

Business Continuity Plan

Summary Disclosure Statement

Northcoast Research Partners, LLC (NCRP) has developed a Business Continuity Plan to be able to continue conducting business in the event of a significant disruption or disaster. As the timing and frequency of disasters and disruptions are both unpredictable, we will exercise flexibility in responding to actual events as they occur. This Business Continuity Plan Summary Disclosure Statement provides a summary detail of NCRP'S risk mitigation strategy in the event of an interruption to its daily conduct of business.

NCRP'S BCP is aimed at responding to a Significant Business Disruption (SBD) by protecting its employees and assets, assessing its financial and operational capability, and rapidly instituting recovery measures to resume operations—and therefore allow our customers to conduct business as soon as possible—while protecting the firm's books and records. The BCP is intended to comply with the NASD mandate particularly Rule 3510(e).

Our BCP anticipates two kinds of SBDs, internal and external. Internal SBDs affect only our firm's ability to communicate and do business, such as a disastrous event that would occur within our business premises. External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, or a wide-scale, regional disruption. Our response to an external SBD relies more heavily on other organizations and systems, and other entities with whom we have agreements. Our firm does not maintain custody of clients' funds or securities.

In the event of an SBD, either external or internal, NCRP shall establish an ordered dependency list and begin immediately communicating relevant information with our clients, employees, critical business constituents, critical banks, critical counter-parties, and regulators. The communication options we will employ may include email, telephony (mobile and fixed line), US postal mail service, and our website.

All mission-critical systems are backed up—a copy is stored offsite. Mission-critical systems are defined by NCRP accordingly in the BCP. In the event of an SBD, these backups will be obtained and restored as need be.

Despite our efforts to create an ideal BCP and therefore be able to address an SBD with a greater degree of preparation, we acknowledge the unpredictable nature of disasters and the impossibility of anticipating every possible catastrophic scenario. We are confident that our measures will allow us to continue conducting business with minimum impact to our clients and business partners; however, the possibility of an adverse effect to our operations by a third party's (beyond our knowledge and control) inability to cope with the SBD cannot be totally disregarded.