

BUSINESS CONTINUITY PLAN

RCM has developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

Contacting Us – If after a significant business disruption you cannot contact us as you usually do you should call our alternative numbers (516) 535-3800 or (646) 572-3300. You can also access our website www.raffertycapitalmarkets.com. If you cannot access through either of those means, you should contact our clearing firm Broadcort at (800) 246-0561 for instructions on how they may assist you in providing access to funds and securities, entering orders, and processing other trade-related cash and security transfer instructions.

Our Business Continuity Plan – 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, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data back-up 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.

Our clearing firm backs up our important records in a geographically separate area. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, we have been advised by our clearing firm that their objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments within several hours. Your orders and requests for funds and securities could be delayed during this period.