

Uphold Securities Inc.

Business Continuity Plan (BCP) – 2024

I. Emergency Contact Persons

Our firm's two emergency contact persons are:

Scott Kaplan
212.885.6354
scott@jnk.com

Curt Snyder
212.885.6314
curt@jnk.com

Curt Snyder, President & COO/CCO of Uphold Securities, will promptly notify FINRA of any change in this information through FCS (but no later than 30 days following the change) and will review, and if necessary update, this information within 17 business days after the end of each calendar year.

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

II. Firm Policy

Our firm's policy is to respond to a Significant Business Disruption (SBD) by safeguarding employees' lives and firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of the firm's books and records, and allowing our customers to transact business.

A. Significant Business Disruptions (SBDs)

Our plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only our firm'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 firms, 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 our clearing firm.

B. Approval and Execution Authority

Scott Kaplan, CEO of Uphold Securities and a registered principal, is responsible for approving the plan and for conducting the required annual review. Curt Snyder, President & COO/CCO of Uphold Securities, has the authority to execute this BCP.

C. Plan Location and Access

Our firm 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 the ONE DRIVE as well as on our Firm's website: www.jnksecurities.com.

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

III. Business Description

As of December 31, 2022, our firm no longer conducts its trading or floor business and now only sells our third party industry research to institutional customers for hard dollar payments.

IV. Office Locations

Our firm has offices located in one Locations: 1: Main Office

A. Office Location #1: Main Office

Our office is located at 530 Fifth Ave., 3rd Floor, New York, NY, 10036. Its main telephone number is 212.885.6300. Our employees may travel to that office by means of foot, car, subway, train, bus, boat, plane, etc.

Alternative Physical Location(s) of Employees

In the event of an SBD that closes our office location, staff can work from home until the office access is restored. We also have the option to temporarily move to our FINOP's offices, if necessary. This is ACI Secure, 77 Water Street, Suite 1604, New York, NY 10005. Phone: 212.668.8700, Fax: 212.668.8428 (this will serve as an administrative office only – NO order taking will take place at this location)

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

V. Customers' Access to Funds and Securities

Our firm no longer has customer accounts.

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.

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

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

Our firm maintains its primary hard copy books and records and its electronic records at ACI Secure, 77 Water Street, Suite 1604, New York, NY, 10005. Jay Gettenberg, CEO of ACI Secure, 212.668.8700 x24 is responsible for the maintenance of these books and records. Our firm maintains the following document types and forms that are not transmitted to our clearing firm: Hard copies of all current year documents are housed in fire proof file cabinets. These records consist of but are not limited to the following: General Ledgers, Trial Balances, and Regulatory Reports including FOCUS and 600TC, Bank and Brokerage statements as applicable.

Our firm maintains its back-up hard copy books and records at 77 Water Street, Suite 1604, New York, NY 10005

Paid invoices are maintained on Docu-Xplorer and sent to an archiving service (Amerivault) every night. Accounting records prior to the prior calendar year are warehoused off-premise at GRM Information Management Services located at 215 Coles Street, Jersey City, NJ 07312.

Electronic (computer) records are transmitted every night to an archiving service. Amerivault provides a highly secure, managed archiving service that fully protects and preserves file records in two separate offsite locations. This methodology fulfills FINRA and SEC compliance standards.

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).

VII. 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. Although the effects of an SBD will determine the means of alternative communication, the communications options we will employ will include our website, telephone voicemail, secure email and instant message. In addition, we will retrieve our key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic).

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. 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 parent, Uphold Inc If we cannot remedy a capital deficiency, we will file appropriate notices with our regulators and immediately take appropriate steps.

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

VIII. Mission Critical Systems

Our only mission critical system at this point is our email and electronic communication archiving system. These are cloud based and are able to be accessed from any location with proper credentials.

A. Our Firm's Mission Critical Systems

B.

1. Other Services Currently Provided to Customers

- Third party research is sent to customers through email.

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

IX. Alternate Communications Between the Firm and Customers, Employees, and Regulators

A. Customers

We now communicate with our customers using telephone, email, bloomberg message, and in-person visits at our firm 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.

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

B. Employees

We now communicate with our employees using email or telephone. 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. We will also employ a call tree so that senior management can reach all employees quickly during an SBD. The call tree includes all staff home and office phone numbers. We have identified persons, noted below, who live near each other and may reach each other in person:

The person to invoke use of the call tree is: Scott Kaplan, CEO

Caller	Call Recipients
Scott Kaplan, CEO	All Employees

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

C. Regulators

We are currently members of the following self-regulatory organizations (SROs), and are also regulated by: FINRA. We communicate with our regulators using telephone, regular mail, fax and email. 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).

X. **Critical Business Constituents, Banks, and Counter-Parties**

A. Business constituents

We have contacted our critical business constituents (businesses with which we have an ongoing commercial relationship in support of our operating activities, such as vendors providing us critical services), and determined the extent to which we can continue our business relationship with them in light of the internal or external SBD. 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 a SBD to them or our firm. Our major suppliers are: ACI Secure – address and information provided above.

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

B. Banks

We have contacted our banks and lenders to determine if they can continue to provide the financing that we will need in light of the internal or external SBD. The bank maintaining our operating account is: Flagstar Bank, 71 Broadway, New York, NY, 10005, 646.882.1260.

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

C. Counter-Parties

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

XI. Regulatory Reporting

Our firm is subject to regulation by: FINRA & the SEC. ACI Secure and Uphold Securities 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).

XII. Disclosure of Business Continuity Plan

Attached is our written BCP disclosure statement we provide customers at account opening and send it out annually. We also post the disclosure statement on our website and mail it to customers upon request.

Rule: FINRA Rule 4370(e).

XIII. Updates and Annual Review

Our firm will update this plan whenever we have a material change to our operations, structure, business or location or to those of our clearing firm. In addition, our firm will review this BCP annually, on or about January 1st to modify it for any changes in our operations, structure, business or location or those of our clearing firm.

Rule: FINRA Rule 4370(b).

XIV. Senior Manager Approval

Approve the firm's BCP by signing below.

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

Rule: FINRA Rule 4370(d).

Signed: 

Title: President

Date: January 9, 2024