

Gage-Wiley / New England Capital

Business Continuity Plan Summary

Securities industry regulations require each member to create and maintain a business continuity plan reasonably designed to meet its obligations to its clients. In accordance with these requirements, Gage Wiley & Co. / NEW ENGLAND CAPITAL have designed 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 will have to 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.

Contacting Us

Our office and central operations are housed at 120 King Street, Northampton, MA., 01060, 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 and you cannot contact us as you usually do at (413) 584-9121 or (508) 746-7526, you should call our alternate number 413-530-1763 or go to our web site at www.gagewiley.com for information regarding the disruption. If possible, the firm will post information and/or updates on the particular disruption so that clients can remain informed. If you cannot access us through either of those means, you should contact the appropriate custodian.

If you receive monthly statements from Gage-Wiley & Co., Inc., your account is custodied with First Clearing, LLC; their contact information is:

First Clearing Correspondent Services
1 North Jefferson Avenue
St. Louis, MO 63101
Phone: 1-877-496-3223
www.firstclearingllc.com

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
5010 Wateridge Vista Drive
San Diego, CA 92121-5775
Phone: 1-866-381-7360
www.tdainstitutional.com

As previously stated, you can contact the appropriate party 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 material interruption in our business operations.

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 if necessary, and notify you through our web site www.gagewiley.com.

We believe our business continuity plan is adequate, but in any disaster scenario events beyond our control may affect how quickly we can act or how quickly electronic communication can be resumed. 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.

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.

Our firm's policy is to respond to a Significant Business Disruption (SBD) by safeguarding employees' lives and firm property. Once that is accomplished, the firm will implement its action plan, which includes financial and operational assessments; data backup and recovery; all mission critical systems; alternative communications with customers, employees, and regulators; alternate physical location of employees and operations; 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.

Our business continuity plan is designed to resume operations as quickly as possible, depending upon the scope and severity of the significant business disruption.

In the event that we determine we are unable to continue our business, we will assure customers prompt access to their funds and securities through direct access to our custodians.

Both custodians (First Clearing, LLC and 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 taken steps to insure that our custodians have their own business continuity plan and we have been advised that their objective is to restore their own operations and be able to complete existing transactions and accept new transactions and payments promptly.

Be Advised

To the extent our plan is dependent upon our custodians remaining operational in a disaster that affects our home office, we have no control over such a scenario and 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, it may be that all such parties (Gage Wiley / NEW ENGLAND CAPITAL, First Clearing, and TD Ameritrade Institutional) are not able to conduct business when a disaster is of the scope or magnitude that the securities markets are not operational or closed.

For more information – If you have questions about our business continuity planning, you can contact us at (413) 584-9121. Our full business continuity plan is updated and reviewed periodically but no less than annually.