

TRADEMAS, INC.

BUSINESS CONTINUITY PLAN (BCP)

I. Emergency Contact Persons

Our firm's emergency contact person is:

1. Frank Masiello
B: (212) 306-5311
C: (917) 499-9710

This information will be updated in the event of a material change. Mr. Frank Masiello, 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.

A. Significant Business Disruption (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. In the event of an SBD on a pandemic level that affects some of the Firm's employees, the Firm will advise all employees of the situation and ascertain whether there is sufficient staff to conduct business. In the event of a SBD on a pandemic level that affects the entire Firm, TradeMas, as an execution agent for other broker dealer's, will not conduct business until such time as adequate personnel were able to return to work. The Firm would contact all of its employees, vendors and customers to advise them of the situation and keep them informed as information changes. In the event of an SBD on a pandemic level that closes the NYSE, we will move our staff from affected offices to any alternative site designated by the Exchange. If the Exchange was not able to conduct business at an alternative site, the Firm would not conduct business until such time that the NYSE reopens for business. The Firm would invoke its call tree and advise all employees of the situation.

B. Approval and Execution Authority

Mr. Frank Masiello is responsible for approving the plan and for conducting the required annual review.

C. Plan Location and Access

TradeMas, Inc. will maintain copies of its BCP plan and the annual reviews, and the changes that have been made to it for inspection. Upon request, we will provide the Securities & Exchange Commission (“SEC”), New York Stock Exchange, Inc. (“NYSE”), the Financial Industry Regulatory Authority (“FINRA”) and any state regulatory agency of which we are registered, a copy of our plan.

III. Business Description

TradeMas, Inc., *formerly, Bowers Securities, Inc.* (the “Firm”) is a member firm of the New York Stock Exchange, Inc. TradeMas was admitted as a member of the Financial Industry Regulatory Authority effective October 26, 2007 pursuant to the Waive-In Membership Application. TradeMas provides a \$2 brokerage service to registered broker/dealers and other exchange members. *The Firm is currently pending FINRA approval to conduct an options two-dollar brokerage business on the Floor of the NYSE American.* The Firm’s business is conducted solely in NYSE and NYSE American listed securities on an agency basis. Our firm 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. Our firm services only registered broker-dealers.

IV. Office Locations

The Firm has an office located in Location #1:

A. Office Location #1

Our location #1 office is located at 11 Wall Street, New York, New York, 10005 on the Floor of the NYSE in Pod-D. Our main telephone number on the floor of the Exchange is (212) 306-5311. Our employees may travel to that office by means of foot, car, subway, train, bus or ferry. The Firm engages in order taking and order routing at this location.

The Firm is currently pending FINRA approval to conduct an options two-dollar brokerage business on the Floor of the NYSE American. Upon approval, the Firm will obtain booth space on the NYSE American.

V. Alternative Physical Location(s) of Employees

In the event of an SBD that closes the NYSE, we will move our staff from the NYSE to any alternative site designated by the Exchange.

VI. Customers’ Access to Funds and Securities

The Firm does not maintain custody of customers’ funds or securities. In the event of an internal or external SBD, if telephone service is available and the NYSE is operational, our registered persons intend to take customer orders or instructions.

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 creditors. We will assist SIPC and the trustee by providing our books and records identifying accounts subject to SIPC regulation.

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

Our firm maintains its primary hard copy financial books and records and its electronic records at Bayat Consulting, Inc. (“BCI”), 14 Wall Street, 20th Floor, New York, NY 10005. Ms. Anoshka Bayat is responsible for the maintenance of these books and records. Ms. Bayat may be reached at (347) 599-2300. Hard copies of all documents are housed in fire-proof file cabinets. These records consist of, but are not limited to the following:

- General Ledgers;
- Trial Balances;
- Regulatory Reports to include, but not limited to, FOCUS and Form 600TC;
- Paid Invoices;
- Bank and brokerage statements, as applicable.

BCI has an image back-up of all electronic records located on its main PC completed every night and removed from the location to their back-up site located in Garden, N.Y. The telephone number at this alternative site is (631) 648-0026. A duplicate server is set up at that location and is operational. The image back-up can be restored from this remote server. Hard copies of the prior year accounting records are also maintained at this location and 3rd off site location in Bohemia, N.Y. with the exception of paid bills. Paid bills and hard copies of all accounting records prior to the current calendar year are housed at the off-site warehouse of GRM located at 215 Cole Street, Jersey City, NJ 07310.

Our firm maintains its hard copy order tickets on the floor of the exchange. These records are also maintained in electronic format on Optimal Applications server, the Firm’s order management system. Additionally, Optimal Applications provides the firm with a disk that is also stored on the floor of the exchange.

TradeMas utilizes the services of Global Relay Communications, Inc. (“Global Relay”), an independent third party, for messaging (i.e., e-mail, instant messaging) compliance services. Global Relay will manage select components of TradeMas e-mail services, which will include archiving all messages sent to or originating from their archived domain name.

In the event of an internal or external SBD that causes the loss of our paper records on the Floor, we will attempt to physically recover them, to the extent possible, from our back-up site or an electronic source. If our primary site is inoperable, we will continue operations from an alternate location, as determined by the Exchange. For the loss of electronic records, we will attempt to either physically recover the storage media or electronically recover data from BCI, Optimal Applications and/or Global Relay.

VIII. Financial and Operational Assessments

A. Operational Risk

In the event of an SBD, we will attempt to 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, e-mail and/or instant message. In addition, we will retrieve our key activity records as described in the section above, Data Back-up and Recovery (Hard Copy and Electronic).

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 investors to apprise them of our financial status. If we determine that we may be unable to meet our obligations, 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.

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 of securities transactions, allocation, clearance and settlement of securities transactions, the maintenance of customer accounts, access to customer accounts and the delivery of funds and securities. More specifically, these systems include the NYSE BBSS system. *The Firm is currently pending FINRA approval to conduct an options two-dollar brokerage business on the Floor of the NYSE American. Upon approval, the Firm will utilize the NYSE Dash Blaze OMS to enter and execute orders in options.*

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 execution.

A. Our Firm's Mission Critical Systems

1. Order Taking

During an SBD, either internal or external, we intend to continue taking orders through any of the methods currently used 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 telephone or other available means.

2. Order Entry

If the NYSE is open for business we will place customer orders through the means and systems currently being used, to the extent that they are available.

In the event of an internal or external SBD that affects order entry, we will enter and send orders by the fastest and most reliable means available, including manually, or in a form prescribed by the NYSE under the circumstances.

3. Order Execution

In the event of an internal or external SBD that effects order execution, our staff will communicate and execute orders via available means, including manually if necessary.

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

A. Customers

We now communicate with our customers using the telephone, e-mail, instant messaging, and U.S. mail. In the event of an SBD, we will assess which means of communications are still available to us and use the means closest in speed and form 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 instant message 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.

B. Employees

We now communicate with our employees using the telephone, e-mail, instant message and in person. In the event of an SBD, we will assess which means of communications are still available to us and use the means closest in speed and form 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 person to invoke use of the call tree is Frank Masiello.

C. Regulators

We are currently members of the NYSE and FINRA. We communicate with our regulators using the telephone, e-mail, U.S. 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 to the means that we have used in the past to communicate with the other party.

XI. Critical Business Constituents, Banks, and Counter Parties

A. 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 that we need from them because of a SBD to them or our firm.

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:

Signature Bank

C. Counter Parties

We have contacted our critical counter parties 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 intend to work with our counter parties directly to make alternative arrangements to complete those transactions as soon as possible under the circumstances.

XII. Regulatory Reporting

Our firm is subject to regulation by the SEC, NYSE and FINRA. We now file reports to our regulators using paper copies in the U.S. mail and electronically. In the event of an SBD, we will check with the SEC, NYSE, FINRA, and other regulators to determine which means of filing is still available to us and use the means closest in speed and form to our previous filing method. In the event that we cannot contact our regulators, we will continue to file required reports using the communications means available to us.

XIII. Disclosure of Business Continuity Plan

Customers are entitled to a copy of the firm's BCP disclosure statement when their account is opened, and thereafter upon request.

XIV. Updates and Annual Review

Our firm will update this plan whenever we have a material change to our operations, structure, business or location. In addition, our firm will review this BCP annually, to modify it for any changes in operations, structure, business, or location.

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: _____

Title: Frank Masiello, Chief Executive Officer

Date: June 7, 2019