



Business Continuity Plan (BCP)

January 31, 2020

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FINRA’s Rule 4370 and the provisions of the NASD’s Notice to Members 04-37 require CGIS Securities, LLC (“CGIS”/ “Firm”) to design and publish a protocol to reasonably ensure the continuity of its business when confronting a Significant Business Disruption (“SBD”) event.

I. Emergency Contact Persons

The Firm has designated the following three emergency contact persons:

Riggín Dapena, Chief Executive Officer (“CEO”) and Chief Compliance Officer (“CCO”)

Cell Phone: (305) 318-6436

Email Address: rdapena@cgissecurities.com

Melissa Richards, Operations Manager, Chief Operations Officer (“COO”)

Cell Phone: (305) 397-5379

Email Address: mrichards@cgissecurities.com

Jaqueline Rodriguez, AML Compliance Officer (“AMLCO”)

Cell Phone: (305)308-9964

Email Address: jrodriguez@cgissecurities.com

The CCO will notify FINRA of any change in this information through FCS (no later than 30 days following the change), and will review and, if necessary, update the 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 an SBD prudently and diligently after taking all the necessary precautions to guarantee our employee’s personal safety and the Firm’s property. The Firm will promptly assess the scope of the disruption and take action to recover and resume operations as quickly as possible. The Firm will ensure that all books and records are properly guarded and, that in the event that we are unable to recover promptly, our clients are assured access to their funds and securities through our clearing firm, Pershing, LLC.

A. Significant Business Disruptions (SBDs)

Our plan anticipates two types of SBDs, internal and external. Internal SBDs affect only our Firm’s ability to communicate and do business, such as a blackout or a fire in our

building. External SBDs prevent the operation of the securities markets or a number of firms and include, among others: terrorist attacks, hurricanes, social unrest, violence or a wide-scale regional electrical grid disruptions. Our response to an external SBD depends on the ability of other organizations and systems to recover, particularly on the capability of our clearing firm to recover and return us to relative normality.

B. Approval and Execution Authority

The CEO and the CCO are responsible for approving the Plan and conducting the required annual review.

C. Plan Location and Access

Our Firm maintains physical and electronic copies of its BCP, annual reviews, and any updates and supplements are maintained in our internal server and available for inspection. An electronic copy of our plan is available to the public on our website:

www.cgisecurities.com

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

III. Business Description

CGIS is a registered securities broker/dealer offering transactional and investment advisory business in equity securities; options; mutual funds; corporate debt securities; government securities; municipal bonds; private placements and structured products. The Firm trades fixed income securities, including: US corporate debt, US government securities and foreign sovereign and corporate debt with emphasis in emerging markets for its own account. From time to time CGIS may act as a selling group member on a “best effort” basis in underwritings of foreign corporate debt securities.

The Firm introduces brokerage investment accounts to Pershing LLC (“Pershing” or “clearing firm”).

IV. Office Location

Our Office of Supervisory Jurisdiction (“OSJ”) and sole branch office is located at:

990 Biscayne Boulevard, Office 901

Miami, FL 33132

Telephones: Office 305-507-4544 (Main), CEO 305-318-6436 (c), OM 305-397-5379, AMLCO 305-308-9964

Our Building name is “990” and the Building Staff contact information is currently:

Chief Executive	Juan Santiago	954-647-6105
Building Executive	Cailliam Rodriguez	754-244-3438
Tech	Eduardo Molina	786-234-7854

Tech	Roberto Morris	786-515-8982
Tech	Oscar Wong	786-973-9677
Tech	Jorge Jimenez	786-804-7086
Maintenance Assistant	Malie Arocho	786-206-6798

Our employees can access the building by foot, car, train, or bus.

The Firm also conducts business from non-registered branch locations where certain registered personnel reside. All non-branch locations are supervised from the home office. The contact information for non-registered branch locations include:

Contact Name	Address	Telephone
Susana Fidalgo	Puerto Williams 6690 Santiago, Chile	569-9325-6189
Pedro Stern Friedlander	Fernandez Concha 435 Departamento 203 Santiago, Chile	569-9227-2873
Raymond Kassin	Rambla Batlle y Roosevelt Torre Le Parc I Punta del Este, Uruguay	5-4911-4447-2623
Daniel Shayo	Edificio Long Beach # 904 Av. Chiverta y Amazonas Punta del Este, Uruguay	54911-5328-7540
Michael Dahan	Camino San Francisco de Asis 1180, Departamento 221 Santiago, Chile	569-9139-2963
Loreto Paredes	Av, Cristobal Colon 5185 Departamento 32 Santiago, Chile	569-9887-1108
Patricia Pessa	San Francisco de Asis 1700 Casa 25 EV Santiago, Chile	569-9822-9104
Francisca Tampier	Palamos 395,Citacura Santiago, 7660193, Chile	569-8923-0081
Otto Arnold	Tulipanes 2845, Bo. Olivos Carrasco, Montevideo, Uruguay	569-7957-4901
Florence T. Dhainaut	Calle Ferrari 1258, Piso 3 Montevideo, 11500 Uruguay	54-9116 -909-7982
Eli Procianoy	Sucre 755, Departamento 7D Buenos Aires Argentina	54-9115-865-3754

V. Alternative Physical Location(s) of Employees

In the event of an SBD, we will move our staff from affected office to **either** the home address of an employee closest to our existing location and/or a safe and secure location with access to internet and phone:

The current address and phone number of the alternate office is:

Riggín Dapena
8811 SW 68 Avenue
Pinecrest, FL 33156

Phone: (305) 318-6436

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

VI. Customers' Access to Funds and Securities

CGIS does not maintain custody of clients' funds or securities; all client funds and securities are maintained by Pershing. In the event of an internal or external SBD, if telephone service is available, our registered representatives will take client orders or instructions and contact our clearing firm on their behalf. If Web access is available, we will post on our Firm's website that clients may access their funds and securities by contacting Pershing's customer service line at (201) 413-3635 or in writing to the address below:

Pershing LLC
P.O. Box 2065
Jersey City, New Jersey 07303-2065

The Firm makes this information available to clients through its Monthly Statements, Welcome Kit and Website (see Addendum 3 for updated Pershing contact list).

If SIPC determines we are unable to meet obligations to our clients or 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.

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

CGIS maintains an electronic and hard copy of its books and records at the OSJ branch office. Electronic records can be found in the Firm's shared drive, which is backed up daily by an independent data back-up provider and the hard copy within the compliance files. The CCO is responsible for maintenance of these books and records.

In the event of an internal or external SBD that causes loss of our paper records, we will recover them from our back-up site. If our primary site is inoperable, we will resume operations from our 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. In other words, if CGIS's hard-drives with data were to crash for whatever reason, the business would recover using the physical files on-site or the cloud backup with Microsoft OneDrive.

Rule: FINRA Rule 4370(c)(1).

VIII. Financial and Operational Assessments

A. Operational Risk

In the event of an SBD, we will immediately identify what means permit us to communicate with our clients, employees, critical business constituents, banks, counter-parties and regulators. Although the effects of an SBD determine what means of alternative communication we have, some options we will make use of include our website, email, telephone, and regular mail. 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 maintain minimum capital required by regulation. We will contact our clearing firm, critical banks and investors to apprise them of our financial status. 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 bank or other credit source to fulfill responsibilities to our clients. 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).

IX. Mission Critical Systems

Our Firm's "mission critical systems" are those that ensure prompt and accurate processing of securities transactions, including order taking, entry, execution, comparison, allocation, clearance and settlement of securities transactions, the maintenance of customer accounts, access to customer accounts and the delivery of funds and securities.

More specifically, these systems include:

- Email (hosted by SMARSH)
- Bloomberg Messenger
- Dedicate Link of an Internet Provider
- 8x8 Communications (i.e. Phone communication platform)
- NETX360 Order Management and Transmittal

We have primary responsibility for establishing and maintaining our business relationships with our clients and have sole responsibility for our mission critical functions of order taking, entry, and execution. Pershing provides, through contract, the comparison, allocation, clearance and settlement of securities transactions, maintenance as well as access to client accounts and delivery of funds and securities.

Our clearing firm contract states they will maintain a business continuity plan and the capacity to execute that plan. Pershing represents that it will advise us of any material changes to its plan that might affect our ability to maintain our business. In the event our clearing firm executes its plan, it represents it will notify us of such execution and provide us equal access to services as its other customers. If we reasonably determine that our clearing firm has not or cannot put its plan in place quickly enough to meet our needs, or is otherwise unable to provide access to such services, our clearing firm represents that it will assist us in seeking services from an alternative source.

Our clearing firm represents that it backs up our records at a remote site. Our clearing firm represents that it operates a back-up operating facility in a geographically separate area with the capability to conduct the same volume of business as its primary site. Our clearing firm has also confirmed the effectiveness of its back-up arrangements to recover from a wide scale disruption by testing on a regular basis.

Recovery-time objectives provide concrete goals to plan for and test against. They are not, however, hard and fast deadlines that must be met in every emergency situation, and various external factors surrounding a disruption, such as time of day, scope of disruption and status of critical infrastructure—particularly telecommunications—can affect actual recovery times. Recovery refers to the restoration of clearing and settlement activities after a wide-scale disruption; resumption refers to the capacity to accept and process new transactions and payments after a wide-scale disruption. Our clearing firm has the following SBD recovery time and resumption objectives: recovery time period of 4 hours, depending on the availability of external resources and resumption time within the same business day.

The CCO will periodically review our clearing firm’s capabilities to perform the mission critical functions contracted to perform for our Firm.

A. Our Firm’s Mission Critical Systems

1. Order Taking

Currently, our Firm receives orders from clients via telephone. In special cases, a Principal may approve an order sent by email, and instant messenger. During an SBD,

either internal or external, we will continue to take orders through any of these methods that are available and reliable; in addition, as communications permit, we will inform our clients of alternate ways they can send their orders to us. If necessary, we will advise our clients to place orders directly with Pershing.

2. Order Entry

Currently, our Firm enters Equities and Derivatives and listed bonds electronically with Pershing through its trading platform, NETX360 Order Management or telephonically. We have contacted Pershing and were told that, under its BCP, we can expect order entry services to resume within 4 hours, depending on availability of external resources. Orders for Fixed Income Securities that are not listed are taken verbally and executed via TRACE, also through Pershing.

In the event of an internal SBD, we will enter and send records to our clearing firm by the fastest alternative available or refer our clients to deal directly with Pershing for their orders. In the event of an external SBD, we will maintain the order in electronic or paper format, and deliver it to Pershing by the fastest means available when it resumes operations.

3. Order Execution

We currently execute orders through our clearing firm. In the event of an internal or external SBD, we would execute orders through the fastest alternative means available.

B. Mission Critical Systems Provided by Our Clearing Firm

CGIS relies, by contract, on our clearing firm to provide order comparison, order allocation, client account maintenance and/or access and delivery of funds and securities.

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

II. Alternate Communications between the Firm and Clients, Employees, and Regulators

A. Clients

We now communicate with our clients using telephone, email, our website, fax, U.S. mail 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.

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

B. Employees

We currently communicate with our employees via telephone, email, and in person. In the event of an SBD, after assessing which means of communication are still available to

us, we will use the means closest in speed and form (written or oral) to communicate with our employees. A contact list will be used by senior management to reach all employees quickly during an SBD. The contact list includes staff cell phone numbers and addresses.

The person to invoke use of the contact list is Rigoberto Dapena, CEO, or designee (Principal). Employees will receive a contact list at the time of hire and when a change is made. The Firm maintains a call tree separate from this document (see Attachment "B" for a current list).

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

C. Regulators

We are currently members of the following self-regulatory organizations (SROs), and are also regulated by the Financial Industry Regulatory Authority Inc. (“FINRA”), the Securities Exchange Commission (“SEC”) and the state of Florida. We communicate with our regulators by telephone, email, fax, and U.S. mail. 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 communicate with the other party.

Rule: FINRA Rule 4370(c)(9).

III. 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 goods or services when needed, because of an SBD to them or our Firm. Our major suppliers are:

Service	Company	Contact Person	Telephone
Phone service	8x8, Inc.	Brent Neitzel	(408) 816-1695
Message Archiving	SMARSH	Daniel Brody	(646)679-2251
Audit	MBAF	Erbin Ramirez	(305)373-5500
Bank Account	Apollo Bank	Nancy Garcia	(305)398-9054
FinOP Support	Maven Strategic Solutions	Robert Gilman	(561)771-0036
Compliance Support	Blueprint Regulatory Consulting	Nelson Rosa	(561)245-4710
IT Consultants	Tekfirm	Oscar Gonzalez	(305)934-1752

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 we will need in light of an internal or external SBD. The Firm maintains its Operating Account, Capital Account with Apollo Bank; our Proprietary Account of Introducing Brokers/Dealers (PAIB account) is kept with Pershing, LLC. If our banks and other lenders are unable to provide the financing, we will seek alternative financing immediately from our Shareholders.

Rules: FINRA Rule 4370(c)(7)

C. Counter-Parties

We have contacted our critical counterparties, such as other broker-dealers or institutional customers, to determine if we will be able to carry out our transactions with them in light of an internal or external SBD. Where the transactions cannot be completed, we will work with our clearing firm or contact those counterparties directly to make alternative arrangements to complete those transactions as soon as possible.

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

IV. Regulatory Reporting

Our Firm is subject to regulation by FINRA, the SEC, and the state of Florida. We file regulatory information, forms and reports with our regulators via the U.S. postal mail or electronically via fax 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 most efficient and effective means to comply with all regulatory requirements. In the event we cannot contact our regulators, we will continue filing required reports using the communication means available to us.

Our core examiner is:

Financial Industry Regulatory Authority, Florida District Office
5200 Town Center Circle, Tower 1, Suite 200
Boca Raton, FL 33486

Tel. (561) 443-8000

Rule: FINRA Rule 4370(c)(8).

V. Disclosure of Business Continuity Plan

Attached is our written BCP disclosure statement we provide customers at account opening and upon request.

Rule: FINRA Rule 4370(e).

VI. Updates and Annual Review

CGIS will review, modify and/or update this plan annually and when there are changes in our operations, structure, business or location as well as those of our clearing firm occurs.

Rule: FINRA Rule 4370(b).

VII. Senior Manager Approval

Approved on January 31, 2020 by:

Riggin Dapena, CEO

Melissa Richards, OM

J. Rodriguez, AMLCO

Rule: FINRA Rule 4370(d)

Attachment A: CGIS Securities LLC's Business Continuity Planning

CGIS Securities LLC ("CGIS" or "Firm") has developed a Business Continuity Plan with the protocols required by law to confront events that may significantly disrupt our business. However, since the timing and impact of disasters and disruptions are unpredictable, we are always ready to adapt and improvise critical solutions responding to real life situations. Our Principals are clear: in times of emergency, we give top priority to the physical wellbeing of the people and the protection of our client's financial assets and confidential information.

Contacting Us – After a significant business disruption event you should call our main-office telephone, (305)507-4544, or go to our website for guidance. If you cannot contact us through either mean, you should contact our clearing firm, Pershing LLC ("Pershing"), at (201) 413-3635 or www.pershing.com. Pershing, LLC will provide you with instructions on how to access your funds and securities, including: entering orders, confirming orders and processing other service-related and money transfer transactions.

Our Business Continuity Plan – Our goal when confronted with a significant business disruption event is to recover and renew operations as soon as possible. Our Protocols include safeguards for protecting our employees and property, assessing financial and operational capabilities, protecting the Firm's books and records, and providing access to our customers' assets and transactional ability.

Our business continuity plan addresses: data backup and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees and operations; contact with critical suppliers, contractors, banks and counter-parties; regulatory reporting; and assuring our customers prompt access to their funds and securities even if we are unable to recover.

We have redundancy in our critical functions. Pershing, LLC, backs up our important records electronically in a different geographical area. While every emergency situation poses unique problems depending on its nature, time and severity, CGIS is confident that in most cases, our clearing firm will be able to restore its own operations, complete transactions and accept new transactions and payments within 4 hours from the time of disruption. Your orders and requests for funds and securities could be delayed during this period.

Varying Disruptions – In our case, a significant business disruption event can affect only our Firm's office, the 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 necessary and expect to recover and resume business within hours during a normal market day, or the next business day. A major disruption affecting our business district, city or region, may force us to transfer our operations to a site outside of the affected area, and recover and resume business within a period of 48 to 72 hours.

In any case, if confronted with a significant business interruption situation, we will continue servicing your needs directly from a different location or by transferring control to our clearing firm. We will make our best effort to notify you of such emergency through our website or our customer emergency number, (305) 507-4544. If the significant business disruption is so severe that it prevents us from recovering within a reasonable period of time, our customer will have prompt access to their funds and securities through our clearing firm.

For more information – If you have questions about our business continuity planning, you can contact our Operations Manager at mrichards@cgissecurities.com