

Global Financial Services, LLC

GFS Advisors, LLC

Business Continuity Plan

Employee Manual

February 2023

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1. INTRODUCTION

Emergencies can occur at any time, without warning. Careful planning can help personnel handle crises and emergencies with appropriate responses. Therefore, it is the responsibility of all employees to be familiar with this Business Continuity Plan (“BCP”).

This BCP applies to: (i) **Global Financial Services, LLC**, a registered broker-dealer with the Financial Industry Regulatory Authority (FINRA) and an Introducing Broker with the National Futures Association; and (ii) **GFS Advisors, LLC**, an investment adviser registered with the U.S. Securities and Exchange Commission, (collectively, “the Firm” or “Global”). This BCP was prepared and is maintained to address the requirements under applicable regulatory rules (e.g., FINRA Rule 4370. Business Continuity Plans and Emergency Contact Information).

2. FIRM POLICY

Global’s policy is to respond to any emergency or significant business disruption by assessing the severity and potential duration of the disruption followed by the implementation of disaster recovery protocols. The priority will be to safeguard the lives of employees, protect customer and Firm assets, and quickly recover and resume operations. Recovery time objective is within 24 hours. However, if Global is unable to recover and resume operations, it will ensure customers' prompt access to funds and securities through clearing firm and custodial relationships.

The BCP anticipates two types of disruptions, localized and systemic. Localized disruptions may affect the Firm’s ability to communicate and conduct business, such as a regional weather event or power outage. However, a systemic disruption may prevent the operation of securities markets or a significant number of firms and/or counterparties, such as a large-scale terrorist attack or a global pandemic¹ involving an infectious disease. Our response to a large-scale systemic disruption may rely more heavily on other organizations and infrastructure, particularly on the capabilities of our clearing firms.

Infectious Disease Update:

Coronavirus Disease (COVID-19) – How to Protect Yourself & Others

Preventive Actions²

The CDC recommends preventive actions to help prevent the spread of COVID-19 and other respiratory diseases, including:

- Get Vaccinated and stay up to date on your COVID-19 vaccines.
 - COVID-19 vaccines are effective at preventing you from getting sick.
 - COVID-19 vaccines are highly effective at preventing severe illness, hospitalizations, and death.

¹ The **World Health Organization** defined a pandemic as “the worldwide spread of a new disease” that affects large numbers of people.

² Source: Center for Disease Control and Prevention.

- Getting vaccinated is the best way to slow the spread of SARS-CoV-2, the virus that causes COVID-19.
- CDC recommends that everyone who is eligible stay up to date on their COVID-19 vaccines, including people with weakened immune systems.
- Wear a mask.
 - Everyone ages 2 years and older should properly wear a well-fitting mask indoors in public in areas where the COVID-19 Community Level is high, regardless of vaccination status.
 - Wear a mask with the best fit, protection, and comfort for you.
 - If you are in an area with a high COVID-19 Community Level and are ages 2 or older, wear a mask indoors in public.
 - If you are sick and need to be around others, or are caring for someone who has COVID-19, wear a mask.
 - If you are at increased risk for severe illness, or live with or spend time with someone at higher risk, speak to your healthcare provider about wearing a mask at medium COVID-19 Community Levels.
 - People who have a condition or are taking medications that weaken their immune system may not be fully protected even if they are up to date on their COVID-19 vaccines. They should talk to their healthcare providers about what additional precautions may be necessary.
- Avoid close contact with people who are sick.
- Avoid touching your eyes, nose, and mouth.
- Stay home when you are sick (if you feel it necessary, consider telecommuting).
- Cover your cough or sneeze with a tissue, then throw the tissue in the trash.
- Clean and disinfect frequently touched objects and surfaces using a regular household cleaning spray or wipe.
- Wash your hands often with soap and water for at least 20 seconds, especially after going to the bathroom; before eating; and after blowing your nose, coughing, or sneezing. If soap and water are not readily available, use an alcohol-based hand sanitizer with at least 60% alcohol. Always wash hands with soap and water if hands are visibly dirty.

For information about handwashing, see [CDC's Handwashing website](#).

For information specific to healthcare, see [CDC's Hand Hygiene in Healthcare Settings](#).

These are everyday habits that can help prevent the spread of several viruses.

In the event of an emergency or significant business disruption, Global's Chief Operating Officer will assess the situation, and if necessary, make a declaration that emergency conditions exist. If the declaration is made, consistent with FINRA Rule 3110(f)(2)(A)(vii), key employees assigned with business continuity roles will be contacted and directed to work remotely from their homes or another temporary location established in response to the implementation of the business

continuity plan³. Each employee has a BCP Manual which describes the required activities and how those activities should be conducted outside of the office.

3. EMERGENCY RESPONSE TEAM

When circumstances result in a significant business interruption, the Chief Operating Officer will attempt to ascertain the severity and duration of the interruption, and if necessary, make the declaration to invoke emergency protocols. If he determines that emergency conditions indeed exist, he will then notify the Emergency Response Team (level two) to begin their assigned roles pursuant to this BCP Plan. If the Chief Operating Officer is unable to make the declaration, then the responsibility falls to the Chief Compliance Officer. Once contacted, the Emergency Response Team will contact support staff in accordance with Call Tree procedures.

LEVEL ONE:

Jack Bruno (Chief Operating Officer) – has primary responsibility for declaration of emergency protocol.

William Cathriner (Chief Compliance Officer) – has back-up responsibility for declaration of emergency protocol, if the Chief Operating Officer is unable to make the declaration.

LEVEL TWO:

Gordon Bell Dilia Medrano or Carolee Mitchell

Adria Salazar

Gerardo Chapa (primary); Victor Villarreal or Claudia Reyes (back-up)

Daniel Priwin or Juan Carlos Cantu (primary); Bernardo Velez (back-up)

Eduardo Leon

Jose Sepulveda

Alfredo Tellez

³ For regulatory purposes, FINRA defines a "**Branch Office**" as any location where one or more associated persons of a member regularly conducts the business of effecting any transactions in, or inducing or attempting to induce the purchase or sale of, any security, or is held out as such, **excluding a temporary location established in response to the implementation of a business continuity plan.**

4. KEY EMPLOYEES ASSIGNED TO BCP ROLES

Key Employees are listed below with their assigned area of responsibility. Each key employee will call employees as designated by the call tree along with any other employee that is in his/her area to give the status of the business interruption and update them as necessary. Individual job tasks may be assigned to each Global employee as needed.

KEY EMPLOYEES	AREA OF RESPONSIBILITY
Jack Bruno	Operational Assessment, Alternative Communications, and Assuring Customer Access to Funds and Securities Financial Assessment and Critical Banking Constituents
William Cathriner	Regulatory Communications and Alternate Physical Locations
Gordon Bell	Mission Critical Systems, including Access to Network, Phones, and Electronic Communications
Dilia Medrano or Carolee Mitchell	Critical Trading Constituents, including Settlement and TRACE Reporting
Adria Salazar	Phones and Manual Routing of Calls
Gerardo Chapa	Customer Trading and Communications
Daniel Priwin or Juan Carlos Cantu	Customer Trading and Communications
Eduardo Leon	Customer Trading and Communications
Jose Sepulveda	Customer Trading and Communications
Alfredo Tellez	Customer Trading and Communications

5. KEY SERVICE PROVIDERS & CONTACT INFORMATION

No.	SERVICE	SERVICE PROVIDER	CONTACT	PHONE	ADD'L INFORMATION
1	BCP Recovery Site	Regus Workplace - Dallas	Notice to Invoke	(972) 776-5355	www.regus.com
2	Building Management Four Oaks Place	Transwestern	Property Management Contact: Jack Gregoire	(713) 552-4802	jack.gregoire@transwestern.com ; http://www.fouroaksplace.com/
3	Clearing Firm	Raymond James & Associates, Inc.	Mike Randall VP Correspondent Services	(727) 567-3992	mike.randall@raymondjames.com
4	Clearing Firm	Raymond James & Associates, Inc.	Robb Combs Director Correspondent Services	(727) 567-3990	robb.combs@raymondjames.com
5	Clearing Firm	Raymond James & Associates, Inc.	IT Support: Technology	(877) 847-5435	Business Hours: Monday thru Friday: 6:30 a.m. to 9:00 p.m. ET; Saturday and Sunday: 8:00 a.m. to 8:00 p.m. ET
6	Data Back-up and Recovery	DataVox.net	Support Desk (support@datavox.net), Paul Adetunji (paula@datavox.net)	(713) 881-5353	Support Desk (support@datavox.net), Paul Adetunji (paula@datavox.net)
7	IT Help Desk	DataVox.net	Support Desk (support@datavox.net), Paul Adetunji (paula@datavox.net)	(713) 881-5353	Support Desk (support@datavox.net), Paul Adetunji (paula@datavox.net)
8	E-Mail Archiving	Global Relay	Support Desk	(866) 484-6630	support@globalrelay.net
9	E-mail Encryption	App River	Support Desk	(866) 223-4645	support@appriver.com
10	Avaya Phone System	Friday's Communication	Tammie Cason (tammie@fridayscomm.com), Danny Friday (danny@fridayscomm.com)	(214) 340-5092	Phone Switchboard
11	Doors - Card Readers	DSS Security	Dan Preston (dan.preston@afpgusa.us)	(281) 391-3818	https://dsssecurity.net , http://10.21.40.222
12	Internet	AT&T	Customer Service	(800) 221-0000	https://www.att.com/contactus/smb/index/internet.html?tab=2
13	Internet	Xfinity	Customer Service	(800) 391-3000	https://business.comcast.com/help-and-support/contact-us
14	Operating Bank Account	Bank of America CashPro	User Access: Jack Bruno	(713) 968-0400 ext. 460, 429, or 436	Tech Support: Monday thru Friday 24- Hrs cashpro.assistant@bankofamerica.com or by phone Monday thru Friday 7:00am
15	Regulator	FINRA-New Orleans Office	Brady Perniciaro	(504) 522-6527	brady.perniciaro@finra.org
16	Regulator	U.S. Securities and Exchange Commission - Fort Worth Office	Marshall Gandy Associate Regional Director - Examinations	(817) 978-3821	dfw@sec.gov
17	Trading	Bloomberg	Sam Miller	(212) 617-8843	smiller127@bloomberg.net Bloomberg
18	Website Host	WP Engine	Trafton Esler	(877) 973-6446	etrafton@wpengine.com

6. EMPLOYEE CONTACT INFORMATION

Please retain a copy of the Emergency Contact List in a secure and easily accessible place.
See **Appendix A**: Emergency Contact List – [Revised 02/15/2023](#).

7. CALL TREE

The Call Tree referenced in Appendix B illustrates the protocol for contacting employees in the event that Firm-wide communication is required relative to an emergency or significant business disruption. Employees that cannot be reached within two hours of the implementation of disaster recovery protocols must be reported to Jack Bruno, the head of the Emergency Response Team.

Please retain a copy of the Call Tree in a secure and easily accessible place.
See **Appendix B**: Call Tree – [Revised 02/15/2023](#).

8. BUSINESS DISRUPTION ACTION PLAN

The Emergency Response Team is responsible for carrying out the BCP Action Plan. In this regard, the Response Team will:

1. Ascertain the severity and potential duration of the disruption.
2. Implement disaster recovery protocols.
3. Decision to invoke Dallas recovery site (Regus Workplace Notice to Invoke - Call the 24/7 Invocation Line ph. 972-776-5355).
4. Communicate with employees that disaster recovery protocols are active, alerting Business Constituents as necessary.
5. Verify connectivity for key employees. Employees may connect using the VPN, or in the case of power failure in the Post Oak Building, employees may access mission critical applications directly through the web using a secure internet connection, e.g., a private WiFi network with password protection, bypassing the VPN configuration. Note, the use of public WiFi networks is expressly prohibited under this BCP plan.
 - a. **Virtual Private Network (VPN)** – you can access the Global network through the **WatchGuard VPN for GFS Remote Access**. To establish VPN access, please see detailed instructions in **Appendix C**. Please note, this may be the only way you can access the network in the event of a significant weather disruption. If you have not installed the new WatchGuard VPN and need assistance, please contact IT Support via email at support@datavox.net or ph. (713) 881-5353. Note, a successful VPN connection automatically provides access to all applications, as if the employee were sitting in his/her office. However, there are many scenarios that could disrupt this connection, e.g., a loss of power to the building or an office PC that was simply turned off.
 - b. **Raymond James Advisor Access** – employees may access RJ's Advisor Access remotely using RJ's proprietary VPN. To establish direct access to RJ's Advisor Access employee must contact Raymond James IT Department directly at ph. (877) 847-5435.

- c. **Morgan Stanley** (advisory accounts only) – employees may access MS by using the following link: <https://login.morganstanleyclientserv.com/>.
 - d. **Pershing** (advisory accounts only) – employees may access Pershing through Netx360 link: <https://www2.netx360.com/portal/login>.
 - e. **Outlook Email** – employees can access Outlook Emails remotely by going to Microsoft Office 365 (link: outlook.office365.com) from any PC, just enter your Global email address and network password to access your Firm.
6. Ensure phones are redirected to qualified personnel and auto-attendant is activated.
 7. Contact clearing firm and other key service vendors as needed.
 8. If necessary, add message to Firm website advising customers on how they may access their funds and securities. The Firm will provide the custodian’s contact information in the event clients cannot access their information through the online service.

See also...

APPENDIX A – Emergency Contact List

APPENDIX B – Call Tree

APPENDIX C – WatchGuard VPN Instructions for GFS Remote Access