

Business Continuity

PROCEDURES



Carr, Riggs & Ingram M&A Advisors

CRD Number: 154996

Main Office Address:

**7035 Halcyon Park Drive
Montgomery, AL 36117**

These procedures were approved by Kimberly Miller, CCO on January 1, 2025. These procedures are effective from the date approved until the date of their authorized revision, update or replacement (see below).

Date these procedures became effective: January 1, 2025

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This "Business Continuity Plan" has been created to meet the requirements described in FINRA Rules 4370. This Business Continuity Plan is reasonably designed to enable our firm to meet its obligations to customers in the event of a Significant Business Disruption.

Authorized Approval Signature: _____

Printed Name & Title: Kimberly Miller, CCO

Date: September 10, 2024

This Plan is effective from the date approved until the date of its authorized revision, update or replacement (see below).

Introduction

On April 7, 2004, the Securities and Exchange Commission approved NASD Rule Series 3500 dealing with emergency preparedness. On December 14, 2009, these Rules were converted to FINRA Rule 4370 as part of the FINRA Rule Consolidation process. Rule 4370 requires each member to create and maintain a Business Continuity Plan (BCP) that identifies procedures relating to an emergency or significant business interruption that are “reasonably designed to enable the member to meet its existing obligations to its customers.” In addition, the plan must address the firm’s existing relationships with other members and counterparties. This plan must be promptly made available to the FINRA staff upon request.

Rules 4370(b) requires that each member review its plan at least annually to determine if any changes are needed and update its plan more frequently in the event of any material change to its operations, structure, business or location.

The plan should reflect the firm’s business and operations. Therefore, the requirements of the plan, as identified in Rule 4370, are flexible and should be tailored to the firm’s size and needs.

However, at a minimum, the CRI M&A Advisors plan must address the following areas:

- Data back-up and recovery (hard copy and electronic);
- All mission critical systems;
- Financial and operational assessments;
- Alternate communications between customers and the member;
- Alternate communications between the member and its employees;
- Alternate physical location of employees;
- Critical business constituents, banks, and counter-party impact;
- Regulatory reporting;
- Communications with regulators; and
- How the member 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.

Each firm is required to only address the elements applicable to its business, but the plan must contain an explanation if any element above is not included.

Rule 4370 requires each member to designate two individuals as emergency contacts that the FINRA may contact in the event of a significant business disruption. Each contact must be a registered principal or member of senior management. However,

- If the member has only one principal but has other employees, the second contact should be another firm employee, or
- If the firm has only one principal and no other employees, the second contact may be someone who has knowledge of the firm’s business, such as an accountant, attorney, etc.

Rule 4370 also requires that each member enter this information into the FINRA’s Contact System (NCS) at https://regfiling.finra.org/contacts/ncs_contacts.aspx and that required changes are made promptly.

Emergency Contact Persons

Carr Riggs and Ingram Transaction Advisors, LLC has designated the following individuals to act as contact persons for the firm as required under Rule 4370:

Primary Contact:

Joel Sikes, Managing Partner
1117 Boll Weevil Circle
Enterprise, AL 36330
Direct: 334-467-1092
Tel: 334-365-1234
Fax: 334-358-0271
E-mail Address: joel@criadv.com

Secondary Contact:

Kimberly Miller, CCO
12400 Coit Road, Suite 700
Dallas, TX 75251
Tel: 972-284-5478
E-mail Address: kim@criadv.com

These contacts will be reported through FINRA's Contact System. This system may be accessed directly at https://regfiling.finra.org/contacts/ncs_contacts.aspx or through the Firm Gateway at www.finra.org/firmgateway and must be updated in the event of a material change. In addition, CRI M&A Advisors CCO must review and update this information, if necessary, within 17 business days of the end of the calendar year. The CCO or his designee will also ensure that contact information is updated promptly if changes occur at any time during the year.

Executive Representative and Managing Partner: CRI M&A Advisors Executive Representative Joel Sikes

Disaster Recovery Coordinator/Team: The Company has designated the Managing Partner as the "Disaster Recovery Coordinator." In his absence, Kimberly Miller, the CCO will assume his responsibilities.

The "Disaster Recovery Coordinator" has the responsibility to make an immediate preliminary assessment of the nature and extent of the disruption by assessing the following: electricity supply; condition of computer network/phones; damage to the building; HVAC in extreme weather; and other hazards.

If the Coordinator determines that personnel should evacuate the affected location(s), he/ she must make an announcement to all personnel as to appropriate procedures. The announcement may be given via personal contact, e-mail, intercom or other methods as appropriate given the systems available and size of staff and building. This announcement should be short and concise, should calmly identify the situation and should provide instructions to employees on how to

respond. This announcement should be repeated as often as necessary to avoid confusion and to ensure all employees are aware of the situation. After ensuring the physical safety of Company personnel, the coordinator must then implement this BCP.

If the situation does not merit evacuation, steps should be taken to alert designated persons of necessary actions to facilitate ongoing operations in the face of limited disruption. In this case, the coordinator will determine which, if any, procedures in this BCP should be implemented.

In the event, the SBD has directly affected other areas of the building but has not directly impacted the Company's office, the coordinator will contact building security or emergency personnel for instructions on how the Company should respond and proceed accordingly.

Firm Policy

CRI M&A Advisors 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. In the event that it is determined the firm is unable to continue its business, the firm will assure customers prompt access to their funds and securities.

Significant Business Disruptions (SBDs)

CRI M&A Advisors plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only the Company's ability to communicate and do business, such as a fire or loss of electrical power in the office or building.

External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a natural disaster, or another event that causes a wide-scale, regional disruption in essential services. The Company's response to an external SBD will rely more heavily on other organizations and systems, especially on the capabilities of the state and federal emergency authorities, local officials and utility companies.

Approval and Execution Authority

The CCO is responsible for approving the plan and for conducting the required annual review. She also has the authority to execute this BCP.

Plan Location and Access

CRI M&A Advisors will maintain copies of its BCP plan, a record of the firm's annual reviews, and the changes that have been made to the BCP for inspection by regulators. A hard copy of the Company's Plan is located in its main business location and may be accessed by contacting Joel Sikes and/or Kimberly Miller. The BCP Plan is also linked to the firm's website.

An electronic copy of the Company's plan is located internally on the Company's server.

Business Description

CRI M&A Advisors offers investment banking services to small US or foreign companies, including mergers and acquisition related services, capital raising, strategic planning and valuation services. Potential investors in sell-side transactions where the Company is representing the seller may include US qualified institutions, accredited individuals and/or foreign institutions. The Company does not hold customer funds or securities.

Office Locations

The Company or its registered personnel currently operate from the following locations:

Type of Location, Registered or Unregistered	Address and Main Phone Number	Located in a Personal Residence? (Y or N)	Means of Transportation Employees Use to Reach Office	Mission Critical Systems Taking Place at Office
Home Office	1117 Boll Weevil Circle Enterprise, AL 36330 Tel: 334-365-1234	N	Car	M&A Advisory services and due diligence
Branch Office	7035 Halcyon Park Drive, Montgomery, AL 36117 Tel: 334-467-1092	N	Car	M&A Advisory services and due diligence
Branch Office	12400 Coit Road, Suite 700 Dallas, TX 75251 Tel: 972-284-5478	N	Car	M&A Advisory services and due diligence / Compliance

Alternative Physical Location(s) of Employees: In accordance with Rule 4370 each member designates a location at which business will be conducted in the event the primary office of the Company must be evacuated. In accordance with this requirement, Carr Riggs and Ingram Transaction Advisors, LLC will move critical members of its staff from affected offices to the Company's closest unaffected office locations and/or to their home if their home is accessible. If none of the Company's other office locations are accessible to receive staff, they will relocate to one the Carr Riggs and Ingram, LLC's (Affiliate) offices in Alabama and/or Texas.

Customers' Access to Funds and Securities

Carr Riggs and Ingram Transaction Advisors, LLC business is limited to providing business financial advisory services to small US or foreign companies, including mergers and acquisition related services, capital raising, strategic planning and valuation services. The Company does not maintain custody of customer account, funds or securities.

In the event of a SBD, our registered persons will advise customers on alternative methods of contacting the Company for questions on engagements. The Company will make this information available to customers as described in its disclosure policy and on the firm's website as appropriate.

If the Company is in violation of Securities Exchange Act Rule 15c3-1 or cannot meet its financial obligations, Carr Riggs and Ingram Transaction Advisors, LLC will notify applicable regulatory agencies and will provide applicable books and records to these regulators as needed.

Data Back-Up and Recovery

CRI M&A Advisors maintains its primary books and records electronically in Egnyte. Kimberly Miller, CCO is responsible for the maintenance of these books and records.

Back-up of Paper Records

CRI M&A Advisors maintains its books and records electronically through Egnyte. In the event of an internal or external SBD that causes the loss of the CRI M&A Advisors paper records, the Company has the ability to access the electronic records.

Financial and Operational Assessments

Operational Risk

In the event of an SBD, CRI M&A Advisors will immediately identify any methods available that will permit personnel to communicate with customers, other employees, critical business constituents, critical banks, critical counterparties, and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options the Company may employ will include telephone voice mail or e-mail.

Financial and Credit Risk

In the event of an SBD, CRI M&A Advisors FINOP, Joel Sikes, will evaluate the Company's ability to continue to fund its operations and remain in capital compliance. CRI M&A Advisors will contact applicable regulators to apprise them of the Company's financial status as required. If the Company determines that it may be unable to continue to fund its operations, Carr Riggs and Ingram Transaction Advisors, LLC will request additional financing from our bank or other credit sources to fulfill its obligations. If CRI M&A Advisors cannot remedy a capital deficiency, the FINOP will file appropriate notices with applicable regulators and immediately take appropriate steps, including a suspension of certain business activities.

In the event of a suspension or termination of the Company's business, the Company will attempt to notify customers regarding the situation and provide them with instructions for completing engagements or transactions in process or for conducting future business. Notification will be a form allowed based on the circumstances permitted by regulatory authorities and may include telephone calls, or letters.

Mission Critical Systems

Internal Mission Critical Systems

CRI M&A Advisors does not maintain trading or other critical systems to handle customer accounts since its business is limited to providing business financial advisory services to small US or foreign companies, including mergers and acquisition related services, capital raising, strategic planning and valuation services. The Company has primary responsibility for establishing and maintaining business relationships with customers. Its mission critical systems support its primary functions of communicating with customers, completion of engagements and maintenance of the Company's required books and records through Egnyte.

Alternate Communications

Customers

The Company currently communicates with our customers using the telephone, e-mail, fax, U.S. mail, and in person visits at the Company's main office or at the customer's location. In the event of an SBD, we 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 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.

Employees

The Company currently communicates with its 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 Company employs a limited staff and the Joel Sikes, Managing Partner, is responsible for contacting each person as to events and the manner in which they should proceed.

Regulators

The Company is currently a member of FINRA and is registered with the SEC. The Company is also registered to conduct business in Alabama.

CRI M&A Advisors communicates with applicable regulators using the telephone, e-mail, fax, 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 party.

Critical Business Constituents, Banks, and Counterparties

Business constituents

CRI M&A Advisors has contacted our critical business constituents (businesses with which the Company has an ongoing commercial relationship in support of its operating activities, such as vendors providing critical services), and determined the extent to which the Company can

continue its business relationship with these businesses in light of the internal or external SBD. The Company will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services when we need them because of a SBD to them or our firm. Our major suppliers are:

Business Constituent	Service Provided
Egnyte, Inc.	Firm Books and Records
Global Relay	Electronic Communications
ACA Group	FINOP Services
CRI Capital, LLC	Systems

Banks

CRI M&A Advisors has contacted its banks and lenders to determine if they can continue to provide the financing that the Company may need in light of the internal or external SBD. The Company's accounts are currently with the following institutions:

Types of account	Name of Financial Institution	Address of Financial Institution	Telephone Number
Checking	Synovus	P.O. Box 2646-R Columbus, GA 31902	888-796-6887

If our banks and other lenders are unable to provide the financing, we will seek alternative financing immediately from our members.

Counterparties

CRI M&A Advisors will contact customers, if needed, to determine if we will be able to carry out our engagements or transactions with them in light of the internal or external SBD. Where the engagements or transactions cannot be completed as contracted, we will work with those counterparties directly to make alternative arrangements to complete those engagements or transactions as soon as possible.

Regulatory Reporting

CRI M&A Advisors is subject to regulation by the FINRA and SEC, as well as various state and other securities regulators (see list of states in Part 10 – Regulators). The Company currently files reports with our regulators electronically using e-mail, and the Internet. If we cannot contact our regulators, we will continue to file required reports using the communication means available to us.

The Company's current regulators can be reached as follows:

FINRA Risk Monitoring Analyst:

Younjae Choi

Email: Karine.Choi@finra.org

FINRA Risk Monitoring Director:
Drew Barraford
Phone: 646-315-7267
Email: Drew.Barraford@finra.org

SEC Atlanta Region:
Address: 3475 Lenox Road, NE, Suite 1000, Atlanta, GA 30326
Phone: 404-842-7600

Alabama Securities Commission:
Address: 401 Adams Avenue, 2nd Floor, Montgomery, AL 36130
Phone: 334-242-2984

Disclosure of Business Continuity Plan

Where required, the firm will disclose a summary of our BCP to customers at the time a business relationship is established. The firm will notify customers in writing when material changes are made to the Plan that may affect their business relationship with the Company. The firm will also mail it to customers upon request.

The summary addresses the possibility of a future SBD and how we plan to respond to events of varying scope. In addressing the events of varying scope, the summary:

- Provides specific scenarios of varying severity (e.g., a firm-only business disruption, a disruption to a single building, a disruption to a business district, a city-wide business disruption, and a regional disruption);
- States whether we plan to continue business during that scenario and, if so, our planned recovery time; and
- Provides general information on our intended response.

Our summary also discloses the existence of back-up facilities and arrangements.

Updates and Annual Review

CRI M&A Advisors will review and modify its BCP, if necessary, at least annually, but no later than within 12 months of the date on which this Plan was put into effect or previously reviewed, to take into account any changes in the Company's operations, structure, business, or location.

Customer Disclosure Statement

CRI M&A Advisors

CRI M&A Advisors plans to quickly recover and resume business operations after a significant business disruption (SBD) and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our company's business continuity plan (BCP) is designed to permit us to resume operations as quickly as possible, given the scope and severity of the SBD.

The BCP addresses: data backup and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

Significant Business Disruptions: The Company's plan takes into account two kinds Significant Business Disruptions, internal and external. Internal SBDs affect only the Company's ability to communicate and do business, such as a fire or loss of electrical power in the office or building.

External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a natural disaster, or another event that causes a wide-scale, regional disruption in essential services.

Internal SBDs: In the event of a disruption in the Company's business operations due to an internal SBD, the Company will attempt to continue to conduct business as usual by utilizing alternative communication methods (if available), such as the Internet, cell phones, etc., or by moving its operations to an alternative location. If personnel or operations must be moved to an alternate location, the Company anticipates that it will resume regular operations within 2-4 hours.

External SBDs: In the event of a disruption in the Company's business operations due to an external SBD, the Company will attempt to continue to conduct business as usual by moving its operations to an alternative location outside the effected area, if possible, or by providing customers with alternative communication arrangements, as indicated below, to conduct business. The Company will attempt to resume business within 24 hours and to keep its customers informed regarding relevant events to the best of its ability based on the circumstances.

In all cases, the Company will resume normal business operations as soon as it is able to do so, based on the type and the extent of the disrupting event. If the significant business disruption is so severe that it prevents us from remaining in business, we will notify customers accordingly.

Communications: In the event you are unable to reach the Company at our main number, please proceed as follows:

Contact Mr. Sikes, the Company's Managing Partner, at the following alternate telephone number: 334-467-1092

Contact Kimberly Miller, the firm's CCO, at the following telephone number: 972-284-5478.

Contact the FINRA's District office at the following telephone number for more information on the company's status and additional instructions: 972-716-7657.

Contact information: Any questions regarding the Company's Business Continuity Plans should be addressed to: Joel Sikes, CRI M&A Advisors, 1117 Boll Weevil Circle, Enterprise, AL 36330; 334-365-1234.