

## Strasbourg Pearson Tulcin Wolff Incorporated

### Business Continuity Plan

Strasbourg Pearson Tulcin Wolff Incorporated (“SPTW”) has established disaster recovery and business continuity plans that will be activated in the event of a significant business disruption (“SBD”). SPTW understands the need to be able to continue material business operations and maintain mission-critical business systems should a SBD occur. SPTW’s business continuity plans include emergency procedures, scenario planning, back-up communications, and key systems support as required industry regulations.

In planning for potential significant business disruptions, SPTW has studied a number of scenarios, including, for example, a disruption to a single building, a city-wide disruption, and a regional business disruption. The firm’s plans are intended to permit the continuation of business operations during most types of disruptions by resuming mission-critical operations within minutes for minor disruptions, or within the same business day for more serious disruptions, or within the same business day for more serious disruptions. To assist in maintaining continuity, the firm maintains back-up records in an alternative location.

In the case of an extreme disruption, where the immediate continuation of business may not be practical, SPTW will implement emergency actions that will allow clients prompt access to their funds and securities. Should a contingency situation occur, SPTW’s primary means of communication with its customers will be through cellular telephone and/or email. We will also work closely with our clearing firm, Pershing, LLC. Pershing may be contacted at (201) 413-3635 for recorded instructions. Pershing LLC’s website address is [www.pershing.com/about.htm](http://www.pershing.com/about.htm).

SPTW’s business continuity plan is subject to continual modification and upgrading and contains details of confidential and proprietary nature. Therefore, the plan will not be distributed in full to the public. However, periodic updates will be communicated in writing on the customer monthly statements to keep customers informed of changes to the plan that may affect them. If you have any questions regarding SPTW’s Business Continuity Plan, please call (800) 221-4270 or (212) 952-7500, or email us at [Schumacher@sptw.com](mailto:Schumacher@sptw.com).