

Business Continuity Disclosure

DISCLOSURE REQUIRED BY FINANCIAL INDUSTRY REGULATORY AUTHORITY (FINRA) 4370

Pershing Advisor Solutions and its affiliates maintain a business continuity plan that covers the resumption of business processes for each Pershing Advisor Solutions department in the event of a business interruption, consistent with applicable regulations, including FINRA Rule 4370. The plan is updated whenever there is a material change to the Pershing Advisor Solutions business. Additionally, Pershing Advisor Solutions policy requires formal semi-annual reviews, including business risk assessments of the plan. Changes to Pershing Advisor Solutions processes, products or the business environment are evaluated and modifications to the configuration of Pershing Advisor Solutions Business Continuity Disaster Recovery Sites ("Recovery Sites") are performed as required.

Current copies of the plan are maintained in several off-site locations.

Pershing Advisor Solutions also maintains Recovery Sites for its personnel. The Recovery Sites provide for the relocation of Pershing Advisor Solutions associates to resume processing operations and

trading functions in the event of a business interruption. Each operations or trading workstation to be used under the plan is equipped with all the software and telecommunication equipment needed for Pershing Advisor Solutions associates to continue in their roles. A centralized fax and wire printer room, where all communications to Pershing Advisor Solutions are controlled, is also maintained. Partitions on the hard drives of the workstations to be used under the plan separate business continuity client server, and market data and desktop applications from the day-to-day uses of the Recovery Sites workstations. Pershing Advisor Solutions also employs telephone rollover technology whereby the local telephone company is able to route inbound calls and faxes to the Recovery Sites' facilities outside of Jersey City, NJ.

If you are unable to contact your Investment Advisor due to a significant business interruption, you may contact Pershing Advisor Solutions directly to process limited trade-related transactions, cash disbursements and security transfers. Such instructions to Pershing Advisor Solutions must be in writing and transmitted via facsimile at (866) 355-5571 or postal service as follows:

Pershing Advisor Solutions LLC

P.O. Box 2065

Jersey City, NJ 07303-2065

For additional instructions, select the Customer Support links at Pershing Advisor Solutions' website or contact your dedicated service team.

BNY Pershing maintains its own business continuity plan, which is outlined below. The Pershing plan includes geographically dispersed data centers and processing facilities. The Pershing plan is reviewed annually and updated as necessary. The Pershing plan outlines the actions Pershing will take in the event of an incident, including:

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

All BNY Pershing operational facilities are equipped for resumption of business and are tested. In circumstances within BNY Pershing's control, it is BNY Pershing's objective to resume business within four (4) hours or less depending upon the availability of external resources. In the event that you and your

Investment Advisor(s) are unable to contact Pershing Advisor Solutions due to a significant business interruption, you may contact Pershing directly to process limited trade-related transactions, cash disbursements and security transfers. Instructions to Pershing must be in writing and transmitted via facsimile at (201) 413-5368 or by postal service to Pershing LLC, P.O. Box 2065, Jersey City, NJ 07303-2065.

For additional information about how to request funds and securities when Pershing Advisor Solutions cannot be contacted due to a significant business interruption, please access the information located in the Business Continuity and Other Disclosures link on the Pershing website at www.pershing.com or call (201) 413-3635 for recorded instructions.

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