

Business Continuity Plan

Northcoast Research Partners, LLC (“Northcoast Research” or the “Firm”) has developed a Business Continuity Plan on how the Firm will respond to events that significantly disrupt business. Since the timing and impact of disasters and disruptions is unpredictable, Northcoast Research will have to be flexible in responding to actual events as they occur. With that in mind, Northcoast Research is providing you with this information on the Firm’s business continuity plan.

Contacting Us – If after a significant business disruption you cannot contact us as you usually do at (216) 468-6900, you should go to the Firm’s website at www.northcoastresearch.com. If the business disruption prohibits you from contacting us, you may contact our clearing firm, Pershing LLC (“Pershing”), directly to process limited trade-related transactions, cash disbursements, and securities transfers. Instructions to Pershing must be in writing and transmitted via facsimile to (201) 413-5368 or by postal service as follows: Pershing LLC, P.O. Box 2065, Jersey City, New Jersey 07303-2065.

For additional information about how to request funds and securities when Pershing cannot be contacted due to significant business interruption please select the Business Continuity and Other Disclosures link at the bottom of the home page on the Pershing web site at www.pershing.com. You may also call (201) 413-3635 for recorded instructions.

Our Business Continuity Plan – Northcoast Research plans to quickly recover and resume business operations after a significant business disruption and respond by safeguarding the Firm’s employees and property, making a financial and operational assessment, protecting the Firm’s books and records, and allowing customers to transact business. In short, the business continuity plan is designed to permit Northcoast Research to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

The 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 customers prompt access to their funds and securities if Northcoast Research is unable to continue business.

The clearing firm also backs up Northcoast Research’s 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, Northcoast Research has been advised by the 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 4 hours, depending upon the availability of external resources. Your orders and requests for funds and securities could be delayed during this period.

Varying Disruptions – Significant business disruptions can vary in their scope, such as only Northcoast Research, a single building housing Northcoast Research, the business district where

Northcoast Research is located, the city where Northcoast Research is located, or the whole region. In either situation, Northcoast Research plans to continue in business, transfer operations to the clearing firm if necessary, and notify you through the Firm's website how to contact us. If the significant business disruption is so severe that it prevents us from remaining in business, Northcoast Research will assure the Firm's customer's prompt access to their funds and securities.

For more information – If you have questions about Northcoast Research's business continuity planning, you can contact us at (216) 468-6900.