



IMPORTANT NOTICE TO OUR CLIENTS

Disaster Recovery Plan - Business Continuity Plan

July 2020

FINRA Rule 4370 requires each member firm at the time of account opening, and upon request, to disclose to its customers how it plans to address possible future significant business disruptions.

Intesa Sanpaolo IMI Securities Corp. ("IMI SEC") has developed a comprehensive Business Disaster Recovery Plan (the "Plan") to address actions to be taken in the event of a disaster or emergency affecting the primary facilities and systems at our principle place of business, 1 William Street, New York, New York, 10004 USA. Such disasters can take many forms and vary in scope. The purpose of this notice is to give you an overview of how IMI SEC intends to continue critical business operations in the face of emergencies of different magnitudes.

Settlement of outstanding transactions, preservation and restoration of books and records, maintenance of confidentiality of client information, management of risk and credit exposure, and communication with our regulators and customers regarding IMI SEC's status during a disaster are among the tasks we consider "mission critical." Accordingly, IMI SEC maintains both on-site and off-site electronic and/or paper records of its business. IMI SEC has also arranged for off-site facilities should it need to relocate its operations.

IMI SEC has formed a Crisis Management Team ("CMT") comprised of management, operations and technology staff. The CMT convenes immediately upon any event disrupting IMI SEC's business, assesses the situation and initiates corrective action, including the relocation to our off-site facilities. Below is an outline of some possible disaster scenarios and how IMI SEC intends to address them:

Minor Disruptions at IMI SEC Only: *Examples of disruptions affecting only IMI SEC include localized loss of power or telephone service, interruption of systems connectivity, etc. IMI SEC expects that these sorts of disruptions will be of a very temporary nature given the on-site back-up systems, however, if the matter cannot be resolved quickly, the CMT will implement the Plan, including, if necessary, relocation of critical staff to IMI SEC's off-site facilities. IMI SEC expects it will be able to continue its business and fulfill mission critical tasks during the disruption.*

Disruptions to the IMI SEC's Building: *Examples of disruptions affecting the entire building in which IMI SEC is located include fires, bomb threats, loss of power, etc. If IMI SEC's staff is unable to enter the building, the CMT will implement the Plan to relocate critical staff to IMI SEC's off-site facilities. IMI SEC expects it will be able to continue its business and fulfill mission critical tasks during the disruption.*

City-wide/Regional Disruptions: *Examples of widespread disruptions are the events of 9/11 and the August 2003 blackout. When an event of this magnitude occurs, the CMT will direct critical staff to relocate to the off-site facilities where IMI SEC will fulfill its mission critical tasks, including restoration of its records and systems, and will attempt to maintain its business operations. Instructions and restrictions imposed by local and/or federal authorities may limit IMI SEC's ability to relocate its staff and continue its business during a disaster. You will be advised as soon as practically possible of IMI SEC's status during a crisis.*

Pandemics: *A Pandemic is defined as "virulent human flu that causes a global outbreak, or pandemic, of serious illness." IMI SEC has addressed the issue in its Plan. The United States government has indicated it may resort to quarantines in the event of a pandemic outbreak. IMI SEC will make every effort fulfill its mission critical tasks, including restoration of its records and systems, and will attempt to maintain its business operations within the parameters of government orders should a pandemic occur.*

IMI SEC reviews and tests its Plan regularly, but in no case less than annually. The Plan is subject to ongoing revision and improvement as staff, technology and business changes warrant. The entire Plan is available for your review upon request. If you would like to receive a copy of the current Plan or have any questions, please call 212-326-1100.

Sincerely,

Intesa Sanpaolo IMI Securities Corp.