

Northbound Securities LLC

Business Continuity Summary Plan Disclosure

Overview

Northbound Securities LLC (“Northbound Securities” or the “Firm”) has created and implemented a Business Continuity Plan (“BCP”) in an effort to mitigate the effects related to unforeseen business interruptions. The BCP is designed to enable the Firm to continue or resume trading operations as soon as possible in the event of an emergency or significant business disruption (“SBD”).

Communications and Locations of Employees During a Disruption

In the event of an SBD, Northbound Securities will communicate with its employees in several different ways. The Firm will employ an Emergency Contact List, which would be implemented by management in the event of an SBD. Recovery time for most of the applications is expected to range from immediate to 24 hours.

Communications with Customers

Northbound Securities is currently able to communicate with its customers using the telephone, email, and US Mail. In the event of an SBD, Northbound Securities will assess which means of communication are still available and use the means closest in speed to the means used in the past. Additionally, if all traditional means of communication are not available, Northbound Securities will provide emergency contact information and instructions to its accounting firm – Alvarez & Associates, Inc. – regarding access to Northbound Securities representatives.

Books & Records

Northbound Securities maintains its hard-copy books and records and electronic records primarily at its Main Office and back-up books and records at alternate locations. If records are lost as the result of a business disruption or for any other reason, Northbound Securities has the means to physically recover data from both physical and electronic back-up locations.

Vendors and Counterparties

Northbound Securities’ BCP may need to rely upon the recovery and restoration of services provided by various critical business constituents at both its primary and alternate business locations. Northbound Securities has considered the extent to which the Firm may be able to depend upon these business relationships during an SBD as a part of its decision to do business with the constituent. Where possible the Firm has engaged and/or vetted alternate arrangements in order to avoid business disruptions in the case of a business constituent not being able to provide needed goods or services in an emergency.

Disclosure

Northbound Securities’ BCP is designed to address the continued operation of the Firm in the event of an emergency situation or SBD. However, all risks of business interruption cannot be eliminated and Northbound Securities cannot guarantee that systems will always be available or recoverable following an SBD. Furthermore, Northbound Securities has no control over and must rely upon the disaster recovery plans of its various critical business constituents and vendors. In the event that material changes are made to this BCP, Northbound Securities will send an updated copy to all of its customers.

The information contained in this disclosure is provided by Northbound Securities for informational purposes only, and nothing contained herein shall be construed to amend, supplement or otherwise modify any of the terms and conditions set forth in any customer agreement between you and Northbound Securities.