

J. M. Lummis Securities Business Continuity Plan: Disclosure Statement 2020

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 J M 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 we are located, affect the entire business district where we are located, result in a town wide disruption, result in a regional disruption or as we have most recently seen, result in a worldwide 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 worldwide impact. Our plan has recently been tested, and it is working effectively.

To address disruptions affecting only JMLS, the building where JMLS is located or the business district where JMLS conducts business, the Company has allowed outside physical locations as well as key technology infrastructure where employees have the critical information technology systems in order to provide services for its counterparties.

To address town wide, regional and worldwide business disruptions, in addition to the above, JMLS has communicated with its clearing firm and they will help JMLS conduct business if we are unable to do so. Our clearing firm has an updated and tested BCP and we have full confidence in it and them.

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 continue to change. Should you have any questions concerning the business continuity plan please submit a written request of additional information to your broker.

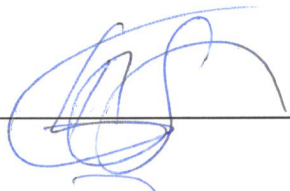
I. Updates and Annual Review

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.

II. Senior Manager Approval

I have approved this Business Continuity Plan as reasonably designed to enable our firm to meet its obligations to its counterparties in the event of a significant business disruption.

Signed:



Title:

RESIDENT

Date:

5-28-2020
