

Business Continuity Disclosure Policy

Billow Butler & Company, L.L.C. ("Firm") is a FINRA registered broker/dealer providing brokerage services to its customers. Accordingly, the Firm is furnishing this document to all clients to provide information about its efforts to ensure that the Firm's securities operations will not be significantly impacted as a result of an emergency or significant business disruption.

Securities Industry regulations require each member firm to create and maintain a business continuity plan reasonably designed to meet its obligations to its clients or other counter-parties. In accordance with these requirements, the Firm has designed a business continuity plan to address possible scenarios in efforts to minimize any service impact to our clients.

In keeping with the regulatory requirements, the business continuity plan for the Firm is designed to address key areas of concern - including but not limited to the following:

- Data back-up and recovery;
- All mission critical systems;
- Financial and operational assessments;
- Alternate means of communication between the Firm and its customers;
- Alternate means of communication between the Firm and its employees;
- Alternate physical locations of employees;
- Critical business constituent, bank and counter-party impact;
- Regulatory reporting;
- Communications with regulators; and
- How the Firm will ensure that customers have access to their funds and securities in the event that the Firm determines it is unable to continue its business.

Since events creating business disruptions may vary in nature and scope, the Firm has anticipated scenarios in which the following are affected:

- A disruption to the Firm's primary or main office location
- A disruption to a single building in which the Firm's main office is located
- A disruption to the business district or city where the Firm's primary systems are located
- A disruption to the region where the Firm's primary systems are located

Regardless of the scope of potential disruption, the Firm intends to continue to provide service to its clients.

A Disruption to the Firm and/or Single Building

In the event that there is a significant business disruption to the firm and/or the building in which the Firm is located, the Firm has duplicative systems that will be operated from a separate back-up ("alternate") site. This disruption may be caused by physical damage, technology problems, or an inability to have personnel arrive at the office. As such, the Firm will transfer its securities operations to one or more designated alternate site(s) located in the same city or in adjoining cities that are sufficiently separated from the Firm's main operations. The alternate site will be used to restore internal operations as well as electronic access and communications as soon as key employees are relocated to the designated sites. In this process, Clients may experience a minor delay in reaching the Firm due to increased telephone calls, technology delays, or other minor difficulties arising from the transfer of operations. The Firm expects that any delay will be less than twelve (12) hours. Nevertheless, the unlikely failure of the teleph

result in a delay of up to twenty-four (24) hours.

A Business-District, Citywide, or Regional Disruption

In the event that there is a significant business disruption that affects the *business district* or *city* where any of the Firm's primary systems are located, the Firm will transfer operations to its designated back-up ("alternate") site located in a separate and distinct business district and city from its main operations. The alternate site will be used to restore internal operations, electronic access and communications as soon as key employees are relocated to the site.

In the event of a significant business disruption to the *region* where the Firm's primary systems are located, the Firm would intend to take advantage of any available branch or other facilities that may be located in other geographical regions to use in limited capacity to resume operations temporarily. As a secondary back-up, the Firm may enter into a "BCP Joint Pact" with another broker/dealer or similar firm that currently operates in an adjoining region that will effectively leverage the use of technology and infrastructure to continue operations. Under the BCP Joint Pact, the selected firm will be determined as sufficiently capable to operate as a designated back-up facility. In this process, clients may experience minor delays in reaching the Firm due to increased telephone calls, technology delays, or other minor difficulties arising from the transfer of operations. The Firm expects that any delay will be less than twenty-four (24) hours.

Nevertheless, please be aware that due to the unpredictability of events, there can be no assurance that service will continue without interruption in certain circumstances, such as a regional blackout, a natural disaster or a terrorist attack. However, in the unlikely event that the Firm has determined that it cannot resume operations within a reasonable amount of time, it will provide as much advance notice as possible regarding its ongoing operations.

Note: this business continuity plan is subject to periodic modification, therefore, updated plans will be promptly posted on the Firm's Web site for review (if available). Alternatively, customers may obtain a complete copy of the Firm's business continuity plan by requesting a written copy in writing.

Please be advised that the Firm's business continuity plan is reviewed and updated on an annual basis and subject to change and modification. Therefore, any changes and updated information will be promptly posted on the Firm's Website located at www.billowbutler.com. Alternatively, customers may obtain a copy of the Firm's business continuity plan by requesting a written copy in writing.

At Billow Butler & Company, L.L.C (“BBC”), protecting your privacy is our top priority. When you work with a financial service professional, you may share highly personal information which may be critical to providing superior products and service. Therefore, at BBC, we understand our obligation to keep information about you secure and confidential. We will inform you of our policies for collecting, using, securing, and sharing your nonpublic personal information (“Customer Information”) the first time we do business and every year that you remain a customer with us. The following information describes our policies and procedures for handling your personal financial information.

Information We Collect. We collect and use various types of information we believe is necessary to administer our business, and to offer you the best possible customer service. Customer Information we collect is categorized into the following types: (1) information we receive from you on applications, or on other forms, through telephone or in-person interviews, such as your name address, phone number, social security number; your assets, income and other household information; (2) information about your transactions and account experience with us or others, such as your account balance, transaction history; (3) information from consumer reporting agencies, such as information regarding your creditworthiness or credit history; (4) other general information we obtain about you that is not assembled for the purpose of opening an account or offering certain products or services that you may request, such as demographic information.

Information We Share. We may disclose your non-public personal information as part of servicing and maintaining your policy, contract or account, and/or for other purposes as permitted or required by law. In the normal course of business, we may share personal information with persons or entities involved in servicing and administering products and services on our behalf. These could include: your agent or broker, insurance companies, consumer reporting agencies, firms assisting in administration of policies and claims, companies that perform marketing services on our behalf or other financial institutions with whom we have joint marketing agreements, and other service providers and affiliates assisting us.

We may also disclose any of the types of Customer Information to other organizations under certain conditions as permitted by law. These may include: (1) a disclosure in connection with a subpoena or similar legal process; (2) a fraud investigation; (3) recording of deeds of trust and mortgages in public records; (4) an audit or examination; and (5) the sale of your account to another financial institution.

We will NOT disclose personal information about current or former customers to non-affiliated third parties, except as permitted or required by law, and we do NOT sell any personal information about you to any third party.

Protection and Confidentiality of Information. We have procedures in place that limit access to Customer Information to only those employees, representatives and service providers who are considered “authorized” personnel who need to know the information to perform business services or market products on our behalf. We also educate our employees about the importance of protecting the privacy and security of confidential personal information. Additionally, we maintain physical, electronic and procedural safeguards that comply with federal and state regulations to guard your personal information.

SIPC Contact Information. You may obtain information about SIPC, including the SIPC brochure, by contacting SIPC. SIPC’s Web site address is (www.sipc.org) and telephone number is (202) 371-8300). You will obtain this information, in writing, at least once each year.

Updating Our Privacy Policy. We will provide notice of our privacy policy annually, as long as you maintain an ongoing relationship with us. We will also update our policies and procedures when necessary to ensure that your privacy is maintained and that we conduct our business in a way that fulfills our commitment to you. If we make any material changes in our privacy policy, we will provide our customers with an updated notice.

Please Contact Us With Any Questions. Confidentiality is an established hallmark of our business. We understand the need to safeguard the personal information that you disclose to us, and we have an established tradition of discretion and respect for our customers’ privacy. We reinforce this daily in the way we routinely handle sensitive client information as part of our normal business operations. If you have any questions about our privacy policy, please contact us at (312) 559-9055.