

AcreTrader Financial, LLC

Business Continuity Plan (BCP)

January 2023

As part of its service to its clients, and as required under the Federal Compliance Program Rule, AcreTrader Financial, LLC (“AcreTrader” or the “Firm”) has adopted this Disaster Recovery/Business Continuity Plan (the “Plan”) to provide for AcreTrader’s recovery from an emergency or disaster and for the resumption of business operations in as short a period of time as possible. These policies and procedures are, to the extent commercially practicable, designed to address those specific types of disasters that AcreTrader might reasonably face given its business operations and location.

I. Emergency Contact Person

Our Firm's Primary Emergency Contact Person is Michael Iseman. His telephone number is (816) 728-9331 . The Secondary Emergency Contact Person is David Amster. His telephone number is (917) 568-6470 The Firm is a limited liability company wholly-owned by AcreTrader, Inc. FINRA Rules require that the list of the emergency contact person(s) be updated within 30 days in the event of a material change, and be reviewed within 17 business days of the end of each calendar year in accordance with FINRA Rule 4517.

If FINRA requests such emergency contact information, it will be provided within 15 days of the request.

Rule: FINRA Rule 4370(f); FINRA Rule 4517.

II. Firm Policy

Our Firm's policy is to respond to a Significant Business Disruption (SBD) by first safeguarding lives of our employees or associated persons (collectively, “Staff”) and then seeking to: safeguard critical Firm property, make financial and operational assessments, quickly recover and resume operations, protect all of the Firm's books and records, and ensure the Firm is able to continue to transact business with its clients. In the event that we determine we are unable to continue our business operations due to an SBD, we will endeavor to notify promptly those of our clients which we believe are likely to be immediately, materially and adversely affected by such eventuality.

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, power outage, or

building evacuation. *External SBDs* prevent the operation of the securities markets or a number of firms, such as a terrorist attack a city flood, pandemic, or a wide-scale, regional disruption. Our response to an external SBD relies more heavily on other organizations and systems, including public utilities and our governmental authorities. However, AcreTrader's IT systems run on virtual servers. All critical systems and data are replicated in near real-time to a secondary data center location where storage and computer infrastructure exists. All critical systems and data can be accessed by our staff at the secondary data center by us in the event of an SBD.

B. Approval and Execution Authority

David Amster, a registered principal and Chief Executive Officer, 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

Our Firm will maintain copies of its BCP plan and the annual reviews, as well as any changes that may have been made to it for inspection.

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

III. Business Description

AcreTrader will conduct a limited business in private placements. It will not maintain a clearing arrangement. The Firm does not currently intend to engage in any business other than what has been described above or related thereto.

We do not hold customer funds or securities.

IV. Office Locations

The main office is located at 114 North East Ave., Fayetteville, AR 72701 and its main telephone number is (479) 335-5660. Our Staff may travel to that office by means of automobile, bus, walking, or taxi.

V. Alternative Physical Location(s) of Employees or Associated Persons

In the event of an SBD, we will move our Staff from the Firm's affected office to its disaster recovery location at the Parent's main office ("DR Site"): 112 W. Center Street, Suite 600, Fayetteville, AR 72701. The site includes dedicated PCs with internet access.

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

VI. Clients' Access to Funds and Securities

AcreTrader does not maintain custody of its clients' funds or securities.

If SIPC determines that we are unable to meet our obligations to our clients 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 clients. We will assist SIPC and the trustee by providing our books and records which identify AcreTrader's client accounts subject to SIPC regulation.

Rules: FINRA Rule 4370(a); Securities Exchange Act Rule 15c3-1; 15 U.S.C. 78eee (2003).

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

The Firm's primary hard copy books and records and electronic records are maintained at its main office location at 114 North East Street, Fayetteville, AR 72701. David Amster has primary responsibility for the maintenance of these books and records.

In the event of an internal or external SBD that causes the loss of our primary paper or electronic records, we will recover those that we need from our back-up records. If our primary site is inoperable, we will continue operations from our DR Site.

The firm backs up its electronic records daily through its Information Technology staff and third party storage solutions providers – Google Cloud Services, Google Workspace and Global Relay.

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 will continue operations from our back-up site or an 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.

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

VIII. Financial and Operational Assessments

A. Operational Risk

In the event of an SBD, we will as soon as commercially practicable identify appropriate means of communicating with our clients, Staff, and any critical business constituents, banks or counter-parties, and regulators. Although the circumstances of a particular SBD will largely

determine the means of such alternative communications, the communications options we will employ may include, but not limited to, telephone, cell phone and email. 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 the Firm's investments and other assets in order to evaluate the Firm's ability to continue to fund its operations and remain in compliance with regulatory capital requirements under applicable law. We will endeavor to contact critical banks, counterparties and customers to apprise them of our financial status, if appropriate. If we determine that we may be unable to meet our obligations to such parties or to continue to fund our operations, we may seek financing from appropriate credit sources to fulfill our obligations. If we cannot remedy a capital deficiency, we will file appropriate notices with our regulators and immediately take appropriate steps, deciding on those steps after due deliberation and possible consultation with our attorneys and other advisers.

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 private placements. More specifically, these systems include Firm computers that contain emails and documents related to private placement activities: Google Cloud Services and Google Workspace, Google Suite Software, Django Administration, HubSpot, as well as Microsoft Outlook and Microsoft Office Suite Software.

We have primary responsibility for establishing and maintaining our business relationships with our customers and have sole responsibility for our mission critical functions.

Our 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.

The Firm also reviews its third-party vendors' Disaster Recovery Plans (DRPs). Survival and mission critical systems and data hosted by third-party vendors are required to have DRPs in place that are tested on a regular basis.

The Firm backs up its critical books and records on a routine basis. Our key third-party vendors have confirmed that they conduct regular testing of their DRPs to confirm the effectiveness of their DRPs, including their backup arrangements.

The CCO will periodically review the plans that support the survival and mission critical functions performed by the Firm.

A. Firm's Mission Critical Systems

1. Google Suite/Drive – document management
2. Wireless cellphone network infrastructure
3. DialPad (for internet telephone service)
4. Django Administration
5. HubSpot
6. Global Relay – eComms storage
7. 17a-4 D3P - third-party data room provider
8. Google Cloud Services, Google Workspace – Cloud Data Storage

Rules: FINRA Rules 4370(c)(2) & (g)(1).

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

A. Clients

We communicate with our clients via the telephone, cell phones, e-mail, fax, U.S. mail, overnight or messenger delivery services and in person visits at the Firm's main office or at other locations, as appropriate. 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 email but the Internet is unavailable, we will call them on the telephone and follow up where a record is needed with a paper copy using the U.S. mail, overnight delivery services or messengers, as available.

Rule: FINRA Rule 4370(c)(4).

B. Staff

We communicate with our Staff via telephone, cell phone, e-mail, and in person. 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. We will also employ a call tree so that senior management can reach all Staff quickly during an SBD. The call tree includes home and cellular phone numbers of our Staff.

Persons Invoking the Call Tree	Call Recipients
David Amster (Chief Executive Officer)	Jennifer Larose Fred Bush Michael Iseman

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

C. Regulators

We are currently registered with the SEC and are a member firm of FINRA. We communicate with our regulators using the telephone, cell phone, e-mail, fax, U.S. mail, overnight delivery services, messengers, and in person, as appropriate. 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) (9).

XI. Banks and Counterparties

A. Banks

In the event of an SBD, we may seek financing from appropriate credit sources (including, but not limited to, our members, banks and/or other lenders) to enable us to continue to fulfill our obligations. The bank maintaining our main operating account is Signature Bank of Arkansas with its headquarters located at Signature Plaza, 3878 N. Crossover Rd., Fayetteville, AR 72703.

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

B. Counterparties

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 the internal or external SBD. Where the transactions cannot be completed, we will contact those counterparties directly to make alternative arrangements to complete those transactions as soon as commercially practicable.

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

XII. Regulatory Reporting

Our Firm is subject to regulation by the SEC and FINRA. We file 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, we will check with the SEC and FINRA 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.

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

XIII. Disclosure of Business Continuity Plan

We will provide our BCP disclosure statement (see attachment A) to each customer at such customer's account opening. We will also post our BCP disclosure statement on our website at www.AcreTrader.com and provide a hard copy thereof upon request.

Rule: FINRA Rule 4370(e).

XIV. Updates and Annual Review

Our Firm will update this Plan whenever we have a material change to our operations, structure, business or location within 30 days of the change. We will train our Staff to be familiar with the policies and procedures of the Plan and have a thorough understanding of their responsibilities in the event of an emergency. Material changes in business, operations, structure, contracts and contacts, including new Staff, new vendors or new addresses for existing employees, vendors, or the clearing firm, etc. must be reflected in the Plan. In addition, our firm will review this BCP annually to modify it for any changes.

Rule: FINRA Rule 4370(b).

Epidemics and Pandemics

In response to FINRA's Notice Member 09-59, the Firm may take the necessary precautions to ensure the health and safety of its Staff. In the event that any Staff member becomes ill due to an epidemic, pandemic or any other serious communicable disease, the Firm will notify such person to stay at home for the duration of such illness, and until such time that the person is fully recovered and able to work from AcreTrader's office.

Senior Manager Approval

I have approved this Business Continuity Plan as reasonably designed to enable our Firm to meet its obligations to clients in the event of an SBD.

Rule: FINRA Rule 4370(d).

Signed: _____
Name: David Amster
Title: Chief Executive Officer

Date: