

## **Business Continuity Plan (BCP) Summary**

### **Firm Policy**

Moors & Cabot's mission is to provide our customers with appropriate products and services to facilitate their investment strategies. Our strategy is to manage an approved corporate-wide Business Process Continuity Program to maintain the policy and standards while providing a comprehensive implementation process. A centralized Business Process Continuity Group is responsible for administering the program and ensuring all business units and subsidiaries comply.

Our method is to align the Continuity Planning staff with business area Continuity Planners. Working together, they ensure structure and consistency are maintained through the use of formal processes. The objective is to create, document, test and maintain business process continuity plans to recover critical systems and functions. At least annually, business units and technology departments test their plans to ensure that they are workable and in compliance and that staff are aware of their roles in a business interruption. A corporate communication and management process exists to ensure business functions resume quickly, thereby reducing financial risk.

The Business Process Continuity Program encompasses both technology and business continuity planning worldwide.

### **Significant Business Disruptions (SBDs)**

Our plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only our firm's ability to communicate and do business, such as a fire in our building. External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a city flood, or a wide-scale, regional disruption. Our response to an external SBD relies more heavily on other organizations and systems, especially on the capabilities of our clearing firm.

### **Pandemic Preparedness**

In light of current events involving Covid-19, the threat of a pandemic occurring has become very real, much like other various types of SBDs. As a result, regarding pandemics specifically, our plan addresses the top three most significant challenges likely to be faced during a pandemic: absenteeism, remote work arrangements and telecommunications disruptions. We also incorporate an activation of plan actions or protocol and Pandemic Contact Information for each state in which we have a branch office.

### **Business Description**

Our firm conducts business in equity, fixed income, and derivative securities. Our firm is an introducing firm and does not perform any type of clearing function for itself or others. Furthermore, we do not hold customer funds or securities. We accept and enter orders. All transactions are sent to our clearing firm, RBC, which executes our orders, compares them, allocates them, clears and settles them. Our clearing firm also maintains our customers' accounts, can grant customers access to them, and delivers funds and securities. Our firm services retail customers and institutional customers.

### **Customers' Access to Funds and Securities**

Our firm does not maintain custody of customers' funds or securities, which are maintained at our clearing firm, RBC. In the event of an internal or external SBD, if telephone service is

available, our registered persons will take customer orders or instructions and contact our clearing firm on their behalf. If our Web access is available, our firm will post on our website: [www.moorscabot.com](http://www.moorscabot.com) information on how customers may contact us and access their funds and securities.

If SIPC determines that we are unable to meet our obligations to our customers or if our liabilities exceed our assets in violation of Securities Exchange Act Rule 15c3-1, SIPC may seek to appoint a trustee to disburse our assets to customers. We will assist SIPC and the trustee by providing our books and records identifying customer accounts subject to SIPC regulation.

### **Data Back-Up and Recovery**

Moors & Cabot Inc. employs several technologies for data backups. The method used is determined by the recovery requirements of the application.

As a firm, Moors & Cabot Inc. relies on RBC for major primary computer facilities located in geographically diverse areas nation-wide. Moors & Cabot Inc. is effectively positioned to counter an event that would render one of our primary computers processing facility substantially or entirely disabled. The corporation has prepared not only for full Data Center relocation, but also for Intra Data Center recovery.

### **Financial and Operational Assessments**

**Operational Risk** - In the event of an SBD, we will immediately identify what means will permit us to communicate with our customers, employees, critical business constituents, critical banks, critical counter-parties, and regulators.

**Financial and Credit Risk** - In the event of an SBD, we 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.

### **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.

We have primary responsibility for establishing and maintaining our business relationships with our customers and have sole responsibility for our mission critical functions of order taking and entry and execution. Our clearing firm provides, through contract, the 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.

RBC 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 twice a year.

## **Our Firm's Mission Critical Systems**

Order Taking and Entry - Currently, our firm receives orders from customers via telephone and in person visits by the customer. During an SBD, either internal or external, we will continue to take orders through any of the methods that are available and reliable, and in addition, as communications permit, we will inform our customers when communications become available to tell them what alternatives they have to send their orders to us. Customers will be informed of alternatives by our website. Currently, our firm enters orders by recording them on paper and electronically and sending them to our clearing firm electronically.

Order Execution - We currently execute orders through RBC Betalink or by calling our desk. In the event of an internal SBD, we would still use RBC Betalink or if necessary we could contact RBC directly.

## **Alternate Communications between the Firm and Customers**

We now communicate with our customers using the telephone, e-mail, our Web site, fax, U.S. mail, and in person visits at our firm or at the other's location. In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party. For example, if we have communicated with a party by e-mail but the Internet is unavailable, we will call them on the telephone and follow up where a record is needed with paper copy in the U.S. mail.

## **Disclosure of Business Continuity Plan**

We disclose in writing a summary of our BCP to customers at account opening. We will also mail it to customers upon request. Our summary addresses the possibility of a future SBD and how we plan to respond to events of varying scope.

## **Updates and Annual Review**

Our firm 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, our firm will review this BCP annually to modify it for any changes in our operations, structure, business, or location or those of our clearing firm.