

Business Continuity Plan

World Capital Brokerage, Inc.
Business Continuity Plan (BCP)

I. Emergency Contact Persons

Our firm's two emergency contact persons are:

Timothy E. Taggart
ttaggart@worldcapitalbrokerage.com

and

Patricia Blum
pblum@worldcapitalbrokerage.com

These names will be updated in the event of a material change, and an Executive Representative will review them within 17 business days of the end of each quarter.

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.

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 of 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 Business Disruption

In the event of a pandemic crisis the Firm has assigned senior management as well as key associates critical processes that can be distributed across multiple geographic locations. Members of the Firm have the ability to operate out of different locales which may include isolated areas such as homes. The Firm also can implement Social Distancing which minimizes contact between associates, decreasing the potential for transmitting a virus or other health risk.

Approval and Execution Authority

Timothy E. Taggart, President, a registered principal, is responsible for approving the plan and for conducting the required annual review. Timothy E. Taggart has the authority to execute this BCP. In the event Mr. Taggart is unavailable, Michael Gaughan or Patricia Blum have the authority to execute this BCP.

Plan Location and Access

Our Firm will maintain copies of its BCP plan and the annual reviews, and the changes that have been made to it for inspection. The BCP is also available on the Firm's Web Site.

III. Business Description

Our Firm conducts business in equity, fixed income, and mutual fund/variable annuities 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, 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 and institutional customers.

We do not engage in any private placements.

Our clearing firm is:

Pershing LLC
DBS 5th Floor
1 Pershing Plaza
Jersey City, NJ 07399

and our contact person at that clearing firm is:

Ferdinando Catania Account Manager Ferdinando.Catania@pershing.com

Our clearing firm has also given us the following alternative contact in the event the main contact cannot be reached:

Doug Maughan Vice President [DMAughan@pershing.com](mailto:DMaughan@pershing.com)

IV. Office Locations

Our Firm's offices are located at:

Office Location #1
1636 Logan Street
Denver, Colorado 80203

Its main telephone number is 303-626-0631. Our employees may travel to that office by means of foot, car, train, or bus. This location is responsible for all functions of the company and its business.

In the event of an SBD, we will move our staff from affected office to the closest of our unaffected office locations. If none of our other office locations is available to receive those staff, we will move them to an alternate address in Denver Colorado, outside of the Denver metro area.

In the event of an SBD please email taggart@worldcapitalbrokerage.com for an updated mailing address.

VI. Customers' Access to Funds and Securities

Our Firm does not maintain custody of customers' funds or securities, which are maintained at our clearing firm, Pershing. 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. 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.

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 1636 Logan Street, Denver Colorado 80203. Timothy E. Taggart (303-626-0631 taggart@worldcapitalbrokerage.com) is responsible for the maintenance of hard copy books and records. Timothy E. Taggart (303-626-0631 taggart@worldcapitalbrokerage.com) is responsible for the maintenance of electronic records.

The Firm backs up its electronic records daily by a monitored automated computer program that checks for quality as well as accuracy. Our Firm maintains its back-up hard copy books and records at Wells Fargo Bank in Denver Colorado in a safe deposit box. The hard copies are burned on to a non-rewritable, non-erasable DVD and removable hard drive and placed in the bank vault daily. Electronic Data is backed up on an external hard drive which is placed in the bank vault daily.

In the event of an internal or external SBD that causes the loss of our paper records, we will physically recover the electronic versions from our back-up site. If our primary site is inoperable, we will continue operations from our back-up site or 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 our back-up site or an alternate location.

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

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 to protect the client's assets.

IX. 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. These systems, including backup, are controlled and maintained by our clearing firm Pershing.

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. 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.

Our clearing firm contract provides that our clearing firm will maintain a business continuity plan and the capacity to execute that plan. Our clearing firm represents that it will advise us of any material changes to its plan that might affect our ability to maintain our business and has presented us with an executive summary of its plan, which is available upon request. In the event our clearing firm executes its plan, it represents that it will notify us of such execution and provide us equal access to services as its other customers. If we reasonably determine that our clearing firm has not or cannot put its plan in place quickly enough to meet our needs, or is otherwise unable to provide access to such services, our clearing firm represents that it will assist us in seeking services from an alternative source.

Our clearing firm 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.

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. Our clearing firm has the following SBD recovery time and resumption objectives: recovery time period of 4 hours; and resumption time of within the same business day.

Our Firm's Mission Critical Systems

Order Taking

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 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. If necessary, we will advise our customers to place orders directly with our clearing firm Pershing.

Order Entry

Currently, our Firm enters orders by recording them on paper and electronically and sending them to our clearing firm electronically or telephonically.

In the event of an internal SBD, we will enter and send records to our clearing firm by the fastest alternative means available, which includes Internet, UPS, Federal Express and U.S. Mail. In the event of an external SBD, we will maintain the order in electronic and/or paper format, and deliver the order to the clearing firm by the fastest means available when it resumes operations. In addition, during an internal SBD, we may need to refer our customers to deal directly with our clearing firm for order entry.

Order Execution

World Capital Brokerage, Inc. does not execute its own orders.

Other Services Currently Provided to Customers

N/A

Mission Critical Systems Provided by Our Clearing Firm

Our firm relies, by contract, on our clearing firm to provide order execution, order comparison, order allocation, and the maintenance of customer accounts, delivery of funds and securities, and access to customer accounts.

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

A. Customers

We communicate with our customers using email, telephone, U.S. mail and in person visits at our Firm. 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.

In the event that the phone systems become inoperable for any reason, WCB will forward all incoming calls to an outside location staffed by an employee of WCB for the duration of the outage.

In the event that the internet systems become inoperable for any reasons, email will be monitored via a remote location by an employee of WCB via Global Relay.

B. Employees

We communicate with our employees using U.S. Mail, 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, noted below, who live near each other and may reach each other in person:

The person to invoke use of the call tree is Timothy E. Taggart. If Mr. Taggart is unavailable Mr. Gaughan may invoke the call tree.

C. Regulators

We are currently members of the following SROs or subject to the following regulators: FINRA, SEC, as well as the relevant agency or department in the states we do business in. We communicate with our regulators using the telephone, e-mail, fax, U.S. mail, overnight 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.

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

Business constituents

We have contacted our critical business constituents 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.

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 and PAIB account is:

Operating and PAIB account

Alpine Bank
1777 Wynkoop Street
Denver, CO 80202
Tel. No. 303-573-0709

If our banks and other lenders are unable to provide the financing, we will seek alternative financing immediately from

TD Bank
1120 Tilton Rd
Northfield, NJ 08225
Tel. No. 609-645-1771

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 our clearing firm or contact those counter-parties directly to make alternative arrangements to complete those transactions as soon as possible.

XII. Regulatory Reporting

Our Firm is subject to regulation by: FINRA and SEC and all states that it is licensed in. We now file reports with our regulators using paper copies in the U.S. mail as well as with overnight vendors, 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.

XIII. Disclosure of Business Continuity Plan

We disclose in writing a summary of our BCP to customers at account opening and annually. We also post the summary on our Web site and 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., a firm-only business disruption, a disruption to a single building, a disruption to a business district, a city-wide business disruption, and a regional disruption); (2) states if 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. This BCP is subject to modification; an updated version will be promptly posted on our Web site www.worldcapitalbrokerage.com. Customers may also obtain an updated summary by requesting a written copy via mail or by calling us at 888-742-0631.

XIV. 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.

XV. 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.

Signed: /s/ Timothy E. Taggart

Title: President, CCO

Date: 01/17/2020