

BUSINESS CONTINUITY PLAN (BCP) DISCLOSURE STATEMENT

Firm Policy

Our firm's policy is to respond to a Significant Business Disruption (SBD) by safeguarding employees' lives and firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of the firm's books and records, and allowing our customers to transact business. In the event that we determine we are unable to continue our business, we will ensure customers prompt access to their funds and securities.

Significant Business Disruptions (SBDs)

Our plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only our firm's ability to communicate and do business, such as a fire in our building. External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a city flood, or a wide-scale regional disruption. Our response to an external SBD relies more heavily on other organizations and systems, especially on the capabilities of our clearing firms.

Emergency Contact Persons

In the event that the firm experiences an SBD, senior management will call for the implementation of our BCP. During times of an SBD, our firm's two emergency contact persons are:

Charles Lyon	Ron Trout
Office: +1 (407) 741-5347	Office: +1 (205) 949-3594
Cell: +1 (407) 407-491-3523	Cell: +1 (727) 204-0637
Charles.Lyon@intlfcstone.com	Ron.Trout@intlfcstone.com

Our Office Locations

Office #1: 329 Park Avenue North, Suite 350, Winter Park, FL 32789 • +1 (407) 741-5300
Office #2: 155 East 44th Street, New York, NY 10017-4201 • +1 (212) 485-3500
Office #3: 1221 Brickell Avenue, 25th Floor, Miami, FL 33131 • +1 (305) 377-0074
Office #4: 2600 North Military Trail, Suite 350, Boca Raton, FL 33431 • +1 (561) 544-7610
Office #5: 107 Francis St., Suite 990, Mobile, AL 36602 • +1 (251) 295-9432
Office #6: 2 Perimeter Park South, Suite 100W, Birmingham, AL 35243 • +1 (205) 949-3500
Office #7: 230 South LaSalle, Suite 10-500, Chicago, IL 60604 • +1 (312) 780-6972
Office #8: 1251 NW Briarcliff Parkway, Suite 800, Kansas City, MO 64116 • +1 (800) 255-6381
Office #9: 1075 Jordan Creek Parkway, Suite 300, West Des Moines, IA 50266 • +1 (515) 223-3797
Office #10: 1453 3rd St. Promenade, Suite 390, Santa Monica, CA 90401 • +1 (424) 610-3897
Office #11: 3424 Peachtree Road, Suite 1710, Atlanta, GA 30326 • +1 (800) 541-1977
Office #12: 530 Fifth Avenue, 15th Floor, New York, NY 10036 • +1 (212) 692-5100

Severity of SBDs

Our BCP takes into account various levels of disruption. Because office locations serve as backups to each other and are located in different regions, we are confident that we can continue operations during an SBD to a specific building, business district, city, or region. If one of these types of SBDs were to affect one of our locations, it is our intent that the unaffected location would immediately assume the functions of the affected one; however, some functionality might take up to 4 hours to be restored. Every in-house and supplier provided system is available in both the New York and Winter Park, FL locations. Some of these systems are available in multiple locations in New York, London, and Miami. Of course, we are dependent on some systems from outside providers. In the event of an SBD that affects a business district, city or region, an unaffected office might be unable to utilize the services of some of these outside providers until such time as these providers have restored service. Our mission critical providers all have stated plans for restorations of services within four hours. It is necessary to recognize that an SBD of sufficient magnitude may leave these providers unable to meet their four hour goal. Nevertheless, our contingencies should ensure that we return to operations concurrent with the restorations of operations of the major U.S. equity and fixed income markets from any widespread SBD.

Because of our redundancies and the security of our systems, we believe that our exposure to an SBD limited to our firm is minimal. If an event was to occur that rendered all US offices inoperable, we would rely on the support of our clearing firms (INTL FCStone Financial Inc., Broadcort, and Pershing) to help us restore operations, while ensuring that all pending transactions were properly completed.

Communications

Our BCP is subject to modification. A link to any updated summary will be posted on our website when modifications occur. Customers may alternatively obtain updated summaries by requesting a written copy by mail by writing to:

INTL FCStone Financial Inc.
329 Park Avenue North, Suite 350
Winter Park, FL 32789
Attn: Compliance Department

Our Clearing Firms

- INTL FCStone Financial Inc.
Correspondent Clearing Division
2 Perimeter Park South, Suite 100W
Birmingham, AL 35243
+1 (888) 786-9925
www.intlfcstone.com
Contact: James Hughes
+1 (205) 414-7304
James.Hughes@intlfcstone.com
- Merrill Lynch, Pierce, Fenner & Smith Incorporated
Broadcort Division
101 Hudson Street
Jersey City, NJ 07302
+1 (201) 413-4200
Contact: Anthony Maranzano
+1 (201) 557-3852
Anthony.maranzano@ml.com
- Pershing, LLC
One Pershing Plaza
Jersey City, NJ 07399
+1 (201) 413-4200
www.pershing.com
Contact: Michael Pagliaro
+1 (312) 249-4885
mpagliaro@pershing.com