

J. M. Lummis Securities Business Continuity Plan: Disclosure Statement 2019

J. M. Lummis Securities, Inc. (JMLS) is a fixed income broker-dealer which only deals with other broker-dealers and institutional counter-parties. We are a member of FINRA and are located in New Canaan, CT.

FINRA Rule 4370 requires each member firm to create and maintain a business continuity plan. In accordance with these rules JM Lummis Securities has developed a plan to ensure that business continues to run uninterrupted during business emergencies.

The plan is designed to address key areas of concern including but not limited to the following:

- **Books and records recovery;**
- **All mission critical systems;**
- **Financial and operational assessments;**
- **Alternate means of communication between JMLS and its counter-parties;**
- **Alternate means of communication between JMLS and its employees;**
- **Alternate physical locations of employees;**
- **Critical business constituent, bank and counter-party impact;**
- **Regulatory reporting;**
- **Communications with regulators**

Events creating a disruption of business may vary in nature. They could affect only JMLS, affect the building where JMLS is located, affect the entire business district where JMLS is located, result in a town wide disruption, or result in a regional disruption. JMLS fully intends to continue to conduct a securities business during these periods of business disruption ranging from disruptions that only affect JMLS to disruptions that have regional impact.

To address disruptions affecting only JMLS, the building where JMLS is located or the business district where JMLS conducts business, JMLS has arranged an outside physical location as well as key technology infrastructure where JMLS will have the opportunity to relocate its employees and critical information technology systems in order to provide services for its clients.

To address town wide and regional business disruptions, JMLS has communicated with its clearing firm and they will help JMLS conduct business if JMLS is not able to do so. Our clearing firm has a current BCP and we have confidence in its content.

Please be advised that business continuity plans are subject to change and modification. JMLS intends to update and test its business continuity plans as business conditions and technology change. Should you have any questions concerning the business continuity plan please submit a written request of additional information to your broker.

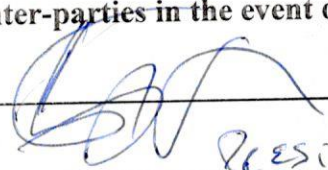
XIV. Updates and Annual Review

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 to modify it for any changes in our operations, structure, business, or location or those of our clearing firm.

XV. Senior Manager Approval

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

Signed:



Title:

RESIDENT

Date:

4-8-2019
