

NorthStar Business Continuity Plan Summary

It is the policy of NorthStar Financial Services Group, LLC (“NorthStar”) to maintain a comprehensive Business Continuity Plan (the “Plan”) designed to permit NorthStar (including NorthStar and its subsidiaries) to resume critical organization functions that would be necessary in the event of a disaster.

A disaster is defined as a disruption of normal organization functions where the expected time for returning to normalcy would seriously impact NorthStar’s ability to maintain customer commitments and regulatory compliance through its standard business operations.

Recovery and Restoration Program

NorthStar’s recovery and restoration program is designed to resume operations and critical systems as quickly as possible thereby allowing customers to transact business. To facilitate a recovery, NorthStar has implemented alternate work sites and remote technologies allowing employees to resume critical operations. In addition, NorthStar utilizes multiple, geographically-dispersed, data centers equipped with mirroring and replication technologies allowing for efficient fail-over recovery of critical systems and resumption of business.

- **Alternate Work Sites (AWS)** – Alternate Work Sites are configured with seating, computers, internet circuits, and telecommunication circuits allowing employees to quickly continue business operations.
- **Remote Technologies**– Remote technologies (VPN, Citrix, etc.) provide employees the ability to work remotely during a disaster event.
- **Multiple Data Centers** – NorthStar’s critical systems are housed in state-of-the-art, geographically-dispersed, data centers. Critical systems and data (files, databases, etc.) are mirrored and/or replicated between data centers. Company sites, data centers and the AWS are all connected together with high speed bandwidth including Metro Ethernet, MPLS and VPN technologies.

Customer Communication

Redundant phone systems with reroute technology are located at the geographically-dispersed data centers to allow for the continuation of telecommunications during a recovery. NorthStar also utilizes a third party IVR solution with a configurable call-forwarding feature allowing incoming calls to be quickly rerouted. The websites also may be utilized to communicate status updates regarding a disaster event.

Access to Website

NorthStar utilizes a highly available architecture to assure customer access to websites. This includes many redundant web servers in multiple, geographically-dispersed data centers. NorthStar also utilizes internet load balancing and rerouting technologies to maintain website availability.

Testing

Disaster recovery testing is conducted a minimum of four times per year. Employees from NorthStar’s information technology (IT) division, as well as testers from NorthStar’s various business units, report to the AWS designated for each particular test. NorthStar’s IT employees follow their activation procedures to enable critical technology systems and infrastructure. The testers use pre-defined, web based surveys

that guide them through business critical tests. The testers are required to log the results of each test. That information is then used to calculate a grade for the disaster recovery test.