



BUSINESS CONTINUITY PLANNING STATEMENT

Institutional Capital Management, Inc. has developed a Business Continuity Plan on 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 – If after a significant business disruption you cannot contact us as you usually do at 888-358-8040, you should call our alternative number 800-725-2660 or via your sales representative's e-mail or cell-phone number, as provided. Institutional Capital Management uses the Message Archiver, an outsourced electronic storage media service provided by Global Relay Communication Inc. to store certain books and records as required by SEC Rules 17a-3 and/or 17a-4. Global Relay provides Disaster Recovery & Business solution with users access to the e-mails away from the office. If you cannot access us through any of those means, you should contact our clearing firms as follows:

RBC Dain Correspondent Services

510 Marquette Ave., Minneapolis, MN 55402

www.rbcdain.com

ATTN: Dennis Hollenkamp at 314-589-5770

Raymond James Correspondent Services

880 Carillon Parkway, P.O. Box 12749, St. Petersburg, FL 33733

www.raymondjames.com

800-248-8863

They will provide you with instructions on how you can gain access to funds and securities, enter orders and process other trade-related, cash, and security transfer transactions.

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 firms, RBC Dain Correspondent Services and Raymond James Correspondent Services, backs up 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 mission critical systems and operations and most likely be able to complete existing transactions and accept new transactions and payments within the same business day. 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 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 when needed 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 two business days. In either situation, we plan to continue in business, will transfer operations to our clearing firm if necessary, and notify you through our toll-free number or by contacting you directly, on how to contact us. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer's prompt access to their funds and securities via our clearing firms, RBC Dain Correspondent Services and Raymond James Correspondent Services.

For more information – If you have questions about our business continuity planning, you can contact us at 888-358-8040 or via e-mail to britz@icmcapital.com.