

ETC Brokerage Services (“ETCB” or the “Firm”) has developed an internal business continuity plan (“BCP” or the “plan”) that will be used in the event of a severe business disruption (“SBD”). This plan outlines the anticipated measures that would be taken to ensure the integrity and availability of our client transactions and account data during an SBD or unforeseen events.

Included in our BCP are policies, procedures, and contingencies that are based upon the severity of the business disruption that spans local events, individual facility losses, and regional disruptions.

ETCB has taken precautions to prevent the loss of any customer information and will work to resume business with our clients expeditiously in the event of an SBD. The amount of time to recover from an event will depend upon the severity of the disruption and geographic scope along with the impact on the Firm’s overall operations.

In the event of a disruption to only our office location(s) that houses our various operations, we will transfer operations to our offsite employee locations and expect to resume business within 8 hours. In a disruption that affects our business region, we anticipate clients will continue to have access to their account holding(s) and funds through ETCB. In either event, we plan to continue business operations and notify you through our online website or telephone systems as to how to contact us as well as provide emergency procedures. If you are unable to reach ETCB through our telephone number, 1-877-403-0369, customers can access their accounts online at [www.etcbrokerage.com](http://www.etcbrokerage.com) or your single sign on access through myEquity.

Our BCP addresses: data backup and recovery; mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical suppliers, contractors, bank, and counter-party impact; regulatory

reporting; and assuring our clients prompt access to their funds and securities if we are unable to continue business operations.

In order to support our plan and ensure customer satisfaction and security, ETCB relies in part on its affiliate Equity Trust Company that has also implemented a business contingency plan for online backups of related critical information, as well as equipment and software for our employees to work at full capacity remotely in the event of a SBD.

ETCB maintains and evaluates its emergency plans on an on-going basis to help minimize disruptions. In addition, the Firm’s self-clearing third-party operations service provider has established provisions for the backup of critical Firm-related information in a geographically separate area which is outlined in their own business continuity and resumption plan to further ensure that our clients will have access to their account information, holdings, and funds.

ETCB’s BCP is subject to modification at any time, and the Firm seeks to provide material updates to its plan via information posted on our website at [www.etcbrokerage.com](http://www.etcbrokerage.com). Although the plan is regularly updated and may be reviewed by our regulators, ETCB cannot guarantee that the BCP will be successful for each business disruption or that it will avoid or mitigate any such disruption. Customers may contact us if they have questions or are seeking further information regarding the Firm’s BCP.

If your account at ETCB is managed by an advisor you selected, we will work directly with your advisor(s) in the event of a BCP. Any questions you may have regarding access to funds that may require action in your account should be directed to your advisor.