

Structura Group, Ltd.
DISCLOSURES

Business Continuity Plan Disclosure

Structura Group Ltd. has developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

Our Business Continuity Plan – 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. 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 significant business disruption.

Our business continuity plan 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.

Varying Disruptions – 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 4 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 recover and resume business within one business day.]. In either situation, we plan to continue in business, transfer operations to our clearing Firm if necessary, and notify you through our website .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 248.792.2602

Customer Identification Program Notice

To help the government fight the funding of terrorism and money laundering activities, Federal law requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account or transacts business. This notice answers some questions about our firm's Customer Identification Program (CIP).

What types of information will you need to provide?

When you open an account, our firm is required to collect information such as the following: your name, address, date of birth, Identification number:

US Citizen: taxpayer identification number (social security number or employee identification number), or a corporation, partnership, trust or other legal entity may need to provide other information such as its principal place of business, local office, employer identification number, certified articles of incorporation, government issued business license, a partnership agreement or a trust agreement.

Privacy Policy

Structura Group, Ltd. Collects nonpublic personal information about you from the following sources:

- Information we receive from you during our due diligence process, and/or on applications or other forms;
- Information about your transactions with us or others; and
- Information we may receive from a consumer reporting agency.

We do not disclose any nonpublic personal information about you to anyone, except as permitted by law. We maintain our privacy policies and procedures as described in this notice beyond the closing of a transaction.

Our Firm restricts access to your corporate and personal information to those employees who need to know that information to provide service to you and we maintain physical, electronic and procedural safeguards to guard your nonpublic personal information. Please visit our website at www.structuragroup.com for a copy of our Model Privacy Notice Form.