



Thrasher & Chambers Inc
Business Continuity Plan (BCP)
August 5, 2024

I Emergency Contact Persons

Our firm's two emergency contact persons are: David Thrasher, Executive Representative, office phone (479) 273-5333, home phone (479) 631-1094, cell phone (479) 640-3470, email thrasherinvest@thrasherfinancial.com; and Mark Chambers, Executive Representative, office phone (479) 273-5333, cell phone (479) 619-6640, email mchambers@thrasherfinancial.com. Our firm is a small firm and these names have not changed since 2000. Either of the Executive Representatives will review these names and will update this information if any changes are made.

II Firm Policy

Our firm'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 our customers to transact business. In the event that we are unable to conduct our business, we will assure customers prompt access to their funds and securities.

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 any type of wide-scale regional disruption. Our response to an external SBD relies more heavily on other organizations and systems, especially the capabilities of our clearing firm.

B Approval and Execution Authority

Either David Thrasher, Executive Representative, and a Registered Principal, or Mark Chambers, President, Executive Representative, and Principal, will be responsible for approving this plan and for any required reviews of the plan. Either has the authority to execute this plan.

C Plan Location and Access

Our firm will maintain copies of its BCP and any reviews and will make these items available to any existing client upon request. You may also request a copy of our BCP by contacting FINRA at (800) 321-6273.

III Business Description

Our firm conducts business in equity, fixed income, and mutual fund investments. Our firm is an introducing firm and does not perform any type of clearing function for itself or any other firm. Also, we do not hold customer funds or securities. We accept and enter orders. All transactions are sent to our custodial firms, which then executes these transactions in accordance with our instructions. Our custodial firms also maintains our customer's accounts and they can grant customers access to them, and deliver funds and/or securities. Our firm services only retail customers and we do not engage in private placements.

Our custodial firm is Hilltop Securities, Inc., and they can be reached at 717 N Harwood Suite 3400 Dallas, TX 75201, phone 800-973-7977, email maclendon.aiken@hilltopsecurities.com and website www.hilltopsecurities.com. Our contact person is Maclendon Aiken, Relationship Services. A copy of Hilltop Securities' Business Continuity Plan Summary is available on their website <https://www.hilltopsecurities.com/hilltop-securities-inc-disclosures/>.

IV Office Locations

Our only office is located at 1110 SE 28th Street, Suite 10, Bentonville, AR 72712. Our main phone number is (479) 273-5333. Our alternate phone numbers are (479) 273-6681 and (479) 273-9349. Our fax number is (479) 273-5343. Our employees may travel to this office by means of foot, car, and bicycle. We engage in order taking and entry at this location.

V Alternative Physical Location

In the event of an SBD, we will move our staff to the home of David Thrasher located at 102 Woodside Lane, Rogers, AR 72756.

VI Customers' Access to Funds and Securities

Our firm does not maintain custody of customers' funds or securities. These are maintained at our clearing firm, Hilltop Securities, Inc. In the event of an internal or external SBD, if telephone service is available, our registered persons will take customer orders or instructions and contact our clearing firm on their behalf. In the event that a client is not able to contact one of our registered persons, the client may contact Hilltop Securities, Inc. as noted in Section III above.

If SIPC determines that we are unable to meet our obligations to our customers, they 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

VII Data Back-Up and Recovery

Our firm maintains its hard-copy books and records at its address noted above. Mark Chambers is responsible for the maintenance of these books and records. Our firm is an Introducing Broker and Back-Up Records can be obtained from our clearing firm. In the event of an internal or external SBD that causes the loss of our paper records, we will recover those records through our clearing firm and through our Business Constituents as noted in Section XI.

VIII Financial and Operational Assessments

A Operational Risk

In the event of an SBD, we will immediately identify what means will permit us to communicate with our customers, employees, critical business constituents, clearing firm, and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications alternatives we may employ include our office phones, home phones, cell phones, and email. In addition, we will retrieve our key activity records as described above.

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 remain in capital compliance. 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 sources to fulfill our obligations to our customers and clients. If we cannot remedy a capital deficiency, we will file appropriate notices with our regulators and immediately take appropriate steps.

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.

We have primary responsibility for establishing and maintaining our business relationships with our customers and have sole responsibility for our mission critical functions of order taking, entry, and execution. Our clearing firm provides, through contract, the 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.

Our clearing firm contract provides that our clearing firm will maintain a business continuity plan and the capacity to execute that plan. Our clearing firm 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 that 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.

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 and resumption time of within one day.

A Our Firm's Mission Critical Systems

1 Order Taking

Our firm receives orders from customers via telephone, email, mail and person-to-person visits. During an SBD, either internal or external, we will continue to take orders through any of these methods that are available and reliable, and in addition, as communications permit, we will inform our customers when communications become available to tell them what alternatives they have to send their orders to us. If necessary, we will advise our customers to place orders directly with our clearing firm.

2 Order Entry

Currently our firm transmits orders to our clearing firm either by telephone or electronically. We then make a copy that is signed by both principals. We have contacted our clearing firm and have been advised that, in accordance with their BCP, we can expect full services within minutes following any SBD that might affect their operations.

In the event of an internal SBD, we will enter and send records to our clearing firm by the fastest alternative means available, which include telephone, mail, and/or electronics. In the event of an external SBD, we will maintain customer orders in electronic or paper format, and will deliver the order to the clearing firm by the fastest means available. In addition, during any type of SBD, we may need to refer our customers directly to our clearing firm for order entry.

B Mission Critical Systems Provided by Our Clearing Firm

Our firm relies, by contract, on our clearing firm to provide order execution, order comparison, order allocation, and the maintenance of customer accounts, delivery of funds and securities, and access to customer accounts.

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

A Customers

We now communicate with our customers using the telephone, e-mail, 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.

B Employees

We now communicate with our employees using the telephone, 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. The following is a list of contact information for every employee of our firm:

David Thrasher, Chairman & Executive Representative
Office phone: (479) 273-5333
Cell phone: (479) 640-3470
Home address: 102 Woodside Lane, Rogers, AR 72756

Mark Chambers, President, Executive Representative, Principal
Office phone: (479) 273-5333
Cell phone: (479) 619-6640
Home address: 1756 S Osage Rd Rogers, AR 72758

Trey Taylor, Registered Representative
Office: (479) 273-5333
Cell: (469) 993-6966
Home Address: 2900 S Fitzroy Ave Rogers, AR 72758

Thrasher & Chambers, Inc.
STOCKS BONDS MUTUAL FUNDS
Member: Financial Industry Regulatory Authority (FINRA)
Security Investors Protection Program (SIPC)

Kim Ruopp, Assistant to Mark Chambers & Trey Taylor/ Office Manager
Office phone: (479) 273-5333
Cell phone (479) 366-1848
Home address: 101 Lion Drive N Gravette, AR 72736

Mary Presley, Assistant to Mark Chambers & Trey Taylor
Office: (479) 273-5333
Cell: (479) 721-1114
Home Address: 501 SW Pearl Drive, Apt 1 Bentonville, AR 72712

C Regulators

We are currently members of or report to the following regulatory organizations: FINRA, SIPC, MSRB, & SEC. We communicate with these regulators using telephone, fax, email, U. S. 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 parties. See Section XII for regulator contact information.

XI Critical Business Constituents

A Business Constituents

We have contacted our critical business constituents and determined the extent to which we can continue our business relationship with them during an internal or external SBD. We will quickly establish alternative arrangements if a business constituent can no longer provide the needed services to our firm. Our business constituents are as follows:

American Funds Service Company (mutual funds)
P.O. Box 2560
Norfolk, VA 23501
800 421 0180

ASA Group (life insurance)
The ASA Building
11807 Hinson Road
Little Rock, AR 72212
800 833 0558

Brighthouse
PO BOX 305075
Nashville, TN 37230
800 882 1292

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Security Investors Protection Program (SIPC)

Commonwealth Service Center (Allmerica, Scudder Gateway)
P.O. Box 758550
Topeka, KS 66675
800 782 8380 (for Scudder or Allmerica products)

Genworth (used to be First Colony Life Insurance)
3100 Albert Lankford Drive
P.O. Box 40016
Lynchburg, VA 24506
888 325 5433

Franklin Templeton Funds (mutual funds)
Attn: Partner Services
P.O. Box 33093
St Petersburg, FL 33733-9844
800 450 9060

Franklin Templeton (mutual funds)
Attn: FAST
P. O. Box 997154
Sacramento, CA 95899-7154
800 450 9060

Franklin Templeton
529 College Savings Plan
P.O. Box 33090
St Petersburg, FL 33733-9844
Hartford – IPS (annuities) Now Talcott
P.O. Box 14293
Lexington, KY 40512
800 862-7155

Jackson National
1 Corporate Way
Lansing, MI 48951
800 873 5654

Jackson National
PO BOX 30900
Lansing, MI 48909

John Hancock Life Insurance Co (annuities)
Manulife Financial – Variable Annuities
P.O. Box 55230
Boston, MA 02116-3739
800 333 0963

Hilltop Securities

Thrasher & Chambers, Inc.
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Member: Financial Industry Regulatory Authority (FINRA)
Security Investors Protection Program (SIPC)

717 N Harwood Suite 3400
Dallas, TX 75201
800 973 7977

Nationwide/Provident Mutual (life insurance)
P.O. Box 15750
Wilmington, DE 19850-5750
800 688 5177

App & payments, additional payments
Pacific Life Insurance Co
P.O. Box 2290
Omaha, NE 68103

Regular correspondence & mail:
Pacific Life Insurance Company
P.O. Box 2378
Omaha, NE 68102
800 722 2333

Principal Financial Group (retirement plans)
P.O. Box 2004
Mason City, IA 50402-2004
800 448 0177

Protective Life Insurance Co (merged with Chase Insurance)
Annuity Services
2500 Westfield Drive
Elgin IL 60124-7836
800 986 3343

US Allianz Service Center (annuities)
300 Berwyn Park
P.O. Box 59060
Minneapolis, MN 55459
800 950 5872

Zurich Life (servicing existing annuity contracts)
Attn: Destinations Team
P.O. Box 4250
Hartford, CT 06147-4250
800 449 0523

Zurich Life Insurance Company (servicing existing annuity contracts)
1600 McConnor Parkway
Schaumburg, IL 60196-4000
800 621 5001

B Banks

We have contacted our bank to determine if they can continue to provide services in light of an SBD. Our bank is as follows: First Security Bank, 3901 West Walnut, Rogers, AR 72756, phone (479) 246-7000, contact Mr. Stewart Baguley, President.

XII Regulatory Reporting

Our firm is subject to regulation by: FINRA, SEC, SIPC, & MSRB. We now 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, 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. Regulatory contacts are as follows:

FINRA Region 5
1100 Poydras Street
Energy Centre, Suite 850
New Orleans, LA 70163
(504) 522-6527

FINRA
1735 K Street, NW
Washington, DC 20006-1500
(800) 321-6273

SEC
450 5th Street NW
Washington, DC 20549
(202) 942-7040

SIPC
805 15th Street NW, Suite 800
Washington, DC 20005-2215

MSRB
P. O. Box 79864
Baltimore, MD 21279-0864

XIII Disclosure of Business Continuity Plan

We provide in writing a BCP disclosure statement to customers at account opening. We also mail this disclosure statement to existing customers upon request.

XIV Updates and Annual Review

Thrasher & Chambers, Inc.
STOCKS BONDS MUTUAL FUNDS
Member: Financial Industry Regulatory Authority (FINRA)
Security Investors Protection Program (SIPC)

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 during the month of September during our annual meeting to modify it for any changes in our operations, structure, business, or location or those of our clearing firm.

XV Senior Manager Approval

I have approved this Business Continuity Plan (BCP) as reasonably designed to enable our firm to meet its obligations to customers in the event of an SBD.

Signed: _____

Name & Title: _____

Date: _____