

Business Continuity Disclosure

DISCLOSURE REQUIRED BY FINANCIAL INDUSTRY REGULATORY AUTHORITY (FINRA) 4370

To address interruptions to BNY Pershing's normal course of business, BNY Pershing maintains a business continuity plan, which includes geographically dispersed data centers and processing facilities. The plan is reviewed annually and updated as necessary.

The plan outlines the actions BNY Pershing will take in the event of a building, city or regional incident, including:

- Continuous processing support by personnel located in unaffected facilities
- Relocating technology or operational personnel to alternate regional facilities
- Switching technology data processing to an alternate regional data center

All BNY Pershing operational facilities are equipped for resumption of business and are tested. Regarding all circumstances within our control, BNY Pershing's Critical Business Service recovery time objective for business resumption, including those involving a relocation of personnel or technology, is four (4) hours or less, depending upon the availability of external resources.

In the event that your financial organization experiences a significant business interruption, BNY Pershing may be contacted directly to process limited trade-related transactions, cash disbursements and security transfers. Instructions to Pershing must be in writing to general.customer.service@bny.com or postal service as follows:

Pershing LLC
P.O. Box 2065
Jersey City, NJ 07303-2065

Please note that the information above is for business interruption-related issues only, and should not be used for any other purposes, such as change of address notices, account transfers and credit verification. Information received that is unrelated to business interruption issues will not be acted upon. For additional information about how to request funds and securities when your financial organization cannot be contacted due to a significant business interruption, refer to the information below or dial the following BNY Pershing telephone number (201) 413-3333 for instructions. The specific transactions BNY Pershing may perform for clients of our introducing firms, and the required accompanying information, are as follows:

Trades

BNY Pershing will process the following closing security transactions:

- Sale of security position held long in the client's account
- Buy of security to close-out short security position

BNY Pershing will process closing security transactions upon receipt of written instructions that must include the following information:

- Client brokerage account number
- Client name (as registered on the brokerage account)
- Security description, including symbol or CUSIP® number
- Quantity of order (e.g. shares, contracts, bonds, etc.)

Note: All orders will be handled as market orders and on a best efforts basis

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Cash Disbursements

BNY Pershing will process cash disbursements upon receipt of signed written instructions that must include the following information:

- Client brokerage account number
- Client name (as registered on the brokerage account)
- Exact amount to be disbursed
- Method of disbursement (as follows), and provide the information indicated:

a) Check

- Indicate name and address of record check is to be mailed to*

***Note:** Checks will only be supporting to the mailing or legal address of record on your account

b) ACH Transfer

- Indicate receiving bank name, ABA number and receiving bank account number and account title*

***Note:** ACH transfers will only be supported to a bank instruction that has been pre-authorized as a standing instruction on your account

Account and Securities Transfers

BNY Pershing will act on account and security transfer requests received via the Automated Customer Account Transfer Service (ACATS) or via alternative Non-ACAT transfer instruction received directly from the financial institution to which you are requesting a transfer*. To facilitate the transfer of your account, contact the financial institution to which you are requesting a transfer directly for instructions, that institution will initiate the transfer and work directly with BNY Pershing to complete the transfer.