

PULSE TRADING INC. BUSINESS CONTINUITY PLANNING

Pulse Trading Inc. 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 will have to 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 at 617-316-5620, you should call our alternative number 212-921-8181 or go to our website at www.PulseTrading.com. If you cannot access us through either of those means, you should contact our clearing firm, Pershing LLC, at 201-413-4020 and www.pershing.com for instructions on how it may provide prompt access to funds and securities, enter orders and process other trade related, cash, and security transfer instructions for your customers.

Our Business Continuity Plan – We plan to quickly recover and resume business operations after a significant business disruption (SBD) and 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. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

In the event of an SBD, we will move our staff from affected offices to the closest of our unaffected office locations. Pulse is assuming that not more than one of its office locations will be affected at one time. If an SBD causes the closing of a location **OTHER THAN Boston, MA**. Pulse Trading will declare an SBD and activate its BCP. This action will result in the Head of Desk of the affected office to immediately begin calling all accounts covered by that office location, providing them with contact information to the Boston Office and directing them to use our trade order and execution services in Boston until the event that caused the SBD has been satisfactorily resolved.

In the event of an SBD causes the closing or evacuation of our corporate headquarters in Boston, Massachusetts, Pulse will declare an SBD event and activate the BCP. This action will result in senior management in Boston contacting the Head of Desk in each branch office and apprising them of the situation. Boston-based accounts will then be immediately contacted providing them with contact information to the New York City office and directing them to use our trade order and execution services in New York City until the event which caused the SBD has been satisfactorily resolved. St. Louis and San Francisco, in that order, will be used as back-up to the New York City Desk.

Our business continuity plan addresses: data backup 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 counterparty impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

Our clearing firm, Pershing LLC, backs up our most 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 that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments within four hours. Your orders and requests for funds and securities could be delayed during this period.

For more information - If you have any questions about our business continuity planning, you can contact us at 617-316-5615