

## **Curvature Securities, LLC**

### **Business Continuity Plan Client Disclosure Document**

#### ***Introduction***

The purpose of this letter is to provide you with very important information about Curvature Securities, LLC's ("CSL" or the "Firm") Business Continuity Plan ("BCP") so that you are aware of what you need to do to in the event that our Firm experiences a significant business disruption ("SBD"). It is important for firms in the financial services industry to take steps to ensure their preparedness to meet customer needs and resume regular business operations in a timely manner in the event of an SBD, such as power outages, natural disasters, pandemics or other situations.

There are several types of SBDs varying in severity and scope that may occur on an internal or external level. An internal SBD, such as a fire in our building, would only affect the Firm's ability to conduct its normal business. An external SBD, such as an earthquake, regional power outage, or terrorist attack, would affect the operations of several firms or the financial markets as a whole. An SBD may also involve a pandemic, that may significantly disrupt our business operations.

FINRA Rule 4370 requires members to establish emergency preparedness plans and procedures, and to create and maintain a business continuity plan ("BCP" or "Plan"). The Rule enumerates certain requirements that each plan must address. The Rule further requires members to update their BCPs upon any material change and, at a minimum, to conduct an annual review of their BCP. Each member also must disclose to its customers how its BCP addresses the possibility of a future SBDs and how the member plans to respond to events of varying scope.

#### ***Firm Policy***

Our policy is to respond to an SBD in a manner that prioritizes the immediate safety of our employees, preservation of the Firm's property, and a quick recovery in order to meet the business needs of our clients. If we determine that the SBD has been catastrophic to the level that we are unable to continue our business, we will ensure that our clients have prompt access to their funds and securities.

Alternate office location

In the event that the main office becomes inoperable, the Firm will shift its operations to its designated back-up facility which is reasonably distant from the main office so as to reduce the chance that it will be affected by the same SBD, yet close enough to relocate to quickly if necessary. All of the Firm's employees are familiar with the back-up facility and have been provided with driving directions.

#### ***Back-up books and records***

CSL maintains back-ups of all its client files and other internal books and records at an off-site facility. Should an SBD cause our primary records to be inaccessible or destroyed, we have procedures in place to access the back-up files and implement them promptly in order to assure the least possible impact on our clients.

### *Third party business relationships*

CSL has business relationships with several entities upon which we rely for varying services. Such entities include our clearing firm, banks, telecommunications providers, etc. We have contacted our essential third parties to assess the impact that varying types of SBDs may have on the services we are provided by them. Based on that information we have been able to develop alternate plans to counter any interruptions in these services that we may experience during an SBD.

### *Key systems*

The Firm has identified the possibility of a loss of functionality of the systems relied upon for its regular business operations in the event of an SBD. We have enumerated our key systems in our BCP, identified the individual(s) responsible for them, and developed procedures to switch to alternative systems should our primary systems be incapacitated. Based on the trial conversions we have run, we expect minimal down time if a situation arises which forces us to switch to our alternate systems.

### *Potential SBD Scenarios*

In an effort to prepare for the variety of effects that different types of SBDs might have on CSL, we have outlined some SBD scenarios and the corresponding actions that the Firm will need to take in order to assure that the SBD has the least possible effect of the Firm and our clients. We are aware that the exact ramifications of any type of SBD cannot be predicted precisely and in the event of an SBD, we will take the time to assess the Firm's particular resulting situation and take the necessary steps as described in our BCP to handle the situation as effectively as is possible under the circumstances we encounter.

### ***Illustration #1 – Internal SBD***

In the event that a fire consumes CSL's main office destroying all hardware and files, after assuring the safety and well-being of our employees, the following actions will be taken:

<b>Effect of SBD</b>	<b>Action to be taken</b>
Personal computers, servers, and data storage hardware are destroyed	Acquire new computers, transport them to alternate location, and install the necessary software obtained from off-site storage facility. Contact network service provider if necessary to re-establish technological infrastructure and web services.
Books and records are destroyed	Assess the feasibility of recovering the damaged books and records. If more efficient, obtain back-up books and records from off-site facility for immediate use to the alternate location.
Office is destroyed	Relocate to the alternate location and establish operations. Once business has resumed and is fully operational, start searching for a new main office location.
Telecommunications hardware is destroyed	Contact service provider to transfer existing service to the alternate location, arrange for necessary hardware and software installations.

We estimate the resumption of business and communications channels within forty-eight (48) hours of the onset of this type of SBD.

### ***Illustration #2 – External regional SBD***

In the event that an earthquake, or other natural disaster causes structural damage to our building and the buildings of some of our service providers, including our clearing firm, CSL will make the following assessments and take the following steps:

<b>Effect of SBD</b>	<b>Action to be taken</b>
Building is not structurally sound	Evacuate the office and obtain alternate equipment and files and transport them to the alternate location so that business may resume promptly.
Clearing firm has been forced to relocate to its secondary business location	Contact the clearing firm and assess the repercussions of its relocation on its business. Determine which method will be the most effective for delivering customer orders and requests for withdrawals to the clearing firm.
Other vendors are experiencing service interruptions	Contact vendors to determine when they anticipate being fully operational and make arrangements for the continuance of service, if possible, in the meantime.

Depending on the impact of this particular type of SBD on our third-party vendors, we estimate a range of forty-eight (48) to seventy-two (72) hours for the Firm to be able to resume normal business operations.

### ***Illustration #3 – Catastrophic SBD***

In the event of an SBD on the level of a terrorist attack, major natural disaster, political crisis, or other event that is of a magnitude great enough to force the close of the markets but does not *physically* affect CSL, the Firm will take the following steps:

<b>Effect of SBD</b>	<b>Action to be taken</b>
The financial markets are closed (other than normal market holidays)	Communicate the situation to clients and assure that the clearing firm will be able to process transactions when the markets re-open.
One of CSL's banks has been significantly affected and cannot continue its business for a prolonged (more than seventy-two hours) period of time	Contact the bank to determine how funds may be withdrawn and transfer the funds to another account. If funds are frozen for an uncertain amount of time, assess the Firm's financial situation and pursue additional financing if necessary.
The Firm's investments in the financial markets are frozen	Perform a risk assessment based on the overall status of the SBD to decide how to best preserve the Firm's capital position under a variety of market re-open scenarios.
There is a possibility of further SBDs resulting from the primary SBD	Test the Firm's procedures for handling an SBD that results in the Firm's relocation. Assure that back-up systems, hardware, and files are ready to be utilized and can be set up quickly if needed.

It is virtually impossible to predict a recovery time for this category of SBD due to the scope and the myriad of ramifications on the financial services industry as a whole. We are confident that with the procedures we have in place we will be able to ensure the least possible impact on our clients as dictated by the circumstances.

#### ***Illustration #4 – Pandemic SBD***

The Firm will monitor publications by the World Health Organization (WHO), Centers for Disease Control (CDC) and the local health department for any warnings of a pandemic. The Firm will also implement travel restrictions if recommended by the CDC. In the event of a pandemic, CSL will take the following steps:

<b>Effect of SBD</b>	<b>Action to be taken</b>
Pandemic outbreak in the vicinity of the Firm	Provide employees with guidelines on how to prevent the spread of disease and how to respond when they or a family member gets sick. Encourage employees to work from home if they think they may have come in contact with an infected person.
One or more employees becomes infected	Circulate a companywide memorandum informing employees of the outbreak in the company and require infected employees to work from home if able. If employees are unable to work from home their duties will be re-assigned to another employee by the employee's supervisor.

#### ***Important Contact Information***

**Curvature Securities, LLC**  
39 Main Street Main Street Suite 100  
Chatham, NJ 07928 United States  
Tel: (908) 304-0311

In the event of an SBD, for accounts clearing through Curvature Securities, you can access your funds and securities held at Curvature by contacting:

[SBD@curvaturesecurities.com](mailto:SBD@curvaturesecurities.com)

or

**Curvature Securities, LLC**  
39 Main Street  
Chatham, NJ 07928 United States  
Tel: (908) 304-0311  
or  
(646) 671-2723

In the event of an SBD, you can access your funds and securities held at the clearing firm(s) by contacting the clearing firm(s) below.

#### ***For Additional Information About Our BCP***

Should you have any questions in relation to our BCP or this notice, please don't hesitate to contact us at any time.

## ***Summary***

At CSL we deeply value the relationships we have built with our clients and we strive to meet their changing needs in any business climate. It is not the intent of this document to assure our clients that there will be no impact on them whatsoever in the event that CSL is affected by an SBD. Rather, we wish to convey the fact that we have developed procedures for varying types of possible SBDs which will allow us to address the effects on our Firm on a variety of levels, manage those effects, and utilize our alternate arrangements in a manner that we expect will minimize client impact. In our procedures, we stress the importance of maintaining communications with our clients through as many media as possible so that we may continue to meet their needs and transact business in as smooth a fashion as is possible under whatever circumstances may have arisen.

***Appendix # 2***  
Key Contacts List

Contact Individual	Title	Primary Office Phone	Office Fax	Primary Office Address	Email
		Alternate Phone		Alternate Address	
Miriam Yoshida	COO	908-304-9200	(908) 304-9500	39 Main Street Chatham, NJ 07928 United States	mcyoshida@curvaturesecurities.net
		917-922-6029		37 Station Road, Madison, New Jersey 07940 United States	
Mike Lisi	Operations	908-304-9300	(908) 304-9500	39 Main Street Chatham, NJ 07928 United States	mlisi@curvaturesecurities.net
		732-581-5739		258 Ueland Road Red Bank, NJ 07701 United States	
William Pigott	CEO, ER	908-565-1216	(908) 304-9500	581 Buttonwood Bay Drive, Boca Grande, FL 33921 United States	tpigott@curvaturesecurities.net
		908-304-9200		37 Station Road, Madison, New Jersey 07940 United States	
Todd Pigott	CCO, AMLCO	646-71-2723	(908) 304-9500	39 Main Street Chatham, NJ 07928 United States	toddpigott@curvaturesecurities.net
		908-304-9200		37 Station Road, Madison, New Jersey 07940 United States	

Contact Individual	Title	Primary Office Phone	Office Fax	Primary Office Address	Email
		Alternate Phone		Alternate Address	
Greg Sorrentino	Equity Finance	908-304-0211	(908) 304-9500	39 Main Street Chatham, NJ 07928 United States	gsorrentino@curvaturesecurities.net
		516-225-7092		258 Ueland Road Red Bank, New Jersey 07701	
Michael Bodner	President	908-304-0311	(908) 304-9500	39 Main Street Chatham, NJ 07928 United States	mbodner@curvaturesecurities.net
		917-232-1310		37 Station Road, Madison, New Jersey 07940	
Stephanie Sarno	Clearing Business	908-741-4120	(908) 304-9500	39 Main Street Chatham, NJ 07928 United States	ssarno@curvaturesecurities.net
		845-775-9230		37 Station Road, Madison, New Jersey 07940	
Scott Skyrn	Fixed Income	908-394-8159	(908) 304-9500	39 Main Street Chatham, NJ 07928 United States	sskyrm@curvaturesecurities.net
		203-249-0032		37 Overlook Drive New Canaan, CT 06840	

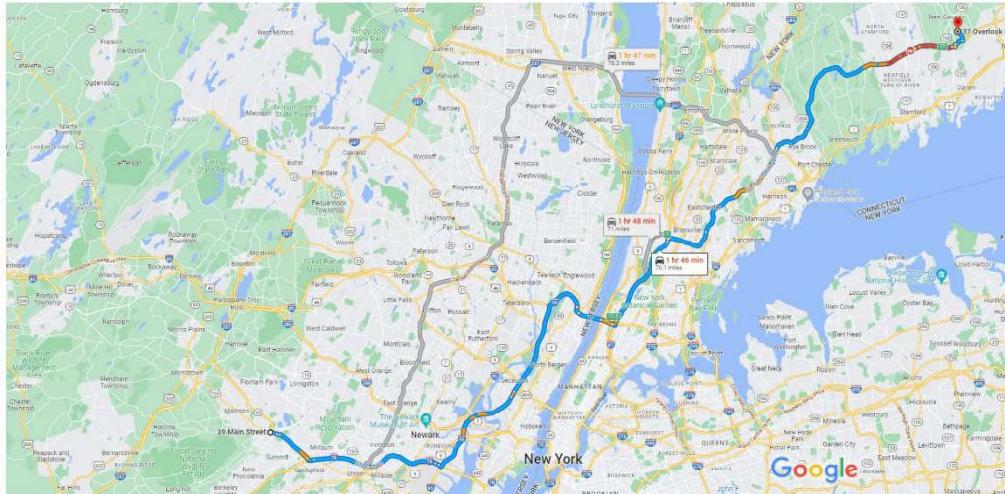


***Appendix # 3***  
Back-up Facilities List

Physical Address	Phone	Fax	Email	Directions from Home Office
37 Station Road Madison, New Jersey 07940 USA	(917) 922-6029			*See attached map and driving directions
37 Overlook Drive New Canaan, CT 06840	(203) 249-0032			*See attached map and driving directions
258 Ueland Road Red Bank, New Jersey 07701	(516) 225-7092			*See attached map and driving directions



39 Main St, Chatham, NJ 07928 to 37 Overlook Dr, New Canaan, CT 06840 Drive 70.1 miles, 1 hr 46 min



Map data ©2022 Google 2 mi

39 Main St  
Chatham, NJ 07928

⚠ This route has tolls.

Get on NJ-24 E in Summit

- ↑ 1. Head north toward NJ-124 E/Main St/Morris Tpke  
105 ft
- ↪ 2. Turn right onto NJ-124 E/Main St/Morris Tpke  
Continue to follow NJ-124 E/Morris Tpke  
0.5 mi
- ⬆ 3. Use the left lane to take the ramp onto NJ-24 E  
0.2 mi

Take I-78 Express E/Phillipsburg–Newark Expy, I-95 N, I-87 N, Cross County Pkwy, ... and CT-15 N to CT-124 N in New Canaan. Take exit 37 from CT-15 N

- ⬆ 4. Merge onto NJ-24 E  
1 hr 16 min (67.9 mi)  
2.4 mi
- ↪ 5. Use the left lane to take the I-78 E exit toward I-95/Holland Tunnl  
0.6 mi

- ↗ 6. Merge onto I-78 Express E/Phillipsburg–Newark Expy  
⚠ Toll road  
8.9 mi
- ↖ 7. I-78 Express E/Phillipsburg–Newark Expy turns slightly left and becomes I-78 E/Phillipsburg–Newark Expy  
⚠ Toll road  
0.2 mi
- ↘ 8. Use the right 2 lanes to take the New Jersey Turnpike exit  
⚠ Toll road  
207 ft
- ↖ 9. Keep left at the fork, follow signs for I-95 N and merge onto I-95 N  
⚠ Toll road  
7.6 mi
- ↘ 10. Keep right to stay on I-95 N  
⚠ Toll road  
0.4 mi
- ↖ 11. Keep left to stay on I-95 N  
9.1 mi
- ↘ 12. Keep right to stay on I-95 N  
0.5 mi
- ↑ 13. Continue onto US-9 N  
430 ft
- ↑ 14. Continue onto I-95 Lower Level N/U.S. 1 Lower Level N  
⚠ Toll road  
⚠ Parts of this road may be closed at certain times or days  
ℹ Entering New York  
1.5 mi
- ↘ 15. Keep right to continue on I-95 Lower Level N/Trans-Manhattan Expy/U.S. 1 Lower Level N  
⚠ Parts of this road may be closed at certain times or days  
0.8 mi
- ↗ 16. I-95 Lower Level N/Trans-Manhattan Expy/U.S. 1 Lower Level N turns slightly right and becomes I-95 N  
0.1 mi
- ↘ 17. Take exit 1C-D to merge onto I-87 N toward Albany  
7.1 mi
- ↘ 18. Take exit 4 to merge onto Central Park Ave  
0.2 mi

19. Use the right lane to take the Cross County Pkwy ramp  
404 ft
20. Keep left at the fork, follow signs for Hutchinson Pkwy and merge onto Cross County Pkwy  
3.3 mi
21. Merge onto Hutchinson River Pkwy N  
8.0 mi
22. Keep right at the fork to stay on Hutchinson River Pkwy N  
[Entering Connecticut](#)  
2.8 mi
23. Continue onto CT-15 N  
13.8 mi
24. Take exit 37 for CT-124 toward New Canaan/Darien  
0.2 mi

**Take Gerdes Rd and White Oak Shade Rd to Overlook Dr**

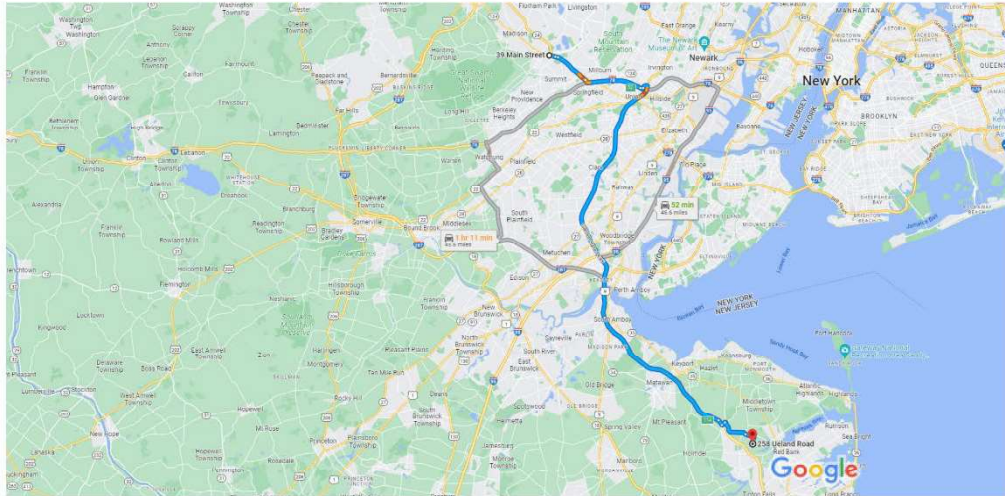
25. Turn left onto CT-124 N  
4 min (1.6 mi)
26. Turn right at the 1st cross street onto Gerdes Rd  
0.2 mi
27. Turn left onto White Oak Shade Rd  
0.6 mi
28. Turn left onto Overlook Dr  
[Destination will be on the right](#)  
0.7 mi
- 499 ft

37 Overlook Dr  
New Canaan, CT 06840



39 Main St, Chatham, NJ 07928 to 258 Ueland Rd,  
Red Bank, NJ 07701

Drive 40.3 miles, 45 min



Map data ©2022 Google 2 mi

39 Main St  
Chatham, NJ 07928

⚠ This route has tolls.

Get on NJ-24 E in Summit

- 2 min (0.7 mi)
  - ↑ 1. Head north toward NJ-124 E/Main St/Morris Tpke
- 105 ft
  - ↗ 2. Turn right onto NJ-124 E/Main St/Morris Tpke
- 0.5 mi
  - 📍 Continue to follow NJ-124 E/Morris Tpke
- 0.2 mi
  - ⬆ 3. Use the left lane to take the ramp onto NJ-24 E

Take Garden State Pkwy to Red Hill Rd in Holmdel. Take exit  
114 from Garden State Pkwy

- 35 min (36.2 mi)
  - ⬆ 4. Merge onto NJ-24 E
- 2.4 mi
  - ↙ 5. Use the left 2 lanes to merge onto I-78 E toward Newark
- 3.9 mi
  - ↘ 6. Take exit 52 for G S Parkway
- 0.3 mi

- ↗ 7. Keep right at the fork, follow signs for Garden State Parkway S and merge onto Garden State Pkwy  
⚠ Toll road  
18.2 mi
- ↗ 8. Keep right at the fork to stay on Garden State Pkwy  
⚠ Toll road  
11.0 mi
- ↘ 9. Take exit 114 toward Holmdel/Middletown  
⚠ Toll road  
0.4 mi

Take Dwight Rd to Ueland Rd in Middletown Township

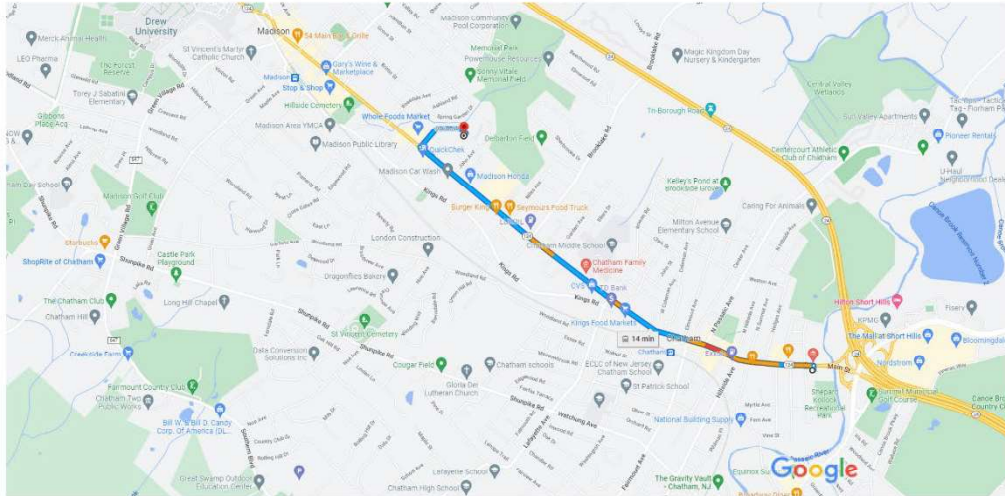
- 8 min (3.5 mi)
- ↙ 10. Use the 2nd from the left lane to turn left onto Red Hill Rd  
0.3 mi
- ↘ 11. Turn right onto Dwight Rd  
1.9 mi
- ↑ 12. Continue onto Nutswamp Rd  
0.6 mi
- ↘ 13. Turn right onto Ueland Rd  
0.5 mi
- ↙ 14. Turn left to stay on Ueland Rd  
ⓘ Destination will be on the right  
0.2 mi

258 Ueland Rd  
Red Bank, NJ 07701



39 Main St, Chatham, NJ 07928 to 37 Station Rd,  
Madison, NJ 07940

Drive 2.2 miles, 8 min



Map data ©2022 Google 1000 ft

39 Main St  
Chatham, NJ 07928

- ↑ 1. Head north toward Main St/Morris Tpke  
105 ft
- ← 2. Turn left onto Main St/Morris Tpke  
Continue to follow Main St  
Pass by Dunkin' (on the right in 0.2 mi)  
2.0 mi
- ↘ 3. Turn right after Dunkin' (on the left)  
Destination will be on the right  
0.2 mi

37 Station Rd  
Madison, NJ 07940



## ***Appendix # 4***

### Key Systems List

Key System	Brief Description	Responsible Individual
Computer system	All hardware and software	Todd Pigott
Telecommunications	Telephone and internet service	Todd Pigott
Power source	Electricity through power company	Todd Pigott