
Business Continuity and Disaster Recovery Plan 2025-26

ICON Capital Group

FINRA Rule 4370 is FINRA's emergency preparedness rule. It requires firms to create and maintain business continuity plans (BCPs) appropriate to the scale and scope of their businesses, and to provide FINRA with emergency contact information.

Introduction

Planning for business continuity and recovery in the aftermath of a Significant Business Disruption (SBD) is important in order to ensure that the firm will be able to recover enough to continue business and meet existing obligations to its customers. This plan anticipates two kinds of SBDs: internal and external. Internal disruptions affect the firm's ability to communicate and do business, while external disruptions prevent securities markets or a number of firms from operating, such as in the case of a terrorist attack, an earthquake, a city flood or a wide-scale, regional disruption.

The Firm's policy is to respond to a Significant Business Disruption (SBD) by safeguarding employees' lives and the firm's property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of the firm's books and records and allowing our customers to transact business. In the event that we determine we are unable to continue our business, we will assure customers prompt access to their funds and securities. The Firm does not allow for acceptance of or possession of any funds of securities of its customers.

The Firm conducts a securities business that includes private placements of securities, merger and acquisition advisory services, limited partnerships, capital raising and the selling and marketing of hedge funds. The firm does not hold customer funds or securities.

The firm will operate from the main office (home office and supervisory branch office/OSJ) located at

5 Upper Newport Plaza Suite 200
Newport Beach, CA 92660
888-324-ICON
949-418-8669 Direct
949-693-0900 FAX
WWW.ICONCAPG.COM
jc@iconcapg.com

While branches are contemplated at some point, none will be established during the first year of operation, post-acquisition.

This location can be reached by foot, taxi and personal automobile.

This Business Continuity Plan is developed based on the size and needs of the firm, but will address, at a minimum, each of the following areas:

- Person Responsible for the Business Continuity Plan;
- Data back-up and recovery (hard copy and electronic);
- Mission critical systems;

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- 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-parties;
- 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.

A copy of this Business Continuity Plan will be maintained in a file in the home office (soft copy and electronic copy) and at the offsite location.

Person Responsible

John Calicchio, the President and a General Securities Principal of the firm, is responsible for establishing the plan, reviewing the plan on an annual basis, updating the plan annually (or as changes occur) and educating the firm's employees regarding the business continuity and disaster recovery procedures of the firm. Mr. Calicchio is also responsible for approving the plan in writing and maintaining the written approval in the home office and at an offsite location.

Emergency Contact Persons

The Firm's emergency contact persons are:

John Calicchio – [jcalicchio@iconcg.com]

David McClean – [dmcclean@iconcg.com or dmcclean@dmacgroup.net]

This information will be promptly updated in the event of a material change, including changes to the designation of the emergency contact persons, via FINRA's Contact System (FCS). The firm's Executive Representative or designee (FINOP review at final FOCUS filing of the year) will review and update, when necessary, the emergency contact information on an annual basis (by the 17th business day following the close of the calendar year), or as changes warrant.

Locations

Emergency Location: Office of DMA Consulting Group, 150 Motor Parkway, Hauppauge, NY 17788.

Alternative Physical Location

In the event of an SBD, and if we do not have access to the Newport Beach office, we will instruct all broker/dealer personnel to work from home until further notice. Also, through the internet, the firm can set up the VOIP phones and access all broker/dealer documents.

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Technology

Computers and Computer System – The firm uses PCs running Windows 10 and Microsoft Office products. The accounting system is QuickBooks. The home office/OSJ has several desktop and laptop computers.

Password Protection – All computers are password protected with “complex” password strength, utilizing minimum password length and case sensitivity.

Backup System – The firm will have a backup system in place. The files will be backed up continuously and accessed online using the service **SharePoint – Microsoft**. This service is encrypted and SAS 70 compliant and can be accessed remotely.

Remote Access – Certain documents may be maintained on Dropbox from time to time, to facilitate banking deals or for audits. Through the internet, the firm can access Dropbox documents remotely. David McClean will be the administrator and can enable and limit access to broker/dealer documents and data for each user of the service at the firm.

Phone System – The firm uses an office services vendor solution for phones. The service has redundant backups which will switch over to backup numbers in the event of a power failure or service failure. As noted above, there are battery backups in the office for the phone in case the power goes out.

Cell Phone, Internet and Email Access – All registered individuals will have cell phone and internet access. Cell phones are personal phones and not provided by the firm.

Website – www.iconcapg.com. Customer accounts cannot be accessed via the site.

Computer Security, Data Back-up and Recovery (hard copy and electronic)

The firm maintains its primary hard copy books and records and its electronic records at the home office. This company data includes customer records, client data, associated person files, corporate documents, research, due diligence and financial data. Hard copies are stored in locked metal file cabinets and the electronic versions are stored via Dropbox. As a rule, all paper files will be reduced to digital versions.

In order to have an effective business continuity plan, the firm will maintain, at its home office and at the offsite location, the following information:

- Copy of the Business Continuity Plan
- Copies of corporate documents (operating agreements, formation documents, tax forms, corporate resolutions, minutes, etc.)
- A supply of blank checks (stored at the home office and at the branch office location)
- Copies of marketing materials, if any

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- Employee list with home addresses, email addresses and phone numbers (include any home number, cell number, pager number, emergency contact number)
- Vendor list with contact names and phone numbers
- List of necessary personnel and contact information at the district and national level
- SEC contact number and addresses (regional and national)
- Insurance contact list
- Bank contact information

The firm has the following systems and backup plans in place to provide data back-up and recovery services:

Email Back-up, Maintenance, Storage and Retention

The firm has entered into a contract with Global Relay as a third party vendor for email back-up, maintenance, storage and retention. Required notification of this will made to FINRA. Global Relay contact information is as follows:

Global Relay

286 Madison Avenue, 7th Floor, New York, NY 10017
866-484-6630

www.globalrelay.com

Warren Hopwood, Global Relay contact

Also:



Call us

NORTH AMERICA:
+1.866.484.6630

UNITED KINGDOM:
+44.203.206.1850

INTERNATIONAL:
+1.604.484.6630



Email us

SALES & GENERAL INFO:
info@globalrelay.net

CUSTOMER SUCCESS:
customersuccess@globalrelay.net

EMPLOYMENT:
careers@globalrelay.net

PARTNERS:
partners@globalrelay.net

MEDIA:
pr@globalrelay.net

ACCOUNTING & BILLING:
accounting@globalrelay.net



Support

Our support desk is available 24/7/365 from anywhere in the world.

support@globalrelay.net

NORTH AMERICA (TOLL FREE):
+1 866 484 6630

INTERNATIONAL:
+1 604 484 6630

UNITED KINGDOM:
+44 203 206 1850

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Back-up of Firm Data and Documents

All firm data, documents, etc. are electronically stored by **Global Relay** and **SharePoint**. For additional information please contact David McClean at 516 680 6630.

Lastly we will make certain all data and systems will be made available in the event of a disaster, data loss, a minor system failure or an SEC audit.

In the event of an internal or external SBD that causes the loss of our paper records, we will physically recover those that are available from the above vendor servers. If our primary site is inoperable, we will continue operations from our alternate location. For the loss of electronic records, we will either physically recover the storage media or electronically recover data from our back-up platforms. Access to the vendor storage solutions can be had remotely.

Also, the firm utilizes QuickBooks as its accounting database. Accounting data is also backed up as noted above. In addition, the offsite/outsourced FINOP also provides additional financial documentation back-up for the firm. The FINOP maintains copies of monthly financials, bank statements, bank account reconciliations, net capital computations and FOCUS reports. The FINOP of the firm is David McClean.

On-site Storage of Hard Copy/Paper Documents

In addition, the firm utilizes on-site storage (lockable) for back-up hard copy document storage that is only accessible to the registered or non-registered fingerprinted persons associated with the firm.

Timeframe for Resumption of Business in the Event of an SBD

Resumption depends on the infrastructure and utilities compromised in an emergency event or significant business disruption. In consideration of these factors and of the systems that the firm has established, the firm could be up and running in several hours, with complete functionality restored in 24 to 48 hours.

Mission Critical Systems

Mission critical systems are those used by the firm to ensure prompt and accurate processing of securities transactions. The firm currently clears through Vision Brokerage Services:

Main Office Location	1010 WASHINGTON BLVD SUITE 300 STAMFORD, CT 06901 UNITED STATES	Established in	New York since 06/22/1999
Mailing Address	1010 WASHINGTON BLVD SUITE 300 STAMFORD, CT 06901 UNITED STATES	Type	Limited Liability Company
Phone	203-388-2700	Fiscal Year End	June

Subscription documents, due diligence, offering documents, engagement letters, etc. are maintained according to the securities business conducted by the firm. The firm does not conduct a traditional retail securities business.

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In the case of a SBD, deals will be executed in the same manner as described above, if possible. Should alternative arrangements for conducting business become necessary, the firm will make its investors and clients aware of those arrangements when communication becomes available.

The responsible person (David McClean) has the primary responsibility for establishing and maintaining business relationships with customers and has the responsibility for the mission critical systems of the firm.

Financial and Operational Assessments

The firm utilizes the QuickBooks accounting software package. Access to the firm's financial data is available through online access and through the frequent back-ups conducted and stored by the system and by the FINOP.

Operational Risk

In the event of an SBD, the firm will immediately identify through what means the firm can communicate with investors, clients, employees, critical business constituents, critical banks, critical counter-parties, and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options the firm will employ will include one or more of the following: the firm's web site, telephone voice mail, and email.

Financial Risk

Note: The firm does not hold customer accounts, nor does it accept or hold any customer funds or securities.

In the event of a significant business disruption, the firm will determine the value and liquidity of its investments and assets and decide whether or not it is able to remain in compliance with net capital requirements. If the firm determines that it may not be able to meet its obligations, additional financing will be obtained through principal contributions in order to fulfill obligations to the firm's customers. The direct and indirect owners of the firm have significant personal financial resources. If it is determined that the firm is unable to maintain capital sufficiency, the firm will file appropriate notices with regulators and immediately take the steps that are outlined in SEC Rule 17a-11. This would include giving notice of deficiency that same day to the principal office of the Commission in Washington, D.C. (the SEC), the regional or district office of the Commission, and FINRA. This notice shall be given by telegraph or fax.

Back-ups of the firm's monthly financial reports, net capital computation and FOCUS Reports are also maintained by the firm's Financial and Operations Principal, Carol Ann Kinzer.

Alternate Communications between Customers and the Member

This Plan is designed to provide a consistent communication framework to plan for and/or respond to any crisis situation that may disrupt the firm's operations. Its purpose is to support the response to any crisis that may occur by providing timely, accurate information to customers.

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In the event of a significant business disruption that disables telephone service or forces employees out of their primary location, VOIP phones will remotely forward the office phone to an alternate working number. By doing so clients/customers can reach the firm by dialing the existing office telephone numbers.

The firm will communicate with clients/customers via telephone, fax, US mail, in-person visits and email. The firm will maintain (electronic and hard copy) a list of clients/customers, client/customer contact phone numbers and address, and if available, email addresses. This list will be updated on a regular basis. Client/customer information can be accessed remotely; therefore, if telephone service is available, the firm can communicate verbally with customers in the event of a significant business disruption. In the event of a disruption, the firm will determine which means of communication are still available and use the means closest in speed and form (written or oral) to the means used in the past to communicate with customers. For example, if the firm has communicated with a party by e-mail but internet access is unavailable, the customer will be called on the telephone. If necessary, the firm may also use registered mail as a way to contact customers.

If the firm has customer email addresses, an email will be sent to each client that may have pending securities business with the firm. This will give customers the opportunity to contact the firm, even if phone service is interrupted.

Each Associated Person has a cell phone and internet/email capabilities away from the office. This will allow contact with Registered Representatives away from the office, if necessary.

Any disruption to the firm's service will be posted to the firm's website, once established. This will give detailed information regarding the emergency situation and how to contact someone associated with the firm. The website is also a good forum for communicating further emergency instructions to employees, clients and individual investors. The firm's Business Continuity Plan Disclosure Statement also includes the language that customers may access firm information during an emergency situation by accessing the firm's webpage.

Alternate Communications between the Member and its Employees

This Plan is designed to provide a consistent communication framework to plan for and/or respond to any crisis situation that may disrupt the firm's operations. Its purpose is to support the response to any crisis that may occur by providing timely, accurate information to its employees. Should it be necessary to contact employees, senior managers will use the fastest, most efficient means available at the time. Communication may consist of telephone, email, fax, website, or in person. In the event of an SBD, we will assess which means of communication are available for use and will employ the form of communication that will be the quickest, most effective way to reach that employee.

The firm will maintain a list of employee names, addresses and all contact phone numbers. This list will be maintained at the home office, branch office and stored electronically and remotely accessible through SharePoint. Once the broker/dealer is operational, a call tree will be developed to allow for speed of contact with the employees of the firm. Employees will be

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contacted by the fastest method of communication available in the event of an SBD. The firm's website will also be a good forum for communicating further emergency instructions to the firm's employees and associated persons.

To aid in the continuity and recovery process, the firm will maintain a list of important phone numbers and a secure list of computer log-ins and passwords.

Should there be a significant business disruption at the home office; employees will be instructed to work from home, and this should not lead to a major communications challenge.

Critical Business Constituents, Banks and Counter-Parties

Critical Business Constituents

Critical business constituents (business with which we have an ongoing commercial relationship in support of our operating activities, such as vendors providing us critical services, issuers or product sponsors) and determined the extent to which we can continue our business relationship with them in light of the internal or external SBD. We will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services when we need them due to a SBD (either theirs or ours).

Banks

The firm maintains its bank account with Chase

*JPMorgan Chase Bank, N.A.
P O Box 182051
Columbus, OH 43218 - 2051*

The firm's bank account activity records, including deposits, withdrawals, and statements can be accessed from any Chase location or through the bank's on-line banking services at www.chase.com

The firm utilizes the QuickBooks accounting software package. Financial data can be accessed from the back-ups stored by the firm and by the outsourced FINOP.

Counterparties

If necessary, the firm will contract with critical counter-parties to determine if transactions will be carried out in light of an internal or external SBD. Where the transactions cannot be completed, will work with or contact those counter-parties directly to make alternative arrangements to complete those transactions as soon as possible.

Regulatory Reporting

The firm is regulated by FINRA and the SEC, in addition to other state jurisdictions. Reports are currently filed electronically. In the event of a SBD, the firm will contact regulatory authorities and determine what methods of reporting are available. If the firm cannot contact authorities,

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regulatory reports, such as FOCUS reports, will be filed by the speediest method available that is closest in form to the previous filing method. If the internet is not available, the firm will file reports via overnight delivery service, US mail or fax.

Communications with Regulators

The firm will maintain a list of names and telephone numbers of the securities regulators as well as other contacts at FINRA / SEC, both on the district and national level. The list will include addresses, phone numbers and, if available, email addresses. This will allow the firm to communicate to FINRA, the SEC or any state regulator, any significant business disruption that may be experienced. Communication with regulators may be through telephone, fax, email, US mail and overnight delivery services. If necessary, the principals of the firm can access FINRA district personnel and SEC district personnel in person.

FINRA Office – Washington, DC

1735 K Street, NW
Washington, DC 20006

FINRA Office in Rockville, MD

9509 Key West Avenue
Rockville, MD 20850
301-590-6500
301-869-6699

SEC Regional Office

Los Angeles Regional Office

444 South Flower Street, Suite 900
Los Angeles, CA 90071
323-965-3998

SEC – Washington, DC

SEC Headquarters
100 F Street, NE
Washington, DC 20549
Office of Investor Education and Assistance
(202) 551-6551
e-mail: help@sec.gov

Prompt Access by Customers to their Funds and Securities should the firm not be able to Continue Business

The firm does not hold any customer funds or safekeep customer securities. In the event of a SBD, if customers are unable to get in touch with the firm directly, they may contact custodians, transfer agents, escrow agents and/or issuers directly to gain access to their funds. Subscription

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agreements and/or memorandums received by customers contain addresses and contact information for any custodians, transfer agents, escrow agents and issuers.

If SIPC determines that the firm is unable to meet its obligations to customers, or if its liabilities exceed assets, thus violating Securities Exchange Act Rule 15c3-1, SIPC may seek to appoint a trustee to disburse the firm's assets to customers. Should that event occur, the firm will provide its books and records identifying customer accounts subject to SIPC regulation.

Review, Maintenance and Updating of the Business Continuity Plan

Ensuring that the Business Continuity Plan reflects ongoing changes is crucial to the successful implementation of the plan. This task includes reviewing the Plan and revising it to reflect updates, testing the updated Plan (if necessary) and training employees and Associated Persons to the updates. Maintenance of this plan is the responsibility of David McClean. Changes will be made as they occur and the firm will review the full Business Continuity Plan on an annual basis.

Disclosure of Business Continuity Plan

The firm provides a written BCP disclosure statement to any individual investors the time the investment is made and thereafter, upon request. The firm's disclosure statement is attached.

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 Significant Business Disruption.



Signature: _____

Printed Name: David E. McClean

Title: Principal

Date as of : January 2, 2025