

Business Continuity Plan

Weeden & Co. LP (“Weeden”) maintains a comprehensive Business Continuity Plan (BCP) that details how Weeden will respond to events that significantly disrupt our business. Consistent with regulatory requirements, Weeden provides this disclosure statement to its clients, summarizing the program, at account opening, on its website and upon request. The BCP is reviewed, updated and tested on a regular basis.

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.

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.

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. Depending on the scope and severity of the business disruption, Weeden will determine whether it is necessary to transfer our operations to a local site or to a site outside of the affected area. In either situation, we plan to continue in business, transfer operations to our clearing firm if necessary, and notify you through our website www.weedenco.com or our customer emergency number, (800-843-9333) how to contact us. If the significant business disruption is so severe that it prevents Weeden from remaining in business, we will assure our customer’s prompt access to their funds and securities.

Our clearing firm, Broadcort, a division of Merrill Lynch, Pierce, Fenner & Smith Incorporated (“Broadcort”), maintains a business continuity plan and the capacity to execute that plan. Broadcort asserts that it will advise us of any material changes to its plan that might affect our ability to maintain our business and has presented us with an executive summary of its plan. In the event Broadcort executes its plan they will notify us of such execution. Broadcort affirms that it backs up our records at a remote site and 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. Broadcort has also confirmed the effectiveness of its back-up arrangements to recover from a wide scale disruption by testing, and it has verified that it tests its back-up arrangements. A copy of the Broadcort plan can be provided at your request.

If after a significant business disruption you cannot contact us as you usually do at (800-843-9333) or (203-861-7600) you should go to our website at www.weedenco.com. If you cannot access us through either of those means, you should contact our clearing firm, Broadcort, at (646-743-0110) or <http://corp.bankofamerica.com/business/ci/broadcort> for instructions on how it may provide prompt access to funds and securities, enter orders and process other trade related, cash, and security transfer transactions.

If you have any questions regarding our business continuity planning, you can contact us at (800-843-9333).