

Abraham & Co.

Summary of Business Continuity Plan

March 2018

Abraham & Co. has developed a detailed “Business Continuity Plan” which describes how we will respond to events that significantly disrupt our business. Since the timing and severity of disasters and disruptions is unpredictable, we expect to respond in a situationally-applicable manner to the best of our ability. The following is a summary of our plan:

If, after a significant business disruption, you cannot contact us at our main email: abeco@abrahamco.com or our main office number: (253) 851-7486, you should attempt to email us at: abeco@comcast.net In the event our email or phone systems are down and you can not reach us directly you should contact our clearing firm, Hilltop Securities, Inc., at: (214) 859-9100 or the Business Continuity page of the Hilltop Securities website: <http://swst.com/Pages/swstcorporategovernance.aspx> and follow instructions on how Hilltop may execute orders on your behalf, distribute funds from your brokerage account, provide current account balances and information and or answer general questions about your brokerage account.

We plan to quickly recover and resume business operations after a significant business disruption 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. Our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data back up 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.

Our clearing firm, Hilltop Securities, Inc., also backs up our important records in a geographically separate area. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, we have been advised by our clearing firm that its objective is to restore its own operation

and be able to complete existing transactions and accept new transactions and payments within 24 hours your orders and requests for funds and securities could be delayed during this period.

Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business within 7 business days. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area, and recover and resume business within 10 business days. In either situation, we plan to continue in business, transfer operations to our clearing firm if necessary, and notify you through our web site www.abrahamco.com or our customer emergency numbers on how to contact us. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer's prompt access to their funds and securities.

For More Information If you have questions about our business continuity planning, you can contact us at (253) 851-7486 or email us at: abeco@abrahamco.com