

BUSINESS CONTINUITY PLAN

Our broker dealer Growth Capital Services has developed a Business Continuity Plan (BCP) as part of our ongoing contingency planning efforts to mitigate the impacts of business interruptions. Since disasters and disruptions are 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.

We plan to quickly recover and resume business operations after a Significant Business Disruption and respond by safeguarding employees' lives and firm property, 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 backup and recovery;
- 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; and
- regulatory reporting

Significant business disruptions can vary in their scope. For example, an SBD could affect 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.

In any situation, we plan to continue in business, and notify you through our web site or our main customer number regarding how to contact us. This plan is reviewed periodically and subject to modification without notice. A written copy of the summary of this plan is provided to customers at account opening, posted on the firm's website, and provided to customers upon request. If you have questions about our business continuity planning, please contact us at your convenience.