

## Britehorn Securities Business Continuity Plan 2026

FINRA Rule 4370 (Business Continuity Plans and Emergency Contact Information) requires a member firm to create, maintain, annually review and update upon any material change a written BCP identifying procedures relating to an emergency or significant business disruption. Britehorn Securities (hereinafter, “Britehorn”) has adopted this Disaster Recover/Business Continuity Plan (hereinafter, the “Plan”) to provide for the firm’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 practicable, designed to address those specific types of disasters that Britehorn might reasonably face given its business and location.

### Critical Elements

At a minimum, a BCP must address these elements, to the extent applicable and necessary:

- (1) Data back-up and recovery (hard copy and electronic);
- (2) All mission critical systems;
- (3) Financial and operational assessments;
- (4) Alternate communications between customers and the member;
- (5) Alternate communications between the member and its employees;
- (6) Alternate physical location of employees;
- (7) Critical business constituent, bank and counter-party impact;
- (8) Regulatory reporting;
- (9) Communications with regulators; and
- (10) How the firm will assure customers’ prompt access to their funds and securities in the event that the member determines that it is unable to continue its business.

To the extent that these categories are not applicable we, have excluded them from this BCP policy.

### THE BRITEHORN TEAM & EMERGENCY CONTACT PERSONS

Name	Title	Email	Cell Phone	Emergency Contact?
Andrew Hurry	Partner & FINOP	Andrew@britehorn.com	303.949.6053	Primary
Brett Story	Partner	Brett@britehorn.com	720.345.2393	Secondary
Bobbi Armstrong	Partner & CCO	Bobbi@britehorn.com	303.717.9869	
Natalia Story	Compliance Director	Natalia@britehorn.com	650.773.6748	

In the event of a serious business disruption, all the individuals above will be contacted by Andrew Hurry or the first person to be aware of the disruption to coordinate next steps. Should there be any loss of key personnel, any of the individuals above can step in to assist with mission-critical business items.

### FIRM POLICY

Our BCP’s primary objectives are to continue providing services to our registered representatives, protect the health and safety of our employees, fulfill our legal and regulatory obligations, and resume full business operations in as short a period of time as possible. Depending on the limitations, we will notify registered representatives if there needs to be a halt in securities-related activities until we can resume operations.

Each employee is responsible for understanding his/her role during a disaster. The following individuals have the primary responsibility for implementation and monitoring of the Plan:

- Natalia Story, a registered compliance principal and member of senior management, is responsible for approving the plan and for conducting the required annual review.
- Andrew Hurry is responsible for identifying and listing key or mission critical people in the event of an emergency or disaster, obtaining their names, addresses, e-mails, phone numbers, and other information and distributing this information to all personnel.
- Andrew Hurry is responsible for establishing back-up telephone/communication system for clients, personnel and others to contact the firm and for the firm to contact clients.
- Bobbi Armstrong is responsible for designating backup storage location(s), backup systems, backup procedures, persons with access, and necessity of data backups in separate locations.
- Bobbi Armstrong is responsible for determining and assessing backup systems and/or recovery plans for key vendors and mission critical service providers.

Consistent with FINRA Rule 4511 (General Requirements), our firm will maintain copies of its BCP, any modifications that have been made to the BCP and the annual reviews for inspection, and the BCP will be made available promptly upon request to FINRA staff. The BCP is also available to all employees on within Box or online at <https://www.britehorn.com/privacy-policy>.

## **BUSINESS DESCRIPTION**

Britehorn Securities (“Britehorn”) is a \$5,000 introducing broker-dealer that provides regulatory oversight, supervisory services, and compliance infrastructure to independent registered representatives engaged in institutional mergers and acquisitions advisory, capital-raising, and strategic advisory activities. Britehorn’s services are strictly limited to regulatory and supervisory functions, including supervision of securities-related activities in accordance with applicable FINRA rules and SEC regulations. Britehorn does not open or maintain customer accounts and does not hold customer funds or securities.

Britehorn registered representatives engage exclusively in the marketing of M&A transactions and private placement securities to institutional investors.

Britehorn does not direct, manage, or otherwise control the business activities of its registered representatives, except as required to fulfill its supervisory obligations with respect to securities-related activities under applicable federal and state securities laws and regulations. Registered representatives are not employees of Britehorn. Although compensation is paid through the firm in accordance with FINRA Rule 2040 and registered representatives receive IRS

Forms 1099, such individuals are not independent contractors of Britehorn and do not perform services for Britehorn.

## **OFFICE LOCATIONS**

Britehorn's main and only physical office is at 1401 Lawrence Street, Suite 1600, Denver, CO 80202. Andrew Hurry, Brett Story, and Natalia Story are all based out of this office. In addition, Bobbi Armstrong — who is responsible for the supervision of registered representatives — is based at an RSL in Florida.

If Britehorn's principal office is damaged or otherwise inaccessible, Britehorn has designated Andrew Hurry's residence as a temporary alternate location from which to restore normal business operations. If the expected duration of the disruption or inaccessibility of Britehorn's principal office is longer than a month, Andrew Hurry will determine a more permanent alternative location or new principal office.

However, with most activities now able to be conducted remotely, books and records being stored in the cloud, and having a distributed team — a physical disruption at any physical office should not disrupt mission critical systems.

## **CUSTOMERS' ACCESS TO FUNDS & SECURITIES**

Our firm does not maintain custody of customers' funds or securities, nor does it maintain an ongoing relationship with any clients or investors/buyers once a transaction has been completed.

## **DATA BACK-UP & RECOVERY**

Our firm maintains its primary or original books and records in electronic form in the cloud with Box. Bobbi Armstrong is responsible for the maintenance of Box books and records and the setup of associated roles and permissions. Our enterprise version of Box satisfies the resiliency expectations of FINRA regulations without offline backups — including geo-redundant storage, continuous provider-level replication, versioning and retention locks, and contractual uptime and recovery SLAs. In addition, Box files are backed up offline on a regular basis by Bobbi Armstrong.

Our emails are all backed up by Global Relay, which is widely accepted by FINRA as a compliant electronic records archive and also meets resiliency criteria such as geo-redundancy, provider-level replication, versioning and retention lock, and contractual uptime and recovery SLAs.

Britehorn subscribes to QuickBooks Online to provide and store accounting and financial records and provides geo-redundant cloud storage. General ledger and financial statements files are backed up offline every month and stored by Andrew Hurry.

In the event of a serious business disruption, we will assess the level and duration of disruption and if necessary, coordinate with the appropriate service providers to restore any lost information.

## FINANCIAL & OPERATIONAL ASSESSMENTS

In the event of a serious business disruption, we will identify whether there are any limitations on our ability to communicate with our employees, registered representatives, critical business constituents, critical banks, critical counterparties and regulator.

In the event of a serious business disruption impacting our financial position, we will evaluate our ability to continue to fund our operations and remain in capital compliance. We will contact critical banks to apprise them of our financial status. If we determine that we may be unable to meet our obligations to any counterparties or otherwise continue to fund our operations, we will request additional financing from our bank or other credit sources (potentially including owner equity investment or loans) 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.

## MISSION CRITICAL SYSTEMS

Our firm’s “mission critical systems” are those that ensure prompt and accurate oversight over our registered representatives, in accordance with our WSPs and all federal and state regulations. More specifically, these systems include:

System	Function	Provider	Contact Information
Outlook	Email communications	Microsoft & Rackspace	<a href="https://support.microsoft.com/en-us">support.microsoft.com/en-us</a>
Archiving	Records of business communications	Global Relay	<a href="mailto:support@globalrelay.net">support@globalrelay.net</a> 866.484.6630 / 604.484.6630
Cloud Storage	Books & records	Box	<a href="https://support.box.com/hc/en-us">support.box.com/hc/en-us</a>
Website	Public-facing company information & contact form	Wix & GoDaddy	<a href="https://support.wix.com/en">support.wix.com/en</a> <a href="https://www.godaddy.com/help/contact-us">www.godaddy.com/help/contact-us</a> or 480-366-3550
Financial Records	Books & records	QuickBooks Online	<a href="https://quickbooks.intuit.com/learn-support/en-us">quickbooks.intuit.com/learn-support/en-us</a>

In the instance of failure of any mission critical systems, we will assess the effect on our business systems, attempt to contact the appropriate support personnel as quickly as possible, use alternate methods of communications — and depending on the extent of limitations — notify registered representatives if there needs to be a halt in securities-related activities until we can resume operations.

## **ALTERNATE COMMUNICATIONS WITH CUSTOMERS, EMPLOYEES, AND REGULATIONS**

Britehorn does not have any customer. In the event of a serious business disruption, Britehorn will assess limitations on our ability to communicate with employees, registered representatives and regulators

Depending on the limitations, Britehorn will employ alternative modes of communication, including phone or alternate emails. When an alternate mode of communication is used, we will consider any increased risk of cybersecurity events stemming from the alternate mode, as well as any disruption to mandated archiving of business communications.

In addition, in the event that employees move to a back-up location or remote location for an extended period of time (*e.g.*, due to a pandemic) — we will circulate updated employee contact information within the firm to maintain service.

## **CRITICAL BUSINESS CONSTITUENTS, BANKS, AND COUNTERPARTIES**

In the event of a serious business disruption related to our critical business constituents (businesses with which we have an ongoing commercial relationship in support of our operating activities, such as vendors providing us critical services), we will contact our critical business constituents and determine the extent to which we can continue our business relationship with them in light of the disruption. Our critical business constituents are those listed under Mission Critical Systems. We will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services when we need them because the business constituent is experiencing its own business disruption.

In the event of a serious business disruption related to our financing, we will contact our banks and lenders to determine if they can continue to provide the financing. The bank maintaining our operating account is JPMorgan Chase. If our banks and other lenders are unable to provide the financing needed, we may seek an alternative arrangement with another bank or owner equity investment/loans.

In the event of a serious business disruption related to our financing, we will contact our critical counterparties, such as our registered representatives and their clients to determine if we will be able to carry out our transactions with them in light of the disruption. Where the transactions cannot be completed, we will work to make alternative arrangements to complete those transactions as soon as possible.

## **REGULATORY REPORTING**

Our firm is subject to regulation by the Financial Industry Regulatory Authority (FINRA) and the SEC. We fulfill our regulatory reporting obligations using paper copies in the U.S. mail, electronic means, and the FINRA Gateway.

In the event of a serious business disruption, we will identify whether there are any limitations in our ability to fulfill our regulatory reporting obligations. Depending on the limitations, we will employ alternate modes of communication, including phone and alternate emails to communicate with regulators in fulfilling our regulatory reporting obligations. In the event we are unable to fulfill a regulatory reporting obligation in a timely manner we will notify our FINRA staff contacts:

Role	Contact	Email	Phone
Risk Monitoring Director (RMD)	Henry Kugaczewski	Henry.kugaczewski@finra.org	212-858-4246
Risk Monitoring Analyst (RMA)	Michael Mailes	Michael.mailes@finra.org	816-802-4779
VP/SD, Risk Monitoring	Stephen Poirier	Stephen.poirier@finra.org	617-532-3459

## DISCLOSURE OF BUSINESS CONTINUITY PLAN TO CUSTOMERS

Britehorn does not have any customers. However, the Business Continuity Plan is available publicly online on our website at <https://www.britehorn.com/privacy-policy>.

## UPDATES AND ANNUAL REVIEW

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 in December/January to determine whether any modification are necessary due to changes in our operations, structure, business or location or those of our clearing firm.

## SENIOR MANAGER APPROVAL

I have approved this Business Continuity Plan as reasonably designed to enable our firm to meet its obligations to customers in the event of a serious business disruption.

Signed:   
box SIGN 1866895P-15LZ5L8X

Name: Bobbi Armstrong

Title: CEO & CCO

Date: Jan 23, 2026