

BUSINESS CONTINUITY PLAN (“BCP”)

EMERGENCY CONTACT PERSONS

Our firm’s two emergency contact persons are as follows:

Primary Contact

Kathy Hofer

Chief Operating Officer

Office # (248)824-6708

Cell # (248)701.4704

Email: khofer@concordeis.com

Secondary Contact

Jason Kavanaugh

Chief Executive Officer

Office # (248)824-6710

Cell # (734) 883-5440

Email: jkavanaugh@concordeis.com

These names, as well as the remainder of the policy, will be updated in the event of a material change.

FIRM POLICY

Our firm’s 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 our customers to transact business. In the event that we determine we are unable to continue our business, we will promptly notify our customers.

SIGNIFICANT BUSINESS DISRUPTIONS (SBDS)

Our plan anticipates two kinds of SBDS, internal and external. Internal SBDS affect only our firm’s ability to communicate and do business, such as a fire in our building. External SBDS prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a city flood, or a wide-scale, regional disruption.

APPROVAL AND EXECUTION AUTHORITY

Kathy Hofer and Jason Kavanaugh are responsible for approving the plan and for conducting the required annual review. Jason Kavanaugh and Kathy Hofer have the authority to execute this BCP.

PLAN LOCATION AND ACCESS

Our firm will maintain copies of its BCP plan and the annual reviews and the changes that have been made to it for inspection.

BUSINESS DESCRIPTION

Concorde Investment Services provides wealth management and financial advisory services to its clients in Variable Insurance products, Mutual Funds, and Private Placements. These services will be provided to sophisticated investors, both accredited and unaccredited households consisting of generally working or retired professionals, and institutional and commercial clients. The core specialty will be in using a blend of mutual funds, real estate and note programs, and variable annuities. The Firm does not intend to engage in proprietary trading, market making, underwriting, securities custodial services, audit, accounting, or tax services.

Concorde Investment Services intends to offer clients a diversified product mix consisting of Mutual Funds, variable annuities, traditional stocks and bonds and other alternative investment programs.

OFFICE LOCATIONS

Our firm is located at 19500 Victor Parkway, Suite 550, Livonia, Michigan 48152. Its main telephone number is (248.)824-6710. Our employees may travel to that office by means of foot, car, or bus. Where appropriate and approved, employees may work remotely. Our accounting department is located at 1120 East Long Lake Road, Troy, Michigan 48085 and can be reached at the telephone number listed above. The firm also has approximately 90 branches located all over the United States.

ALTERNATIVE PHYSICAL LOCATION(S) OF EMPLOYEES

In the event of an SBD, we will move our staff from affected offices to their designated remote locations. All employees are set up to work remotely from almost anywhere using the Concorde approved, web-based technology platform from any location where secure internet connectivity can be found. If needed, longer-term alternate locations will be found. Approximately half of the firm's staff has geographic diversity to headquarters, however, should there be an anticipated or actual extended utility disruption, the firm will relocate key employees to physically diverse locations to ensure business operations can continue.

CUSTOMER'S ACCESS TO FUNDS AND SECURITIES

Our firm does not maintain custody of customers' funds or securities. Our firm is an introducing-broker firm, which provides broker dealer services in Variable Insurance products, Mutual Funds, and Private Placements, and to offer advisory services for sophisticated investors, institutional and commercial clients.

DATA BACK-UP AND RECOVERY (HARD COPY AND ELECTRONIC)

Our firm maintains its primary hard copy books and records at 19500 Victor Parkway, Suite 550, Livonia, Michigan 48152 and financial records at 1120 East Long Lake Road, Troy Michigan 48085. Electronic copies of books and records are in the custody of various vendors including Docupace, Forms Logic, Global Relay, and Microsoft Office365. Danielle Kammeyer and Kathy Hofer are responsible for the maintenance of these books and records.

Client information, email retention and related functions are cloud-based, and all pertinent information on the cloud-based servers will be backed up regularly. Concorde Investment Services will regularly review its systems to prevent data loss and/or system failure.

With regard to voice communications, the telephone system is a purely web-based intranet platform, accessible on demand assuming access to the internet. A failsafe line is in place through the system provider, Windstream. If our system reverts to this line it will do so automatically and our phones will function as normal. Provided our phone vendor has power and its server is functioning, our main line can be transferred over to another phone, by calling Cygnus Systems at 248-557-4600. All employees also can forward their individual lines to their cell phones remotely or from the office. When necessary, we will advise customers and representatives of key employee cell phone numbers to ensure business is not disrupted due to phone issues.

Should the principal office become inoperative for operations, based on its' small anticipated size, the office can be easily moved to existing vacant office space in the surrounding area or the personal residences of the principals. This is also made possible by our cloud-based retention systems that are accessible from anywhere.

FINANCIAL AND OPERATIONAL ASSESSMENTS

OPERATIONAL RISK

In the event of an SBD, we will immediately identify what means will permit us to communicate with our customers, 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 we will employ will include our website, telephone voicemail, secure e-mail, or cellular phones, etc. Remote employees will be utilized to assist in delivering messages needed to continue business with customers. In addition, we will retrieve our key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic).

FINANCIAL AND CREDIT RISK

In the event of an SBD, we will determine the value and liquidity of our investments and other assets to evaluate our ability to continue to fund our operations and remain in capital compliance. We will contact our critical banks, and investors to apprise them of our financial status. If we determine that we may be unable to meet our obligations to those counter-parties or otherwise continue to fund our operations, we will request additional financing from our bank or other credit sources 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 the maintenance of customer accounts, access to customer accounts, and the delivery of funds and securities. Although most of these functions are performed by our clearing firms and custodians, we have primary responsibility for establishing and maintaining our business relationships with our customers and have sole responsibility for our mission critical functions of servicing customer accounts, and access to customer information.

Recovery-time objectives provide concrete goals to plan for and test against. They are not, however, hard and fast deadlines that must be met in every emergency, and various external factors surrounding a disruption, such as a time of day, scope of disruption, and status of critical infrastructure – particularly telecommunications – can affect actual recovery times. Recovery refers to the restoration of all mission critical systems after a wide-scale disruption; resumption refers to the capacity to continue normal business activities after a wide-scale disruption.

OUR FIRM'S MISSION CRITICAL SYSTEMS

A. Order Taking

During an SBD, either internal or external, we will continue to inform our customers when communications become available about the alternatives they have to send their orders to us, including contacting our custodians directly to place trades. Customers will be informed of alternatives by telephone or e-mail or other means as deemed necessary.

B. Order Entry

During an SBD, either internal or external, when communications become available our alternatives for order entry will include contacting our custodians via telephone or email to enter trade order. Custodians will be informed of the need for alternatives by telephone or e-mail.

C. Order Execution

Based on the firm's type of business, we do not execute any type of orders for customers.

D. Other Services Currently Provided to Customers

The firm does not provide its customers with other services for this section.

Mission Critical Systems Provided by Our Clearing Firm

We have two clearing arrangements. Should they experience a business disruption, we will follow their business continuity plan.

ALTERNATE COMMUNICATIONS BETWEEN THE FIRM AND CUSTOMERS, EMPLOYEES, AND REGULATORS

CUSTOMERS

We now communicate with our customers using the telephone, e-mail, U.S. mail, and in person visits at our firm or at the other locations. 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. 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

We communicate with our 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 persons to invoke use of the business continuity plan is Jason Kavanaugh, Lori Kamen or Kathy Hofer.

REGULATORS

We are currently members of the following SROs: SEC, FINRA, and various multi-state jurisdictions. We communicate with our 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 COUNTER-PARTIES

BUSINESS CONSTITUENTS

We have contacted 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), and determined the extent to which we can continue our business relationship with them considering 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 because of a SBD to them or our firm.

BANKS

We have contacted our banks and lenders to determine if they can continue to provide the financing that we will need considering the internal or external SBD. The bank maintaining our operating account is: Huntington Bank. If our banks and other lenders are unable to provide the financing, we will seek alternative financing immediately from other lenders.

COUNTER-PARTIES

Based on the firm's type of business, we do not enter any type of arrangements with counter-parties.

REGULATORY REPORTING

Our firm is subject to regulation by the SEC, FINRA and various multi-state jurisdictions. We file reports with our regulators using paper copies in the U.S. mail, and electronically using fax, e-mail, and the internet. In the event of an SBD, we will check with the SEC, FINRA, and other regulators to determine which means of filing are still available to us and use the means closest in speed and form (written or oral) to our previous filing method. If we cannot contact our regulators, we will continue to file required reports using the communication means available to us.

DISCLOSURE OF BUSINESS CONTINUITY PLAN

We disclose in writing a summary of our BCP to customers at account opening. We also mail it to customers upon request. Our 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, our summary (1) provides specific scenarios of varying severity (e.g. a firm-only business disruption, and a regional disruption); (2) states whether we plan to continue business during that scenario and, if so, our planned recovery time; and (3) provides general information on our intended response.

UPDATES AND ANNUAL REVIEW

Our firm will update this plan whenever we have a material change to our operations, structure, business or location. In addition, our firm will review this BCP annually to modify it for any changes in our operations, structure, business, or locations.

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 an SBD.

Signed: _____

Title: Jason Kavanaugh, Designated Principal

Date: _____

Concorde Investment Services, LLC has developed a Business Continuity Plan defining how we will respond to events that significantly disrupt our business. Because the timing and impact of disasters and disruptions are unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with the following information.

Contacting Us – If after a significant business disruption, you are unable to contact us at (248)824-6710 or through our business email addresses, you should call Jason Kavanaugh’s cell phone (734)883-5440.

Our Business Continuity Plan – After a significant business disruption, we plan to quickly recover and resume business operations 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 business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the 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; and regulatory reporting if we are unable to continue our business.

Varying Disruptions – Significant business disruptions can vary in their scope; for example, affecting only our firm, the building housing our firm, the business district in which our firm is located, the city in which we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary. In a disruption to our firm alone or to the building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business within 24 to 48 hours. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area and will recover and resume business within 5-7 business days. In either situation, we plan to continue our business and notify you through telephone, facsimile, mail or e-mail, regarding how to contact us.

For more information – If you have questions about our Business Continuity Plan, please contact Kathy Hofer at (248)824-6710.

