

At TradeStation Group, we recognize that our clients rely on our systems and services. In accordance with applicable regulations, TradeStation has developed a **Business Continuity Plan** to help TradeStation companies operate in response to an emergency or significant business disruption. In order to maintain the security and effectiveness of this plan, we do not provide specific details in this disclosure. However, we can tell you that the plan does include:

- *A description of daily back-up of specified data and records and maintenance of back-up media at a secure offsite location.*
- *Alternate forms of communication between us and our customers, employees, vendors and regulators.*
- *A review of financial and operational risks.*
- *Alternate physical locations for employees, and logistical and safety strategies.*
- *Identification of mission critical systems.*
- *Identification of critical operations and, where applicable, how those operations could be reestablished in the event of a disruption.*
- *Identification of how we can assure our customers' prompt access to their funds and assets in the event that we determine we are no longer able to continue business.*

Response to Incidents of Varying Scope:

A business interruption includes any event, external or internal, that creates extreme operational site disruption as a result of which TradeStation must alter normal, daily processing procedures. TradeStation's **Business Continuity Plan** has been designed to respond both to specific-building and city-wide disruptions. In these situations, the plan's goal is to enable TradeStation to continue to do business, at a limited capacity, and reasonably meet client and customer obligations within the business day.

Disruptions that cause evacuation of a particular building, but no damage takes place, and systems stay functional:

- In the event that we need to evacuate a particular building, the highest-ranking company official available will make the decision to activate the continuity plan. All employees will be notified to exit the building per firm-approved evacuation procedures.
- All inbound numbers will be re-routed to a backup data center where they will be prompted with messages until the predetermined emergency staff logs into the phone queues via IP Agents at our alternate site.

In the event of these types of site disruption, customers should experience a minimal amount of downtime in their ability to contact TradeStation.

Disruptions that cause immediate evacuation of a particular building, damage takes place, and systems are not functional:

- All inbound numbers will be re-routed to a backup data center where they will be prompted with messages until the predetermined emergency staff logs into the phone queues via IP Agents at our alternate site. If the local alternate site is affected by the disruption, all critical personnel will be directed to other disaster recovery sites to resume operations.
- Procedures detailing these responsibilities are included in the **Business Continuity Plan**. Common (probable) examples when disaster recovery site procedures will be activated for this type of site interruption include (but are not limited to): (1) acts of nature—hurricanes, floods, fires, etc.; (2) global solar issues—impacting national and/or international communication and power grids; and (3) acts of terrorism.

TradeStation's Business Continuity Plan is designed for our customers to have full, appropriate access to our systems and their funds and assets in a timely manner. However, in the case of an extremely significant disruption, the actual recovery time depends upon the severity of the disruption and how many TradeStation locations and personnel are affected, the condition of the financial and banking systems, and a myriad of other factors outside of our control. Even well-designed plans may not function as intended in certain situations.

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