

Mazzone & Associates, Inc.

Business Continuity Plan (BCP)

Introduction. As a result of our ever-changing and evolving world, it has become necessary for firms in the financial services industry to take steps to ensure their preparedness to meet customer needs and resume regular business operations in a timely manner in the event of a significant business disruption (“SBD”).

On April 7, 2004, the Securities and Exchange Commission (“SEC” approved the new NASD Rule 3500 Series, which requires members to establish emergency preparedness plans and procedures. Rule 3510 requires each member to establish and maintain a business continuity plan (“BCP” or “Plan”) and enumerates certain requirements that each plan must address. The Rule further requires members to update their BCPs upon any material change and, at a minimum, to conduct an annual review of their BCP. Each member also must disclose to its customers how its BCP addresses the possibility of a future SBD and how the member plans to respond to events of varying scope.

Firm Policy. In the event of a significant business disruption (“SBD”) Mazzone & Associates, Inc. (“M&A”) will safeguard employees’ lives and firm property, make financial and operational assessments, quickly recover and resume operations, protect all of the firm’s books and records, and allow our customers to transact business. In the event that we determine we are unable to continue our business, we will assure customers prompt access to their funds and securities, if any.

Senior Management Approval. Pursuant to Rule 3510, M&A is required to designate a member of senior management who is a registered principal to approve its BCP and be responsible for conducting the annual review of the BCP. The designated principal (“DP”) responsible for approval and review of M&A’s BCP is Dominic Mazzone.

BCP Training and Education. The DP is required to ensure that all employees of M&A are aware of this BCP and are familiar with the appropriate procedures to follow in the event of an SBD.

I. Emergency Contact Persons

Our firm's two emergency contact persons are:

1. **Dominic Mazzone**
Office: 404.574.5745
Cell: 404.775.2825
Email: dmazzone@globalmna.com
2. **Stuart Sanford**
Office: 404.995.1711
Cell: 504.722.2866
Email: ssanford@globalmna.com

These names will be updated in the event of a material change, and our Executive Representative will review them within 17 business days of the end of each quarter.

Rule: NASD Rule 3520.

II. Firm Policy

In the event of a significant business disruption ("SBD") Mazzone & Associates, Inc. ("M&A" or "Our") will safeguard employees' lives and firm property, make financial and operational assessments, quickly recover and resume operations, protect all of the firm's books and records, and allow our customers to transact business. In the event that we determine we are unable to continue our business, we will assure customers prompt access to their funds and securities, if any.

A. Significant Business Disruptions (SBDs)

Our plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only our firm's ability to communicate and do business, such as a fire in our building. External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a city flood, or a wide-scale, regional disruption. Our response to an external SBD relies more heavily on other organizations and systems, especially on the capabilities of our clearing firm.

B. Approval and Execution Authority

Dominic Mazzone, CEO, Managing Director and a registered principal, is responsible for approving the plan and for conducting the required annual review. He has the authority to execute this BCP.

C. Plan Location and Access

M&A will maintain copies of its BCP plan and the annual reviews, and the changes that have been made to it for inspection. An electronic copy of our plan is located on the server in our only office located in our data storage room at Office Tower at the Four

Seasons, 75 Fourteenth St., NE, Suite 2800, Atlanta, Georgia 30309 and on off-site back-up provided by Mozy Pro whose address is EMC Building (3rd floor), 505 1st Ave S, Suite 600, Seattle, WA 98104. M&A's emails are also redundantly stored offsite with Global Relay Communications Inc. whose address is 220 Cambie Street, 2nd Floor, Vancouver, BC V6B 2M9.

III. Business Description

M&A's business is limited to advisory mergers and acquisitions and private placements. Our firm is an introducing firm and does not perform any type of clearing function for itself or others. Furthermore, M&A does not hold customer funds or securities. M&A also does not accept and does not enter orders.

IV. Office Location

M&A sole location is: *Office Tower at the Four Seasons, 75 Fourteenth St., NE, Suite 2800, Atlanta, Georgia 30309*. Its main telephone number is 404.931.8545. Our employees may travel to that office by means of foot, car, subway, train, or bus. M&A does not engage in order taking or entry.

V. Alternative Physical Location(s) of Employees

In the event of an SBD, M&A will move our staff from our offices to 3894 The Highlands NW, Atlanta, GA 30327. Its main telephone number is 404.575.4988. This location is reasonably distant from the main office so as to reduce the chance that it too will be affected by the SBD, yet close enough to relocate to quickly if necessary. All of M&A's employees have been provided with driving directions to this location.

Rule: NASD Rule 3510(c)(6).

VI. Customers' Access to Funds and Securities

Our firm does not maintain custody of customers' funds or securities. M&A does not take customer orders and, therefore, no alternative method for taking order need be specified herein since the prompt access to client funds and securities requirement is inapplicable to M&A's business.

If SIPC determines that M&A is unable to meet our obligations to our customers or if 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. M&A will assist SIPC and the trustee by providing our books and records identifying customer accounts subject to SIPC regulation or any other applicable regulatory procedures.

Rules: NASD Rule 3510(a); Securities Exchange Act Rule 15c3-1; 15 U.S.C. 78eee (2003).

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

M&A maintains its primary hard copy books and records and its electronic records at: Office Tower at the Four Seasons, 75 Fourteenth St., NE, Suite 2800, Atlanta, Georgia 30309.

Dominic Mazzone, CEO and Managing Director, 404.574.5745 is responsible for the maintenance of these books and records. M&A does not have retail customer accounts, does not accept cash and does not accept securities. Consequently, M&A's business does not require the use of a clearing house and, therefore, M&A maintains all of its own books and records.

M&A maintains its back-up copy of its books and records are done electronically every day off-site by Mozy Pro whose address is EMC Building (3rd floor), 505 1st Ave S, Suite 600, Seattle, WA 98104. M&A's emails are also redundantly stored offsite with Global Relay Communications Inc. whose address is 220 Cambie Street, 2nd Floor, Vancouver, BC V6B 2M9. Dominic Mazzone, CEO and Managing Director, 404.574.5745 is responsible for confirming that such back-ups and off-site maintenance of these back-up books and records is re-occurring, complete and accurate. Our firm backs up its paper records by copying and taking them to our back-up site.

In the event of an internal or external SBD that causes the loss of our paper records, we will physically recover them from our back-up site. If our primary site is inoperable, we can continue operations from our secondary or alternative locations using the back-up books and records. 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.

Rule: NASD Rule 3510(c)(1).

VIII. Financial and Operational Assessments

FINRA defines "financial and operational assessments" as a set of written procedures that allows a member to identify changes in its operational, financial, and credit risk exposures. As demonstrated following the events of September 11, 2001, an SBD of great enough severity can expose affirm to several risk factors that can potentially put the firm out of business or cause financial harm to its clients. It is important, in the face of an SBD, for M&A to manage the risks that are particular to our business and take whatever steps possible to assure the least amount of impact on its clients. M&A's procedures to identify changes in its operational, financial, and credit risk exposures in the event of an SBD are set forth below. M&A will periodically assess the changes in these exposures, and quickly make such an assessment in connection with an SBD.

A. Operational Risk

In the event of an SBD, M&A will immediately identify what means will permit us to communicate with our customers, employees, critical business constituents, critical banks, critical counter-parties, and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options M&A will employ will include our Web site, telephone voice mail, cell phones, and secure e-mail. In addition, M&A will retrieve our key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic).

Rules: NASD Rules 3510(c)(3) & (f)(2).

B. Financial and Credit Risk

In the event of an SBD, M&A will determine the value and liquidity of our investments and other assets to evaluate our ability to continue to fund our operations and remain in capital compliance. M&A will contact (to the extent applicable to our business) our clearing firm, critical banks, and investors to apprise them of our financial status. If M&A determines that it may be unable to meet its obligations to those counter-parties or otherwise continue to fund our operations, M&A will request additional financing from our bank or other credit sources to fulfill our obligations to our customers and clients. If M&A cannot remedy a capital deficiency, M&A will file appropriate notices with our regulators and immediately take appropriate steps to fulfill our obligations to our customers and clients.

Rules: NASD Rules 3510(c)(3), (c)(8) & (f)(2).

IX. Mission Critical Systems

A “mission critical system” is any system that is necessary, depending on the nature of a member’s business, to ensure prompt and accurate order processing of securities transactions, including, but not limited to, order taking, order 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.” M&A does not take orders or other otherwise trade securities on any exchange on behalf of itself or its customers, nor does it accept any cash or securities from its customers, nor does it have customer accounts for the same. Therefore, M&A does not have any “mission critical systems” to ensure prompt and accurate processing of securities transactions (for example, 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). Consequently, M&A does not have or work with any clearing houses that provide any such services or systems for M&A or its customers.

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 can affect actual recovery times. M&A’s

most critical systems are its telecommunications services. Our objective is to regain use of those telecommunication systems as soon as practicable, but M&A is unaware of how to test the recovery time for its telecommunications services.

The systems that are most critical to the operation of our business are:

- **Computer System:** Desktop and laptop computers and our server. In the event of an SBD that renders our computer system useless, M&A will obtain new computer equipment. During the switch-over, our downtime would not be more than 24 to 48 hours. On a scale of 1 to 5 (with 5 being the most significant), the extent of the risk of our potential liability for a power outage is a 1.
- **Telecommunications:** Comcast Business Solutions located at 3625 Utoy Dr SW, Atlanta, GA 30331, telephone no. (770) 468-0378, is our telecommunications provider. In the event of an SBD that renders our telecommunications system useless, M&A will switch to using our cellular phones. During the switch-over, our downtime would not be more than one hour. On a scale of 1 to 5 (with 5 being the most significant), the extent of the risk of our potential liability for a power outage is a 1.
- **Power Source:** Georgia Power located at 805B Ralph David Abernathy Blvd., Atlanta, Georgia 30310, telephone no. 888.655.5888, is our power provider to our offices. In the event of an SBD that causes a power outage, M&A will relocate to our alternate location at 684 Sherwood Road, Atlanta, Georgia 30324, telephone no. 404.575.4988. During the switch-over, our downtime would not be more than one hour. On a scale of 1 to 5 (with 5 being the most significant), the extent of the risk of our potential liability for a power outage is a 1.

X. Alternate Communications Between the Firm and Customers, Employees, and Regulators

A. Customers

M&A communicates with its customers using the telephone, e-mail, our Web site, fax, U.S. mail, and in person visits at our firm or at the other's location. In the event of an SBD, M&A 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 M&A has used in the past to communicate with the other party. For example, if M&A has communicated with a party by e-mail but the Internet is unavailable, M&A will call them on the telephone and follow up where a record is needed with paper copy in the U.S. mail.

Rule: NASD Rule 3510(c)(4).

B. Employees

M&A communicates with its employees using the telephone, e-mail, and in person. In the event of an SBD, M&A 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

M&A has used in the past to communicate with the other party. Given the small number of employees at M&A, M&A should be able to efficiently assess the best means of communications and communicate with its employees accordingly.

Rule: *NASD Rule 3510(c)(5).*

C. Regulators

M&A is currently a member of FINRA. M&A communicates with our regulators using the telephone, e-mail, fax, U.S. mail, and in person. M&A also uses the Internet for form filing and access to WebCRD. In the event of an SBD, M&A 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. The following is information that may be vital in dealing with our regulators in the event of an SBD:

- Firm Information: Mazzone & Associates, Inc. (f/k/a M&A Vision Company), CRD# 144159;
- FINRA – District 7 Office: Telephone no. 404.239.6100
- FINRA – Washington, DC: Telephone no. 301.590.6500
- SIPC: Telephone no. 202.371.8300
- SEC – Market Regulation: Telephone no. 202.942.0069

Rule: *NASD Rule 3510(c)(9).*

XI. Critical Business Constituents, Banks, and Counter-Parties

M&A's procedures to identify changes in the impact an SBD will have on its relationship with its critical business constituents, banks, and counter-parties, and how it will deal with those impacts are set forth below.

A. Business constituents

M&A has 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. M&A will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services when we need them because of a SBD to them or our firm.

Our major suppliers are listed in Section "IX. Mission Critical System" above and our FINOP services which are provided by Capital Markets Compliance. LLC, telephone no. 770.263.7300, fax no. 877.600.1780.

Rules: *NASD Rule 3510(c)(7).*

B. Banks

M&A has contacted our banks to determine if they can continue to provide the service that we will need in light of the internal or external SBD. M&A does not borrow capital and has no financing needs from any banks to operate or otherwise conduct its business.

M&A maintains its operating bank accounts (business checking and savings accounts) at with Bank of America, phone no. 404.870.3030.

In the event of an SBD, M&A will determine if a need exists for financing its operations and, if so, M&A will contact the bank in which we do business and other financial institutions to seek such financing arrangement. If M&A cannot obtain the necessary financing, M&A will pursue alternative financing through personal financial resources of its owner(s).

Rules: NASD Rule 3510(c)(7).

C. Counter-Parties

M&A has contacted our critical counter-parties, 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 the internal or external SBD. Where the transactions cannot be completed, to the extent applicable to our business, M&A will work with our clearing firm or contact those counter-parties directly to make alternative arrangements to complete those transactions as soon as possible.

Rules: NASD Rules 3510(a) &(c)(7).

XII. Regulatory Reporting

M&A is subject to regulation by federal and state securities regulators, specifically the SEC, FINRA and the State securities regulators in the States of Georgia and South Carolina. M&A files reports with our regulators using paper copies in the U.S. mail, and electronically using fax, e-mail, and the Internet. In the event of an SBD, M&A will check with the SEC, FINRA, and other regulators to determine which means of filing are still available to us, and use the means closest in speed and form (written or oral) to our previous filing method. In the event that M&A cannot contact our regulators, M&A will continue to file required reports using the communication means available to us.

The contact information for our regulators, as well as the reports filed and method of filing for each regulator, is as follows:

Report	Method of Filing
FOCUS reports	Via Internet through Web-FOCUS system
Financial statements to regulators	Via fax
Form filings (BD, U4, U5, etc.)	Via Internet through Web-CRD system

Rule: NASD Rule 3510(c)(8).

XIII. Disclosure of Business Continuity Plan

M&A provides in writing a BCP disclosure statement to customers at account opening. M&A also posts the disclosure statement and link to our BCP on our Web site (www.globalmna.com) and will mail our BCP to customers upon request. Our disclosure statement is as follows:

In the event of a significant business disruption (“SBD”) Mazzone & Associates, Inc. (“M&A”) will safeguard employees’ lives and firm property, make financial and operational assessments, quickly recover and resume operations, protect all of the firm’s books and records, and allow our customers to transact business. M&A has made arrangements for back-up facilities and services. However, in the event that we determine we are unable to continue our business as a result of the SBD, we will assure customers prompt access to their funds and securities, if any. In the event of an SBD, please contact either Dom Mazzone at 404.775.2825 or Stuart Sanford at 504.722.2866 and check our website at www.globalmna.com for additional updates.

Rule: NASD Rule 3510(e).

XIV. Updates and Annual Review

M&A will update this plan whenever M&A has a material change to our operations, structure, business or location. In addition, M&A will review this BCP annually, on or before December 31st, to modify it for any changes in our operations, structure, business, or location. M&A’s business is limited and it, therefore, does not work with any clearing houses and need not consider the BCP of any clearing house under this BCP unless M&A’s business changes.

Rule: NASD Rule 3510(b).

XV. Potential SBD Scenarios

In an effort to prepare for the variety of effects that different types of SBDs might have on M&A, below is an outline of some scenarios and the actions that M&A will need to take to assure that the SBD has the least possible effect on M&A and its clients. M&A is aware that the exact ramifications of any SBD cannot be predicted precisely and in the event of an SBD, M&A will take the time to assess its particular resulting situation and take necessary steps as described in the BCP to handle the situation as effectively as possible under whatever the circumstances may be.

Illustration #1 – Internal SBD

In the event that a fire consumes M&A’s main office destroying all hardware and files, after assuring the safety of our employees, the following actions will be taken:

Effect of SBD	Responsible Party	Actions to be Taken
Personal computers, servers and data storage hardware are destroyed	Dominic Mazzone	Acquire new computers, transport them to alternate location, and install the necessary software to re-open business. Contact network service provider if necessary to re-establish technological infrastructure and web services.
Books and records are destroyed or partially destroyed	Dominic Mazzone	Assess the feasibility of recovering the damaged books and records. If more efficient, obtain back-up books and records from off-site facility and transport them for immediate use to the alternate location.
Office is destroyed	Dominic Mazzone	Relocate to the alternate location and establish operations. Once business has resumed and is fully operational, start searching for new main office location.
Telecommunications hardware is destroyed	Dominic Mazzone	Contact service provider to transfer existing service to the alternate location, arrange for necessary hardware and software installations.

M&A estimates the resumption of business and communications channels within 48 hours of the onset of this type of SBD.

Illustration #2 – External regional SBD

In the event that an earthquake or other natural disaster causes structural damage to our building and the buildings of some of our service providers, the following actions will be taken:

Effect of SBD	Responsible Party	Actions to be Taken
Building is not structurally sound	Dominic Mazzone	Evacuate the office and obtain alternate equipment and files and transport them to the alternate location so that business may resume promptly.
Other vendors are experiencing service interruptions	Dominic Mazzone	Contact vendors and service providers to determine when they will be fully operational and make arrangement for the continuance of service, if possible, in the meantime.

Depending on the impact of this particular SBD on our third-party vendors and service providers, M&A estimates the resumption of normal business operations in 48 to 72 hours.

Illustration #3 – Catastrophic SBD

In the event of an SBD on the level of a terrorist attack, major disaster, political crisis or other event that is of a magnitude great enough to force the close of the markets but does not physically affect M&A, the following actions will be taken:

Effect of SBD	Responsible Party	Actions to be Taken
The financial markets are closed	Dominic Mazzone	Communicate with clients to determine the effect of the SBD on the transaction in progress.
One of M&A's banks has been significantly affected and cannot continue its business for a prolonged period of time	Dominic Mazzone	Contact the bank to determine how funds may be withdrawn and transfer the funds to another account. If funds are frozen for an uncertain amount of time, assess the firm's financial situation and pursue additional financing if necessary.
M&A's investments in the financial markets are frozen	Dominic Mazzone	Perform a risk assessment based on the overall status of the SBD to decide how to best preserve M&A's capital position under a variety of market re-open scenarios.
There is a possibility of further SBDs resulting from the primary SBD	Dominic Mazzone	Test M&A's procedures for handling an SBD that results in M&A's relocation. Assure that back-up systems, hardware, and files are ready to be utilized and can be set up quickly if needed.

It is virtually impossible to predict a recovery time for this category of SBD due to the scope and the myriad of ramifications on the financial services industry as a whole. M&A is confident that with the procedures in place will be able to ensure the least possible impact on our clients as dictated by the circumstances.

XVI. Senior Manager Approval

The undersigned has approved this Business Continuity Plan as reasonably designed to enable our firm to meet its obligations to customers in the event of an SBD.

Rule: NASD Rule 3510(d).



Signed: _____

Title: Chief Executive Officer

Date: December 1, 2015