

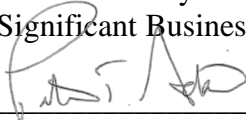
Sidoti & Company, LLC – Business Continuity Plan

Table of Contents

	<u>Page</u>
Introduction.....	2
Emergency Contact Persons	2
Firm Policy.....	4
Business Description.....	5
Office Locations.....	5
Alternative Physical Location(s) of Employees	5
Customers’ Access to Funds and Securities	5
Data Back-Up and Recovery	6
Financial and Operational Assessments.....	7
Mission Critical Systems	8
Alternate Communications	10
Critical Business Relationships.....	11
Regulatory Reporting.....	11
Disclosure of BCP.....	12
Updates and Review	12
Customer Disclosure Form	13

This “Business Continuity Plan” has been created to meet the requirements described in FINRA Rule 4370. This Business Continuity Plan is reasonably designed to enable our firm to meet its obligations to customers in the event of a Significant Business Disruption.

Authorized Approval Signature: _____



Printed Name & Title: _____

Peter Sidoti, CEO

Date: _____

October 25, 2021

This Plan is effective from the date approved until the date of its authorized revision, update or replacement (see below).

Date this Plan was no longer effective (date of revision, update or replacement): _____

Recordkeeping: Discard after _____ (date three years from termination of use).

Introduction

FINRA Rule 4370 requires each member to create and maintain a Business Continuity Plan (BCP) that identifies procedures relating to an emergency or Significant Business Disruption (SBD) that are “reasonably designed to enable the member to meet its existing obligations to its customers.” In addition, the plan must address the firm’s existing relationships with other members and counter-parties. This plan must be promptly made available to the FINRA staff upon request.

Rules 4370(b) requires that each member review its plan at least annually to determine if any changes are needed and update its plan more frequently in the event of any material change to its operations, structure, business or location.

The plan should reflect the firm’s business and operations. Therefore, the requirements of the plan, as identified in Rule 4370, are flexible and should be tailored to the firm’s size and needs.

However, at a minimum, Sidoti & Company, LLC’s plan must address the following areas:

- Data back-up and recovery (hard copy and electronic);
- All mission critical systems;
- Financial and operational assessments;
- Alternate communications between customers and the member;
- Alternate communications between the member and its employees;
- Alternate physical location of employees;
- Critical business constituents, banks, and counter-party impact;
- Regulatory reporting;
- Communications with regulators; and
- How the member will assure customers’ prompt access to their funds and securities in the event that the member determines that it is unable to continue its business.

Each firm is required to only address the elements applicable to its business, but the plan must contain an explanation if any element above is not included.

Rule 4370 requires each member to designate two individuals as emergency contacts that FINRA may contact in the event of a significant business disruption. Each contact must be a registered principal or member of senior management. However,

- If the member has only one principal but has other employees, the second contact should be another firm employee, or
- If the firm has only one principal and no other employees, the second contact may be someone who has knowledge of the firm’s business, such as an accountant, attorney, etc.

Rule 4370 also requires that each member enter this information into FINRA’s Contact System (NCS) and that required changes are made promptly.

1. Emergency Contact Persons

Sidoti & Company has designated the following individuals to act as contact persons for the firm as required under Rule 4370:

Primary Contact

Name, Title: Peter Sidoti, CEO
Address: 1177 Avenue of the Americas – Floor 5, New York, NY 10036
Telephone Number: 212-453-7000
~~Fax Number: 212-297-9166~~
E-mail Address: psidoti@sidoti.com

Secondary Contact:

Name, Title: Jason Philosophos, Institutional Equity Sales
Address: 3625 S Lake Dr, Boynton Beach, FL 33435
Telephone Number: 212-453-7094
~~Fax Number: 212-297-9166~~
E-mail Address: jphilosophos@sidoti.com

These contacts will be reported through FINRA’s Contact System. This system may be accessed directly through the Firm Gateway and must be updated in the event of a material change. In addition, Sidoti & Company’s Executive Representative or his written designee must review and update this information, if necessary, within 17 business days of the end of the calendar year. The Executive Representative or his designee will also ensure that contact information is updated promptly if changes occur at any time during the year.

Executive Representative:

Sidoti & Company’s Executive Representative is Peter Sidoti.

Disaster Recovery Coordinator/Team:

The Company has designated Peter Sidoti, CEO as the “Disaster Recovery Coordinator” (“Coordinator”). In his absence, Jason Philosophos, Institutional Equity Sales will assume his responsibilities.

The “Disaster Recovery Coordinator” has the responsibility to make an immediate preliminary assessment of the nature and extent of the disruption by assessing the following: electricity supply; condition of computer network/phones; damage to the building; HVAC in extreme weather; and other hazards.

If the Coordinator determines that personnel should evacuate the affected location(s), he must make an announcement to all personnel as to appropriate procedures. The announcement may be given via personal contact, e-mail, intercom or other methods as appropriate given the systems available; the size and location of the staff; and the size of the office or building. This

announcement should be short and concise, should calmly identify the situation and should provide instructions to employees on how to respond. This announcement should be repeated as often as necessary to avoid confusion and to ensure all employees are aware of the situation. After ensuring the physical safety of Company personnel, the Coordinator then implement this BCP.

If the situation does not merit evacuation, steps should be taken to alert designated persons of necessary actions to facilitate ongoing operations in the face of limited disruption. In this case, the Coordinator will determine which, if any, procedures in this BCP should be implemented.

In the event, the SBD has directly affected other areas of the building but has not directly impacted the Company's office, the Coordinator will contact building security or emergency personnel for instructions on how the Company should respond and proceed accordingly.

2. Firm Policy

Sidoti & Company's policy is to respond to a Significant Business Disruption (SBD) by safeguarding employees' lives and firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of the firm's books and records, and allowing its customers to transact business. In the event that it is determined the firm is unable to continue its business, the firm will assure customers prompt access to their funds and securities.

Significant Business Disruptions (SBDs):

Sidoti & Company's plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only the Company's ability to communicate and do business, such as a fire or loss of electrical power in the office or building.

External SBDs may prevent the operation of the securities markets for a number of firms, such as a terrorist attack, a natural disaster, pandemics or another event that causes a wide-scale, regional disruption in essential services. The Company's response to an external SBD will rely more heavily on other organizations and systems, especially on the capabilities of the federal emergency authorities, local officials and utility companies.

Approval and Execution Authority:

Peter Sidoti, CEO a registered principal, has the authority to execute this BCP and is responsible for approving the plan and for conducting the required annual review.

Plan Location and Access:

Sidoti & Company will maintain copies of its BCP plan, a record of the firm's annual reviews, and the changes that have been made to the BCP for inspection by regulators. A hard copy of the Company's Plan is located in its main business location and may be accessed by contacting Peter Sidoti.

An electronic copy of the Company's plan is located internally on Sidoti & Company's Teams folder for employee resources. A back-up copy of this electronic file is maintained at 611 S Congress Ave, Ste 215-B, Austin, TX 78704.

A copy of the BCP will be provided to FINRA District Office #10 located in New York, NY upon request.

3. Business Description

Sidoti & Company produces and distributes research to institutional clients where they can place orders with unaffiliated brokerage firms and Sidoti may receive a portion of the commission charged by the other broker dealer. The firm also participates in underwriting and hosts conferences for small and micro cap companies as well as produces company sponsored research. Furthermore, the Company does not hold customer funds or securities. The Company services only institutional customers.

4. Office Locations

The Company or its registered personnel currently operate from the following locations:

Type of Location, Registered or Unregistered	Address and Main Phone Number	Located in a Personal Residence? (Y or N)	Means of Transportation Employees Use to Reach Office	Mission Critical Systems Taking Place at Office
Registered Home Office	1177 Avenue of Americas Floor 5 New York, NY 10036	No	foot, car, subway, train, bus,	All
Registered Branch Office	611 S Congress Ave Ste 215-B Austin, TX 78704	No	foot, car, public transportation	All

Alternative Physical Location(s) of Employees:

In accordance with Rule 4370 each member must designate a location at which business will be conducted in the event the primary office of the Company must be evacuated. Sidoti & Company has no other office locations, therefore, in accordance with this requirement; members of the Company's staff will relocate to their personal residence.

5. Customers' Access to Funds and Securities

Sidoti & Company does not maintain custody of customers' funds or securities. Respective hedge fund managers, private placement issuers, registered investment advisors and other broker dealers maintain all account records and documentation related to its customers' investments.

If SIPC determines that the Company is unable to meet its obligations to its customers or if the Company's liabilities exceed its assets in violation of Securities Exchange Act Rule 15c3-1, SIPC may seek to appoint a trustee to disburse the Company's assets to its customers. Sidoti & Company will assist SIPC and the trustee by providing applicable books and records identifying customer accounts subject to SIPC regulation.

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

Sidoti & Company maintains its primary books and records in hard copy or electronically at its Home Office. Peter Sidoti, is responsible for the maintenance of these books and records.

Back-up of Paper Records:

The Company does not keep a back up copy of its hard copy books and records (Certain—but not all—hard copy records are backed up electronically) because the Company does not hold customer funds or securities and customer investments are maintained directly by their clearing firm, respective fund or offeror. Therefore, an internal or external SBD affecting Company offices should not pose a threat to customer records or financial holdings. While the Company may lose access to some or all FINRA- or SEC-required records in an external SBD, or may permanently lose some or all such records in an internal SBD (such as a fire), we believe our customers would not suffer as a result.

Back-up of electronic records:

The firm backs up its electronic records to a remote server located at 275 Hartz Way Secaucus, NJ 07094. In the event that electronic records are lost, the Company will recover the data from the backup appliance.

7. Financial and Operational Assessments

Operational Risk:

In the event of an SBD, Sidoti & Company will immediately identify any methods available that will permit personnel to communicate with customers, other 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 the Company may employ will include Web site, telephone, voice mail, secure e-mail and captured chat sites. In addition, Sidoti & Company will retrieve key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic).

Financial and Credit Risk:

In the event of an SBD, Sidoti & Company's FINOP will determine the value and liquidity of its investments and other assets to evaluate the Company's ability to continue to fund its operations and remain in capital compliance.

Sidoti & Company will contact its critical banks, and investors to apprise them of the Company's financial status. If the Company determines that it may be unable to meet its obligations to those counter-parties or otherwise continue to fund its operations, Sidoti & Company will request additional financing from its bank or other capital sources to fulfill its obligations to its customers and clients. If Sidoti & Company cannot remedy a capital deficiency, the FINOP will file appropriate notices with applicable regulators and immediately take appropriate steps, including suspension of certain business activities and contacting SIPC.

In the event of a suspension or termination of the Company's business, the Company will attempt to notify customers regarding the situation and provide them with instructions for accessing their funds or securities, if applicable, for verifying transactions in process or for conducting future business. Notification will be a form allowed based on the circumstances permitted by regulatory authorities and may include, among others, telephone calls, letters or a posting on the Company's website.

8. Mission Critical Systems

Internal Mission Critical Systems

Sidoti & Company's does not maintain trading or other critical systems to handle customer accounts since its business is limited to production of research and client referrals. The firm's "mission critical systems" are those that ensure prompt and accurate processing of requests for research and maintaining relationships with institutional clients.

In the event of an internal or external SBD, the Company will attempt to continue to offer these services provided that doing so does not place our employees or customers in harm's way. These services may be temporarily suspended if the Company determines that safety cannot be assured or if critical systems necessary for offering these services, such as telephone or Internet systems are disrupted.

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

Customers

The Company currently communicates with our 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, 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. For example, if we have communicated with a party by e-mail but the Internet is unavailable, we will call them on the telephone and follow up where a record is needed with paper copy in the U.S. mail.

Employees

The Company currently communicates with its employees using the telephone, e-mail, recorded chat on Teams, and in person.

In the event of a 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.

Senior management will reach out to all department heads. The Department heads will then contact all representatives within their department by any available means.

Regulators

The Company is currently a member of FINRA and is registered with the SEC.

The Company is registered to conduct business in the following states: AK, AL, AR, AZ, CA, CO, CT, DC, DE, FL, GA, IA, IL, IN, KS, KY, LA, MA, MD, MI, MN, MO, NE, NC, NH, NY, NJ, NV, OH, OR, PA, RI, SC, TX, UT, VA, VT, WA, WI, & WY.

Sidoti & Company communicates with applicable regulators using the telephone, e-mail, fax, U.S. mail, and in person.

In the event of a 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.

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

Business constituents

Sidoti & Company has contacted our critical business constituents (businesses with which the Company has an ongoing commercial relationship in support of its operating activities, such as vendors providing critical services), and determined the extent to which the Company can continue its business relationship with these businesses in light of the internal or external SBD. The Company 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.

Banks

Sidoti & Company has contacted its banks and lenders to determine if they can continue to provide the financing that the Company may need in light of the internal or external SBD. The Company's accounts are currently with the following institutions:

Types of account (i.e. checking, savings, PAIB, escrow)	Name of Financial Institution	Address of Financial Institution	Telephone Number	Contact Name
Checking and Money Market Acct.	TD Bank	125 Park Avenue, 24 th Fl New York, NY 10017	212-271-5514	Alina Rizo
Checking	JP Morgan Chase	1 Chase Manhattan Plaza, New York, NY 10005	212-623-4268	Jeffrey DeCarlo
Mutual Fund	Morgan Stanley	Park Ave. Plaza/ 55 E. 52 ND Street, 28 FL New York, NY 10055	212-883-7700	Tyler Morgan

If our banks and other lenders are unable to provide the financing, we will seek alternative financing immediately from Peter Sidoti, psidoti@sidoti.com, 212-453-7000.

Counter-Parties

Sidoti & Company 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, we will contact those counter-parties directly to make alternative arrangements to complete those transactions as soon as possible.

11. Regulatory Reporting

Sidoti & Company is subject to regulation by FINRA and SEC, as well as various state and other securities regulators (see list of states in Part 10 – Regulators)

The Company currently 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 a 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 means closest in speed and form (written or oral) to our previous filing method. In the event that we cannot contact our regulators, we will continue to file required reports using the communication means available to us.

The Company's current regulators can be reached as follows:

FINRA District Number #10:
Brookfield Place
200 Liberty St
New York, NY 10281
212-858-4000

SEC New York Regional Office:
Address: 200 Vesey St, Suite 4000
New York, NY 10281
212-3361100

12. Disclosure of Business Continuity Plan

The Company will disclose in writing a summary of our BCP to customers at account opening or at the time a business relationship is established. The Company will notify customers in writing when material changes are made to the Plan than may affect their business relationship with the Company. The Company will also post the summary on our Web site and mail it to customers upon request.

The summary addresses the possibility of a future SBD and how we plan to respond to events of varying scope. In addressing the events of varying scope, the summary:

1. Provides specific scenarios of varying severity (e.g., a firm-only business disruption, a disruption to a single building, a disruption to a business district, a city-wide business disruption, and a regional disruption);
2. States whether we plan to continue business during that scenario and, if so, our planned recovery time; and
3. Provide general information on our intended response.

Our summary also discloses the existence of back-up facilities and arrangements. A copy of the Company's disclosure statement is included at the back of this Plan.

13. Updates and Annual Review

The Company will update this plan whenever there is a material change to its operations, structure, business or location.

The Company's BCP will be reviewed and modified, if necessary, at least annually, but no later than within 12 months of the date on which this Plan was put into effect or previously reviewed, to take into account any changes in the Company's operations, structure, business, or location.

Customer Disclosure Statement

Sidoti & Company

Sidoti & Company plans to quickly recover and resume business operations after a significant business disruption (SBD) and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our company's business continuity plan (BCP) is designed to permit us to resume operations as quickly as possible, given the scope and severity of the SBD.

The BCP addresses: data back up and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

Significant Business Disruptions: The Company's plan takes into account two kinds Significant Business Disruptions, internal and external. Internal SBDs affect only the Company's ability to communicate and do business, such as a fire or loss of electrical power in the office or building.

External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a natural disaster, or another event that causes a wide-scale, regional disruption in essential services.

Internal SBDs: In the event of a disruption in the Company's business operations due to an internal SBD, the Company will attempt to continue to conduct business as usual by utilizing

alternative communication methods (if available), such as the Internet, cell phones, etc., or by moving its operations to an alternative location(s).

If personnel or operations must be moved to an alternate location, the Company anticipates that it will resume regular operations within 48 hours.

External SBDs: In the event of a disruption in the Company's business operations due to an external SBD, the Company will attempt to continue to conduct business as usual by moving its operations to an alternative location(s) outside the affected area, if possible, or by providing customers with alternative communication arrangements, as indicated below, to conduct business or to access their funds and securities.

The Company will attempt to resume business within 24-48 hours and to keep its customers informed regarding relevant events to the best of its ability based on the circumstances.

In all cases, the Company will resume normal business operations as soon as it is able to do so, based on the type and the extent of the disrupting event.

If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer's prompt access to their funds and securities.

Communications: In the event you are unable to reach the Company at our main number, please proceed as follows:

1. Contact the Company at the following alternate telephone number: 917-754-2707
2. Access the Company's website at www.sidoti.com.
3. Contact the product sponsor directly at the number listed on your most recent statement.
4. Contact the private placement issuer directly at the number listed on applicable offering documents.
5. Access the product sponsor or issuer website for more information on contacting this entity and their business continuity plans. The website address can generally be found on your statement or offering documents.
6. Contact FINRA's District office at the following telephone number for more information on the company's status and additional instructions: (212) 858-4000

Contact information: Any questions regarding the Company's Business Continuity Plans should be addressed to:

Peter T. Sidoti, CEO
Sidoti & Company, LLC
1177 Avenue of the Americas – Floor 5

New York, NY 10036
212-453-7000
psidoti@sidoti.com