

## **FLETCHERBENNETT GROUP LLC**

### **IMPORTANT LEGAL DISCLOSURES**

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Any and all FINRA-related broker-dealer services are conducted through FletcherBennett Capital LLC, a wholly-owned subsidiary of FletcherBennett Group LLC.

FletcherBennett Group LLC and its affiliates, FletcherBennett Global Advisors LLC and FletcherBennett Capital LLC, do not, and will not, effect or attempt to effect transactions in securities through this website.

All consulting work and services are provided through FletcherBennett Global Advisors LLC, a wholly-owned subsidiary of FletcherBennett Group LLC.

#### **IMPORTANT INFORMATION ABOUT PROCEDURES FOR OPENING A NEW ACCOUNT**

To help the government fight the funding of terrorism and money laundering activities, Federal law requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account.

What this means for you: When you open account, we will ask for your name, address, date of birth and other information that will allow us to identify you. We may also ask to see your driver's license or other identifying documents.

#### **BUSINESS CONTINUITY PLANNING**

FLETCHER BENNETT CAPITAL LLC ("FletcherBennett") has developed a Business Continuity Plan on 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 business continuity plan.

**Contacting Us** – If after a significant business disruption you cannot contact us as you usually do at 212-521-1140, you should contact us via the contact information on our website at [www.fletcher-bennett.com](http://www.fletcher-bennett.com).

**Our Business Continuity Plan** – 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 business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data back up 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.

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## **INFORMATION PRIVACY POLICY**

FletcherBennett Capital LLC collects non-public personal information about you from the following sources:

- Information we receive from you on applications or other forms;
- Information about your transactions with us or others; and
- Information we receive from a consumer reporting agency

We do not disclose any non-public personal information about you to anyone, except as permitted by law.

If you decide to close your account(s) or become an inactive customer, we will adhere to the privacy policies and practices as described in this notice.

FletcherBennett Capital LLC restricts access to your personal and account information to those employees who need to know that information to provide products or services to you.

FletcherBennett Capital LLC maintains physical, electronic, and procedural safeguards to guard your non-public personal information

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## **EXHIBIT A - Business Continuity Plan (BCP) Summary Disclosure**

### **Overview**

FletcherBennett Capital LLC (“FletcherBennett”; “the Firm”) has created and implemented a business continuity plan (“BCP”) in an effort to mitigate the effects related to unforeseen business interruptions. This BCP is designed to enable the Firm to continue or resume trading operations in the event of an emergency or significant business disruption (“SBD”).

### **Communications and locations of Employees during a disruption**

In the event of a SBD, FletcherBennett will communicate with its employees in several different ways. The Firm will employ a calling tree, which would be implemented by management in the event of an SBD. The BCP also addresses the relocation of staff to an alternative back-up location in the New York area, which would be immediately available with the equipment and facilities necessary for the Firm’s professionals to be able to conduct business for a temporary or extended period of time. Recovery time for most of the applications and relocation to the alternate location is expected to range from immediate to 24 hours.

### **Communications with Customers**

FletcherBennett currently communicates with its customers using the telephone, email, fax, US Mail, and in person. In the event of an SBD, FletcherBennett will assess which means of communication are still available and use the means closest in speed to the means used in the past. Additionally, if traditional communications are not available, FletcherBennett representatives will use the best available means to contact the Firm’s clients in order to make contingent plans for the duration of the SBD. In the event of an SBD that may affect the Firm’s ability to communicate with its clients, the Firm’s senior management may elect to place emergency contact information and/or instructions on the website of its affiliated companies ([www.fletcher-bennett.com](http://www.fletcher-bennett.com)) as an additional means of communication with the Firm’s clients.

### **Books & Records**

FletcherBennett maintains its hard copy books and records and electronic records primarily at its Main Office and back-up books and records at alternate locations. If records are lost as the result of a business disruption, FletcherBennett has the means to physically recover data from both physical and electronic back-up locations.

### **Vendors and Counterparties**

FletcherBennett’s BCP may need to rely upon the recovery and restoration of services provided by various critical business constituents and counterparties both at its primary and alternate locations. FletcherBennett has considered the extent to which the Firm may be able to depend upon these business relationships during an SBD as a part of its decision to do business with the constituents. Where possible the Firm has engaged and/or vetted alternate arrangements in order to avoid business disruptions in the case of a business constituent not being able to provide needed goods or services in an emergency.

### **Disclosure**

FletcherBennett’s BCP is designed to address the continued operation of the Firm in the event of an emergency situation or SBD. However, all risks of business interruption cannot be eliminated and FletcherBennett cannot guarantee that systems will always be available or recoverable following an SBD. Furthermore, FletcherBennett has no control over and must rely upon the disaster recovery plans of its various critical business constituents, vendors, clearing firms and counterparties. In the event that material changes are made to this BCP, FletcherBennett will send an updated copy to all of its clients.

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The information contained in this disclosure is provided by FletcherBennett for informational purposes only, and nothing contained herein shall be construed to amend, supplement or otherwise modify any of the terms and conditions set forth in any customer agreement between you and FletcherBennett.