

# **Altitude Capital Group Business Continuity Plan**

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### **SECTION 1. FIRM POLICY**

References: FINRA Rule 4370

The Firm maintains this written business continuity plan, identifying procedures for emergencies or significant business disruptions. These procedures are designed to meet existing customer obligations and address the Firm's relationships with other broker-dealers and counter-parties. The plan will be available promptly upon request to FINRA staff.

The Firm will update the plan for any material changes to operations, structure, business, or location. An annual review will assess modifications based on changes to the Firm's operations, structure, business, or location.

The plan includes data back-up and recovery, mission-critical systems, financial and operational assessments, alternative communications, and customers' prompt access to funds and securities in the event of business discontinuation.

Michael DiMeo, a senior management member, approves and conducts the required annual review.

The Firm will inform customers of its business continuity plan, addressing potential significant business disruptions and response plans. This disclosure will be made in writing, posted on the website, and mailed upon request.

Emergency contact information will be promptly updated, complying with FINRA rules.

The Firm's policy is to prioritize safeguarding lives, firm property, assessing finances, and promptly resuming operations during a Significant Business Disruption (SBD). If unable to continue, clients, banks, and regulators will be notified.

1.1 Significant Business Disruptions (SBDs)

The plan anticipates two types of SBDs: internal and external. Internal SBDs affect the Firm's communication and business conduct, like a fire. External SBDs impede securities market operation, requiring reliance on other organizations.

## **SECTION 2. EMERGENCY CONTACT PERSONS**

References: FINRA Rule 4370, FINRA Rule 1160, NTM 07-42

Emergency contact persons:

1. Mike DiMeo, Tel: 917-423-5998, Email: mdimeo@altitudecapitalgp.com
2. Second Backup: Rich Onesto, Tel: 347-853-6534, Email: Rich@Finopsolutions.com

Information will be updated following FINRA rules, verified annually, and promptly provided upon request.

## **SECTION 3. BUSINESS DESCRIPTION**

The Firm is an introducing Firm without clearing functions or custody of funds/securities. It offers underwriting, private placements, securities trading, and M&A advisory services.

## **SECTION 4. OSJ AND BRANCH OFFICE LOCATIONS**

Main office: 5 Eucalyptus Newport Coast, CA 92657, Tel: 949-226-8440, engaged in order taking.

## **SECTION 5. ALTERNATIVE PHYSICAL LOCATION(S) OF EMPLOYEES**

References: FINRA Rule 4370

In an SBD, staff will move to the closest unaffected office or work from home until an alternative site is determined.

## **SECTION 6. CUSTOMERS' ACCESS TO FUNDS AND SECURITIES**

References: FINRA Rule 4370, Securities Exchange Act Rule 15c3-1

The Firm doesn't hold customer funds/securities. In an SBD, if available, orders will be taken via phone or web, with assistance from SIPC if needed.

## **SECTION 7. DATA BACK-UP AND RECOVERY (HARD COPY AND ELECTRONIC)**

References: FINRA Rule 4370

Hard copy and electronic records are stored at the home office. In an SBD, data recovery will occur from electronic retention services or backup locations.

## **SECTION 8. FINANCIAL AND OPERATIONAL ASSESSMENTS**

References: FINRA Rule 4370

8.1 Operational Risk: Communication methods with customers, employees, and others will be identified during an SBD.

8.2 Financial and Credit Risk: Asset valuation, funding, and compliance with capital requirements will be assessed. Additional financing will be sought if necessary.

## **SECTION 9. MISSION CRITICAL SYSTEMS**

References: FINRA Rule 4370

9.1 RESERVED

9.2 The Firm's Mission Critical Systems: Global Relay for email and electronic communications.

9.2.1 Order Taking: Orders will be accepted through available and reliable methods, with customer notifications via telephone, e-mail, or the Firm website.

9.2.2 RESERVED

9.2.3 Order Execution: Publicly traded securities' execution through the Firm's fully disclosed clearing arrangement with RBC.

## **SECTION 10. ALTERNATE COMMUNICATIONS BETWEEN THE FIRM AND CUSTOMERS, EMPLOYEES, AND REGULATORS**

References: FINRA Rule 4370

10.1 Customers: Communication channels include telephone, e-mail, U.S. mail, and in-person visits.

10.2 Employees: Communication methods will include telephone, e-mail, in-person, and a call tree for rapid senior management reach.

10.3 Regulators: Communication methods involve telephone, e-mail, fax, U.S. mail, and in-person.

## **SECTION 11. CRITICAL BUSINESS CONSTITUENTS, BANKS, AND COUNTER-PARTIES**

References: FINRA Rule 4370

11.1 Business Constituents: Arrangements will be established with alternate entities if existing business constituents are unable to provide necessary goods or services.

11.2 Banks: Access to funds from banks will be explored and alternatives sought if unavailable.

11.3 Counter-Parties: Communication will occur with critical counter-parties to ensure transaction viability during an SBD.

## **SECTION 12. REGULATORY REPORTING**

References: FINRA Rule 4370

Reports will be filed with regulators using paper copies via U.S. mail and electronically through fax, e-mail, and the Internet

## **SECTION 13. PANDEMIC POLICIES**

References: Regulatory Notice 20-08

Pandemic policies will be activated if deemed an SBD. Measures may include remote offices, telework arrangements, and cybersecurity considerations.

## **SECTION 14. SENIOR MANAGER APPROVAL**

References: FINRA Rule 4370

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

Signed: 41A4BA64A194461...

Title: CEO

Date: 1/9/2024

## **BCP DISCLOSURE STATEMENT**

The Firm has created a Business Continuity Plan (BCP) that provides for the Firm to continue client service within a reasonable amount of time, given the scope and severity of a significant business disruption (SBD).

The BCP anticipates responding to both internal and external SBDs. An internal SBD, such as the loss of the telephone system, affects only the Firm. The Firm will respond to internal SBDs by re-routing calls to secondary numbers, and/or relocating its primary office to a secondary location, and/or, recovering data from a back-up storage media and/or a back-up site. The Firm expects to recover from an internal SBD within one hour.

An external SBD, such as a power outage or flood, affects multiple businesses and can be local, regional, national, or global. The Firm's response to an external SBD relies more heavily on other organizations, such as product sponsors. The Firm expects to recover from an external SBD within six hours.

In the event a SBD prevents customers from contacting the Firm by using the Firm's primary phone number, fax number, or email address, customers may contact the Firm by using the following secondary contact information:

While no contingency plan can eliminate all risk of service interruption or temporarily impeded account access, the Firm continually assesses and updates its BCP to mitigate all reasonable risk.

This disclosure is subject to modification. You may request a copy of the Firm's full plan by contacting the Firm.