



BUSINESS CONTINUITY PLAN DISCLOSURE

Amherst Pierpont Securities LLC

The Company is committed to safeguarding the interests of our clients and customers in the event of an emergency or significant business disruption (“SBD”). The Company has developed a Business Continuity Plan (“BCP”) in order to respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions are unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you the following information regarding our BCP.

Contacting Us – If after a significant business disruption you cannot contact us as you usually do, you should go to our web site at www.apsec.com for information or contact the Company at the alternate number (641) 715-3900, ext. 481237#. If you cannot access us through either of those means, you should contact our one of our clearing firms. You may contact Pershing LLC at (201) 413-3635 for recorded instructions or go to their web site at www.pershing.com for information regarding processing closing transactions, cash disbursements, and security transfers. You may contact BNY Mellon at (212) 495-1784 or go to their web site at www.bnymellon.com for more information.

Our Business Continuity Plan

We plan to quickly recover and resume business operations after a significant business disruption 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.

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 counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

Our clearing firms Pershing LLC and BNY Mellon maintain a business continuity plan, which includes geographically dispersed data centers and processing facilities. All operational facilities are equipped for resumption of business and are tested. Regarding all circumstances within their control, the recovery time objective for business resumption, including those involving a relocation of personnel or technology is four (4) hours or less, depending upon the availability of external resources. This recovery objective may be negatively affected by the unavailability of external resources and circumstances beyond our control.

Varying Disruptions – SBDs 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. In either situation, we plan to continue our business operations or transfer operations to our clearing firm(s) if necessary, and notify you through our web site at www.apsec.com or our customer emergency number, (641) 715-3900, ext. 481237# how to contact us.

Disclaimers – Amherst Pierpont Securities’ BCP is designed to be prepared for SBDs and to resume our business operations as quickly as possible if an event did occur. The information contained within is a summary of that plan. Because of the confidential nature of much of the plan, it is not possible to distribute the entire plan to clients, customers or other external entities.

Recovery-time objectives provide concrete goals to plan for and test against. They are not, however, hard and fast deadlines that must be met in every emergency situation, and various external factors surrounding a disruption, such as time of day, scope of disruption, and status of critical infrastructure—particularly telecommunications—can affect actual recovery times.

The Business Continuity Plan Disclosure is subject to change without notice. We may modify this disclosure at any time with such modifications becoming effective upon posting to our web site. You may obtain a current copy of this disclosure by accessing our web site at www.apsec.com. Alternatively, you may obtain a hard copy of this disclosure by mail upon request.

Contact Information

Any questions regarding the Company’s Business Continuity Plans should be addressed to:

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