

Business Continuity Plan Summary Plan Disclosure

Overview

TransPacific Group LLC (“the Firm”) has created and implemented a business continuity plan (“BCP”) in an effort to mitigate the effects related to unforeseen business interruptions.

Communications and locations of Employees during a disruption

In the event of a SBD, the Firm will communicate with its employees in several different ways. The Firm will employ a calling tree, which would be implemented by management in the event of a SBD. Recovery time for most of the applications involved in the Firm’s business and relocation to alternate locations is expected to range from immediate to 24-48 hours.

Communications with Customers

The Firm currently communicates with its clients using the telephone, email, fax, US Mail, and in person. In the event of an SBD, the Firm will assess which means of communication are still available and use the means closest in speed to the means used in the past.

Books & Records

The Firm maintains hard-copy books and records and electronic records primarily at its Main Office. If records are lost as the result of a business disruption or for any other reason, the Firm has the means to physically recover data from electronic back-up locations administered by a third-party vendor.

Vendors and Counterparties

The Firm’s BCP may need to rely upon the recovery and restoration of services provided by various critical business constituents, at both primary and alternate locations. The Firm has considered the extent to which it may be able to depend upon these business relationships during an SBD as a part of the initial decision to do business with the various vendors. Where possible the Firm has engaged and/or vetted alternate arrangements in order to avoid business disruptions in the case of a business constituent not being able to provide needed goods or services in an emergency.

Disclosure

The current BCP is designed to address the continued operation of the Firm in the event of an emergency situation or SBD. However, all risks of business interruption cannot be eliminated and the Firm cannot guarantee that systems will always be available or recoverable following an SBD. Furthermore, the Firm has no control over and must rely upon the disaster recovery plans of its various critical business constituents and vendors.

The information contained in this disclosure is provided by the Firm for informational purposes only, and nothing contained herein shall be construed to amend, supplement or otherwise modify any of the terms and conditions set forth in any customer agreement between you and the Firm.