



IURSECURITIES

Business Continuity Plan

IUR Securities LLC
2023

TABLE OF CONTENTS

I.	Business Description and Location.....	3
II.	Emergency Contact Persons.....	4
III.	Firm Policy.....	5
i.	Significant Business Disruptions (SBDs).....	5
ii.	Approval and Execution Authority.....	5
iii.	Plan Location and Access.....	5
iv.	Epidemics and Pandemics.....	5
v.	Working From Home Policy.....	5
IV.	Direct Data Back-Up.....	6
V.	Financial and Operational Assessments.....	7
i.	Operational Risk.....	7
ii.	Financial and Credit Risk.....	7
iii.	Customer Access to Funds and Securities.....	7
VI.	Mission Critical Systems.....	8
VII.	The Firm’s Mission Critical Systems.....	8
i.	Order Taking.....	8
ii.	Order-Entry.....	8
VIII.	Critical Business Constituents, Banks and Counter-Parties.....	9
i.	Business Constituents.....	9
IX.	Banks.....	10
X.	Counterparties.....	10
XI.	Alternate Communications.....	11
i.	Customers.....	11
ii.	Employees.....	11
iii.	Regulators and Regulatory Reporting.....	11
XII.	List of Regulators and Reporting Agencies.....	12
XIII.	BCP Call Tree.....	13
XIV.	BCP Disclosure Statement.....	14
XV.	BCP Testing and Senior Management Approval.....	15

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 has been approved as of July 2019 to able to conduct activities as Introducing Broker-Dealer that clears all its transactions in securities through Interactive Brokers (“IB”). IUR primarily acts as an agency broker in U.S. equity securities, foreign equity securities, corporate debt securities, U.S. government securities, non-exchange member arranging for transactions in listed securities by exchange members, and as a principal broker trading securities for its own account. IUR also acts as a put and call broker or dealer or option writer.

Gareth Ryan (“Ryan”) serves 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”) serves as the Registered Options Principal (“ROP”), and Second Principal. Ivana Shumberg (“Shumberg”) serves 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 have all applicable licenses required to fulfill their duties as representatives of IUR.

Office Locations

IUR maintains two offices of supervisory jurisdiction (“OSJ”) located at 2nd Floor, 48 Dover Street, London, W1S 4FF, United Kingdom and 312A Broad Ave, Stanton, IA 51573

Alternative Address

While the Firm’s principal place of business is located at the London OSJ, it maintains an alternate address at the Iowa OSJ. Due to the geographical distance, employees of both OSJs may also work remotely at their primary residences as their respective alternate locations.

II. *Emergency Contact Persons*

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

- Gareth Ryan
Phone: +44 203 746 7320 (office)
+ 44 7415 778670 (mobile)
Email: gryan@iursecurities.com

- Daniel Roberts
Phone: +1 402 990 2768 (mobile)
Email: droberts@iursecurities.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 the Firm's books and records, and allowing its customers to transact business.

i. 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 several 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.

ii. 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.

iii. Plan Location and Access

The Firm maintains copies of its BCP plan and the annual reviews 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. 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 employees. In the event of an epidemic or pandemic, the Firm will notify its employees to stay at home while they are ill, and until the time they are fully recovered and able to, work remotely from home. The Firm also encourages the use of precautionary measures if someone should become ill while at work.

v. Working From Home Policy

The Firm has implemented policies and procedures to satisfy obligations to prevent insider trading. Under certain circumstances, the Firm may allow registered representatives to work remotely. As a result, additional policies and procedures tailored to such circumstances must be implemented to assist registered representatives and other personnel in avoiding the consequences associated with violations of the insider trading laws. Additional procedures have been addressed in the Firm's Written Supervisory Procedures.

IV. *Direct Data Back-Up*

The Firm's Principals are responsible for the maintenance of the books and records and compliance records. All books and records will be maintained in the Firm's cloud-based platform, SharePoint.

The Firm will maintain its books and records exclusively in electronic format via SharePoint, which has been determined to be compliant with Rule 17a-3 and 17a-4 of the Exchange Act.

. If the primary site is inoperable, the Firm will continue operations from the alternate location previously listed. 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-Multiple ("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.

i. 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 counterparties, and regulators. Although the effects of an SBD will determine the means of alternative communication, the communication 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, Direct Data Back-Up.

ii. 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 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 counterparties 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.

iii. 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 BCP Disclosure located on the Firm's website.

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.

VII. *The Firm's Mission Critical Systems*

i. 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.

ii. 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 maintains a list of its customers that it is currently engaged with via the clearing firm's online trading platform 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.

i. 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 considering 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 an SBD to them or the Firm.

The Firm's major suppliers are:

Interactive Brokers, *Clearing Firm*

One Pickwick Plaza
Greenwich, CT 06830
Main 203 618 5800
Critical Level: High

Sales Force, *Contact Management System*

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

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

Microsoft Office 365, *Books and Records Archiving*

Redmond, WA
Critical Level: High

[Patrina Corporation, *Email Archiving*](#)

45 Broadway Suite 1440
New York, NY. 10006
www.patrina.com
(p) 212-233-1155

[Patten Training & Review, *Outsourced Principals*](#)

[85 North Frontera Circle](#)
[The Woodlands, TX 77382](#)
[Critical Level: High](#)

IX. *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 considering 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.

X. *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.

i. Customers

The Firm will communicate with customers using the telephone, 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.

ii. Employees

The Firm communicates with its employees using telephone and email. 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 has a call tree, so that senior management can reach all employees quickly during an SBD. The call tree includes all staff home and office phone numbers. The person to invoke use of the call tree is Gareth Ryan.

iii. Regulators and Regulatory Reporting

The Firm will communicate with regulators using the telephone, 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 in which it maintains registrations.¹ The Firm will file reports with its regulators via U.S. mail electronically using email, and the FINRA Gateway, as applicable. 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.

¹ 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.

XII. *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

SEC Headquarters
100 F Street, NE
Washington, DC 20549 USA
Phone: +1 (202) 942-8088
e-mail: 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

XIII. *BCP Call Tree*

Associated Person	Office Phone	Alternative Phone	Alternative Email
Gareth Ryan	+44 203 746 7315	+44 7415 778670 +44 203 746 7320	gryan@iurcapital.com
Dan Roberts	(402) 990 2768	203-687-0583	droberts@pattentraining.com
Ivana Shumberg	713-582-4897	281-419-6030	ishumberg@pattentraining.com

XIV. *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.

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.

If you have any questions about our business continuity plan, you may contact us at +44 203 746 7320.

If you would like a full version of the Firm's Business Continuity Plan, please contact Gareth Ryan at gryan@iursecurities.com.

Last Updated: November 2023

XV. *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

Title: Chief Compliance Officer

Date: November 17, 2023