

Northeast Capital Markets Corp.

Business Continuity Plan Disclosure Statement

In the interest of ensuring our ability to continue to serve our customers, even in the most extreme or difficult circumstances, Northeast Capital has developed a Business Continuity Plan that we will invoke should local or national events ever cause a significant disruption to our business. Because we cannot predict whether or when such events will occur, much less the effect such events might have on our business, we need to be both prepared for a range of events and flexible in our responses. We are taking this opportunity to give you an overview of our plans in the event of a severe business disruption.

How to contact us if a severe business disruption has occurred: if, after a severe business disruption, you are unable to contact our firm or your representative through the means you normally use, you should seek to contact us by telephone at (518) 426-0100 or through our website, www.northeastcapital.net, which should contain additional alternative contact information. If you are unable to reach us over the telephone or through our website, you should contact any of the numbers on the attached sheet.

Overview of our Business Continuity Plan: We have developed a plan that, we believe, will enable us quickly to resume our operations in the event of any future disruption. Our plan is designed to ensure the safety of our personnel and property; permit us to make a rapid operational and financial assessment; safeguard our books and records and our customer-related data and information; and create the means for our customers to continue to transact business and have ready access to funds and information.

Specifically, under our plan, we have in place (1) procedures to back-up (that is, duplicate and preserve) data in locations remote from our offices; (2) facilities and procedures that permit us to replicate, supplement and replace all mission-critical systems; (3) procedures to assess our financial strength and stability and our operational capabilities, and promptly address any issues that arise in those areas; (4) procedures and facilities for alternative means of communications with customers and alternative locations and systems through which to conduct our business; (5) procedures to remain in touch with contact critical vendors, suppliers, regulators and business partners and counter-parties; and (6) systems and procedures to ensure that you will have prompt access to your funds.

Business disruptions can vary in duration and scope: business disruptions can vary from minimal to severe; moreover, the scope of a disruption varies from ones that affect only a building or a portion of a city in which our office is located, to disruptions affecting an entire city, or even an entire region. If we are subject to a disruption that affects only a building or a particular office, we will transfer our operations to a remote site outside the affected area. In such an instance, we expect to have our essential business systems and services restored and recovered within 12-24 hours. If a business disruption were to affect an entire region or city, we would take similar steps to disperse or relocate employees, switch to back-up and remotely-located systems and restore any data not immediately available. In such an event, we expect to have essential business systems and services restored and recovered within 24-48 hours. Whether the disruption is moderate and localized or severe and widespread, we plan to continue in business, transfer portions of our operations to remote backup sites if necessary, and to keep you informed via www.northeastcapital.net, direct communications from your representative or principal Northeast Capital contact, or through our emergency telephone numbers (see attached sheet). If a business disruption were so severe as to prevent us from remaining in business, we will assure you of prompt access to your funds.

For more information: or if you have any questions about our business continuity plan, please contact Arthur Loomis at (518) 426-0100 or aloomis@ne-capital.com.