

Scully Capital Securities Corporation Business Continuity Plan Updated December 7, 2020

I. Emergency Contact Persons

Our firm's two emergency contact persons are:

1. Larry J. Scully
Phone: (703) 522-1313
Cell: (202) 841-4451
Email: lscully@scullysec.com
2. Brian T. Oakley
Phone: (202) 244-8994
Cell: (202) 236-2006
Email: boakley@scullysec.com

II. Firm Policy

Scully Capital Securities Corporation ("Scully Capital Securities" or "Firm") does not hold customer funds nor interface with clients. Therefore, our Business Continuity Plan is intended to provide us with remote access to the business systems of the firm.

If we are blocked from occupying our office space at 1050 Connecticut Avenue NW, our plan is to move the staff to 2353 North Edgewood Street in Arlington, Virginia. The computer system there is set up to access the main server of the company, which would provide us access to the firm's records and to project information and Email. Since we do not have customer funds or their securities, our onsite fireproof safe is used to protect critical corporate documents, including financial information.

We maintain an electronic copy of our plan on our main server under Scully Capital Securities/Admin.

III. Business Description

Scully Capital Securities currently conducts business in mergers and acquisitions for our clients. In addition, we provide advisory service on municipal tax-exempt bonds and provide project financing services to private sector clients.

IV. Office Locations

The firm's principal office is located at 1050 Connecticut Avenue NW, Washington, DC 20036. The main telephone number is (202) 775-3434. Our employees may travel to this office by means of subway, car, on foot and bus.

At this location, we provide merger and acquisition advisory service and project finance services.

V. Alternative Physical Location of Employees

In the event of a significant business interruption, our staff, as noted above, will move from our affected office to 2353 North Edgewood Street in Arlington, Virginia. That facility has backup computers which are able to tie into the main server and receive email.

VI. Customer Access to Funds and Securities

Scully Capital Securities does not maintain custody of customer funds or securities.

VII. Data Backup and Recovery

Our Firm maintains its primary hardcopy books and records and its electronic records at 1050 Connecticut Avenue NW, Washington, DC. Nancy Scully is responsible for the maintenance of the books and records, along with Brian Oakley. Our main server is backed up on a continuous basis offsite at our IT firm's office as well as in the cloud service Carbonite.

VIII. Financial and Operational Assessment

Since the Firm does not have customer accounts nor hold their funds or securities, our chief assignment is to maintain communication with our project finance and merger and acquisition customers during the event of a significant business disruption. We have the capability to forward our main switchboard to our backup office and to our cellular phones. In addition, our clients have our cell phone numbers.

IX. Mission Critical Systems

We do not take orders or enter orders in the Firm.

X. Alternative Communications Between Firm, Customers and Regulators

We are able to communicate with our customers via telephone, email, fax and cellular phones. In the event of an SBD, we will use all of these communication devices from our backup office. This will include coordination with our employees and with regulators as necessary.

XI. Critical Business Constituents, Banks and Counterparties

We work closely with Bank of America and have access to our funds, if in the event of an external or internal SBD. Our main branch for the Bank of America is the Vermont Branch located on Vermont and L Street NW in Washington, DC. Kathy Lightfoot is our contact at that bank.

XII. Regulatory Reporting

We now file reports with our regulators using paper copies and the U.S. mail and electronically using fax, Email and the internet. In the event of an SBD, we will check with the FINRA and other regulatory bodies to determine which means of filing are still available to us and use the means closest in speed and form to our previous filing method. In the event we cannot contact our regulators, we will continue to file required reports using communication systems available.

XIII. Disclosure of Business Plan Continuity Plan

Since the Firm does not have customers nor hold accounts, we do not have a system for communicating or for disclosing the business continuity plan to customers.

XIV. Short-Term and Long-Term Unavailability of Principal

Should Mr. Scully, the General Securities Principal of the Firm be unavailable for the short-term or a long-term, the Firm has established the following procedures:

1. Short-Term Unavailability

Should Mr. Scully be unavailable to clients for a short-term period, the Office Manager will contact our regulatory consultants to assist Scully Capital Securities in identifying a General Securities Principal in the interim to coordinate the Firm's client needs with the Office Manager and with our Financial Operations Principal until Mr. Scully's return. Our regulatory consultants have assisted Scully Capital Securities with their regulatory compliance needs for the last 13 years, and their assistance in helping Scully Capital Securities identify an interim General Securities

Principal is covered under Sections (a) and (h) of our Compliance Agreement with Renaissance Regulatory Services.

2. Long-Term Unavailability


Should Mr. Scully be unavailable for a longer period of time, then the interim General Securities Principal would continue to cover our client needs until such time as Mr. Scully returns to the office, or if the unavailability becomes permanent, would work with the Office Manager and the Financial Operations Principal and our legal firm to close the Firm.

XV. Updates and Annual Review

The Firm will update this plan whenever we have a material change to our operations, structure, business or location. In addition, we will review the BCP annually in March of each year to modify it for any changes in our operation, structure or location.

XVI. Senior Management 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: President

Date: December 9, 2020