

# Liberty Capital Investment Corporation

## Continuity Plan

Liberty Capital has developed a Business Continuity Plan for how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we 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 normal, you should call our alternative number 503-471-0733. If you cannot access us through either of those means, you should contact our clearing firm, Hilltop Securities, at 800-678-3792.

### **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 back-up 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 firm, Hilltop Securities, backs up certain of 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 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.

### **Order Routing**

Liberty Capital will provide, upon request, order routing for the most recent 12 months on any orders placed through our company. If you wish to receive information on how any of your transactions were routed, either to a third party or on an exchange, you are welcome to contact our office.

### **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 and expect to recover and resume business within the same business day. 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 within the same business day. In either situation, we plan to continue business, transfer operations to our clearing firm if necessary, and notify you through our website. You may also call our client emergency number at 503-471-0733. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customers prompt access to their funds and securities.

### **For more Information**

If you have questions or if you wish to receive a copy of our plan, please call us at **503-225-9393**.