

ALLIANT SECURITIES, INC.

Business Continuity Plan (BCP)

I. Emergency Contact Persons

Our firm's two emergency contact persons are: Michael Nord, President and a General Securities Principal, at (509)747-9144 or mike@alliantsecurities.com and Paul Kienbaum, Treasurer and a General Securities Principal at (509)747-9144 or paul@alliantsecurities.com. These names will be updated in the event of a material change, and our Executive Representative or her designee will review them within 17 business days of the end of each quarter.

Rule: FINRA Rule 4370.

II. Firm Policy

Our firm's policy is to respond to a Significant Business Disruption (SBD) by safeguarding employees' lives and firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of the firm's books and records, and allowing our customers to transact business. In the event that we determine we are unable to continue our business, we will assure customers prompt access to their funds and securities.

A copy of this document will be provided to all employees of the firm.

A. 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 data service provider.

B. Approval and Execution Authority

Any one of the firm's 2 owners and General Securities Principals, Mr. Michael Nord or Mr. Paul Kienbaum, may approve the plan and both principals will be jointly responsible for ensuring that the annual review is conducted. Ms. Sally Mann, the Firm's Operations Manager and registered Financial & Operations Principal has been given the authority to execute this BCP.

C. Plan Location and Access

Our firm will maintain copies of its BCP plan and the annual reviews, and records of the changes that have been made to it for inspection. A digital copy of our plan will be maintained by our cloud storage service provider.

III. Business Description

Our firm conducts business in equity, fixed income, and investment company securities. Our firm is a fully disclosed firm that clears through Wells Fargo Clearing Services LLC (WFCS), and does not perform any type of clearing function for other firms. We do not hold customer funds or securities. We accept and enter orders at our main office. All equity transactions are routed to WFCS for execution. Our firm services only retail customers and other non-institutional accounts. We do not engage in any private placements.

For brokerage and premier account customers our data service provider is WFCS. Customer Service 877-496-3223 and 877-496-3221 for registered reps. For customers with managed accounts at Charles Schwab & Co., Customer Service 800-435-4000

Wells Fargo Clearing Services, LLC
1 North Jefferson
Saint Louis, MO 63103

Charles Schwab & Co., Inc.
211 Main Street
San Francisco, CA 94105

IV. Office Locations

Our Firm conducts all of its business through our main office, which is located at 695 North Legacy Ridge Drive Suite 300 Liberty Lake, WA 99019. Our main telephone number is (509) 747-9144 and our fax is (509) 623-1543. We can be reached toll-free at (800) 345-9724. Our employees may travel to that office by means of car, bus, bike, or foot.

All of the following activities occur at our main office location:

- Order Acceptance
- Final Acceptance of New Accounts
- Final Approval of Advertising or Correspondence
- Supervision of all Firm Employees

V. Alternative Physical Location(s) of Employees

The operations manager (principal) Sally Mann's residence will serve as the primary alternate physical office location.

Sally Mann Residence
12802 S Fairway Ridge Lane
Spokane, Washington 99224
509 251-1000

If this operations manager (principal) residence is not available one of the other Principals residences can be used as the secondary alternate physical location.

Rule: FINRA Rule 4370.

VI. Customers' Access to Funds and Securities

WFCS maintains custody of customers' funds or securities. 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 Operations Department personnel at the back-up location to effect the transaction on their behalf, and we will notify customers that they may access their funds and securities by contacting our Operations personnel directly.

The firm will make this information available to customers through its disclosure policy.

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.

Rules: FINRA Rule 4370.

VII. Data Back-Up and Recovery (Hard Copy and Electronic)

Our firm maintains its primary hard copy books and records and its electronic records at our main office location. A duplicate copy of all advisory client contracts and other required account documentation will be maintained by a cloud storage service. Sally Mann is responsible for the maintenance of these books and records.

Our firm maintains its back-up hard copy books and records at WFCS.

If our primary site is inoperable, we will continue operations from an alternate location. For the loss of electronic records, we will either physically recover the storage media or electronically recover data from our back-up site, or, if our primary site is inoperable, continue operations from one of our back-up alternate locations.

Our firm maintains the following document types and forms that are not transmitted to WFCS.

- Copies of Customer's Legal Documents (e.g. trust agreements, corporate resolutions, powers of attorney, trading authorization forms, etc)
- Checks and Bank Statements

In the event of an internal or external SBD that causes the loss of our paper records, we will reconstruct our customer records using customer information captured on WFCS's systems and obtain duplicate records of Bank Statements and cancelled checks from our Bank. We have implemented procedures to have our financial/ payroll records backed-up using Quick Books off site on line backup service.

Rule: FINRA Rule 4370.

VIII. Financial and Operational Assessments

A. 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. Although the effects of an SBD will determine the means of alternative communication, the communications options we will employ will include, telephone, voice mail, secure e-mail, cell-phones and in-person visits. In addition, we will retrieve our key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic).

Rules: FINRA Rule 4370.

B. 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 critical banks, and owners 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, our owners, 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 to cease operations.

Rules: FINRA Rule 4370.

IX. Mission Critical Systems

Our firm's "mission critical systems" are those that ensure prompt and accurate processing of securities transactions, including order taking and entry. We have sole responsibility for establishing and maintaining our business relationships with our customers and have sole responsibility for our mission critical functions.

WFCS SmartStation is Alliant Securities' main mission critical system. We at Alliant Securities communicate with SmartStation through VPN (at the Legacy ridge office) internet access, other computers are configured for remote access as necessary.

Currently, we execute all trades with WFCS via access to SmartStation and or by phone.

WFCS has provided us with a summary of its current business continuity capabilities (WFCS report dated 2013). WFCS will provide us with progress reports as it defines and implements changes to its business continuity plans. As WFCS revises its plan, if we should determine that WFCS cannot put its plan in place quickly enough to meet our

needs, or is otherwise unable to provide us with the necessary access to its services, we will seek services from an alternative source.

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.

A. Our Firm's Mission Critical Systems

1. Order Taking

Currently, our firm receives orders from customers via telephone or in person visits by the customer. During an SBD, either internal or external, we will continue to take orders through any of these 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 contacting their Registered Representative or our Operations Department.

2. Order Entry and Execution

Currently, our firm enters equity orders electronically via WFCS's SmartStation system trading application.

In the event of an internal SBD, we will phone in our orders to WFCS and enter them into SmartStation from our primary back-up location at the alternate physical location. In the event of an external SBD, we will phone in our orders to WFCS and enter them into SmartStation at our secondary back-up location. In addition, during an external SBD, we may pursue execution arrangements with other dealers.

Fixed income orders may be executed by our registered persons from our proprietary accounts or through any of a number of fixed income counterparty broker dealers [See *Schedule B*] by providing the appropriate trade information to the back office in person or over the phone. The back office will then process the trade for completion with WFCS. In the event of an internal or external SBD, our registered personnel will continue to process fixed income orders in the same manner.

3. Other Services Currently Provided to Customers

In addition to those services listed above in this section we also carry customers' accounts. In the event of an internal SBD, we would access customer positions through SmartStation access at Alliant Securities.

Additionally, customers can call our Operations Department at any time and request that a check be issued to their bank or address of records - or request that funds be wired to their bank account (however, wire charges may apply). Also, many customers can access their funds through free check writing privileges on their account.

Rules: *FINRA Rule 4370.*

X. Alternate Communications Between the Firm and Customers, Employees, and Regulators

A. Customers

We currently communicate with our customers using the telephone, e-mail, fax, U.S. mail, and in person visits at our firm or meet with them at their home or other customer selected locations. 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.

Rule: *FINRA Rule 4370.*

B. Employees

We now communicate with our employees using the telephone, e-mail, and in person. 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. We will also employ a call tree so that senior management can reach all employees quickly during an SBD. The call tree includes all staff home and office phone numbers. We have identified persons who live near each other and may reach each other in person. [See *Schedule A*, attached.]

Rule: *FINRA Rule 4370.*

C. Regulators

We are currently members of FINRA and registered with the SEC and various States in which we conduct business. We communicate with our regulators using the telephone, e-mail, fax, and U.S. mail. 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. [See also XII below.]

Rule: *FINRA Rule 4370.*

XI. Critical Business Constituents, Banks, and Counter-Parties

A. Business constituents

We have contacted 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), and determined the extent to which we can continue our business relationship with them in light of the internal or external SBD. We will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services when we need them because of a SBD to them or our firm. Our major suppliers are listed on *Schedule B*, attached.

Rules: FINRA Rule 4370.

B. Banks

We have contacted our banks and lenders to determine if they can continue to provide the financing that we will need in light of the internal or external SBD. The bank maintaining our operating account is: U.S. Bank at 422 W. Riverside, Spokane, WA 99201; our contact is Cynthia MacGeagh (509) 353-7027.

If our banks and other lenders are unable to provide the financing, we will seek alternative financing immediately from our owners, other broker-dealers or other local or regional financial institutions.

Rules: FINRA Rule 4370.

C. Counter-Parties

We have contacted 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 internal or external 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. [See list of key Counter-Parties at *Schedule B*, attached.]

Rules: FINRA Rule 4370.

XII. Succession Plan

All parameters with regard to succession planning are addressed in the companies Buy/Sell agreement.

XIII. Regulatory Reporting

Our firm is subject to regulation by the SEC, FINRA, the MSRB and the various States in which we conduct business. We now file reports with our regulators using paper copies in the U.S. mail, and electronically using fax, e-mail, and the Internet. In the event of an

SBD, we will check with the SEC, FINRA, and other regulators to determine which means of filing are still available to us, and use the means closest in speed and form (written or oral) to our previous filing method. In the event that we cannot contact our regulators, we will continue to file required reports using the communication means available to us. [See Regulatory Contact Information attached at *Schedule C*.]

Rule: FINRA Rule 4370.

XIV. Disclosure of Business Continuity Plan

We disclose in writing a summary of our BCP to new customers at account opening (for accounts opened after 8/11/04) and on an annual basis to all accounts. 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. In addressing the events of varying scope, our summary (1) provides specific scenarios of varying severity (e.g., an internal or external disruption); (2) states whether we plan to continue business during that scenario and, if so, our planned recovery time; and (3) provides general information on our intended response. Our summary discloses the existence of back-up facilities and arrangements. [See Disclosure of Business Continuity Plan, attached at *Schedule D*.]

Rule: FINRA Rule 4370.

XV. 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 data service provider. In addition, our firm will review this BCP annually, within 13 months of the date of the most recent revision, to modify it for any changes in our operations, structure, business, or location or those of our data service provider.

Rule: FINRA Rule 4370.

XVI. 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.

Rule: FINRA Rule 4370.

Signed: _____

Title: _____

Date: _____

Attachments:

- A – Employee List
- B – List of Vendors & Key Counterparties
- C – Regulatory Contact Information
- D – Business Continuity Statement