



**COPPER
FINANCIAL**

MEMBER FINRA/SIPC

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Business Continuity Plan

Copper Financial (“CuFi”) has developed a Business Continuity Plan (“BCP”) for how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our BCP.

CONTACTING US

If after a significant business disruption you cannot contact us as you usually do at 888.695.3477 or investments@cu.financial, you should call our alternative number at 800.892.7957. You can also visit cu.financial for updates. If you cannot access us through either of these means you should contact our clearing firm, Apex Clearing Corporation, at www.apexclearing.com or 214.765.1009 for instructions on how it may provide access to funds and securities, enter orders, cash and security transfer transactions, etc. For direct accounts not held at Apex Clearing Corporation, you should contact the insurance carrier, mutual fund company, or other direct business provider using the contact information on your account statement or their website.

OUR BUSINESS CONTINUITY PLAN (“BCP”)

We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm’s books and records, and allowing our customers to transact business. In short, our BCP is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our BCP addresses: data backup and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

We back up our important records in a geographically separate area. While every emergency situation poses unique problems based on internal and external factors, such as time of day and the severity of the disruption our objective is to restore our own operations and be able to complete existing transactions and accept new transactions and payments as soon as possible. Your orders and requests for funds and securities could be delayed during this period.

VARYING DISRUPTIONS

Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. We will assess the scope and severity of the business disruption and determine if it is necessary to move our operations to an alternative location and work to restore business operations as soon as possible. In any situation, we plan to continue conducting business, transfer operations to our clearing firm if necessary, and notify you through our website cu.financial or our customer emergency number, 888.695.3477 or 800.892.7957 on how to contact us. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer’s prompt access to their funds and securities.

FOR MORE INFORMATION

If you have questions about our BCP, you can contact us at 888.695.3477 or investments@cu.financial.