



August 9, 2023

William O'Neil Securities ("the Firm") is committed to providing highly reliable service to its clients. The Firm's goal in the event of a business disruption is to resume normal business and client support operations in the shortest time possible with minimal service impact on its clients. The Firm's business continuity plan ("BCP") focuses on mitigating business disruptions by providing technical redundancy, efficient response and prompt recovery.

The Firm prioritizes technology and supplies a number of options for systems availability that would require, in most cases, the failure of three separate systems to directly impact the equity trading business you conduct with the Firm. In the event of an unexpected disaster or emergency, Gregory Jannetta, CEO, is the designated, out-of-area alternate contact. He has been provided with the information necessary to assist you. The Firm has tested its procedures to ensure that the trading department is prepared to address the myriad of circumstances that could present themselves in a significant business disruption ("SBD").

In the event of an internal or external SBD: where only the Firm's order management system (TRAFIX) is down, trading personnel will route orders by telephone to the appropriate marketplaces. This information would be entered into the Firm's in-house electronic order management system to document the trade information.

In the event that all electronic trading systems are down: trading personnel will document client orders to a paper trade ticket and will utilize the telephone to route orders to the appropriate venue and document executions to the ticket. The Firm will enter and send the records to its clearing firm by the fastest alternative means available, which include telephone, facsimile or e-mail. If the telephone service is inoperable clients will be informed of alternatives by notification via website, cellular telephone, e-mails, and written notices as deemed appropriate. If necessary, the Firm will advise its clients to contact its primary emergency contact or secondary emergency contact, or other specified Firm individuals to verify status of any pending orders.

The primary emergency contact information below is confidential and should only be used if a client is unable to reach the Firm's trading department due to an SBD.

Gregory S Jannetta
Mobile Telephone: 617-417-1733

The secondary emergency contact information below is confidential and should only be used if a client is unable to reach the Firm's trading department due to an SBD.

Alexander V. Masotti
Mobile Telephone: 646-996-6320

The Firm will post any pertinent changes to www.oneilsecurities.com for client reference. Please direct any questions to finracompliance@oneilsecurities.com.

Sincerely,

Alexander Masotti

Alexander V. Masotti
General Counsel & Chief Compliance Officer

William O'Neil Securities, Inc.

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