

Fortrend Securities, Inc

BUSINESS CONTINUITY PLAN

September 2021

Fortrend Securities Inc (FSI) maintains a business continuity plan to address interruptions to its normal course of business. These plans are reviewed annually and updated as necessary.

Our firm's emergency contact is: Joe Forster - 646 206 8242 jforster@fortrendsecurities.com, President

The firm's second emergency contact is Ken George 603-380-5435 Phone, ken.george@comcast.net

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

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. Our clearing firm has undertaken significant steps to switch technology to an alternate regional data centre. All our clients are informed of this possibility in an attachment to their monthly commission statements.

Approval and Execution Authority

Joe Forster, a registered principal, is responsible for approving the Business Continuity Plan (BCP) and for conducting the required annual review. Joe Forster has the authority to execute this BCP. In the event of Joe Forster's absence, there is no one else to assume this role.

Plan Location and Access

Our firm will maintain copies of its BCP and the annual reviews, and any changes that have been made to it for inspection. An electronic copy of our plan is located on-line in the FINRA file in the file name of "Business Continuity Plan" and a hard copy of the file is kept in the filing drawer.

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. Per the sub carry agreement, Fortrend Securities Pty Ltd (FSA), an ASIC licensed entity in Australia, introduces accounts to FSI, who introduces accounts to StoneX or RJ. Furthermore, we do not hold customer funds or securities. FSA enters orders directly onto the StoneX or RJ platform for straight through processing on behalf of its clients. We do not have direct communication with members of the public or any of FSA's clients that are introduced to Fortrend. All orders received from FSA are sent to our clearing firm, which executes our orders, 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 clearing firms are StoneX and RJ:

Roger Shaffer
Managing Director
Correspondent Clearing
StoneX Financial, Inc.

2600 N. Military Trail, Suite 350
Boca Raton, FL 33431 USA
Direct: +1 (561) 544-7614
Email: Roger.Shaffer@StoneX.com
Web: <http://ifcs.co/custody-clearing>

Robb Combs
Director Correspondent Services
Raymond James & Associates, Inc.
880 Carillon Parkway
St. Petersburg, FL 33716

www.RaymondJames.com
1-888-752-5327 ext. 73992
813-541-0340 cell
855 537 4498 fax to mail

Office Location

Fortrend has access to a filing cabinet for storage purposes at Level 50, 525 Collins Street, Melbourne, Victoria, 3000, Australia. Its main telephone number is 646 205 8242. Fortrend does not engage in order taking and entry at this location.

Alternative Physical Location of Employees

In the event of an SBD, Joe will work from home, which is currently 5 Torresdale Road Toorak Victoria, 3000, Australia. Its main telephone number is 646 205 8242. This is an internet based phone number that can be diverted to Mr. Forster's cell, home or other phone number as required.

Customers' Access to Funds and Securities

Our firm does not maintain custody of customers' funds or securities, which are maintained at our clearing firms, StoneX or Raymond James. In the event of an internal or external SBD, if telephone service is available, FSA (or its customers) can contact our clearing firm on behalf of its customers with accounts. Fortrend does not have a web site. FSA has agreed to inform clients with accounts at Fortrend that in an emergency where Fortrend is not able to service the account, customers may access their funds and securities by directly contacting the clearing firm as above. Our clearing firm also offers instructions on its websites above. If people cannot access StoneX or RJ from its website or the previously noted telephone numbers. 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.

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

Our firm maintains its primary hard copy books and records and its electronic records at Room 1, filing cabinet #1 as part of a sublease from Painewebber (Australia) Pty Ltd at Level 50, 525 Collins Street, Melbourne Victoria, Australia. Joe Forster is responsible for the maintenance of these records. Our firm maintains the following document types and forms that are not transmitted to our clearing firm: All year end accounts, Balance Sheet and Profit & Loss accounts and Trial Balance, General Ledger, General Journal, Cash Receipts & Disbursements and Net capital Computation.

Fortrend Auditor,

Ernie Wintter of Ernst Wintter & Associates,
675 Ygnacio Valley Road, Suite B-213,
Walnut Creek, CA 94596;

Fortrend FinOp, Ken George, FINOP Services, LLC;

Kenneth R. George, CPA,
12 Christie Lane, Stratham,

NH 03885
ken.george@comcast.net,
603-380-5435 Phone,
603-386-6792 Fax,
www.finop-services.com

also maintain hard copies and electronic records of these accounts.

The firm backs up its electronic records from Joe Forster's laptop to an external hard drive (passport) on a weekly basis. Joe keeps the back up at home in his dressing closet. They are also saved on Box.com in WORM format.

In the event of an internal or external SBD that causes the loss of our paper records, we will rely on electronic copies stored on Joe's laptop or the external hard drive or Box.com. 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 electronically recover data.

Rule: FINRA rule 4370 c 1

[FINRA Rule 4370](#)

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 secure email, offsite phones and mail. 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 c 3

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 capital contributions from Shareholders and/or subordinates, financing from our bank or other credit sources to fulfill our obligations to our customers and clients. If we incur a net capital violation or "early Warning" capital deficiency, we will fax notice to regulators as required by SEC Rule 17a-11.

Rules: FINRA rule 4370 c3

Mission Critical Systems

Our firm's "mission critical systems" are those that ensure prompt and accurate processing of securities transactions by StoneX or RJ, including order processing, 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. More specifically, these systems include: Communications with FSA and StoneX or RJ, and making sure FSA can enter orders with our clearing agents.

We have secondary responsibility for establishing and maintaining our business relationships with FSA customers that are introduced to us. 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. These are made directly available to FSA by StoneX or RJ.

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. 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 within 4 hours, and resumption time of within the same business day.

A. Our Firm's Mission Critical Systems

Order Taking

Currently, our firm receives orders from FSA and the orders are automatically forwarded to the clearing firm. During an SBD, either internal or external, we will continue to allow FSA to enter 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. Customers will be informed of

alternatives by telephone/fax/e-mail. If necessary, we will advise FSA customers to place orders directly with our clearing firm.

Order Entry

FSA can place orders through StoneX or RJ or Bloomberg on behalf of their clients.

In the event of an internal SBD, FSA can, if necessary, enter and send records directly to our clearing firm by the fastest alternative means available, which include courier, email and telephone. In the event of an external SBD, we will maintain the order in electronic 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

Not applicable, our clearing firm performs order execution.

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.

Rules: FINRA rule 4370 c 2

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

A. Customers

We do not currently communicate directly with customers. We communicate with FSA, and StoneX or RJ. 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 c 4

B. Employees

We now communicate with our employees via 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 also maintain an accurate, updated list of all contact details, business and personal for all employees. These details are maintained in our files

available on the cloud. There is also a physical copy in at Level 50, 525 Collins Street, Melbourne, VIC 3000 Australia, room #1, filing cabinet #1.

The person whose responsibility it is to contact staff is Joe Forster, who maintains the contact list.

Rule: FINRA rule 4370 c 5

C. Regulators

We are currently members of the following SROs: FINRA. We communicate with our regulators using the telephone, e-mail, mail, and we meet with their representatives whenever possible. 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.

Rule: FINRA rule 4370 c 9

Critical Business Constituents, Banks, and Counter-Parties

Business constituents

We have contacted our clearing agent and confirmed that they have a contingency plan in the event of a disaster.

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.

Rules: FINRA Rule 4370 c 7

Banks

Our bank accounts are held at StoneX or RJ. Our clearing agent information is as follows:

Roger Shaffer
Managing Director
Correspondent Clearing
StoneX Financial, Inc.

2600 N. Military Trail, Suite 350
Boca Raton, FL 33431 USA
Direct: +1 (561) 544-7614
Email: Roger.Shaffer@StoneX.com
Web: <http://ifcs.co/custody-clearing>

Robb Combs

Director Correspondent Services
 Raymond James & Associates, Inc.
 880 Carillon Parkway
 St. Petersburg, FL 33716

www.RaymondJames.com
 1-888-752-5327 ext. 73992
 813-541-0340 cell
 855 537 4498 fax to mail

Rules: *FINRA Rule 4370 c 7*

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

Rules: *FINRA Rule 4370 c 7*

Regulatory Reporting

Our firm is subject to regulation by: FINRA. We now file reports with our regulators electronically, 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.

Our regulator contact information is as follows: <https://finra.org> FINRA,

100 Pine Street
 Suite 1800
 San Francisco, CA 94111
 (415) 217-1145

Rules: *FINRA Rule 4370 c 8*

Disclosure of Business Continuity Plan

We provide in writing a BCP disclosure statement to customers at account opening. FSI has an agreement with FSA that FSA will disclose this in its FSG and on its website.

Rule: FINRA rule 4370 e

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, on the final working day in March, to modify it for any changes in our operations, structure, business, or location or those of our clearing firm.

Rule: *FINRA rule 4370 b*

Senior Manager Approval

Joe Forster is designated to 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: 4370 d

Signed: _____

Title: _____

Date: _____