

Dougall & Associates Annual Disclosures 2024

This notice contains important information for clients of Dougall & Associates, LLC ("Dougall" or the "Firm"). Dougall is a registered broker-dealer with the Securities and Exchange Commission, FINRA and member of the NYSE-Chicago Exchange. As a client of the Firm, we would like to advise you of several important disclosures, some of which are required by our regulatory agencies. Please note that the information is being provided for informational purposes and is meant to cover different aspects of the Firm's business. Please contact the Firm at 312.663.2670 regarding questions or issues concerning this notice.

Securities Investor Protection Corporation ("SIPC")

Dougall is a member of the Securities Investor Protection Corporation ("SIPC"). Clients may obtain information about SIPC, including a brochure entitled *How SIPC Protects You* by contacting SIPC at:

Securities Investor Protection Corporation: 805 15th Street NW, Suite 800
Washington D.C. 20005
Tel: (202) 371-8300
Fax: (202) 371-6728
Email: asksipc@sipc.org

This information can also be obtained through the SIPC website at www.sipc.org.

Business Continuity Plan

Dougall has developed a business continuity plan to maintain all Financial, Business, & Data records. Dougall will only be operational if our Clearing Firm and the NYSE-Chicago are operational at full capacity.

Contact Information:

If there is a disruption in Dougall's business, we can be reached at 312-663-2670 or 630-781-1925. These phone numbers can be used in the event we are not reachable at our main office located at 445 East North Water Street - Chicago, IL. 60611. Our clearing firm, Axos Clearing LLC., can be reached at 402-384-6180. Dougall does not hold customer funds/and or securities.

Business Continuity Plan:

Pursuant to industry rules, Dougall has established and will periodically update a Business Continuity Plan ("BCP") to address the Firm's actions in the event of a significant business disruption. The plan serves to ensure that the Firm can appropriately address a business disruption event ("event") in a timely and efficient manner. Depending on the severity of an event, the Firm will attempt to resume trading provided that the NYSE-Chicago is operational and/or able to provide remote access to the Firm (in the event Dougall's main office is not operational). The Firm intends to operate from remotely

based locations; we will only execute client orders from our Brokerplex Terminal at a secure location. Our business continuity plan will allow our customers to execute orders in a normal capacity.

Various Aspects from severe disruption:

Dougall's ability to conduct its execution business is completely based on the ability of the NYSE-Chicago to remain open and functioning. If a disruption was to occur and the NYSE-Chicago failed to open, we would at that point decide whether to execute on another venue or cease trading until the Exchange is open. If the Firm decides that it cannot deliver execution quality, it will not open for business. A notice will be posted on our website regarding this decision and any updates regarding the status of our business operation. If you have any questions regarding this BCP, you are encouraged to contact Chad Bluett at 312-663-2670. cbluett@dougallassociates.com

Special Note: During the COVID-19 Pandemic Dougall & Associates will continue to operate remotely. We have not and do not expect to experience any interruptions in our business practices, however, should such an interruption occur, we will follow the procedure outlined in this notice.

Order Handling

Dougall will designate all orders it receives as "not held" unless you advise us otherwise, on an order by order basis. When handling not held orders, Dougall will look to achieve best execution while exercising reasonable trading judgement with respect to the time and price of execution.

Investor Education & Protection

To check our background or any of our registered personnel, you can access information via the FINRA Broker Check system - <http://brokercheck.finra.org/>

USA Patriot Act/Anti-Money Laundering Procedures

Dougall is committed to abiding by the U.S. government's regulatory and statutory requirements regarding Anti-Money Laundering protections. The USA PATRIOT Act (Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism) was enacted to strengthen the United States government's ability to combat terrorist financing and money laundering. An essential component of the USA PATRIOT Act requires financial institutions to obtain, verify, and record information that identifies each person or entity with a relationship at a financial institution. Dougall, prior to opening a new account or developing a client relationship and periodically during the term of that relationship, may request identifying information to allow it to meet the requirements of the USA Patriot Act and know your customer standards.

Compliance with Short Sale and Order Marking

Pursuant to SEC rules, when placing an order to sell securities, the broker-dealer placing a short sale order is required to mark the order as sell short, sell long or short exempt, as appropriate. You are required to provide the broker-dealer handling your order with information concerning any securities borrowing or locate arrangements made by you and/or your Prime Broker in connection with such short sales.

All other sell orders will be for securities owned ("long" as defined in REG SHO Rule 200 (c)) and, by

placing the order as "long", you affirm that the securities to be sold are owned by the respective client and will be delivered on or before the settlement date for such trade.

Cybersecurity Policy

The Firm has a cybersecurity policy to protect confidential client information, to protect against an instruction of its trading platform(s) and to prevent a disruption in its business activities. The Firm will only utilize third-party routing and execution platforms that meet industry standards with respect to cybersecurity.

Institutional Order Handling Practices

NYSE-Chicago Rule 17 generally provides that a broker-dealer handling a customer order in an equity security is prohibited from trading that security for its own account at a price that would satisfy the customer order, unless the firm immediately executes the customer's order up to the size of its own order at the same price or better. This is to inform you that during the course of facilitating a customer order, the Firm may trade on the same side of the market in a quasi-riskless principal fashion in order to fully execute the subject customer order. The Firm will always look to achieve best execution for our customers.