

FIRST TRYON SECURITIES, LLC

BUSINESS CONTINUITY PLAN DISCLOSURE

First Tryon Securities, LLC (“First Tryon”) is committed to safeguarding the interests of our clients and customers in the event of an emergency or significant business disruption. First Tryon 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 must 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 as you usually do, you should go to our web site at www.firsttryon.com for information. Any relevant information regarding our state of operation will be posted on the Home page under “Announcements”. If you cannot access us through any means, you may contact our clearing firm Pershing directly to process limited trade-related transactions, cash disbursements and security transfers. Instructions to Pershing must be in writing and transmitted via facsimile at (201) 413-5368 or by postal service as follows: Pershing LLC, PO Box 2065, Jersey City, NJ 07303-2065. For additional information about how to request funds and securities from Pershing, you may call (201) 413-3635 for recorded instructions, or visit the customer support section of Pershing’s website: www.pershing.com . You may also call (213) 624-6100, extension 500 as an alternate Pershing number for recorded instructions.

Our Business Continuity Plan – Given the scope and severity of the significant business disruption, our plan is designed to permit our firm to recover and resume business operations as quickly as possible. Our firm’s policy is to 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.

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 suppliers, business constituents, 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.

To address interruptions to the normal course of business, our clearing firm, Pershing maintains a business continuity plan which includes geographically dispersed data centers and alternate processing facilities. The plan is reviewed annually and updated as necessary. The plan outlines the actions Pershing will take in the event of a building, city, or regional incident including: (a) continuous processing support by personnel located in unaffected facilities, (b) relocating technology or operational personnel to alternate regional facilities, (c) switching technology data processing to an alternate regional data center.

All Pershing operational facilities are equipped for resumption of business and are tested. Regarding all circumstances with Pershing’s control, recovery time objective (RTO) for business resumption, including those involving a relocation of personnel or technology, is four hours, depending upon the availability of external resources.

Bloomberg's Business Continuity Plan provides an immediate recovery and resumption time due to Bloomberg's ability to switch operations to one of their many redundant network locations (NY, San Francisco, London, Tokyo, Hong Kong, Australia).

Varying Disruptions – Significant business disruptions (SBD's) can vary in their scope, such as only our firm, a single building housing one of our office locations, the business district of one of these office locations, the city of one of our office locations, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In the event of a SBD where we are denied access to the primary branch location in Charlotte, NC but our infrastructure is still intact, the firm has access to their trading system from other locations enabling them to conduct and supervise business activities. There are certain designated employees who have access to the firm's trading system from their primary residences. In a disruption to only one of our locations we would expect to recover and resume business within 2 days. In 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 4 days. In either situation, we plan to continue our business operations or transfer operations to our clearing firm if necessary, and notify you through our web site at www.firsttryon.com. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer's prompt access to their funds and securities.

Disclaimers – First Tryon's Business Continuity Plan prepares us for significant business disruptions and should enable us to resume our business operations as quickly as possible. The Business Continuity Plan Disclosure provides a summary of our plan. Due to various external factors that can affect the severity of a business disruption, such as time of day and status of critical infrastructure, the objectives of our plan may not be met in every emergency situation.

The Business Continuity Plan Disclosure is subject to change without notice. The current disclosure, as well as any future modifications, will be posted on our web site at www.firsttryon.com.

For more information – If you have any questions about our business continuity planning, you can contact us at 704.372.6118.