



Business Continuity Plan (BCP)

June 18, 2024

Table of Contents

I.	EMERGENCY CONTACT PERSONS.....	3
II.	FIRM POLICY.....	3
A.	SIGNIFICANT BUSINESS DISRUPTIONS (SBDs).....	4
B.	APPROVAL AND EXECUTION AUTHORITY.....	4
C.	PLAN LOCATION AND ACCESS	4
III.	BUSINESS DESCRIPTION	4
IV.	OFFICE LOCATION	4
V.	ALTERNATIVE PHYSICAL LOCATION(S) OF EMPLOYEES	5
VI.	CUSTOMERS' ACCESS TO FUNDS AND SECURITIES	5
VII.	DATA BACK-UP AND RECOVERY	5
VIII.	FINANCIAL AND OPERATIONAL ASSESSMENTS.....	6
A.	OPERATIONAL RISK	6
B.	FINANCIAL AND CREDIT RISK.....	6
IX.	MISSION CRITICAL SYSTEMS.....	6
A.	OUR FIRM'S MISSION CRITICAL SYSTEMS	7
1.	Order Taking	7
2.	Order Entry	8
3.	Order Execution	8
B.	MISSION CRITICAL SYSTEMS PROVIDED BY OUR CLEARING FIRM	8
X.	ALTERNATE COMMUNICATIONS.....	8
A.	CLIENTS.....	8
B.	EMPLOYEES	9
C.	REGULATORS	9
XI.	CRITICAL BUSINESS CONSTITUENTS, BANKS, & COUNTER-PARTIES.....	9
A.	BUSINESS CONSTITUENTS	9
B.	BANKS	10
C.	COUNTERPARTIES	10
XII.	REGULATORY REPORTING.....	10
XIII.	DISCLOSURE OF BUSINESS CONTINUITY PLAN.....	10
XIV.	UPDATES AND ANNUAL REVIEW.....	111

XV. SENIOR MANAGER APPROVAL.....	11
----------------------------------	----

ATTACHMENT A	12
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FINRA’s Rule 4370 and the provisions of the NASD’s Notice to Members 04-37 require Latin Securities Inc. to design and publish a protocol to reasonably ensure the continuity of its business when confronting a Significant Business Disruption (“SBD”) event.

I. Emergency Contact Persons

Latin Securities Inc (“The Firm”) has designated the following emergency contact persons:

Juan Pinilla, Chief Executive Officer (“CEO”)

Cell Phone: (305) 815-7907

Email Address: jpinilla@latinsecurities.us

Alina Daglio, Chief Compliance Officer (“CCO”)

Cell Phone: (305) 780-9353

Email Address: adaglio@latinsecurities.us

Farid A. Velazquez, Financial & Operations Principal (“FINOP”)

Cell Phone: (786) 663-3786

Email Address: favelasquez@latinsecurities.us

Patricia Victorica, Chief Operations Officer (“COO”)

Cell Phone: (305) 586-1896

Email Address: pvictorica@latinsecurities.us

The CCO will notify FINRA of any change in this information through FCS (no later than 30 days following the change), and will review and, if necessary, update the information within 15 business days after the end of each calendar year.

Rule: FINRA Rule 4370(f); FINRA Rule 4517; NASD Rule 1160.

II. Firm Policy

Our Firm’s policy is to respond to an SBD prudently and diligently after taking all the necessary precautions to guarantee our employees’ personal safety and the Firm’s property. The Firm will promptly assess the scope of the disruption and take action to recover and resume operations as quickly as possible. The Firm will ensure that all books and records are properly guarded and, that if we are unable to recover promptly, our clients are assured access to their funds and securities through our clearing firm, Pershing, LLC.

A. Significant Business Disruptions (SBDs)

Our plan anticipates two types of SBDs, internal and external. Internal SBDs affect only our Firm's ability to communicate and do business, such as a blackout or a fire in our building. External SBDs prevent the operation of the securities markets or a number of firms and include, among others: terrorist attacks, hurricanes, social unrest, violence or a wide-scale regional electrical grid disruption. Our response to an external SBD depends on the ability of other organizations and systems to recover, particularly on the capability of our clearing firm to recover and return us to relative normality.

B. Approval and Execution Authority

The CEO and the CCO are responsible for approving the Plan and conducting the required annual review.

Rule: *FINRA Rule 4370(b) and (d)*

C. Plan Location and Access

Our Firm maintains electronic copies of its BCP, annual reviews, and any updates and supplements are maintained on our internal server and available for inspection.

Rule: *FINRA Rule 4370(a); FINRA Rule 4511.*

III. Business Description

Latin Securities Inc is a registered securities broker/dealer offering transactional and investment advisory business in equity securities; options; mutual funds; corporate debt securities; government securities; and structured products. The Firm trades fixed income securities, including US corporate debt, US government securities and foreign sovereign and corporate debt.

The Firm introduces brokerage investment accounts to Pershing LLC ("Pershing" or "clearing firm").

IV. Office Location

Our Office of Supervisory Jurisdiction ("OSJ") and sole branch office is located at:

100 SE 2nd Street, Suite 3975
Miami, FL 33131
Phone: (786) 733-9662

Our employees can access the building on foot, car, train, or bus.

V. Alternative Physical Location(s) of Employees

In the event of an SBD, we will move our staff from the affected office to either each employee's home address and/or a safe and secure location with access to internet and phone. The current address and phone number of the alternate office is:

701 Brickell Key Boulevard
Miami, FL 33131
(305) 780 9553

In this event, we will maintain a list of employees working locations and contact information.

Rule: *FINRA Rule 4370(c)(6).*

VI. Customers' Access to Funds and Securities

Latin Securities Inc does not maintain custody of clients' funds or securities; all client funds and securities are maintained by Pershing. In the event of an internal or external SBD, if telephone service is available, our registered representatives will take client orders or instructions and contact our clearing firm on their behalf. If Web access is available, we will post on our Firm's website that clients may access their funds and securities by contacting Pershing's customer service line at (201) 413-3635 or in writing to the address below:

Pershing LLC
P.O. Box 2065
Jersey City, New Jersey 07303-2065

The Firm makes this information available to clients through its Monthly Statements, Welcome Kit and Website (see Addendum 3 for updated Pershing contact list).

If SIPC determines we are unable to meet obligations to our clients or our liabilities exceed our assets in violation of Securities Exchange Act Rule 15c3-1, SIPC may seek to appoint a trustee to disburse our assets to customers. We will assist SIPC and the trustee by providing our books and records identifying customer accounts subject to SIPC regulation.

Rules: *FINRA Rule 4370(a); Securities Exchange Act Rule 15c3-1; see also 15 U.S.C. § 78eee.*

VII. Data Back-Up and Recovery (Hard Copy and Electronic)

Latin Securities Inc maintains an electronic and hard copy of its books and records at the OSJ branch office. Electronic records can be found in the Firm's shared Onedrive, and the hard copy within the compliance files. FINOP is responsible for the maintenance and safekeeping of these books and records.

In the event of an internal or external SBD that causes loss of our paper records, we will recover them from our back-up site. If our primary site is inoperable, we will resume operations from our alternate location. For the loss of electronic records, we can recover data electronically our Onedrive, or, if our primary site is inoperable, continue operations from our back-up site or an alternate location. In other words, if Latin Securities Inc hard-drives with data were to crash for whatever reason, the business would recover using the physical files on-site or the cloud backup with Microsoft OneDrive.

Rule: FINRA Rule 4370(c)(1).

VIII. Financial and Operational Assessments

A. Operational Risk

In the event of an SBD, we will immediately identify what means permit us to communicate with our clients, employees, critical business constituents, banks, counter-parties and regulators. Although the effects of an SBD determine what means of alternative communication we have, some options we will make use of include our website, email, telephone, and regular mail. In addition, we will retrieve our key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic).

Rules: FINRA Rules 4370(c)(3), (c)(4), (c)(5), (c)(7), (c)(9) & (g)(2)).

B. 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 maintain minimum capital required by regulation. We will contact our clearing firm, 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 source to fulfill responsibilities to our clients. If we cannot remedy a capital deficiency, we will file appropriate notices with our regulators and immediately take appropriate steps.

Rules: FINRA Rules 4370(c)(3), (c)(8) & (g)(2).

IX. Mission Critical Systems

Our Firm's "mission critical systems" are those that ensure prompt and accurate processing of securities transactions, including order taking, entry, execution, comparison, allocation, clearance and settlement of securities transactions, the maintenance of customer accounts, access to customer accounts and the delivery of funds and securities.

More specifically, these systems include:

- Email (hosted by Microsoft)
- NETX360 Order Management and Transmittal

We have primary responsibility for establishing and maintaining our business relationships with our clients and have sole responsibility for our mission critical functions of order taking, entry, and execution. Pershing provides, through contract, the comparison, allocation, clearance and settlement of securities transactions, maintenance as well as access to client accounts and delivery of funds and securities.

Our clearing firm contract states they will maintain a business continuity plan and the capacity to execute that plan. Pershing represents that it will advise us of any material changes to its plan that might affect our ability to maintain our business. In the event our clearing firm executes its plan, it represents it will notify us of such execution and provide us equal access to services as its other customers. If we reasonably determine that our clearing firm has not or cannot put its plan in place quickly enough to meet our needs, or is otherwise unable to provide access to such services, our clearing firm represents that it will assist us in seeking services from an alternative source.

Our clearing firm represents that it backs up our records at a remote site. Our clearing firm represents that it operates a back-up operating facility in a geographically separate area with the capability to conduct the same volume of business as its primary site. Our clearing firm has also confirmed the effectiveness of its back-up arrangements to recover from a wide scale disruption by testing on a regular basis.

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 situation, and various external factors surrounding a disruption, such as time of day, scope of disruption and status of critical infrastructure—particularly telecommunications—can affect actual recovery times. Recovery refers to the restoration of clearing and settlement activities after a wide-scale disruption; resumption refers to the capacity to accept and process new transactions and payments after a wide-scale disruption. Our clearing firm has the following SBD recovery time and resumption objectives: recovery time period of 4 hours, depending on the availability of external resources and resumption time within the same business day.

The CEO will periodically review our clearing firm's capabilities to perform the mission critical functions contracted to perform for our Firm.

A. Our Firm's Mission Critical Systems

1. Order Taking:

Currently, our Firm receives orders from clients via telephone. During an SBD, either internal or external, we will continue to take orders through any of these methods that are available and reliable; in addition, as communications permit, we will inform our clients of alternate ways they can send their orders to us. Customers will be informed of alternatives by phone, email or posting on the firm's website. If necessary, we will advise our clients to place orders directly with Pershing.

2. Order Entry:

Currently, our Firm enters Equities and Derivatives and listed bonds electronically with Pershing through its trading platform, NETX360 Order Management or telephonically. We have contacted Pershing and were told that, under its BCP, we can expect order entry services to resume within 4 hours, depending on availability of external resources. Orders for Fixed Income Securities that are not listed are taken verbally and executed via TRACE, also through Pershing.

In the event of an internal SBD, we will enter and send records to our clearing firm by the fastest alternative available or refer to our clients to deal directly with Pershing for their orders. In the event of an external SBD, we will maintain the order in electronic or paper format and deliver it to Pershing by the fastest means available when it resumes operations. In addition, our contract with the clearing firm provides that customers may be referred to the clearing firm for direct order entry.

3. Order Execution

We currently execute orders through our clearing firm. In the event of an internal or external SBD, we would execute orders through the fastest alternative means available.

B. Mission Critical Systems Provided by Our Clearing Firm

Latin Securities Inc has contracted with our clearing firm to provide order comparison, order allocation, client account maintenance and/or access and delivery of funds and securities.

Rules: FINRA Rules 3510(c)(2) & (g)(1).

X. Alternate Communications between the Firm and Clients, Employees, and Regulators

A. Clients

We now communicate with our clients using telephone, email, our website, fax, U.S. mail and in-person visits at our Firm or another location. 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.

Rule: FINRA Rule 4370(c)(5).

B. Employees

We currently communicate with our employees via telephone, email, and in person. In the event of an SBD, after assessing which means of communication are still available to us, we will use the means closest in speed and form (written or oral) to communicate with our employees. A contact list will be used by senior management to reach all employees quickly during an SBD. The contact list includes staff cell phone numbers and addresses.

The person to invoke use of the contact list is Juan Pinilla, CEO, or designee (Principal). Employees will receive a contact list at the time of hire and when a change is made.

Rule: FINRA Rule 4370(c)(5).

C. Regulators

We are currently members of the following self-regulatory organizations (SROs), and are also regulated by the Financial Industry Regulatory Authority Inc. ("FINRA"), the Securities Exchange Commission ("SEC") and the state of Florida. We communicate with our regulators by telephone, email, fax, and U.S. mail. 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 communicate with the other party.

Rule: FINRA Rule 4370(c)(9).

XI. Critical Business Constituents, Banks, and Counterparties

A. 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 goods or services when needed, because of an SBD to them or our Firm. Our major vendors are:

Service	Company	Contact Person	Telephone
Message Archiving	Global Relay	Aiden Hwang	(866) 484-6630
FinOP Support	Elneser Enterprises LLC	Farid A. Velasquez	(786) 663-3786
Trade Surveillance	OtterBlotter	Sam Reinman	(908) 208-6768
IT Consultants	Tek Firm	Oscar Gonzalez	(305) 934-1752
Phone Service	Tek Firm	Oscar Gonzalez	(305) 934-1752
Internet Service	Crown Castle	Michael Gil	(786) 506-6110
Building Maintenance	CP Group	Raquel Pinto Brenda Fonseca	(305) 539-7100 (305) 468-8200

Rule: FINRA Rule 4370(c)(7).

B. Banks

In the event of an SBD related to our financing, we will contact our banks and lenders to determine if they can continue to provide the financing. The bank maintaining our operating account is: Santander Bank Branch, 1401 Brickell Ave, Miami, FL 33131, (305) 341-9440. If our banks and other lenders are unable to provide the financing, we will seek alternative financing immediately from our shareholders.

Rule: FINRA Rule 4370(c)(7)

C. Counterparties

In the event of an SBD related to our financing, we will contact our critical counter-parties, such as other broker-dealers or institutional customers, to determine if we will be able to carry out our transactions with them in light of an internal or external SBD. Where the transactions cannot be completed, we will work with our clearing firm or contact those counterparties directly to make alternative arrangements to complete those transactions as soon as possible.

Rule: FINRA Rule 4370(c)(7).

XII. Regulatory Reporting

Our Firm is subject to regulation by FINRA, the SEC, and the state of Florida. We fulfill our regulatory reporting obligations using electronic means and the FINRA Gateway. 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 most efficient and effective means to comply with all regulatory requirements. In the event we cannot contact our regulators, we will continue filing required reports using the communication means available to us.

Our examiners:

Financial Industry Regulatory Authority, Boston District Office
99 High Street, 9th Floor
Boston, MA 02110 - Tel. (617) 532-3489.

The SEC's main phone line is (800) 732-0330.

Rule: FINRA Rule 4370(c)(8).

XIII. Disclosure of Business Continuity Plan

Attached is our written BCP disclosure statement we provide customers at account opening and upon request.

Rule: FINRA Rule 4370(e).

XIV. Updates and Annual Review

Latin Securities Inc will review, modify and/or update this plan annually and when there are material changes in our operations, structure, business, or location as well as those of our clearing firm occurs.

Rule: FINRA Rule 4370(b).

XV. Senior Manager Approval

Approved on June 18, 2024, by:

Juan Pinilla

Juan Pinilla (19 jun.. 2024 00:04 GMT+2)

Juan Pinilla, CEO

Rule: FINRA Rule 4370(d)

Alina Daglio

Alina Daglio (20 jun.. 2024 10:00 EDT)

Alina Daglio, CCO

Attachment A: Latin Securities Inc's Business Continuity Planning

Latin Securities Inc has developed a Business Continuity Plan with the protocols required by law to confront events that may significantly disrupt our business. However, since the timing and impact of disasters and disruptions are unpredictable, we are always ready to adapt and improvise critical solutions responding to real life situations. Our principals are clear: in times of emergency, we give top priority to the physical wellbeing of the people and the protection of our client's financial assets and confidential information.

Contacting Us – After a significant business disruption event you should call our main-office telephone, (786) 733-9602, or go to our website for guidance. If you cannot contact us through either mean, you should contact our clearing firm, Pershing LLC ("Pershing"), at (201) 413-3635 or www.pershing.com. Pershing, LLC will provide you with instructions on how to access your funds and securities, including: entering orders, confirming orders and processing other service-related and money transfer transactions.

Our Business Continuity Plan – Our goal when confronted with a significant business disruption event is to recover and renew operations as soon as possible. Our Protocols include safeguards for protecting our employees and property, assessing financial and operational capabilities, protecting the Firm's books and records, and providing access to our customers' assets and transactional ability.

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 and operations; contact with critical suppliers, contractors, banks and counter-parties; regulatory reporting; and assuring our customers prompt access to their funds and securities even if we are unable to recover.

We have redundancy in our critical functions. Pershing, LLC, backs up our important records electronically in a different geographical area. While every emergency situation poses unique problems depending on its nature, time and severity, Latin Securities Inc is confident that in most cases, our clearing firm will be able to restore its own operations, complete transactions and accept new transactions and payments within 4 hours from the time of disruption. Your orders and requests for funds and securities could be delayed during this period.

Varying Disruptions – In our case, a significant business disruption event can affect only our Firm's office, the 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 necessary and expect to recover and resume business within hours during a normal market

day, or the next business day. A major disruption affecting our business district, city or region, may force us to transfer our operations to a site outside of the affected area, and recover and resume business within a period of 48 to 72 hours.

In any case, if confronted with a significant business interruption situation, we will continue servicing your needs directly from a different location or by transferring control to our clearing firm. We will make our best effort to notify you of such emergency through our website. If the significant business disruption is so severe that it prevents us from recovering within a reasonable period of time, our customer will have prompt access to their funds and securities through our clearing firm.

For more information – If you have questions about our business continuity planning, you can contact our CEO at jpinilla@latinsecurities.us.









Latin Securites Inc - BCP Apr 2024

Informe de auditoría final

2024-06-20

Fecha de creación:	2024-06-18
Por:	Latin Securities (fgutierrez@latinsecurities.com)
Estado:	Firmado
ID de transacción:	CBJCHBCAABAAAZE4cYL5zH16dWsaYZk5yZZ1a4AdF-oJ

Historial de “Latin Securites Inc - BCP Apr 2024”

-  Latin Securities (fgutierrez@latinsecurities.com) ha creado el documento.
2024-06-18 - 17:05:45 GMT
-  El documento se ha enviado por correo electrónico a Juan Pinilla (jpinilla@latinsecurities.us) para su firma.
2024-06-18 - 17:05:50 GMT
-  Juan Pinilla (jpinilla@latinsecurities.us) ha visualizado el correo electrónico.
2024-06-18 - 22:04:04 GMT
-  Juan Pinilla (jpinilla@latinsecurities.us) ha firmado electrónicamente el documento.
Fecha de firma: 2024-06-18 - 22:04:42 GMT. Origen de hora: servidor.
-  El documento se ha enviado por correo electrónico a Alina Daglio (adaglio@latinsecurities.us) para su firma.
2024-06-18 - 22:04:44 GMT
-  Alina Daglio (adaglio@latinsecurities.us) ha visualizado el correo electrónico.
2024-06-20 - 14:00:28 GMT
-  Alina Daglio (adaglio@latinsecurities.us) ha firmado electrónicamente el documento.
Fecha de firma: 2024-06-20 - 14:00:49 GMT. Origen de hora: servidor.
-  Documento completado.
2024-06-20 - 14:00:49 GMT