

M3SIXTY DISASTER RECOVERY & BUSINESS CONTINUITY PLAN DISCLOSURE STATEMENT

M3Sixty has developed and implemented a BCP to protect its operations in the event of a significant business disruption (“SBD”). Since the timing and impact of disasters and disruptions are unpredictable, we allow for flexibility in responding to actual events. With that in mind, we are providing you with this information on our BCP.

Our BCP is designed to enable M3Sixty to quickly recover and resume business operations after an SBD by safeguarding our employees and property, making financial and operational assessments, protecting the Firm’s books and records, and allowing our clients to transact business.

Our BCP addresses the following areas: responsible parties; data backup and recovery; service and component redundancies; all mission critical systems and business processes; financial and operational assessments; alternative communications with clients, business constituents, employees, and regulators; alternate physical location of employees; critical vendor, contractor, bank and counterparty impact; and regulatory reporting.

We maintain backup records electronically in addition to maintaining certain documentation off-site. While every emergency poses unique problems based on external factors, such as time of day and the severity of the disruption, we have been advised by our technology service providers that their objective is to restore our services within the same business day.

Varying Disruptions, SBDs, can differ in their scope, such as only our Firm, a single building housing our Firm, the business district where our Firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our Firm or a building housing our Firm, we will transfer our operations to a local site when needed and expect to recover and resume business within the same day. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area, and recover and resume business within 24 hours. In either situation, we plan to continue business and notify you using the most practical and expedient means of communication available. M3Sixty’s website (<https://M3Sixty.net>) also can serve as general notification to external clients and contacts.

The BCP is subject to changes and modifications. M3Sixty reviews the plan, at least annually, and updates the plan as business conditions and technology change. M3Sixty posts this BCP Summary on its website at <https://M3Sixty.com/business-continuity-plan>.

For more information or questions about our business continuity planning, please feel free to contact Ted Akins, Chief Operations Officer, at 816.787.0723.