

OTR Global Trading LLC

Business Continuity Plan

Summary

OTR Global Trading LLC ("OTRT") takes its commitment to our clients very seriously, and has complied with NASD Rules 3510 and 3520 in regard to planning for significant business disruptions. OTRT has developed a business continuity plan describing 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 – In the event of a disaster, OTRT personnel will receive emergency notification and instructions, and will attempt to contact you. If after a significant business disruption you cannot contact us as you usually do, you should go to our web site at <http://www.otrglobal.com>. With regard to client assets, our clearing firm handles all assets on our behalf. If you cannot access us, you should contact our clearing firm, **Merrill Lynch Professional Clearing Corp. ("MLPRO")**, at (212) 670-6000, <http://www.ml.com> for instructions on how it can provide prompt access to funds and securities, enter orders and process other trade-related, cash, and security transfer transactions for you.¹

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 reasonable, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data backup and recovery; mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; critical, bank and clearing firm 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, Merrill Lynch Professional Clearing Corp., backs up our customer account 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 0-4 hours in most cases, although for some business functions, next-day recovery is projected. Your orders and requests for funds and securities could be delayed during this period.

¹ We have reviewed a summary of MLPRO's business continuity plan, and are satisfied that it is adequate for the protection of our client assets in the event of any disruption to our operations.

Varying Disruptions – Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the area in which our firm is 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. In a disruption affecting our area, we will transfer our operations to a site outside of the affected area, and recover and resume business as soon as possible. In either situation, we plan to continue in business, transfer operations to our clearing firm if necessary, and notify you through our web site <http://www.otrglobal.com>. 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 about our business continuity planning, please contact your trader.