

## Business Continuity

Wells Fargo Clearing Services, LLC and Wells Fargo Advisors Financial Network, LLC (Members SIPC, non-bank affiliates of Wells Fargo & Company) & (hereinafter known as "WFA") are committed to protecting the interests of our clients and shareholders. The following information concerns our efforts to ensure that impact to your business is minimized in the event of an emergency or disaster.

Securities industry regulations require each broker-dealer to create and maintain a business continuity plan tailored to the size and need of the member and reasonably designed to enable the member to meet its existing obligations to its clients or other counter-parties. In accordance with these requirements, WFA has designed a business continuity plan to address possible scenarios in efforts to minimize any service impact to our clients.

In keeping with the regulatory requirements, the business continuity plan for WFA is designed to address key areas of concern -- including, but not limited to, the following:

- Data back-up and recovery
- Mission-critical systems
- Financial and operational assessments
- Alternate means of communication between the firm and its clients
- Alternate means of communication between the firm and its team members
- Alternate physical locations of team members
- Critical business constituent, bank and counter-party impact
- Regulatory reporting
- Communications with regulators
- How WFA will ensure that clients have access to their funds and securities in the unlikely event that WFA determines it is unable to continue its business

Since events creating disruption of business may vary in nature and scope, WFA has anticipated scenarios in which the following are affected:

- A WFA branch, firm, or office
- A primary WFA building at its headquarters location
- A citywide area
- A regional area

Regardless of the scope of potential disruption, WFA will strive to continue to provide services to its clients. In the event where a WFA branch location is impacted, a contingency plan was created to ensure client telephone calls will automatically be re-routed to a separate location, either to another branch or to the headquarters. Additionally, WFA clients can access their accounts in various ways, including, but not limited to, telephoning Wells Fargo Advisors Solutions, visiting any of our branch offices, or through our online services at [www.wellsfargoadvisors.com](http://www.wellsfargoadvisors.com). These alternative access methods are provided so that our clients are able to maintain consistent and constant access to their accounts.

In the event that a primary building or business district is impacted, WFA is fortunate to have a divided corporate presence in the St Louis, MO, Richmond, VA, and Charlotte NC areas. These facilities are equipped with UPS systems, generator power backup and have 24-hour security services. Should one of the primary buildings in St Louis, MO, Richmond, VA, and Charlotte NC be affected by a disruption, alternate facilities exist that can be used to help restore operations.

In the unlikely event of a citywide or regional disruption, WFA has geographically diverse operations that can sustain critical processing if a primary location is impacted. In addition, WFA has established recovery sites in St. Louis and New Jersey that can be used to restore time sensitive functions as soon as key team members are relocated to the facility. Additionally, as a subsidiary of Wells Fargo & Company, WFA would intend to take advantage of any available facilities of other Wells Fargo & Company affiliates that may be located in other geographic regions. In the event that any such disruption occurs, we have developed alternative service arrangements, systems, locations, and contingency plans to ensure that any service affected is quickly restored.

WFA has identified several computer applications with Mission Critical or High criticality ratings and has documented this within the business continuity plans. Our primary application provider, Thomson Reuters, Inc. has conducted successful testing with Wells Fargo & Company, generally two times per year since November 2000.

Finally, through its parent company, Wells Fargo & Company utilizes data centers, located in other states, which regularly perform disaster recovery testing.

At a minimum, the WFA business continuity plan is reviewed, updated, and tested on an annual basis. Additionally, our primary internal and external application providers periodically conduct testing of their own back-up capabilities to ensure that, in the event of an emergency or significant business disruption, they will be able to provide us with the critical information and applications we need to continue or promptly resume our business.

It is extremely important that any type of disruption does not unduly impact our clients. Our business continuity plan is designed to allow us to continue to provide the quality service you have come to expect from WFA.