CB3 Financial Group, Inc.

Business Continuity Plan (BCP)

1/01/2025

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I. Introduction

This manual documents the business continuity plan CB3 Financial Group, Inc. (CB3), which conducts business in equities, fixed income securities, and ETFs. The purpose of this manual is to document the plans for the recovery of our critical business functions and systems in the event of a business disruption.

II. Emergency Contact Persons

CB3 provides FINRA with the contact information for two emergency contact persons to fulfill this requirement. These two emergency contact persons are registered principles for CB3. CB3 stays in compliance by updating this information upon any material change and reviewing the information quarterly to ensure it is up to date.

The emergency contact persons associated with this office are Charles R. P. Brown, III, CMT President, and Alice A. Brown, Vice President.

Rule: FINRA Rule 4370(f); NASD Rule 1160.

III. Office Policy

We take very seriously safeguarding our employees' lives and our property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of our office's books and records, and allowing our customers to transact business. In the event that we determine we are unable to continue our business, we will direct our customers to Interactive Brokers (IB) service center at (877) 442-2757 for emergency assistance and access to their funds.

A. Significant Business Disruptions (SBDs)

Our plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only our office's ability to communicate and do business, such as a fire in our building. External SBDs prevent the operation of the securities markets or a number of offices, such as a terrorist attack, a city flood, or a wide-scale, regional disruption. Our response to an external SBD relies more heavily on other organizations and systems, especially on the capabilities of IB.

B. Approval and Execution Authority

Charles R. P. Brown, III, CMT, president of CB3 Financial Group, Inc., is responsible for approving the plan and for reviewing it annually. Charles R. P. Brown, III and Alice Brown, Vice President, share joint authority to execute this BCP.

C. Plan Location and Access

Our office will maintain copies of its BCP plan and the annual reviews, and the changes that have been made to it for inspection. An electronic copy of our plan is located on our CB3 Server, in the compliance folder. This folder is backed up in the cloud at multiple locations.

Rule: FINRA Rule 4370(b), (d) and (e).

IV. Business Description

Our office manages portfolios. Interactive Brokers perform all clearing functions and hold

customer funds or securities on our behalf. All transactions are sent to Interactive Brokers, which executes our orders, compares them, allocates them, clears and settles them. Interactive Brokers also maintain our customers' accounts, can grant customers access to them, and delivers funds and securities.

Our contact number for Interactive Brokers is: (877) 442-2757
Interactive Brokers is located at:
209 South LaSalle Street
10th Floor
Chicago, IL 60604

V. Office Location

Our office location is: (630) 845-8880
CB3 Financial Group, Inc.
586 Crescent Blvd #501
Glen Ellyn, IL 60137

VI. Alternative Physical Location(s) of Employees

In the event of an SBD, we suggest they perform primary business functions from their own personal residences when and where possible.

Rule: FINRA Rule 4370(c)(6).

VII. Customers' Access to Funds and Securities

Interactive Brokers maintain custody of customers' funds or securities on our behalf. In the event of an internal or external SBD, if telephone service is available, our registered persons will take customer orders or instructions and contact LPL Financial/ Interactive Brokers on their behalf, and if our Web access is available, our office will post on our website that customers may access their funds and securities by contacting Interactive Brokers at: (877) 442-2757

If the Securities Investor Protection Corporation (SIPC) determines that we are unable to meet our obligations to our customers or if our liabilities exceed our assets in violation of Securities Exchange Act Rule 15c3-1, SIPC may seek to appoint a trustee to disburse our assets to customers. We will assist SIPC and the trustee by providing our books and records identifying customer accounts subject to SIPC regulation [and *insert any additional procedures*].

Rules: FINRA Rule 4370(a); Securities Exchange Act Rule 15c3-1; *see also* 15 U.S.C. § 78eee.

VIII. Data Back-Up and Recovery (Hard Copy and Electronic)

Our office maintains its primary hard copy books, records, and electronic records in Brentwood, TN.

Charles R. P. Brown, President, is responsible for the maintenance of these books and records. Our office also maintains the following document types: training logs and equities research.

Responsible Party: Charles R. P. Brown
Backup Frequency: intraday

The document types and forms that are backed up are: all data.
We back up electronic records daily by cloud archiving; and keep a copy at our office. In the event of an internal or external SBD that causes the loss of our paper records, we will physically recover them from our back-up site. If our primary site is inoperable, we will continue operations from our back-up site or an alternate location. For the loss of electronic records, we will either physically recover the storage media or electronically recover data from our back-up site, or, if our primary site is inoperable, continue operations from our back-up site or an alternate location.

Rule: FINRA Rule 4370(c)(1).

IX. Financial and Operational Assessments

A. Operational Risk

In the event of an SBD, we will immediately identify what means will permit us to communicate with our customers, employees, critical business constituents, critical banks, critical counter-parties and regulators. In addition, we will retrieve our key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic). If needed, we will direct customers directly to Interactive Brokers Customer Service at (630) 542-6901.

Rules: FINRA Rules 4370(c)(3),(c)(4), (c)(5), (c)(7), (c)(9 & (g)(2)).

B. Financial and Credit Risk

In the event of an SBD, we will determine the value and liquidity of our investments and other assets to evaluate our ability to continue to fund our operations and remain in capital compliance. We will contact Interactive Brokers, critical banks and investors to apprise them of our financial status. If we determine that we may be unable to meet our obligations to those counter-parties or otherwise continue to fund our operations, we will request additional financing from our bank or other credit sources to fulfill our obligations to our customers and clients. If we cannot remedy a capital deficiency, we will file appropriate notices with our regulators and immediately take the appropriate steps.

Rules: FINRA Rules 4370(c)(3), (c)(8) & (g)(2).

X. Mission Critical Systems

"Mission critical systems" are those that ensure prompt and accurate processing of securities transactions, including order taking, entry, execution, comparison, allocation, clearance and settlement of securities transactions, the maintenance of customer accounts, access to customer accounts and the delivery of funds and securities.

We have primary responsibility for establishing and maintaining our business relationships with our customers and have sole responsibility for our mission critical functions of order-taking, entry and execution. Interactive Brokers provide the execution, comparison, allocation, clearance and

settlement of securities transactions, maintenance of customer accounts, access to customer accounts and the delivery of funds and securities.

A. Our Office's Mission Critical Systems

Order Taking

Currently, we receive orders from customers via telephone, or in person. During an SBD, either internal or external, we will continue to take orders through any of these methods that are available and reliable, and in addition, as communications permit, we will inform our customers when communications become available to tell them what alternatives they have to send their orders to us. If customers are unable to reach the office to place trades the can Interactive Brokers Customer Service at (630) 542-6901.

Order Entry

Currently, we enter orders by recording them on paper and electronically sending them to Interactive Brokers online ordering system that we use.

In the event of an internal SBD, we will enter and send records to Interactive Brokers by the fastest alternative means available. In the event of an external SBD, we will maintain the order in electronic or paper format; and deliver the order to Interactive Brokers by the fastest means available when it resumes operations. In addition, during an internal SBD, we may need to refer our customers to deal directly with Interactive Brokers for order entry.

Order Execution

Interactive Brokers executes orders on our behalf. Interactive Brokers Greenwich, CT office serves as the primary location for trade executions on our behalf.

Other Services Currently Provided to Customers

We do not offer any other service to our clients.

B. Mission Critical Systems Provided by Interactive Brokers

Our office relies on Interactive Brokers to provide order execution, order comparison, order allocation, customer account maintenance and/or access and delivery of funds and securities. Interactive Brokers backs up our records at their Chicago office which serves as primary the location for mission-critical processing, including Operations, Trade Execution and Processing, and the Service Center.

Rules: FINRA Rules 3510(c)(2) & (g)(1).

XI. Alternate Communications between the Firm and Customers, Employees, and Regulators

A. Clients

We communicate with our clients using the telephone, email, our website, U.S. mail and in-person visits at our office or another location. In the event of an SBD, we will assess which

means of communication are still available to us; and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party. For example, if we have communicated with a party by email but the Internet is unavailable, we will call them on the telephone and follow up where a record is needed with paper copy in the U.S. mail.

We will use whatever means of communication available to us including email, phone, and website or updating our voicemail to instruct our clients to contact the Interactive Broker's customer service line if we will be unable to transact business for them due to power or network outages.

Rule: FINRA Rule 4370(c)(4).

B. **Employees**

We communicate with our employees using telephone, email, and in person. In the event of an SBD, we will assess which means of communication are still available to us and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party.

Rule: FINRA Rule 4370(c)(5).

C. **Regulators**

We communicate with our regulators using telephone, email, fax, U.S. mail and in person. In the event of an SBD, we will assess which means of communication are still available to us and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party.

Rule: FINRA Rule 4370(c)(9).

XII. Critical Business Constituents, Banks, and Counter-Parties

A. Business Constituents

Critical business constituents are businesses with which we have an ongoing commercial relationship in support of our operating activities such as vendors providing critical services. We will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services when we need them because of an SBD to them or our firm.

Rules: FINRA Rule 4370(c)(7).

B. Banks

We have contacted our bank to determine if it can continue to provide the financing that we will need considering the internal or external SBD. The bank maintaining our operating account is U.S. Bank. Address: 736 Roosevelt Rd, Glen Ellyn, IL 60137. Phone: (630) 790-7980.

If our banks and other lenders are unable to provide the financing, we will seek alternative

financing immediately from USAA Bank, 9800 Fredericksburg Road, San Antonio, TX 78288. Phone: (800) 531-8722.

Rule: FINRA Rule 4370(c)(7)

XIII. Regulatory Reporting

We are subject to regulation by the SEC, FINRA NFA, CFTC, and TN state securities regulators. We now file reports with our regulators using paper copies in the U.S. mail, and electronically using fax, email and the Internet. In the event of an SBD, we will check with the SEC, FINRA and other regulators to determine which means of filing are still available to us; and use the means closest in speed and form (written or oral) to our previous filing method. In the event that we cannot contact our regulators, we will continue to file required reports using the communication means available to us.

Rule: FINRA Rule 4370(c)(8).

XIV. Disclosure of Business Continuity Plan

CB3 Financial Group's BCP disclosure statement is provided to our customers at account opening.

Rule: FINRA Rule 4370(e).

XV. Updates and Annual Review

We will update this plan whenever we have a material change to our operations, structure, business or location or to those of Interactive Brokers. In addition, our firm will review this BCP annually to modify it for any changes in our operations, structure, business or location or those of Interactive Brokers

Rule: FINRA Rule 4370(b).

XVI. Senior Manager Approval

I have approved this Business Continuity Plan as reasonably designed to enable our office to meet its obligations to customers in the event of an SBD.

Rule: FINRA Rule 4370(d).

Signed: _____

Title: President and CEO

Date: 1/1/2025