

Sandler O’Neill & Partners, L.P.
Business Continuity Plan Disclosure Statement

In the interest of ensuring our ability to continue to serve our customers, even in the most extreme or difficult circumstances, Sandler O’Neill has developed a Business Continuity Plan that we will invoke should local or national events ever cause a significant disruption to our business. Because we cannot predict whether or when such events will occur, much less the effect such events might have on our business, we need to be both prepared for a range of events and flexible in our responses. We are taking this opportunity to give you an overview of our plans in the event of a severe business disruption.

How to contact us if a severe business disruption has occurred: if, after a severe business disruption, you are unable to contact our firm or your representative through the means you normally use, you should seek to contact us by telephone at (800) 635-6851 or through our website, www.sandleroneill.com, which should contain additional alternative contact information. You may also try to contact us through any other Sandler O’Neill office, using the telephone numbers on the attached sheet. If you are unable to reach us over the telephone or through our website, you should contact our clearing brokers, JPMorgan Clearing Corp. (“JPMCC”) at (212) 552-1919 or Pershing, LLC (“Pershing”) at (201) 413-5368 for liquidating orders, check and wire requests, and ACAT transfers only. In the event that you are unable to communicate with us directly, JPMCC and Pershing will be able to give you access to your funds and securities, to give you account information, and to execute trades in your account(s).

Overview of our Business Continuity Plan: as you probably are aware, we have been subject to with severe business disruptions before, including that associated with the tragic destruction of our New York office on September 11, 2001. We have built on the lessons we learned through those experiences and have developed a plan that, we believe, will enable us quickly to resume our operations in the event of any future disruption. Our plan is designed to ensure the safety of our personnel and property; permit us to make a rapid operational and financial assessment; safeguard our books and records and our customer-related data and information; and create the means for our customers to continue to transact business and have ready access to funds, securities and information.

Specifically, under our plan, we have in place (1) procedures to back-up (that is, duplicate and preserve) data in locations remote from our offices; (2) facilities and procedures that permit us to replicate, supplement and replace all mission-critical systems; (3) procedures to assess our financial strength and stability and our operational capabilities, and promptly address any issues that arise in those areas; (4) procedures and facilities for alternative means of communications with customers and alternative locations and systems through which to conduct our business; (5) procedures to remain in contact with critical vendors, suppliers, regulators and business partners and counterparties; and

(6) systems and procedures to ensure that you will have prompt access to your funds and securities.

In addition, our clearing firms, JPMCC and Pershing, have informed us that they back up their records (including those that relate to your accounts) at multiple remote locations and maintains geographically dispersed facilities that will permit them (within a matter of hours) to provide the services now provided at their facilities in the New York area. While every emergency situation poses unique issues based on factors such as time of day and the nature and severity of the disruption, we have been advised by JPMCC and Pershing that their objectives are to restore their own operations, complete existing transactions, and be able to accept new transactions and payments in no more than 12 hours. Your orders and requests could be delayed during the period in which JPMCC and Pershing are restoring their clearing operations.

Business disruptions can vary in duration and scope: business disruptions can vary from minimal to severe; moreover, the scope of a disruption varies from ones that affect only a building or a portion of a city in which a Sandler O'Neill office is located, to disruptions affecting an entire city, or even an entire region. If we are subject to a disruption that affects only a building or a particular office, we will transfer our operations to another Sandler O'Neill office or to a remote site outside the affected area. In such an instance, we expect to have our essential business systems and services restored and recovered within 12-24 hours. If a business disruption were to affect an entire region or city, we would take similar steps to disperse or relocate employees, switch to back-up and remotely-located systems and restore any data not immediately available. In such an event, we expect to have essential business systems and services restored and recovered within 24-48 hours. Whether the disruption is moderate and localized or severe and widespread, we plan to continue in business, transfer portions of our operations to our clearing firm if necessary, and to keep you informed via www.sandleroneill.com, direct communications from your representative or principal Sandler O'Neill contact, or through our emergency telephone number 1-800-635-6851. If a business disruption were so severe as to prevent us from remaining in business, we will assure you of prompt access to your funds and securities.

For more information: or if you have questions about of business continuity plan, please contact C.K. Smith at 901-507-1431 or csmith@sandleroneill.com.

Sandler O'Neill Office Telephone Numbers

New York: 212-466-XXXX

7920 – Equity Research

8000 – Equity Sales

8020 – Equity Trading

7800 – Fixed Income

7700 – Investment Banking

Atlanta: 404-442-XXXX

2888 – Equity Sales

2866 – Investment Banking

2884 – Equity Research

Boston: 617-994-6500

Chicago: 312-281-XXXX

3401 – Equity Sales

3420 – Fixed Income

3440 – Equity Research

3470 – Investment Banking

San Francisco: 415-978-XXXX

5000 – Fixed Income

5050 – Investment Banking

5030 – Equity Research