Atlas Clearing, Inc.
"Atlas Clearing"

Business Continuity Plan

August 2026

1. Introduction

[FINRA Rule 4370; FINRA Regulatory Notice 13-25; FINRA Notice to Members 06-74 and 04-37; NASDAQ Equity 9 Business Conduct; FINRA Small Firm Business Continuity Plan Template: https://www.finra.org/compliance-tools/small-firm-business-continuity-plan-template/; SIFMA Business Continuity Planning website: https://www.sifma.org/resources/general/bcp/]

Atlas Clearing, Inc. ("Atlas Clearing," or "ATCLR") has developed a Business Continuity Plan ("BCP" or the "Plan") to provide procedures for response and recovery in the event of a Significant Business Disruption (SBD). The purpose of the Plan is to identify responsible personnel in the event of a disaster; safeguard employees' lives and firm property; evaluate the situation and initiate appropriate action; recover and resume operations to allow continuation of business; provide customers with access to their funds and securities; and protect books and records. The Plan was developed considering the types of business conducted, systems critical to support business, and geographic dispersion of offices and personnel.

Atlas Clearing, Inc. will respond to any SBD by first safeguarding employees, and then Firm property. We will make every effort to resume operations quickly and efficiently. The Firm has taken steps to protect the Firm's books and records, which will allow customers quick and accurate access to cash and securities.

2. Business Description/Firm Policy

Atlas Clearing, Inc. is a self-clearing firm headquartered in Salt Lake City, Utah. We conduct business in equity and some derivative securities. All orders we accept are executed by Atlas Clearing or routed out to third parties. Atlas Clearing maintains all customer accounts and accepts and disburses funds and securities. Atlas Clearing provides execution services for our retail and wholesale customer accounts through its trading departments.

Our 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 we determine we are unable to continue our business we will assure customers prompt access to their funds and securities.

2.1. Emergency Contact Information

[FINRA Rule 4370 and 4517]

ATCLR has provided FINRA with the names of two emergency contact persons, one who must be a registered principal and member of senior management and a second who may be unregistered and who has knowledge of the Firm's business. Emergency contact information will be promptly updated when necessary. Contact information will be reviewed by Compliance (or someone else designated) within 17 business days of the end of each calendar year and a written record of the review will be retained.

The Firm's Emergency Contact Persons are:

1) Lincoln T. Eggertz 801-532-1313 Work, 385-441-1648 Cell
   E-mail = leggertz@atlasclearing.com

2) Jeffrey N. Sime 801-532-1313 Work, 385-441-4161
   E-Mail = jsime@atlasclearing.com

3) Tony S. White 801-532-1313 Work, 385-441-0370 Cell
   E-Mail = twhite@atlasclearing.com

4) Jana Losser 801-532-1313 Work, 385-441-1145
   Email = jlosser@atlasclearing.com

5) Scott Davis 801-532-1313 Work, 801-550-7246 Cell
   E-Mail = sdavis@atlasclearing.com

2.2. Significant Business Disruptions

This plan anticipates two kinds of SBDs: internal and external. Internal SBDs affect only the firm's ability to communicate and do business, such as a fire in the building.

External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, earthquake, epidemics, pandemics or other regional disruption. Our response will vary depending on the severity of the SBD, which may include greater reliance on other organizations and systems.

2.3. Approval and Execution Authority

Jeff Sime, CEO and a registered principal, is responsible for approving the plan and the required annual review. Lincoln Eggertz, CCO, is a registered principal, have the authority to execute this Business Continuity Plan.

2.4. Designation Of Responsibilities

The following is a list of those responsible for ATCLR's Business Continuity Plan.

Responsibility	Names or Titles
Maintain and update Plan	CCO, and/or Designee
Approve Plan and Plan revisions: • Conduct annual review • Maintain and update accurate information • Review of critical third parties	CEO, and/or Designee
Annual testing of Plan	CCO and/or Designee
Implementation of Plan when a disruption occurs	Emergency Response Team (defined above)
Maintain and distribute Emergency Contact List and provide updates, when necessary	CCO, and/or Designee
Provide Plan information to customers: • At time of account opening; and • Upon request.	DOO, POO and/or Designee
Post Plan disclosure on ATCLR's web site and update, as required	CCO and/or Designee
Review critical third-party assurances or disaster plans or plan summaries at initial engagement of third party	CCO and/or Designee

2.5. Retention and Location of the Plan

Atlas Clearing will maintain copies of its BCP, the annual reviews, and the changes that have been made to it for inspection. Non-Proprietary portions of the plan will be available on our website at www.atlasclearing.com. An electronic copy of our plan is available to employees via MyComplianceOffice (MCO) and located on critical file back-up managed by Scott Davis. Critical files backed up are maintained off premises and updated daily with Microsoft Azure.

2.6. Implementation of the Plan

The Plan has been designed to be implemented in the event of a disaster that results in an SBD. Whether all or only parts of the Plan are implemented depends on the nature of the disruption. Generally, an SBD would include:

- Destruction of one of ATCLR's offices or facilities, whether by natural causes or by other means
- Loss of life or major injuries to personnel in an office location that disables that office's ability to conduct business
- Disruption of service from a critical service provider
- Disruption of service due to wide-ranging regional outages such as a power outage
- Disruption of service due to a pandemic

2.7. Emergency Response Team

ATCLR has designated an Emergency Response Team that is responsible for implementing necessary procedures included in this Plan. The Response Team's action will depend on the nature and scope of the disruption. The "first responder" has the primary responsibility for taking action, and the "secondary responder" acts as a back-up in the event the first responder is unable to act. Where feasible, the two responders are located in different office locations.

Action	**First Responder/Location**	**Secondary Responder/Location**
Contact emergency services such as police, fire department	Lincoln Eggertz; Salt Lake City, UT	Tony White; Salt Lake City, UT
Establish off-site command center and notify employees	Tony White; Salt Lake City, UT	Lincoln Eggertz; Salt Lake City, UT
Account for employees in affected areas	Tony White; Salt Lake City, UT	Lincoln Eggertz; Salt Lake City, UT
Contact employees regarding Plan initiatives	Tony White; Salt Lake City, UT	Lincoln Eggertz; Salt Lake City, UT
For affected offices, evaluate business disruption and transfer employees and business operations to other locations	Lincoln Eggertz; Salt Lake City, UT	Tony White; Salt Lake City, UT
Initiate alternative market entry points when the Firm's normal access is disabled	Tony White; Salt Lake City, UT	Kevin Sparkman; Salt Lake City, UT
Appoint individuals to manage business areas where needed	Lincoln Eggertz; Salt Lake City, UT	Jeff Sime; Omaha, NE
Assess financial and operations capabilities	Jeff Sime; Omaha, NE	Mike Sardoni; Salt Lake City, UT
Determine financial and credit risk and contact banks and other counter-parties, if necessary, to secure financing to continue operations	Jeff Sime; Omaha, NE	Mike Sardoni; Salt Lake City, UT
Notify regulators in the event of a capital deficiency	Jeff Sime; Omaha, NE	Lincoln Eggertz; Salt Lake City, UT
Interface with SIPC if liquidation of business is initiated	Jeff Sime; Omaha, NE	Mike Sardoni
Contact critical service providers	Tony White; Salt Lake City, UT	Jeff Sime; Omaha, NE
Transfer mission critical functions that are disrupted	Tony White; Salt Lake City, UT	Kevin Sparkman; Salt Lake City, UT

Initiate alternative customer communications systems or procedures	Scott Davis; Salt Lake City, UT	Mitch Doson; Salt Lake City, UT
Update the Firm's web site to include information about operations and contact information	Scott Davis; Salt Lake City, UT	Mitch Dotson; Salt Lake City, UT
Notify customers regarding alternative access to funds and securities	Kevin Spinosa; Longmont, FL	Jana Losser; Salt Lake City, UT
Notify trading counterparties of operations and contact information	Tony White; Salt Lake City, UT	Kevin Sparkman; Salt Lake City, UT
Recover back-up records when primary records are destroyed or inaccessible	Scott Davis; Salt Lake City, UT	Mitch Dotson; Salt Lake City, UT
Contact regulators and notify them of contact persons and recovery plans	Lincoln Eggertz; Salt Lake City, UT	Jeff Sime; Omaha, NE
Identify time-sensitive regulatory requirements and filings	Lincoln Eggertz; Salt Lake City, UT	Jeff Sime; Omaha, NE

2.8. Emergency Contact List

ATCLR has established an Emergency Contact List that includes the names, phone numbers (cell and land lines), e-mail addresses, and other contact information for individuals critical to ATCLR's business including key employees, key vendors or service providers, regulators, insurance carriers, banks, attorneys, and other key contacts. A copy of the List is provided to each member of the Response Team and other key personnel. This list will be reviewed and updated on at least an annual basis.

3. Office Locations

Our Location #1 Office is located at 236 South Main Street, Salt Lake City, UT 84101. Its main phone number is (801) 532 - 1313 and the main point of contact is Lincoln Eggertz, leggertz@atlasclearing.com, 385-441-1648. We engage in order taking and entry at this location. [The alternate location or back-up location are listed in the following section. 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.

3.1. Alternative Business Locations

Atlas Clearing has the capability to operate fully remote. No retail trading business is conducted in offices other than Salt Lake City, Utah.

In the event of an SBD, Atlas Clearing will be able to operate remotely until service is restored or travel to collocation(s) has been arranged.

In the event employees can no longer conduct business at one of ATCLR's office locations, the following actions may be taken:

- Transfer employees to the closest unaffected office location, which may be their primary residences, and notify personnel
- Transfer critical systems to another office or a Cloud DR backup solution
- Transfer business operations to another ATCLR office unaffected by the disruption

The risk of cybersecurity events may be increased due to use of remote offices or telework arrangements. We 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.

Considerations that will be made include:

- Geographic diversity in the event of regional service outages
- Accessibility of alternative sites and the ability of employees to travel to the site and methods of relocating employees and living arrangements, if needed
- Number and composition of staff needed and supervisors for alternative sites
- Generator and other back-up sources at alternative sites
- Resources needed at alternative sites (desks, chairs, telephones, equipment, and supplies, *etc.*)
- Moving staff in advance of a significant BCP event, if it can be anticipated
- Whether employees should work from home and what resources they would need

4. Prompt Access to Funds and Securities

When customer access to funds and securities is impacted by an SBD, customers will be notified by whatever expedient means is available (telephone, e-mail, etc.) regarding who may be contacted to request funds or securities. If ATCLR is unable to continue business operations, customers will be notified of an alternative financial institution where they may conduct business and access their funds and securities.

- Activate Business Continuity Plan
- Run Cash Customer Position Report
- Contact BMO Harris Bank to authorize funds access
- Utilize WD Alternate Locations to have access to the Depository Trust Corporation.
- Utilize Alternate Location, either local or out of state, to restore information feeds.
- Utilize Disaster Recovery Site
- Customers will continue to contact the main office in Salt Lake City during any disruption (phones will be re-directed). Another option will be to visit our website: www.atlasclearing.com.
- Atlas Clearing is a member of the Securities Investor Protection Corporation. (SIPC)

4.1. SIPC Liquidation

In the event SIPC liquidation of ATCLR's business is required, designated personnel will work with the SIPC-appointed trustee to wind down ATCLR's operations and transfer customer funds and securities.

5. Data Back-Up and Recovery

The Firm maintains its primary or original books and records in electronic form in Sharefile, Amazon Cloud Services, Phase3 (FIS), and Microsoft Teams. The CISO is responsible for the maintenance of these books and records.

- Disaster Recovery Site contains a mirror image of all critical systems and data (systems collocated and in "hot" standby mode located off site in.
- Accounts are maintained by the firm.
- Customer records are maintained and backed up by FIS Global. They maintain back up for seven years. They have back-up and hot site facilities for emergency access.
- Customer data can be accessed on any Company-issued Computer remotely.
- Restore from a disruption will be performed by mission critical priority list in order from most to least critical: Internet Service, FIS Order & Trading Systems (Wealth Station & Valdi), FIS Securities360 (Phase3), DTC/NSCC, NASDAQ Market System, Office 365 System.

In the event of an internal or external significant business disruption that causes the loss of ATCLR's records (whether hard copy or electronic records), back-up records will be recovered from the back-up site.

6. Mission Critical Systems

Mission critical systems are systems that are necessary to ensure prompt and accurate processing of securities transactions including order taking, entry, execution, comparison, allocation, clearance and settlement, maintaining customer accounts, and providing access to customer funds and securities.

- Depository Trust Corporation Access (Securities Repository)
- FIS VALDI OMS Trading System for order entry, execution, processing and regulatory reporting.
- FIS Securities360
- Market Map Systems(Quodd) for Retail Broker Information.
- NASDAQ Market Systems for market making activity.
- OTC Markets (Pink Sheets) Systems for market making activity
- Internet Service and Access.
- Office365, IM, E-Mail and OneDrive

The Firm establishes and maintains business relationships with our customers and performs the mission critical functions of order taking, entry, and execution. We also provide the comparison, allocation, clearance and settlement of securities transactions, maintenance of customer accounts, access to customer accounts and the delivery of funds and securities.

All Mission Critical Systems are accessible via the Internet from any location or via the Atlas Clearing Networks present in all locations listed in "Office Locations" and “Alternative Business Locations.”

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. The Firm has the following SBD recovery time and resumption objectives: recovery within 4 hours and resumption within the same business day.

6.1. Order Taking

Currently, the Firm receives orders from customers via phone, email, or in-person visits by the customer. During an SBD, we will continue to take orders through any of these methods that are available and reliable. As communications permit, we will inform our customers what alternative methods are available for sending orders. Customers will be informed of alternatives by posting on the firm’s website. If necessary, we will advise our customers with alternative methods to place orders.

In the event ATCLR's systems for accepting customer orders are disrupted, alternative systems will be communicated to customers and to employees including, where appropriate:

- Accepting orders by telephone or other alternative means
- Communicating orders to trading desks (internal or external) or order execution systems by telephone or other alternative means

6.2. Order Entry

Currently, the Firm places customer orders through Wealth Station. We have contacted Fidelity Information Systems (FIS) and were told that, under its BCP, we can expect services within 4 hours.

In the event of an SBD impacting order entry, we will enter and send orders by the fastest alternative means available, which include email or phone.

6.3. Order Execution

We currently execute orders by electronic processing. In the event of an SBD, we would attempt to execute orders verbally over telecommunication systems or other electronic means.

7. Financial and Operational Assessments

The following describes procedures for assessing changes in operational, financial, and credit risk exposures in the event of a SBD.

1) Activate Business Continuity Plan
2) Communicate with Customers will be business as usual.
3) Contact BMO Harris Bank to authorize access to Bank Accounts.
4) Access Depositary Trust Corporation from an alternate location
5) Process normally or Start Manual Systems if necessary.
6) Contact regulators and advise status.

7.1. Operational Risk

In the event of a significant business disruption, alternative systems will be implemented to communicate with customers, employees, critical business constituents (banks, counter-parties, *etc.*), regulators, and other key parties depending on the nature and impact of the disruption. Communication systems are described in the section "Alternative Communications."

7.2. Financial and Credit Risk

In the event of disruption SBD, ATCLR's financial status will be evaluated to determine the need for additional financing or identify capital deficiencies including the following:

- Review the impact of the disruption on ATCLR's ability to conduct business
- Identify inability to satisfy obligations with counter-parties
- Contact banks or other counter-parties to secure needed additional financing
- Notify regulators of capital deficiencies
- Reduce or cease business as may be required due to capital deficiencies or inability to conduct business
- Transfer business to other financial institutions until ATCLR may resume conducting business

If we cannot remedy a capital deficiency, we will file appropriate notices with our regulators and immediately take appropriate steps

7.3. Alternative Communications

ATCLR may use a wide range of communication systems to communicate with its customers, employees, counter-parties, and regulators including telephone; mail; e-mail; vendor systems (such as Bloomberg); and personal meetings. The Firm may establish contracts with multiple telecommunications carriers to provide redundant systems and devices and to provide key employees with technology at remote locations, including home locations. Procedures for instituting alternative communications in the event of a significant business disruption include the following, depending on the nature of the disruption:

- Identify the most expedient remaining means of communication
- Notify employees if an off-site command center has been activated
- Notify employees of alternative communication systems to be used

Determination of what communication system will be used depends on the nature of the disruption and which communication systems (electronic mail, telephone calls, etc.) are functional and the availability of personnel in the event telephone contact is necessary.

7.3.1.Between Customers And ATCLR

In the event of an SBD that disables communications systems, alternative system procedures will be implemented, including the following:

- Identify the most expedient remaining means of communication
- Notify employees regarding how to contact customers
- Contact customers about how to enter orders, how to access accounts and account assets, and other alternative business operations

When an alternate mode of communication is used, we will consider any increased risk of cybersecurity events stemming from the alternate mode.

7.3.2.Between ATCLR and its Employees

In addition to the above, ATCLR has developed a system to enable senior management to contact employees in the event of an emergency. In the event of an SBD, we will identify whether there are any limitations on our ability to communicate with employees. Depending on the limitations, we will employ alternate modes of communication, including phone, email, Microsoft Teams, or website, to communicate with employees.

Consistent with FINRA Rule 4511 (General Requirements), we will also employ the use of 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.

The call tree includes all staff personal and office phone numbers. The person to invoke use of the call tree is *Lincoln Eggertz, CCO.*

7.3.3.Between the Firm and Trading Counterparties

Communications between the Firm and its trading counterparties regarding conduct of business will be implemented by alternative systems which may include:

- Via a clearing or other alternative business partner
- Phone
- Electronic communications
- Web site postings
- Other alternative means of communicating

7.3.4.Firm's Web Site

The web site will be used to communicate information to customers, counterparties, and others needing access to the Firm. It will include information about operations and contact information, including alternate contact information for, as applicable.

7.3.5.Between ATCLR and Regulators

We are currently members of the following self-regulatory organizations (SROs), and are also regulated by the Financial Industry Regulatory Authority (FINRA), the Securities and Exchange Commission (SEC), the Utah Division of Securities, and the Nasdaq Stock Exchange Contact information for these regulators is below in the Regulatory Reporting Section.

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

Communications with regulators will be conducted using the most expedient available communication system. The Emergency Contact(s) will contact regulators regarding any major business disruption and plans for continuing business.

8. Regulatory Reporting

In the event of an SBD affecting offices responsible for regulatory reporting, regulators will be contacted to determine which means of filing are available under the circumstances to meet filing requirements. In the event the Firm cannot contact regulators, required reports will be filed using communications means available.

The Firm is subject to regulation by FINRA, the SEC, the Utah Division of Securities, and the Nasdaq Stock Exchange. It should be noted that the Firm is registered in all 53 U.S. States and Territories. We fulfill our regulatory reporting obligations using paper copies in the U.S. mail, electronic means and FINRA Gateway.

In the event of an SBD, we will identify whether there are any limitations on our ability to fulfill our regulatory reporting obligations. Depending on the limitations, we 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 we are unable to fulfill a regulatory reporting obligation in a timely manner we will notify our regulator at:

Regulator	Contact Person	Contact Information
FINRA	George Rodriguez Denver District Office	George.Rodriguez@finra.org 646-315-8657 One World Financial Center 200 Liberty Street, 9th Floor New York, NY 10281-1003) 4600 S. Syracuse Street, Suite 1400 Denver, CO 80237 (301) 590 – 6500
SEC	Denver Regional Office	1961 Stout Street, Suite 1700 Denver, CO 80294 (303) 844 – 1000 Main Line: (800) 732 – 0330
Utah Division of Securities	General Contact Information	160 E 300 S 2nd Floor Salt Lake City, UT 84111 (801) 530 – 6600 Securities@utah.gov
Nasdaq Stock Exchange	Denver Location	Granite Tower, Suite 2500, 25th Floor 1099 18th Street, Denver CO 80202

9. Business Constituent, Bank, And Counter-Party Impact

This section describes business continuity procedures regarding third parties that are critical to the conduct of ATCLR's business. In most instances, contracts with critical third parties will include assurances regarding the third party's disaster recovery plans. A disruption impacting ATCLR's ability to conduct business may occur either at ATCLR itself or at the third party.

In the event of an SBD related to our 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), we will contact our critical business constituents and determine the extent to which we can continue our business relationship with them in light of the SBD. Atlas Clearing considers the following Critical Business Constituents:

Business	Service	Contact Information	Impact of SBD
NSCC: National Security Clearing Corporation and the Depository Trust and Clearing Corporation	Clearing and Settlement Services	Frank Lupica flupica@dtcc.com 212-855-2410	NSCC is an industry-critical constituent that provides clearing, settlement, risk management, central counterparty services and a guarantee of completion for certain transactions for virtually all broker-to- broker trades involving equities, corporate and municipal debt, American depositary receipts, exchange-traded funds, and unit investment trusts. In the event NSCC is disrupted, Atlas Clearing and every other broker-dealer nationwide would be unable to clear trades. Though securities held by Atlas Clearing are kept on electronic deposit at DTCC, a subsidiary of NSCC, Atlas Clearing would continue to have access to a record of customer cash and security balances via its own records.
BMO Harris - Firm Bank	Firm Bank	Main Customer Line, (888) 340-2265	BMO Harris provides Atlas Clearing with its operating expense account, its Customer Reserve Account, its PAB Reserve Account, and its rolling line of credit. In the event of a disruption to BMO Harris, Atlas Clearing would be unable to pay customer withdrawals on demand from its operating account. Customer funds are deposited in Dreyfus cash sweep accounts and any customer withdrawals would settle via Dreyfus funds in less than 24 hours. In the event of a prolonged disruption, Atlas Clearing would obtain a new banking partner for its operating and reserve accounts and for its line of credit.
FINRA	Designated Executive Authority	District Office, Denver, CO, 303-446-3100; FINRA ROAR Group, New York, NY, 646-315-8383.	FINRA provides Atlas Clearing and all other broker-dealers industry-wide with self-regulatory functions. In the event FINRA is disrupted, Atlas Clearing would continue to operate under its existing FINRA- compliant policies and procedures and be subject to direct regulation by the Securities and Exchange Commission.
FIS Global	Back-Office Recordkeeping	888-323-0310	FIS provides Atlas Clearing with its back-office recordkeeping software. In the event FIS is disrupted, Atlas Clearing would be unable to accept orders for trades or send or receive customer funds. Atlas Clearing maintains an up-to-date archive of its data stored via FIS, enabling Atlas Clearing to recreate its firm and customer records via a new back-office system provider in the event of a prolonged disruption.

Atlas Clearing can use offices located in other states to continue communications with its Critical Business

Partners.

We will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services when we need them because the business constituent is experiencing its own SBD or we are experiencing our own.

9.1. Business Constituents

ATCLR shall determine whether the third party is able to continue providing critical services. If not, identify and contact an alternate third party to provide services.

9.2. Banks and Other Financial Institutions

In the event of an SBD related to our financing, we will contact our banks and lenders to determine if they can continue to provide the financing. The bank maintaining our operating account is BMO Harris. If our bank and/or other lenders are unable to provide the financing, we will seek alternative financing immediately.

9.3. Critical Counter-Parties

In the event of an SBD related to our financing, we 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 cannot be completed, we will work with those counter-parties directly to make alternative arrangements to complete those transactions as soon as possible.

10. Widespread Health Emergencies

[FINRA Regulatory Notice 20-16, 20-08 and 09-59; FINRA Information Notice 3/26/20 Cybersecurity Alert; Federal government Emergency Preparedness and Response: https://emergency.cdc.gov/planning/]

A widespread pandemic or any biologically based threat could have significant impact on the ability of the Firm to continue conducting business. This section outlines the steps the Firm has taken and will take in the event of a widespread pandemic.

10.1. Preparatory Steps

- Document government resources for information about a pending pandemic
- Engage cybersecurity procedures (see the chapter: CYBERSECURITY)
- Identify and document an alternative firm or firms to handle ATCLR's business for extended periods of time
- Identify and document medical resources to assist employees, including administering vaccinations or other medications
- Stock antibacterial and other hygiene products for use by employees
- Identify alternative work sites
- Identify employees who can telecommute and establish a list of those employees and what computers and technology will be necessary
- Establish supervisory procedures to oversee employees who will telecommute or are relocated to an alternative site

10.2. Action if a Pandemic Occurs

The following procedures will be followed in the event of a threatened health emergency.

1. The Emergency Response Team will meet to determine the potential seriousness of the threat and what action to be taken as the threat escalates.
2. Determine whether employees should work remotely (see the following section).
3. Notify employees of:
    - available vaccinations or other medication and whether they are mandated
    - necessary conduct such as avoiding personal contact such as handshaking

- access to antibacterial or other hygiene products to reduce infections and transmission of communicable diseases
- requirement to stay home and telecommute
- transfer of business/functions to other firms
- contact list of key personnel

4. Restrict access to ATCLR by outsiders (customers, vendors, *etc.*).
5. The Emergency Response Team will meet or communicate regularly to determine steps to be taken.

The Firm tested to ensure that they are prepared for the following risks contained in FINRA regulatory notice 09-59.

Absenteeism - The Firm in the event of 50% absenteeism is prepared to move its operations remotely. The Firm has previously established a cloud-based Disaster Recovery Site, to which the firm pushes a mirror copy of all critical servers, systems, and data. Employees in the Firm can access the Disaster Recovery Site from any remote location with an internet connection and a VPN client.

The majority of Firm employees have been cross-trained on all front and back-office functions. The firm is also prepared to process the business manually if necessary. The majority of the firm's employees have many years of experience in all facets of the industry and have the ability to step in employee's roles to conduct the daily business.

Telecommuting - The firm has taken the appropriate measures to ensure telecommunications and remote work arrangements will function as designed and intended during a pandemic. We are also prepared to have employees work from home as they all potential connectivity via home computers.

Applications and Technology (available to employees telecommuting include, but are not limited to):

- VALDI OMS, FIS Securities 360, FIS Wealth Station, Market Map, OTC Pink Sheets, Email, IM, Microsoft One Drive, OTC, DocuWare, Quick Books, Amazon Web Services

Key Dependencies - The firm has identified their key dependencies and risks (see section IX of the BCP plan) a pandemic will influence.

10.3. Remote Work

Responsibility	Head Trader or Designee
Resources	• BCP • Locations of employees • Regulatory guidance and notices
Frequency	As required
Action	• Include remote supervision testing in BCP testing • Provide guidance and resources to supervisors which may include regular meetings with senior leadership and supervisors to provide updates, emphasize importance of escalating issues, contacting Compliance regarding concerns and questions, providing electronic checklists and attestations, as applicable • Analyze emerging risks via alerts, exception reports, and customer complaints • Request feedback from staff • For remote trading supervision, consider enhanced oversight which may include:

	- attestations from traders - approval for each trader to work remotely - testing trader's remote trading capabilities and review of test results - provide supervisors a special supervisory checklist - maintain and update a list of all remote traders - increase frequency of reviews - use communication tools possibly including cameras, chat rooms, daily calls, collaboration tools and conference calls - record trading staff and review of conversations - implement additional central monitoring and reviews • Oversight of customer communications which may include: - increased email review - additional keyword surveillance - disable certain features of video conferencing platforms, such as chat, that would be subject to recordkeeping obligations impractical in remote locations • Enable remote branch inspections if on-site inspections are stopped
Record	• Records of information provided to supervisors and employees and supervisory reviews • Records of trading supervision • Records of remote staff and locations

If ATCLR decides that employees will work remotely, procedures include the following:

- Provide back-up contact information and redirect phone lines to facilitate customer communications
- Ask remote staff to report their location to their supervisors, requiring approval prior to making changes to location
- Provide additional support and communication to staff which may include firm-wide calls and video conferences to provide updates; virtual training; communicating clear guidance about Firm expectations; provide additional technology tools, if necessary, for remote workers; provide digital collaboration platforms and applications; and disseminate additional guidance and training regarding technology, tools and services in a remote work environment
- Reminding staff about confidentiality of Firm and customer information, cybersecurity and fraud risks
    - Use a secure network connection to access your Firm's work environment (e.g., through a company-provided Virtual Private Network (VPN) or through a secure Firm or third-party website (which begin with "https")).
    - Secure Wi-Fi connections using a stringent security protocol (e.g., WPA2).
    - Check for and apply software updates and patches to routers on a timely basis.
    - Change the default user names and passwords on home networking equipment, such as Wi-Fi routers.

11. Education of Employees

The Business Continuity Plan is communicated to employees as follows:

- A current copy of the Plan is provided to the Emergency Response Team and key employees with responsibilities for aspects of the Plan. When changes are made to the Plan, new copies will be distributed to these employees.
- The most recent Emergency Contact List is provided to key employees.
- The BCP is included in training of employees.

Computers and Mobile Devices

- Check for and apply updates and patches to the operating system and any applications on a timely basis.
- Install and operate anti-virus (AV) and anti-malware software.
- For any files on a personal device, check your Firm's policy about file storage and back-up, especially if the files contain customer personally identifiable information (PII).
- Lock your screen if you work in a shared space and plan to be away from your computer.

Common Attacks

- Be sensitive to the growing variety of scams and attacks that fraudsters are using to exploit the current situation, such as:
    - phishing scams that reference COVID-19, the coronavirus or related matters;
    - fake, unsolicited calls from a "Helpdesk" requesting passwords or wanting to walk you through your home preparedness; and
    - malicious links in e-mails, online sites and unofficial download sites, especially those offering "free software."

Incident Response

- Understand your role in ATCLR's incident response plan and whom to contact in the event of a cybersecurity incident (e.g., data breach, loss or exposure of customer PII, successful e-mail attack, ransomware, lost or stolen mobile device).

Training and Awareness

- Provide staff with training on:
    - how to connect securely to the office environment or office applications from a remote location; and
    - potential scams and other attacks described above.
- Alert ATCLR's IT support staff, or others involved in managing or supporting staff using ATCLR's systems, to be diligent in vetting incoming calls because fraudsters may use the increase in remote work to engage in social engineering schemes, such as making bogus calls requesting password resets or reporting lost phones or equipment.

12. Updating, Annual Review, And Testing

The BCP will be updated whenever we have a material change to our operations, structure, business or location. The Plan will also be reviewed on at least an annual basis and revised as needed. Each revision will be approved by the designated senior manager and copies of the revised Plan distributed to the Emergency Response Team and employees. If changes are made to the BCP disclosure, the Firm will disseminate to customers and update a copy on the Firm’s website. Some material events require updating the Plan when they occur, including:

- Material changes to ATCLR's business
- A change in ATCLR's main office location
- Added office locations
- A change in a major service provider(s)

When the Plan is reviewed, the procedures and accompanying lists and charts will be reviewed and updated as needed.

When appropriate, the Firm will participate in industry-wide testing programs. A written record of the annual review including the date reviewed and name and signature of the reviewer will be retained by Compliance.

13. Disclosure of Business Continuity Plan

Atlas Clearing discloses a short summary of its Business Continuity Plan in writing when customers open new accounts and upon request, by mail or e-mail. We also post updated versions of this plan on our website, www.atlasclearing.com.

14. 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.

Signature: Lincoln T. Eggertz
box SIGN 1526RKKK-42P2Z32Y

Title: CCO/AMLCO

Date: Aug 3, 2026