

## **Soleil Securities Corporation's Business Continuity Planning Disclosure**

Soleil Securities Corporation has developed a Business Continuity Plan to deal with any internal or external disruptions which could affect our ability to do 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.

**Emergency Contact Information** – If after a significant business disruption you cannot contact us as you usually do by telephone at our main office in New York, 212-380-4800, or by e-mail, please contact our Boston office by telephone at 617-757-7891, or check our website (<http://www.soleilgroup.com>). If you cannot access us through either of those means, you should contact our clearing firm, Goldman Sachs Execution & Clearing, L.P., at 212-357-2266 for access to accounts and trade confirmations. You can also contact royalblue Financial, the providers of our order management system, at 212-520-4407 for the status of outstanding orders.

**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. The details of this plan are not revealed in their entirety since this information is proprietary and a potential security risk for our Firm.

Our clearing firm, Goldman Sachs Execution & Clearing, L.P., maintains our trading and settlement 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 its objective is to restore its own operations and be able to complete existing transactions. Any orders and requests for funds and securities could be delayed during this period.

**Scenarios** – Our business continuity plan covers a wide range of scenarios ranging from individual system loss to area-wide outages. We will briefly outline major scenarios that might cause a severe business disruption and our response. Our primary business site is New York and Boston is our secondary site.

- 1) Area-wide or region-wide damage including destruction of our primary site in New York

Our expected recovery time is four hours. During this period, we will transfer our operations to our remote sites and our secondary site in Boston. In the case of an area-wide or region-wide event many of our service providers may be affected. We will evaluate whether we can continue to do business from our secondary office in Boston. We will let our customers know via our website (<http://www.soleilgroup.com>) or by

phone when we plan to resume business and if we need to transfer certain operations over to our clearing firm. Time to resumption of all business services depends on external conditions beyond our control, but we will make every attempt to resume business operations from our Boston office within 48 hours.

2) Destruction of the New York office

Our expected recovery time is four hours. During this period, we will transfer our sales/trading operations to our remote sites and our secondary site in Boston. Research production is a hosted solution so this will remain up and working. We will evaluate whether we can continue to do business from our secondary office in Boston. We will let our customers know via our website (<http://www.soleilgroup.com>) or by phone when we plan to resume business and if we need to transfer certain operations over to our clearing firm. We will make every attempt to resume business operations from our Boston office within 24 hours.

3) Area-wide power outage in New York

Our expected recovery time is less than two hours. Initially control of operations will be transferred to our secondary site in Boston and any remote offices not affected by the outage. We will close out existing transactions and evaluate our ability to handle business from Boston and the possible duration of the outage. We will let our customers know via our website (<http://www.soleilgroup.com>) or by phone when we plan to resume business. If the outage continues we will relocate critical staff to Boston.

4) Extended loss of telecommunications circuit or telecommunications services from a single vendor

We have redundant circuits for all of our data services and these run through different telecommunication providers. We intend to stay open for business. This should not present a serious disruption of business.

**For more information** – For a hard copy of this disclosure or questions about business continuity planning at Soleil Securities Corporation, please call Operations at 212-380-4916 or contact them via e-mail at [operations@soleilgroup.com](mailto:operations@soleilgroup.com).

**Future updates** – We continue to place importance on business continuity planning. As we continue to improve and test our planning, we will post updates to this disclosure on our website at <http://www.soleilgroup.com> and we will make a hard copy available of the updated disclosure upon request to [operations@soleilgroup.com](mailto:operations@soleilgroup.com).