Phoenix Financial Services — Business Continuity Plan Statement

Document	Business Continuity Plan Statement
Entity	Phoenix Financial Services (PHX Financial, Inc.)
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Contents

1. Purpose

1.1

Phoenix Financial Services ("the Firm") is a fully disclosed broker-dealer and member FINRA/SIPC. **FINRA Rule 4370 requires each member firm to create and maintain a business continuity plan.** In accordance with that rule, the Firm has developed a plan to ensure the continuity of operations during business emergencies and disruptions.

1.2

This Statement summarises that plan. It is a summary — it does not describe every element of the plan, and it does not create rights or obligations beyond those in our Terms and Conditions and your account agreements.

2. Who This Statement Covers

2.1

This Statement is issued by **Phoenix Financial Services**, a broker-dealer registered with the U.S. Securities and Exchange Commission (“SEC”) and a member of the Financial Industry Regulatory Authority (“FINRA”) and the Securities Investor Protection Corporation (“SIPC”), CRD number 144403.

2.2

Phoenix Financial Services and PHX Financial, Inc. are the same company. The names “Phoenix Financial Services,” “PHX Financial, Inc.,” “Phoenix Financial,” and “PHX” all refer to that one registered broker-dealer.

2.3

Axos Clearing LLC is our clearing firm and is a separate, unaffiliated company — member FINRA and SIPC, CRD number 117176, of 15950 West Dodge Road, Suite 300, Omaha, NE 68118, **www.axosclearing.com**. It maintains its own business continuity arrangements, which are not described in this Statement.

3. How to Reach Us During a Disruption

3.1

If a significant business disruption prevents you from reaching the Firm or your Financial Consultant using the primary telephone number, fax number, or email address of the location where your account is serviced, use the secondary contact information below.

3.2

For clients whose accounts are serviced at the Firm’s corporate headquarters, 100 Wall Street, 10th Floor, New York, New York 10005:

Primary telephone	212-776-4187 (Daniel Otoya)
Secondary telephone	718-473-9214

3.3

If a disruption affects both the primary and secondary methods of contacting the Firm, contact our clearing firm, Axos Clearing LLC, at 800-811-3487. Axos holds your publicly traded securities and cash and can act on certain instructions concerning them, including requests for delivery of funds or securities held in your account.

3.4

We publish application status information at **www.phoenixinc.app**, and firm information at **www.phoenixinc.com**, where we are able to do so.

4. Your Assets Are Held at Our Clearing Firm

4.1

Your publicly traded securities and cash are held at Axos Clearing LLC, not at Phoenix. A disruption affecting the Firm's own systems or offices does not, by itself, affect the custody of those assets.

4.2

Axos maintains the books and records for your brokerage account and issues your account statements and trade confirmations. Those records govern.

4.3

Private market investments are not held at Axos and are subject to separate arrangements. See our **Private Markets Risk Disclosure** and our **Disclosures**.

5. What the Plan Addresses

5.1

The plan is designed to address key areas of concern including, but not limited to:

- books and records recovery;
- all mission critical systems;
- financial and operational assessments;
- alternate means of communication between the Firm and its clients;
- alternate means of communication between the Firm and its personnel;
- alternate physical locations of personnel;
- critical business constituent, bank, and counter-party impact;
- regulatory reporting;
- communications with regulators; and
- how the Firm will ensure that all clients have access to their funds and securities in the event the Firm determines it is unable to continue its business.

6. Types of Disruption

6.1

Events creating a sudden business disruption may vary in nature. They can affect **only the Firm**, **the building** where the Firm is located, **the entire business district**, or a **wider region**.

6.2

The Firm fully intends to continue to conduct its securities business during periods of disruption of any and every type.

6.3

The wider the disruption, the longer recovery may take. An event affecting an entire region, or affecting market infrastructure or our clearing firm, may delay resumption regardless of the Firm's own readiness.

7. What Happens During a Disruption

7.1

In the event of a sudden business disruption, **the Firm will immediately establish a location for utilising its backup and communications systems** in order to continue servicing clients' accounts.

8. Limits of Any Plan

8.1

Business continuity plans are subject to change and modification.

8.2

No contingency plan can eliminate all risk of service disruption, but the Firm's Business Continuity Plan is calculated to minimise such risks. We cannot guarantee that service will be uninterrupted or that recovery will occur within any particular period.

8.3

This Statement describes intentions and arrangements. It is not a guarantee of any outcome, and it does not vary the terms of your account agreements.

9. Requesting the Full Plan

9.1

Should you have any questions concerning our business continuity plan, or wish to see the full plan, you may submit a written request for additional information to:

Phoenix Financial Services Customer Service Department 100 Wall Street New York, NY 10005

10. Related Documents

Read this Statement together with:

- **Terms and Conditions**
- **Disclosures**
- **Private Markets Risk Disclosure**
- **Data Disclaimer**
- **Client Relationship Summary**

11. Contact Us

Phoenix Financial Services 100 Wall Street, 10th Floor New York, NY 10005

Telephone: (212) 776-4187 Email: contact@phoenixinc.com Website: www.phoenixinc.com Legal documents: www.phoenixinc.app/legal Application status: www.phoenixinc.app Account disclosures: https://phoenixinc.com/account-disclosures/