

**Odeon Capital Group LLC's Business Continuity Planning 2020**

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

**Contacting Us** – If after a significant business disruption you cannot contact us as you usually do at 212-257-6970, you should call our alternative number 310-730-0012 or go to our website at [www.odeoncap.com](http://www.odeoncap.com). If you cannot access us through either of those means, retail clients should contact our clearing firm, Hilltop Securities at 214-859-9100, or go to [www.hilltopsecurities.com](http://www.hilltopsecurities.com) for instructions on how you may be able to access your funds and securities, how orders can be processed, how you can obtain cash, or arrange for security transfer transactions; to name a few options available to you at that time. Institutional clients should contact ICBC Financial Services at 212-993-7344.

**Our Business Continuity Plan** – We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

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

Our clearing firms collectively back up our important records in geographically separate areas. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, we have been advised by our clearing firms that their objectives are to restore their own operations and be able to complete existing transactions and accept new transactions and payments the next business day. Your orders and requests for funds and securities could be delayed during this period.

**Varying Disruptions** – Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business within a 24-hour time period. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area and recover and resume business within 24-48 hour time period. In either situation, we plan to continue in business and notify you through our website [www.odeoncap.com](http://www.odeoncap.com) or our customer emergency number is 203-829-6075, please feel free to contact us with any of your concerns. 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 212-257-6970 or email [admin@odeoncap.com](mailto:admin@odeoncap.com)