



## **Business Continuity Plan**

**IUR Securities LLC  
2020**

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## I. Business Description and Location

### **Business Description**

IUR Securities LLC ("IUR") is a limited liability company duly organized under the laws of the state of Delaware. IUR is affiliated with IUR Capital LLC, a registered Investment Adviser with the Securities and Exchange Commission ("SEC") and IUR Capital Ltd, an Investment Advisor authorized and regulated by the UK Financial Conduct Authority and a Registered Portfolio Manager with the Ontario Securities Commission.

The Firm is applying for FINRA membership to be able to conduct activities as Introducing Broker-Dealer that clears all of its transactions in securities through Interactive Brokers ("IB"). IUR will primarily act as an agency broker in U.S. equity securities and foreign equity securities. IUR will also act as a put and call broker or dealer or option writer.

Gareth Ryan ("Ryan") will serve as the President, Chief Executive Officer ("CEO"), Chief Compliance Officer ("CCO"), Anti-Money Laundering Compliance Officer ("AMLCO"), Executive Representative and Supervisory Principal of IUR. Ryan will retain ultimate responsibility for complying with the Firm's designated supervisory policies and procedures as set forth in more detail in the Firm's WSPs. Daniel Roberts ("Roberts") will serve as the Registered Options Principal ("ROP"), and Second Principal. Ivana Shumberg ("Shumberg") will serve as the Financial and Operations Principal ("FINOP"), Principal Financial Officer, and Principal Operations Officer. All associated persons who are involved in the Firm's securities business will have all applicable licenses required to fulfill their duties as representatives of IUR.

### **Office Address**

IUR's main office and office of supervisory jurisdiction ("OSJ") is located at Third Floor Lansdowne House 57 Berkeley Square, London, W1J6 ER, United Kingdom.

### **Alternative Address**

IUR's alternative address in the case of an emergency is 312a Broad Ave, Stanton, IA, 51573.

## II. Emergency Contact Persons

IUR's emergency contact persons are Gareth Ryan and Daniel Roberts. See contact details below:

- Gareth Ryan  
Phone: +44 203 687 0583 (office)  
+ 44 7494 128 413 (mobile)  
Email: gryan@iursecurities.com
- Daniel Roberts  
Phone: +1 402 990 2768 (mobile)  
Email: droberts@iursecurities.com
- Ivana Shumberg  
Phone: +1 713 582 4897  
Email: ishumberg@cpa.com

These names will be updated on FINRA's Contact System no later than 30 days following any change, and the Executive Representative will review them within 17 business days after the end of each calendar year.

### III. Firm Policy

The 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 its customers to transact business.

#### **Significant Business Disruptions (SBDs)**

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

#### **Approval and Execution Authority**

The Firm's CCO is responsible for approving the Business Continuity Plan ("BCP") plan and for conducting the required annual review. The CCO also has the authority to execute this BCP.

#### **Plan Location and Access**

The Firm maintains copies of its BCP plan and the annual reviews, and the changes that have been made to it for inspection. The Firm will give the FINRA District Office a copy of the plan upon request. An electronic copy of the plan is located on the file server in the BCP file.

#### IV. Direct Data Back-Up

The Firm will maintain its records (hardcopy and electronic) at its main office. Ryan is responsible for the maintenance of the books and records and compliance records. Client records will be maintained by the Firm's London OSJ.

The Firm will maintain the following document types and forms: exception reports, purchase and sales blotters, client account records, written and electronic correspondence, and related documents required by Rule 17a-3 and Rule 17a-4 of the Exchange Act. Hard copy documents received will be filed in a locked, secure location, after they have been scanned and filed electronically to a password protected on-site server in a non-editable, non-rewritable format. Any hard copy documents will be scanned daily and stored on this server

In the event of an internal or external SBD that causes the loss of paper records, the Firm will recover them from the electronic backups either from its existing file servers if they are accessible or from back-ups. If the primary site is inoperable, the Firm will continue operations from the alternate location shown on p. 3 of this BCP. For the loss of electronic records, the Firm will either physically recover the storage media or electronically recover data from the back-up site, or, if the primary site is inoperable, continue operations from an alternate location.

The Firm will use Microsoft Office 365 for electronic storage compliance services. Microsoft Office will have the ability to archive all messages sent to or originating from the Firm's domain name(s). The Firm's email messages will be automatically captured prior to delivery and will be saved in a Write-Once-Read-Many ("WORM") format.

The Firm will also use Microsoft Office to store certain records electronically, which will also be saved in a WORM compliant format. Customer account records, trade blotters and account statements will be stored on its clearing firm platform in a 17a-4 compliant manner.

The Firm's electronic systems and databases will be managed by the CCO in consultation with appropriate third-party vendors.

The Firm's accounts are carried by its clearing firm, IB, and if a disruption prevents the Firm's access to customer funds, the customer would be given direct contact to IB for any access or transaction that is needed. Checks and security delivery will always be handled by the clearing firm, so the Firm's disruption would not affect the customer's ability to access or deposit money or securities.

### **Operational Risk**

In the event of an SBD, the Firm will immediately identify what means will permit it to communicate with its clients, 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 Firm will employ will include telephone voice mail, text messages and secure e-mail. In addition, the Firm will retrieve its key activity records as described in the section above, Data Back-Up and Recovery.

### **Financial and Credit Risk**

In the event of an SBD, the Firm will determine the value and liquidity of the Firm's investments and other assets to evaluate our ability to continue to fund its operations and remain in capital compliance. The Firm will contact its critical banks to apprise them of the Firm's financial status. If the Firm determines that it may be unable to meet its obligations to those counter-parties or otherwise continue to fund its operations, the Firm will request additional financing from the Firm's bank or other credit sources to fulfill the Firm's obligations to the Firm's customers and vendors. If the Firm cannot remedy a capital deficiency, it will file appropriate notices with its regulators and immediately take appropriate steps, including directing its customers to another qualified broker-dealer to complete any remaining contractual services related to securities business.

### **Customer Access to Funds and Securities**

The Firm introduces accounts and does not maintain custody of customers' funds or securities. In the event of an internal or external SBD, if telephone service is available, the Firm's registered persons will take customer orders or instructions and contact any appropriate parties on their behalf. The Firm will make this information available to customers through its disclosure policy.

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

## VI. Mission Critical Systems

The Firm's "mission critical systems" are those that ensure prompt and accurate processing of customer orders and the maintenance of customer accounts. All physical documents are maintained electronically or in hard copy format.

The Firm has primary responsibility for establishing and maintaining its business relationships with customers and has sole responsibility for its mission critical function of acting as the introducing broker.

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 critical infrastructure and facilities after a wide-scale disruption; resumption refers to the capacity to accept and process new transactions after a wide-scale disruption. The Firm has the following SBD recovery time and resumption objectives: recovery time period of 12 hours and resumption time of the next business day.

### **The Firm's Mission Critical Systems**

#### **Order Taking**

The Firm intends on receiving orders from customers via online, email, phone or in-person. During an SBD, either internal or external, the Firm will continue to take orders through any of these methods that are available and reliable, and, as communications permit, it will inform customers when communications become available to tell them what alternatives they have to send their orders to us.

#### **Order-Entry**

The Firm's customers will have the ability to call IB directly with their orders directly in the event the Firm or any of its associated persons is unable to enter a customer order. In the event of an internal SBD, electronic copies of these documents will be easily accessible. In the event of an external SBD, the Firm directs all customers to the clearing firm in order to eliminate any disruptions in order entries.

The Firm will maintain a list of its customers that it is currently engaged with so that they can be contacted during an SBD, either internal or external. The Firm will continue to transact business through the normal methods that are available and reliable, and in addition, as communications permit, it will inform customers when communications become available to tell them what alternatives they have to communicate and to transact business.

**Business Constituents**

The Firm will contact its critical business constituents (businesses with which the Firm has an ongoing commercial relationship in support of its operating activities, such as vendors providing the Firm critical services), and determine the extent to which the Firm can continue its business relationship with them in light of the internal or external SBD. The Firm will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services when the Firm needs them because of a SBD to them or the Firm.

The Firm's major suppliers are:

**Interactive Brokers**

One Pickwick Plaza  
Greenwich, CT 06830  
Main 203 618 5800

**Sales Force**

Salesforce Tower  
415 Mission Street, 3rd Floor  
San Francisco, CA 94105  
Main: 415-901-7000

Level 1 Atrium A,  
Sandyford Business Park,  
Dublin 18, Ireland  
Phone: +353 1 440 3500

**Microsoft Office 365 (Emails)**

**17a-4, LLC (Third Party Downloader)**

Douglas Weeden  
[dweeden@17a-4.com](mailto:dweeden@17a-4.com)

**Banks**

In the case of an SBD, the Firm will contact its bank to determine if they can continue to communicate with the Firm and provide the Firm with access to financial funds required in light of the internal or external SBD. The bank maintaining the Firm's operating account is Citi. If the Firm's bank is unable to provide access to funding and/or financing, the Firm will seek alternative means immediately.

**Counterparties**

In the case of an SBD, the Firm will contact its critical counterparties to determine if the Firm will be able to carry out its transactions with them in light of the internal or external SBD. Where the transactions cannot be completed, the Firm will work with its clearing firm or contact those counterparties directly to make alternative arrangements to complete those transactions as soon as possible.

## VIII. Alternate Communications

### **Customers**

The Firm will communicate with customers using the telephone, fax, email, and in person during visits at the Firm. In the event of an SBD, the Firm will assess which means of communication are still available to the Firm, and use the means closest in speed and form (written or oral) to the means that have been used in the past to communicate with the other party. For example, if the Firm has communicated with a party by e-mail but the Internet is unavailable, the Firm will call them on the telephone and follow up where a record is needed with paper copy in the U.S. mail.

### **Employees**

The Firm communicates with its employees using the telephone, email, and in person. In the event of an SBD, the Firm will assess which means of communication are still available, and use the means closest in speed and form (written or oral) to the means that have been used in the past to communicate with the other party. The Firm will also employ a call tree so that when the employment roster exceeds the initial two individuals, so that senior management can reach all employees quickly during an SBD. The call tree includes all staff home and office phone numbers. The Firm has identified persons, recorded internally, who live near each other and may reach each other in person. The person to invoke use of the call tree is Ryan.

### **Regulators and Regulatory Reporting**

The Firm will communicate with regulators using the telephone, fax, U.S. mail, and in person. In the event of an SBD, the Firm will assess which means of communication is still available, and use the means closest in speed and form. The Firm will be subject to regulation by FINRA, SEC and states.<sup>1</sup> The Firm will file reports with its regulators using paper copies in the U.S. mail, and electronically using fax, and the Internet. In the event of an SBD, the Firm will check with the SEC and FINRA to determine which means of filing are still available to it, and use the means closest in speed and form (written or oral) to its previous filing method. In the event that the Firm cannot contact its regulators, it will continue to file required reports using the communication means available to the Firm.

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<sup>1</sup> The Financial Industry Regulatory Authority (FINRA) is the largest non-governmental regulatory organization for securities brokers and dealers doing business in the United States. FINRA was created through the consolidation of NASD and the member regulation, enforcement and arbitration operations of the New York Stock Exchange. The consolidation, which was announced on November 28, 2006 and approved by the Securities and Exchange Commission on July 26, 2007, became effective July 30, 2007.

## List of Regulators and Reporting Agencies

FINRA New York District 10  
One World Financial Center  
200 Liberty Street  
New York, NY 10006 USA  
Phone: +1 (212)858-4000  
Fax: + 1 (212) 858-4189

SEC New York Regional Office  
200 Vesey Street, Suite 400  
New York, NY 10281 USA  
Phone: + 1 (212) 336-1100  
e-mail: [newyork@sec.gov](mailto:newyork@sec.gov)

SEC Headquarters  
100 F Street, NE  
Washington, DC 20549 USA  
Phone: +1 (202) 942-8088  
e-mail: [help@sec.gov](mailto:help@sec.gov)

New York Office of the Attorney General  
Investor Protection Bureau  
28 Liberty Street  
New York, NY 10005 USA  
Phone: (212) 416-8222  
Fax: (212) 416-8816

## **IX. BCP Disclosure Statement**

The following is the Firm's disclosure statement that will be provided to clients initially, annually and upon request:

IUR has developed a Business Continuity Plan ("BCP") detailing how our firm will respond to events that significantly disrupt our business.

### **Business Continuity Plan**

Since the timing and impact of disasters and disruptions are unpredictable, our firm has an obligation to prepare for unforeseen events as they occur. Our BCP is designed to permit our firm to resume operations in a reasonable amount of time at a secure remote location, given the scope and severity of a major event.

### **Varying Disruptions**

If a business disruption affects only our firm or a specific building within our firm, we will transfer our operations to a local worksite. In a disruption affecting our business district, city, or region, we will transfer our operations to an alternate worksite outside of the affected area. In either situation, we plan to continue conducting business and notify our clients how to contact us through a voice message reached via our main phone number.

In order to accommodate our recovery time objective, telephone service will continue and normal work processes will resume at the alternate worksite. Recovery times may vary depending on the nature and severity of the disruption; however, our recovery time objective for mission critical operations is 0-72 hours. If the significant business disruption is so severe that it prevents us from conducting business, we will update our voice message.

### **Contacting Us**

At a minimum, IUR business continuity plan is reviewed and updated on an annual basis. Additionally, our primary internal and external application providers periodically conduct testing of their own back-up capabilities to ensure that, in the event of an emergency or significant business disruption, they will be able to provide us with the critical information and applications we need to continue or promptly resume our business. Our business continuity plan is designed to allow us to continue to provide the quality service you have come to expect from IUR.

**X. BCP Testing and Senior Management Approval**

The Firm will update this plan whenever it has a material change to its operations, structure, business or location. In addition, the Firm will review this BCP annually, on or about November 1st of each year, to modify it for any changes in our operations, structure, business, or location.

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

Signed: GARETH RYAN  
Gareth Ryan

Title: CCO

Date: April 21, 2020