

# NEW ENGLAND CAPITAL Continuity Plan Summary

---

NEW ENGLAND CAPITAL has a Business Continuity Plan to respond to extraordinary disasters that may impair our service and operations or otherwise unexpectedly 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. Nonetheless, please be assured that we have the necessary plan and manpower available to ensure proper resources are available to provide for the recovery and timely resumption of critical business operations.

## **1. Contacting Us**

Our office and central operations are housed at 120 King Street, Northampton, MA., but direct access to all client accounts, and the ability to buy and sell securities, including trade entry, access to funds through checks and wires, and account liquidation can be accomplished directly with First Clearing, LLC (custodian and clearing firm for Gage-Wiley & Co., Inc. brokerage accounts and NEW ENGLAND CAPITAL Managed Equity Accounts) or TD Ameritrade Institutional (custodian of NEW ENGLAND CAPITAL Strategic Funds Accounts) in the event of a material interruption in our business operations.

In the event of any material business disruption where you cannot contact us as you usually do at (413) 584-9121 or (800) 332-9558, you should call our alternative number (413) 530-1763 or go to our web site at [www.gagewiley.com](http://www.gagewiley.com) for information regarding the disruption. If you cannot access us through either of those means, you should contact the custodian of your assets. If you receive monthly statements from Gage-Wiley & Co., Inc., your account is custodied with First Clearing, LLC; their contact information is: First Clearing LLC, 1 North Jefferson Ave., St. Louis, Missouri, 63103 You may call them at (800) 727-0304, [www.firstclearing.com](http://www.firstclearing.com), for instructions on how to get prompt access to funds and securities, enter orders and process other trade-related, cash, and security transfer transactions for your account. *In the event of a natural or man-made disaster that impacts our clearing firm operations, please refer to their business continuity plan which can be found at <http://www.firstclearingllc.com/Report/FirstClearing/default.htm>.*

If you receive monthly statements from TD Ameritrade Institutional, your account is custodied with TD Ameritrade Institutional and their contact information is: TD Ameritrade Institutional, 4075 Sorrento Valley Blvd, Ste A, San Diego, CA 92191. You may call them at (866) 381-7360 for instructions on how to get prompt access to funds and securities, enter orders and process other trade-related, cash, and security transfer transactions for your account. Their website is [www.tdainstitutional.com](http://www.tdainstitutional.com). TD Ameritrade Institutional's business continuity plan can be found at [http://www.advisorservices.com/content/advisor/pdfs/AMTD\\_5491.pdf](http://www.advisorservices.com/content/advisor/pdfs/AMTD_5491.pdf)

## **II. Our Business Continuity Plan**

In the event of a material disruption in our operations, we expect to recover quickly and resume business operations in short order. Management and certain operations personnel will take necessary and proper actions to safeguard our employees. Management will then perform an operational assessment of our office space, equipment and access to company books and records necessary to transact business.

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 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 while we are unable to conduct business.

Both our clearing firm (First Clearing, LLC) and custodian (TD Ameritrade Institutional) back up our important 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 and custodian that their objective is to restore their own operations and be able to complete existing transactions and accept new transactions and payments promptly. Your orders and requests for funds and securities could be delayed during this period. Generally, our business continuity plan is designed such that our clients' ability to access their funds should not be impacted materially as our clearing firm and custodian, First Clearing, LLC and TD Ameritrade Institutional, can be accessed directly by our customers in the event of an emergency or material business interruption. In the event of some disasters, however, neither Gage Wiley, First Clearing nor TD Ameritrade Institutional may be able to conduct business when a disaster is of the scope or magnitude that the securities markets are not operational or closed.

### **III. Varying Disruptions**

Significant business disruptions can vary in their scope, such as 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 a disruption to only our firm or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business. 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 as soon as possible. In any situation, we plan to continue in business, transfer operations to our clearing firm and/or custodian if necessary, and notify you through our web site [www.gagewiley.com](http://www.gagewiley.com) or our customer emergency number (413) 530-1763 how to contact us. 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. We believe our business continuity plan is adequate, but in any disaster scenario events beyond our control may effect how quickly we can act or how quickly electronic communication can be resumed. To the extent our plan is dependent upon our clearing firm and custodian remaining operational in a disaster that affects our home office, we have no control over our clearing firm or custodian but we have taken steps to insure that First Clearing, LLC and TD Ameritrade Institutional do have their own business continuity plans.

For more information – If you have questions about our business continuity planning, you can contact us at (413) 584-9121 or (800) 332-9558. Our full business continuity plan is updated periodically, and you can request a complete copy of the plan by submitting a written request to firm operations.