## Morgan Keegan & Company, Inc.

## **Business Continuity Plans**

Morgan Keegan & Co., Inc. is a wholly-owned subsidiary of Raymond James Financial, Inc., and is registered as a broker-dealer with the Securities and Exchange Commission. Morgan Keegan (herein after "MK") is a member of the Financial Industry Regulatory Authority (FINRA). As such, Morgan Keegan has been required by rule to create contingency plans in the event a disaster disrupts the Firm's ability to do business.

In response to this rule making, Morgan Keegan has undertaken a study of its business and created contingency plans to address any such interruption of its business. Morgan Keegan identified key departments and personnel within those departments who would be necessary to keep the Firm up and running in the event of a disaster. Provisions have been made for the back up of all hardware and software systems. In the event a disaster shuts down Morgan Keegan's main office, alternate sites have been scouted and equipped to allow for the continuation of the Firm's business.

This disclosure will not attempt to re-create the entire plan, but rather, will attempt to summarize key features of the Plan. The Plan itself is the subject of review and changes. The identity of persons and processes will change over time and Morgan Keegan will endeavor to keep the Plan current with such changes.

In the event of an interruption, an Incident Management Team has been created. This team comprises Senior Managers of various support departments including Operations, Communications, IT, Accounting, Legal/Compliance and Internal Audit. This group will evaluate the severity of the interruption and decide if operations should be moved from the headquarters building at 50 North Front Street.

Each business unit has identified a recovery team leader. In the event of an interruption, the business unit recovery team leader will assemble key team members. Each such business unit will be responsible for notifying its employees if and where they should report.

In the event headquarters facilities at 50 North Front Street are not available, a Disaster Recovery Site has been designated and equipped. This site has been fitted with an independent backup power system. Space has been allocated to each business unit to permit the business units to continue to function.

Short-term and longer-term contingency plans have been created should an incident effectively eliminate the ability to trade from the headquarters at 50 North Front Street. For listed securities, trades will be routed to the New York Office until such time as traders can get to the Disaster Recovery Site. At that point, trading will be handled at the Disaster Recovery Site. For OTC securities, customer orders will be routed to another broker/dealer for execution. Market-making functions will be cancelled until such time as the traders can be relocated to the Disaster Recovery Site. For Options and Fixed Income Securities, trading will resume upon relocation of the traders to the Disaster Recovery Site.

The Business Continuity Planning process also takes into account the information technology needs of the Firm. Backup computer systems have been established. These computers will be reconfigured and restored to the point of any event which cause a system failure. With the restoration of the backup system, all necessary data systems will be functional. The Disaster Recovery Site has been equipped with necessary communications tools. Those services will be switched to the Disaster Recovery Site in the event of a disruption in the headquarters facility.