Business Continuity Plan

Swedbank Securities US, LLC

March 2017

Business Continuity Plan

[FINRA Rule 4370; FINRA Regulatory Notice 13-25; FINRA Notice to Members 06-74 and 04-37; NASDAQ Rule 3510; SIFMA Business
Continuity Planning website: http://www.sifma.org/Services/Business-Continuity-Planning/]
Swedbank Securities U.S., LLC , "SSUS" , has developed a Business Continuity Plan to provide procedures for response and recovery in the event of a significant business disruption. The purpose of the Plan is to identify responsible personnel in the event of a disaster; safeguard employees' lives and firm property; evaluate the situation and initiate appropriate action; recover and resume operations to allow continuation of business; and protect books and records. The Plan was developed considering the types of business conducted, systems critical to support business.

One Penn Plaza - Emergency Action Plan

The management of One Penn Plaza maintains an Emergency Action Plan in compliance with the NYFD Local Law 26. The owner conducts EAP drills on a regular basis. As part of the building's EAP Plan, building concierge employees are trained on EAP requirements and procedures.
In the event of a fire, all employees are required to evacuate by descending down the stairs.
In the event of non-fire emergencies, the following movement responses will be communicated by building management:
"Shelter in Place" - (remain in current work area)
"In-building Relocation" - move to another area of the building such as beside the elevators for more shelter from outside dangers or walk to another floor via the stairs (Note re-entry into the building is available every 4 floors of the building).
"Partial Evacuation" - As communicated by the building EAP team.
"Full Evacuation" - SSUS's assembly areas upon evacuation are as follows:
Assembly Area 1 - Public Park and ballfields at 28th St. between 9th and 10th Avenues
Assembly Area 2 - Bryant Park - 42nd Street between (5th & 6th Ave)

Designation Of Responsibilities

The following is a list of those responsible for SSUS's Business Continuity Plan.

Responsibility	**Names or Titles**
Maintain and update Plan	Chief Compliance Officer
Approve Plan and Plan revisions; conduct annual review	CEO and Chief Compliance Officer
Annual testing of Plan	Chief Compliance Officer
Implementation of Plan when a disruption occurs	Building EAP team and Management of SSUS
Annual review of Emergency Contact Persons and report changes to regulators	Chief Compliance Officer
Maintain and distribute Emergency Contact List	Chief Compliance Officer
Maintain and update Books and Records Chart	Chief Compliance Officer
Provide Plan information to customers: • At time of account opening	Chief Compliance Officer

• Upon request	
Review critical third party assurances or disaster plans or plan summaries: • At initial engagement of third party • Annually when SSUS's Plan is reviewed	Chief Compliance Officer

Retention And Location Of The Plan

Copies of the current and prior versions of the Business Continuity Plan are retained as follows. Copies are dated as of the effective date of the version of the Plan.

- A current electronic copy is retained by Compliance on the network system and hard copy records of the senior manager's approval are maintained.
- Electronic copies (current, prior and drafts) are maintained on the www.complianceresourcesnetwork.com as part of the Broker-Dealer Written Supervisory Procedures.
- Current Business Recovery Plans are retained on SSUS's Local Area Network at Q:\Compliance\Procedures\BCP.

Implementation Of The Plan

The Plan has been designed to be implemented in the event of a disaster that results in a significant business disruption.

The Compliance Officer is responsible for the maintenance of this plan and for conducting the required annual review. The CEO has the authority to approve and execute this BCP.

Whether all or only parts of the Plan are implemented depends on the nature of the disruption. Generally, a significant business disruption would include:

- Destruction of SSUS's offices or facilities, whether by natural causes or by other means
- Loss of life or major injuries to personnel in an office location that disables that office's ability to conduct business
- Disruption of service from a critical service provider
- Disruption of service due to wide-ranging regional outages

Emergency Response Team

SSUS has designated an Emergency Response Team that is responsible for implementing necessary procedures included in this Plan. The Response Team's action will depend on the nature and scope of the disruption. The "first responder" has the primary responsibility for taking action, and the "secondary responder" acts as a back-up in the event the first responder is unable to act. (see next page)

Action	First Responder/Location	Secondary Responder/Location
Contact emergency services such as police, fire department	CCO	CEO
Establish off-site command center and notify employees	CCO	CEO
Contact employees regarding Plan initiatives	CCO	CEO
For affected offices, evaluate business disruption and transfer employees and business operations to other locations	CCO & CEO	
Appoint individuals to management business areas	CCO	CEO
Appoint individuals to manage business areas where needed	CCO	CEO
Assess financial and operations capabilities	CCO	CEO
Determine financial risk and contact banks and other counter-parties, if necessary, to secure financing to continue operations	CCO/FinOp	CEO
Notify regulators in the event of a capital deficiency	FinOp	CEO
Interface with SIPC if liquidation of business is initiated	FinOp	CEO
Contact critical service providers	CCO/FinOp	CEO
Transfer mission critical functions that are disrupted	CCO	CEO
Initiate alternative customer communications systems or procedures	CCO	CEO
Recover back-up records when primary records are destroyed or inaccessible	CCO/FinOp	CEO
Contact regulators and notify them of contact persons and recovery plans	CCO/FinOp	CEO

Alternative Business Locations
In the event employees can no longer conduct business at one of SSUS's office locations, the following actions may be taken:

- All key SSUS employees have PDAs and, if practical will telecommute from home. The CCO also maintains a Swedbank laptop at home that can access the network.
- If access to the premises is prohibitive for several days, critical functions will relocate to the branch office in Oslo.
- All critical systems are maintained by affiliates or outside providers that can be accessed through the Swedbank Network or Websites.
- If access is restricted for an extended period, SSUS's Board will determine if an alternative location should be set up.

The client contact in the event that representatives are unavailable in the U. S. is Trader, Andrew Barrie, Stockholm 011-46-8-700-9505. Mr. Barrie cannot perform representative functions that require licensing by FINRA, but he can advise clients how to reach the appropriate parties.

Data Back-Up And Recovery
SSUS maintains most of its books and records either on the network or with external providers- see Emergency Contact List Section of this Manual. All network and externally maintained books and records are backed up on a regular basis. Critical Books and Records are:

Electronic

- Client contacts - maintained in Outlook
- Personnel Files- Maintained by Administaff
- Client documents including CIP opening documents- active clients all scanned documents on network
- The Books and Records - all data on network- application is Quickbooks 2007
- Trading records - details with clearing brokers and database of transactions on network

Hardcopy
Hard copy trading tickets- maintained in fireproof cabinets on site

Clearing Firm Back-Up And Recovery
The clearing firm maintains records for SSUS under the terms of the clearing agreement. The clearing firm has developed a disaster and recovery plan to recover and retrieve records lost in a disaster affecting SSUS and/or the clearing firm. Records retained by the clearing firm are included on SSUS's Books and Records chart.
SSUS has received assurance from the clearing firm that its plan is consistent with SRO rule requirements and provides adequate protection of customer funds and securities held on behalf of SSUS customers and back-up and recovery systems for records retained by the clearing firm. Compliance (or another person designated to review critical third party plans) will review the clearing firm plan or a summary of the plan at least annually when SSUS's Plan is reviewed.

Mission Critical Systems
Mission critical systems are systems that are necessary to ensure prompt and accurate processing of securities transactions including order taking, entry, execution, comparison, allocation, clearance and settlement and maintaining customer accounts.

Currently SSUS receives orders from customers via Fidessa (Fix) that goes directly to the execution-clearing brokers or via telephone, email or Bloomberg. All of these methods will still be reliable even if there is a disruption at SSUS's premises or clients can execute directly with Stockholm/Oslo.

SSUS relies, by contract, in our clearing firms to provide execution, order comparison, order allocation, and the delivery of funds and securities.

SSUS does not maintain customer accounts or securities for it's own account. SSUS will be able to ensure prompt and accurate processing of securities transactions, including order taking and, entry and transmission to its clearing firms. We do not take custody of, and hence do not deliver funds and securities through our communications systems.

Our clearing firm contracts provide that our clearing firms will maintain a business continuity plan and the capacity to execute those plans. Our clearing firms represent that they will advise us of any material changes to their plans that might affect our ability to maintain our business. In the event our clearing firms execute their plans, they represent that they will notify us of such execution and provide us equal access to services as it provides to their other customers. If we reasonably determine that our clearing firms have not or cannot put their plans in place quickly enough to meet our needs, or are otherwise unable to provide access to such services, our clearing firms represent that they will assist us in seeking services from an alternative source. Our clearing firms represent that they back up our records at a remote site. Our clearing firms represent that they operate a back-up operating facility in a geographically separate area with the capability to conduct the same volume of business as their primary sites. Our clearing firms have also confirmed the effectiveness of their back-up arrangements to recover from a wide scale disruption by testing, and have confirmed that they test their back-up arrangements periodically.

Financial And Operational Assessments
The following describes procedures for assessing changes in operational, and financial risk exposures in the event of a significant business disruption.

Operational Risk
In the event of a significant business disruption, alternative systems will be implemented to communicate with customers, employees, critical business constituents (banks, counter-parties, *etc.*), regulators, and other key parties depending on the nature and impact of the disruption.

Financial Risk
In the event of a significant business disruption, SSUS's financial status will be evaluated to determine the need for additional financing or identify capital deficiencies including the following:

- Review the impact of the disruption on SSUS's ability to conduct business
- Identify inability to satisfy obligations with counter-parties
- Contact banks or other counter-parties to secure needed additional financing
- Notify regulators of capital deficiencies
- Reduce or cease business as may be required due to capital deficiencies or inability to conduct business
- Transfer business to other financial institutions until SSUS may resume conducting business

Alternative Communications
SSUS may use a wide range of communication systems to communicate with its customers, employees, counter-parties, and regulators including telephone; mail; fax; e-mail; vendor systems (such as Bloomberg); and personal meetings. Procedures for instituting alternative communications in the event of a significant business disruption include the following, depending on the nature of the disruption:

- Identify the most expedient remaining means of communication
- Notify employees if they should report to an off-site work location
- Notify employees of alternative communication systems to be used
- Transfer communications to another firm

Determination of what communication system will be used depends on the nature of the disruption and which communication systems (electronic mail, telephone calls, *etc.*) are functional and the availability of personnel in the event telephone contact is necessary.

Between Customers And The Firm
In the event of a significant business disruption that disables communications systems, alternative system procedures will be implemented, including the following:

- Identify the most expedient remaining means of communication
- Notify employees regarding how to contact customers
- Contact customers about how to enter orders, how to access accounts and account assets, and other alternative business operations

Customers' Access to Funds and Securities
Our firm does not maintain custody of customers' funds or securities, as all transactions with our clients are done on a DVP/RVP basis which are settled between our clearing agents ICBC Financial Services LLC, Swedbank, AB our client's respective clearing agents. 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 our clearing agents on their behalf. In the event customers cannot locate a representative from Swedbank Securities US, customers may contact the individuals listed in the section above. The firm will make this information available to customers through its disclosure policy.

If 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.

Between The Firm And Its Employees
In addition to the above, SSUS has developed a system to enable senior management to contact employees in the event of an emergency. Each employee is given a contact card with a list of all personnel and their contact information.

Between The Firm And Regulators
Communications with regulators will be conducted using the most expedient available communication system. The designated Response Team person will contact regulators regarding any major business disruption and plans for continuing business.

Regulatory Reporting
In the event of a significant business disruption affecting offices responsible for regulatory reporting, regulators will be contacted to determine which means of filing are available under the circumstances to meet filing requirements. In the event SSUS cannot contact regulators, required reports will be filed using communications means available.

Business Constituent, Bank, And Counter-Party Impact
This section describes business continuity procedures regarding third parties that are critical to the conduct of SSUS's business. In most instances, contracts with critical third parties will include assurances regarding the third party's disaster recovery plans. A disruption impacting SSUS's ability to conduct business may occur either at SSUS itself or at the third party.
The Business Constituent, Bank, And Counter-Party chart identifies key parties and potential alternatives in the event of a disruption.

Business Constituents
- Determine whether the third party is able to continue providing critical services.
- If not, identify and contact an alternate third party to provide services.

Banks And Other Financial Institutions
- Determine whether the bank/financial institution is able to continue providing financing.
- If not, identify and secure alternative financing.

Critical Counter-Parties
- Determine whether transactions may be completed with counter-parties.
- If not, contact clearing firm or counter-party directly to make alternative arrangements to complete transactions.

Other Obligations To Customers
Accepting Customer Orders
In the event SSUS's systems for accepting customer orders are disrupted, alternative systems will be communicated to customers and to employees including, where appropriate:
- Accepting orders by telephone or other alternative means
- All RRs have Bloomberg Anywhere
- Communicating orders to trading desks (internal or external) or order execution systems by telephone or other alternative means

SIPC Liquidation
In the event SIPC liquidation of SSUS's business is required, designated personnel will work with the SIPCappointed trustee to wind down SSUS's operations and transfer customer funds and securities.

Disclosure Of Business Continuity Plan
[FINRA Rule 4370(e)]
Information about SSUS's Business Continuity Plan is provided to customers as follows:

- At the time of account opening
- Upon request, by mail or email

Emergency Contact Information

SSUS has provided FINRA with the names of two emergency contact persons, one who must be a registered principal and member of senior management and a second who may be unregistered (such as [The SSUS's attorney, accountant, or a clearing firm contact) and who has knowledge of [The SSUS's business. Emergency contact information will be promptly updated, when necessary. Contact information will be reviewed by Compliance (or someone else designated) within 17 business days of the end of each calendar year and a written record of the review will be retained.

Widespread Health Emergencies
[Federal government Business Pandemic Influenza Planning Checklist: http://www.pandemicflu.gov/plan/pdf/businesschecklist.pdf]
A widespread pandemic or any biologically based threat could have significant impact on the ability of SSUS to continue conducting business. This section outlines the steps SSUS has taken and will take in the event of a widespread pandemic.

Preparatory Steps

- Document government resources for information about a pending pandemic
- Identify and document an alternative firm or firms to handle SSUS's business for extended periods of time
- Identify and document medical resources to assist employees, including administering vaccinations or other medications
- Maintain a first-aid kit on site
- Identify employees that can telecommute and establish a list of those employees and what computers and technology will be necessary

Action If A Pandemic Occurs
The following procedures will be followed in the event of a threatened health emergency.
1. The Emergency Response Team will meet to determine the potential seriousness of the threat and what action to be taken as the threat escalates.
2. Notify employees of:

- available vaccinations or other medication and whether they are mandated
- necessary conduct such as avoiding personal contact such as handshaking

- access to antibacterial or other hygiene products to reduce infections and transmission of
- communicable diseases
- requirement to stay home and telecommute
- transfer of business/functions to other firms
- contact list of key personnel

3. Restrict access to SSUS by outsiders (customers, vendors, *etc.*).
4. The Emergency Response Team will meet or communicate regularly to determine steps to be taken.

Education Of Employees

The Business Continuity Plan is communicated to employees as follows:

- A summary is included in the chapter *GENERAL EMPLOYEE POLICIES* in the section *EmergencyBusiness Recovery Procedures* and is provided to all employees.
- A current copy of the Plan is provided to the Emergency Response Team and key employees with responsibilities for aspects of the Plan.
- The most recent Emergency Contact List is provided to key employees.

Updating, Annual Review, And Testing

The Plan will be reviewed on at least an annual basis and revised as needed. Each revision will be approved by the designated senior manager and copies of the revised Plan distributed to the Emergency Response Team and key employees. Some material events require updating the Plan when they occur, including:

- Material changes to SSUS's business
- A change in SSUS's main office location
- Added office locations
- A change in a major service provider

When the Plan is reviewed, the procedures and accompanying lists and charts will be reviewed and updated as needed including the:

- Plan itself
- Emergency Response Team list
- Emergency Contact List
- Books and Records List
- Critical Systems
- Business Constituent, Bank, and Counter-Party lists
- Any other charts or information related to the Plan

A written record of the annual review including the date reviewed and name and signature of the reviewer will be retained by Compliance.

Industry Testing

[Exchange Act Regulation SCI; FINRA Rule 4380; MSRB Rule A-18]

Regulators designate certain firms to participate in industry-wide business continuity/disaster recovery testing. Testing is conducted once a year; firms are notified that they are required to participate. Firms may also participate on a voluntary basis by submitting a request to FINRA.

The Chief Financial Officer is responsible for complying with mandatory testing or designating someone to oversee the testing within the timeframes established by FINRA. Firms are expected to fulfill certain testing requirements which could include, for example, bringing up systems on the designated testing day and processing test scripts to simulate trading activity. Firms may also have to report test results or provide other reports to FINRA.

Records of testing conducted and information provided to FINRA will be retained by the Chief Financial Officer. Anomalies identified during testing will be reviewed and corrected and records retained, if applicable.

For more information – If you have questions about our business continuity planning, you can contact us at 212-906-0836, Attn: Douglas Colombo, Chief Compliance Officer