

Summary Marco Polo Securities Inc. Business Continuity Plan June 2015

Marco Polo Securities Inc. Business Continuity Planning

Marco Polo Securities Inc. 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 at 212- 220-2700, please go to our web site at www.MPSecurities.com. If you cannot access us through either of those means, please contact our clearing firm, INTL FCStone (561) 544-7873. In the event of a significant business disruption, INTL FCStone will provide instructions on gaining prompt access to your funds, securities and enter orders, as well as process other trade-related, cash and security transfer transactions.

Our Business Continuity Plan – We plan to quickly recover 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 enabling our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, depending upon the scope and severity of the business disruption. Our business continuity plan addresses: data backup 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, INTL FCStone (see above) backs up our important records in a separate geographic location. Every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption. Our clearing firm has advised that recovery time objective for business resumption, including those involving a relocation of personnel or technology is four (4) hours. This recovery objective may be negatively affected by the unavailability of external resources and circumstances beyond our control. Your orders and requests for funds and securities could be delayed during this period.

Varying Disruptions – Significant business disruptions vary in scope, such as: solely 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. During a disruption affecting solely our firm or a building housing our firm, we will transfer our operations to a local site and expect to recover and resume business within 4 to 8 hours. During a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area, and recover and resume business within 2 business days. In either situation, we plan to continue in business, transfer operations to our clearing firm, if necessary, and notify you through our web site, www.MPSecurities.com. If a severe business disruption prevents us from remaining in business, we assure to our customers prompt access to their funds and securities.

For more information – If you have questions about our business continuity planning, contact us at 212-220-2700 or write us at: 30 Vesey Street, 14th Floor New York, NY 10007 Attn: Compliance Department