

WILMINGTON CAPITAL SECURITIES, LLC

BUSINESS CONTINUITY PLANNING

Securities industry regulations require each member firm to create and maintain a Business Continuity Plan reasonably designed to meet its obligations to its clients and other counter-parties. In accordance with these requirements, Wilmington Capital Securities, LLC (“Wilmington Capital”) and our clearing firm, RBC Correspondent Services, have each designed a Business Continuity Plan to address possible scenarios to ensure that the impact to you, our client, is minimized in the event of an emergency or disaster.

Wilmington Capital Securities, LLC’s Business Continuity Plan is designed to address key areas of concern, including, but not limited to, the following:

- Data back-up and recovery;
- Mission critical systems;
- Financial and operational assessments;
- Alternate means of communication between Wilmington Capital and its customers;
- Alternate means of communication between Wilmington Capital and its employees;
- Alternate physical locations of employees;
- Critical business constituent, bank and counter-party impact;
- Regulatory reporting;
- Communications with regulators; and
- How Wilmington Capital and its clearing firm, RBC Correspondent Services, will ensure that customers have access to their funds and securities in the event Wilmington Capital determines it is unable to continue its business.

As events creating business disruptions may vary in nature and scope, Wilmington Capital Securities, LLC has endeavored to plan for different scenarios that may affect Wilmington Capital’s primary office, a citywide area, or a regional area. Regardless of the scope of disruption, Wilmington Capital intends to continue to provide service to its valued clientele. The emergency contact person is Ronald Dorushkin, CEO and he can be reached at 516-313-4434.

In the event Wilmington Capital’s primary office is affected, the Firm’s clearing agent may provide alternate office space in the New York area. This alternative space will be serviced by FedEx and maintain 24-hour security services. Should one building be affected by a disruption, the other building may be used to help restore operations.

In the event of a citywide or regional disruption, Wilmington Capital would take advantage of any available facilities offered by affiliates (such as RBC Correspondent Services) that may be located in other geographical regions.

Wilmington Capital has identified several computer applications with mission critical or high criticality ratings. Our primary application provider, RBC Correspondent Services, conducts successful testing with their application provider on a regular basis.

At a minimum, the Wilmington Capital Business Continuity Plan is reviewed, updated and tested on an annual basis. Additionally, our primary internal and external application providers periodically conduct testing of their own back-up capabilities to ensure that, in the event of an emergency or significant business disruption, they will be able to provide us with the critical information and applications we need to continue or promptly resume our business. When testing our Plan, we review the recovery time and resumption time period for all mission critical systems.

Making sure that any type of disruption does not unduly impact our Firm or our clients is extremely important to us, and our Business Continuity Plan is designed to allow us to continue to provide the quality service you have come to expect from Wilmington Capital Securities, LLC.