes and maintains our business relationships with our customers and performs the mission critical functions of order taking, entry and execution. Our clearing firm provides, through contract, the execution, comparison, allocation, clearance and settlement of securities transactions, maintenance of customer accounts, access to customer accounts and the delivery of funds and securities.

If the firm is unable to operate and the clients will need to access the clearing firm for funds and/or securities, the clients may call the client support services number or may access funds and/or securities through the RBC/Investor Connect Application or website. Also, should the client transfer assets out from RBC an ACAT from the receiving firm would transfer the duty of contacting RBC to the receiving firm. Further when a client is switching from Madison Global Partners to another introducing firm it is important to check what clearing firm the new introducing firm is using and if they are covered under SIPC.

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

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MGP clearing firms represents that it backs up our records at a remote site. Our clearing firm represents that it operates a back-up operating facility in a geographically separate area with the capability to conduct the same volume of business as its primary site. Our clearing firm has also confirmed the effectiveness of its back-up arrangements to recover from a wide scale disruption by testing and it has confirmed that it tests its back-up arrangements annually with a Business Impact Analysis.

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 clearing firm has the following SBD recovery time and resumption objectives: recovery time period of [*e.g.,* within 4 hours]*;* and resumption time of [*e.g.,* within the same business day].

Anton Gerdes will periodically review our clearing firm's capabilities to perform the mission critical functions the clearing firm has contracted to perform for our firm.

A. Our Firm's Mission Critical Systems

1. Order Taking

Currently, MGP receives orders from customers via phone and email, in-person visits by the customer. During an SBD, MGP will continue to take orders through any of these methods that are available and reliable. As communications permit, MGP will inform our customers what alternative methods are available for sending orders. Customers will be informed of alternatives by phone, email or posting on the firm's website. If necessary, we will advise our customers to place orders directly with our clearing firms RBC at Client Support Services 1-800-933-9946 or IBKR at 866-694-2757.

2. Order Entry

Currently, MGP places customer orders through RBC Nexus or Interactive Brokers Trader Workstation or records customer orders on paper or electronically and sends them to our clearing firm electronically or telephonically. It has been disclosed by RBC and Interactive Brokers that there is an order of priority for its mission critical systems and getting them up and running after an SBD event.

In the event of an SBD impacting order entry, MGP will enter and send orders to our clearing firm by the fastest alternative means available, which phoning an order to the RBC Trading Desk 416-842-9961 (equity), 866-934-1305 (fixed income), 416-842-2435 (options), sending an email to castrading@rbc.com or entering the order through RBC Nexus. Interactive Brokers alternative means of entering an order are calling the general help line 866-694-2757, sending an email directly to Nick George at

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ngeorge@interactivebrokers.com or calling at 203-422-8986. Phone Orders can be placed at Charles Schwab via 800-367-5198 (Equities & Options), 800-491-1851 (Fixed Income), 800-367-5198 (Mutual Funds) or General Trade Support 800-367-5198. In the event of our clearing firms experiences an SBD impacting order entry, we will maintain the order in [electronic or paper format] and deliver the order to the clearing firms by the fastest means available when it resumes operations. In addition, our contract with the clearing firm provides that customers may be referred to the clearing firm for direct order entry.

3. Order Execution

MGP currently execute orders by taking the order or soliciting from the client, entering the order details on the appropriate portal (IBKR, RBC and/or Schwab), reviewing the order with the customer, hit SUBMIT. In the event of an SBD, we would call in an order to the proper trading desk on an as needed basis, for (i.e., DVP, allocations, price adjustments in which Anton Gerdes handles these expectations.)

4. Other Services Currently Provided to Customers

In addition to those services listed above in this section, MGP also has access to cash and accounts. In the event of an SBD, we would go through the respective clearing firms as stated above and follow their business continuity procedures when it comes to accounts maintained with them.

B. Mission Critical Systems Provided by Our Clearing Firm

MGP has contracted with our clearing firms to provide order execution, order comparison, order allocation, customer account maintenance or access and delivery of funds and securities.

Rule: FINRA Rules 4370(c)(2) and (g)(1).

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

A. Customers

In the event of an SBD, we will identify whether there are any limitations on our ability to communicate with customers. Depending on the limitations, we will employ alternate modes of communication, including MGP website, phone or email, to communicate with customers. When an alternate mode of communication is used MGP will consider any increased risk of cybersecurity events stemming from the alternative mode.

Rule: FINRA Rule 4370(c)(4) and (e).

B. Employees

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In the event of an SBD, MGP will identify whether there are any limitations on our ability to communicate with employees. Depending on the limitations, MGP will employ alternate modes of communication, including MGP website, phone or email, to communicate with employees. When an alternate mode of communication is used MGP will consider any increased risk of cybersecurity events stemming from the alternate mode.

MGP added an e-mail distribution list in November 2023 to all staff to alert the staff of disruptions. In the event email service is down and communication firm wide is needed, a group message will be sent by Anton Gerdes to all firm members.

Consistent with FINRA Rule 4511 (General Requirements), MGP will also employ the use of firm-wide or office-wide emails or text messages or notifications, or a call tree so that senior management can reach all employees quickly during an SBD. In addition, in the event that employees move to a back-up location or remote location for an extended period of time (*e.g.*, due to a pandemic), we will circulate updated employee contact information within the firm to maintain service.

MGP will also have a call tree, which includes all staff personal and office phone numbers. The persons to invoke use of the call tree are: Anton Gerdes or David Kaplan

Caller	**Call Recipients**
Anton Gerdes	Business Continuity e-mail and/or text- All
David Kaplan	Business Continuity e-mail and/or text- All

Rule: FINRA Rule 4370(c)(5).

C. Regulators

MGP are currently members of the following self-regulatory organizations FINRA, and are also regulated by SEC and State of New York. Contact information for these regulators is below in Section XII, Regulatory Reporting.

In the event of an SBD, we will identify whether there are any limitations on MGP ability to communicate with regulators. Depending on the limitations, MGP will employ alternative modes of communication, including our website, phone or email, to communicate with regulators. When an alternate mode of communication is used, MGP will consider any increased risk of cybersecurity events stemming from the alternate mode.

In the event that we have relied on any guidance or temporary regulatory relief from a regulator during an SBD, MGP will document our reliance.

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Regulator	Guidance or Temporary Regulatory Relief and Any Condition(s)	Actions in Reliance	Date(s)
FINRA	TBD		
SEC	TBD		

Rule: FINRA Rule 4370(c)(9).

XI. Critical Business Constituents, Banks and Counter-Parties

A. Business Constituents

In the event of an SBD related to MGP 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), MGP will contact our critical business constituents and determine the extent to which MGP can continue our business relationship with them in light of the SBD. MGP critical business constituents are:

Service/Product	Supplier's Name, Address and Phone Number	Any Alternate Supplier's Name, Address, and Phone Number
Network	Jordan Associates Integrated Systems, Inc www.jtsys.com/ www.Cloudphone4business.com ms@jtjsyc.com eric@jtjsys.com 1070 Washington Dr. Centerport, NY 11721 1-800-788-4550/ (631) 271-9478	Jordan and Assoc. is a facilitator of our IT systems and does not store data locally and in the event Jordan and Assoc. can't be reached MGP can go directly to the vendors websites for backups.
Clearing Firm	Interactive Brokers, LLC 1 Pickwell Plaza Greenwich, Ct 06830 Nick George (203) 618-5509 ngeorge@interactivebrokers.com	IBKRs infrastructure allows them to work from anywhere in the event of an SBD as they are outfitted as an online broker. Please see IBKR business continuity plan.
Clearing Firm	RBC Capital Markets, LLC 3 World Financial Center 200 Vesey Street NY, NY 10281 Nick DeGidio 212-858-7000	RBC relies on themselves and backup capabilities they have implemented as per their BCP.

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Clearing Firm	Charles Schwab 1945 Northwestern Drive El Paso, TX 79912 Jonathan Kirkpatrick 877-687-4083 jonathan.kirkpatrick@schwab.com	Schwab relies on their own capabilities in the event of a SBD to their systems and will update the firm as necessary.
Tri-Party Sub-Clearing Firm	Dinosaur Financial Group 33 Whitehall Street #1102 New York, New York 10004 Hank Acosta (BOM) 917 386 6252 Hacosta@dinogroup.com Dwayne Brydie (OPS) Dbrydie@dinogroup.com	Per the Dinosaur BCP their backup is RBC CS.

MGP will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services when MGP need them because the business constituent is experiencing its own SBD or we are experiencing our own. The firm maintains outside 3rd party vendors for various tasks and are listed here.

Rule: FINRA Rule 4370(c)(7).

B. Banks

In the event of an SBD related to MGP financing, MGP will contact our banks and lenders to determine if they can continue to provide the financing. The bank maintaining our operating account is: Chase Private Client 200 Motor Parkway Hauppauge NY 11788. The bank maintaining our Proprietary Account of Introducing Brokers/Dealers (PAIB account) is Chase Private Client 200 Motor Parkway Hauppauge NY, 11788. If our banks and other lenders are unable to provide the financing, we will seek alternative financing immediately from another entity to be determined.

Rule: FINRA Rule 4370(c)(7).

C. Counter-Parties

In the event of an SBD related to MGP financing, MGP will contact our critical counter-parties, such as other broker-dealers or institutional customers, to determine if we will be able to carry out our transactions with them in light of the SBD. Where the transactions

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

Rule: FINRA Rule 4370(c)(7).

XII. Regulatory Reporting

MGP is subject to regulation by: FINRA, SEC and New York State MGP will fulfill our regulatory reporting obligations using paper copies in the U.S. mail, electronic means and the FINRA Gateway.

In the event of an SBD, MGP will identify whether there are any limitations on MGP ability to fulfill our regulatory reporting obligations. Depending on the limitations, MGP will employ alternate modes of communication, including our website, phone or email, to communicate with regulators in fulfilling our regulatory reporting obligations. In the event MGP are unable to fulfill a regulatory reporting obligation in a timely manner we will notify our regulator at:

Regulator	Contact Person	Contact Information
FINRA	Louis Bruccoleri Associate Principal Analyst	646-315-8439 Louis.Bruccoleri@finra.org
SEC	MGP does not have a designated SEC contact person	SEC.gov

Rule: FINRA Rule 4370(c)(8).

XIII. Disclosure of Business Continuity Plan to Customers

Attached is MGP written BCP disclosure statement we provide customers at account opening [list other times of disclosure if applicable, such as annually]. MGP will also [post the disclosure statement on our website and] mail it to customers upon request.

Rule: FINRA Rule 4370(e).

XIV. Updates and Annual Review

MGP will update this plan whenever we have a material change to our operations, structure, business or location or to those of our clearing firm. In addition, MGP will review this BCP annually, on [date], to determine whether any modification is necessary due to changes in our operations, structure, business or location or those of our clearing firm. As part of our annual review, MGP will conduct a firm-wide test of our BCP.

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Rule: FINRA Rule 4370(b).

XV. Senior Manager Approval

I have approved this Business Continuity Plan as reasonably designed to enable our firm to meet its obligations to customers in the event of an SBD.

Rule: FINRA Rule 4370(d).

Signed: DocuSigned by: Anton Gerdes ABE4D234448B45A...

Title: Anton Gerdes

Date: 11/3/2026

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Madison Global Partners' Business Continuity Planning

Madison Global Partners ("MGP") 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 be flexible in responding to actual events as they occur. With that in mind, MGP 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 646-690-0330 / info@madisonglobalpartners.com. Please feel free to visit our website https://www.madisonglobalpartners.com or contact your broker directly. If you cannot access us through either of those means, you should contact our clearing firms, RBC and Interactive Brokers (RBC at Client Support Services 1-800-933-9946 www.rbc.com), (IBKR at 866-694-2757 www.interactivebrokers.com), (Charles Schwab at 800-435-4000 www.schwab.com) for instructions on how it may provide to you in the event of a significant business disruption; for example, provide prompt access to funds and securities, enter orders and process other trade-related, cash and security transfer transactions for MGP customers.

Our Business Continuity Plan – MGP 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 MGP to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

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

MGP clearing firms, RBC and Interactive Brokers, 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, MGP have been advised by our clearing firms that its objective is to restore their own operations and be able to complete existing transactions and accept new transactions and payments within a timely manner. 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's office, 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 the event of a significant business disruption, we have plans to place to move to a back-up location or remote locations as necessary. In either situation, we plan to continue in business, transfer operations to our clearing firm if necessary, and notify you through our website https://www.madisonglobalpartners.com or our customer emergency number, +1 646-690-0330 on how to contact us. 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 MGP +1 646-690-0330 or info@madisonglobalpartners.com.

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