

Business Continuity Disclosure

DISCLOSURE REQUIRED BY FINANCIAL INDUSTRY REGULATORY AUTHORITY (FINRA) 4370

To address interruptions to Pershing's normal course of business, 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 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 Pershing operational facilities are equipped for resumption of business and are tested. Regarding all circumstances within our control, Pershing's 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.

If your firm experiences a significant business interruption, you may contact Pershing directly to process limited trade-related transactions, cash disbursements and security transfers.

Trades

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

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
- Number of shares

Note: All orders will be handled as market orders

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, NJ 07303-2065

Please note that this fax number 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 on this fax that is unrelated to business interruption issues will not be acted upon.

Cash Disbursements

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
 - b) Federal Funds
 - Indicate receiving bank name, ABA number and receiving bank account number
- Note:** The receiving bank account name and brokerage account name must be identical unless we have a letter of authorization on file indicating alternate instructions.

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Securities Transfers

Pershing will process security transfer requests upon written instructions that must include the following information:

- Client brokerage account number
- Client name (as registered on the brokerage account)
- Description of security(ies) to be transferred, including symbol(s) or CUSIP number(s)
- Quantity to be transferred
- Receiving account information for securities, as follows:
 - a) Transfer to another brokerage account at Pershing
 - Provide receiving account number at Pershing (name and address on both accounts must be the same)
 - b) Transfer to another financial organization
 - Name of the receiving financial organization
 - DTC number (if the receiving financial organization is a registered broker-dealer)
 - Name of the receiving financial organization

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March 2018