

Business Continuity Plan Summary Plan Disclosure

Overview

WCMA (“the Firm”) has created and implemented a business continuity plan (“BCP”) in an effort to mitigate the effects related to unforeseen business interruptions. This BCP is designed to enable Firm to continue to provide services to its clients in the event of an emergency or significant business disruption (“SBD”).

Communications and locations of Employees during a disruption

In the event of a SBD, the Firm will communicate with its employees in several different ways. The Firm will employ a calling tree, which would be implemented by management in the event of an SBD. The BCP also addresses the relocation of staff to alternative back-up locations in New York and the surrounding area. Recovery time for most of the applications involved in the Firm’s business and relocation to alternate locations is expected to range from immediate to 24-48 hours.

Communications with Customers

The Firm currently communicates with its clients using the telephone, email, fax, US Mail, and in person. In the event of an SBD, the Firm will assess which means of communication are still available and use the means closest in speed to the means used in the past. Additionally, if all traditional means of communication are not available, the Firm will post (if at all possible) emergency contact information and instructions on its parent affiliate web site (www.willis.com) regarding access to the Firm’s representatives.

If you cannot reach us in the event of an SBD, you should contact our clearing firm, Pershing LLC, for instructions on how it may provide prompt access to funds and securities, execute orders and process other trade-related, cash, and security transfer transactions.

Pershing LLC Contact information

Customer Support: (201) 413-3635, Fax: (201) 413-5368

Alternate Pershing number for recorded instructions: (213) 624-6100 x500

Books & Records

The Firm maintains hard-copy books and records and electronic records primarily at its Main Office. If records are lost as the result of a business disruption or for any other reason, the Firm has the means to physically recover data from electronic back-up files.

Vendors and Counterparties

The Firm’s BCP may need to rely upon the recovery and restoration of services provided by various critical business constituents, at both primary and alternate locations. The Firm has considered the extent to which it may be able to depend upon these business relationships during an SBD as a part of the initial decision to do business with the various vendors. Where possible the Firm has engaged and/or vetted alternate arrangements in order to avoid business disruptions in the case of a business constituent not being able to provide needed goods or services in an emergency.

Disclosure

The current BCP is designed to address the continued operation of the Firm in the event of an emergency situation or SBD. However, all risks of business interruption cannot be eliminated and the Firm cannot guarantee that systems will always be available or recoverable following an SBD. Furthermore, the Firm has no control over and must rely upon the disaster recovery plans of its various critical business constituents and vendors. In the event that material changes are made to this BCP, the Firm will post the updated summary on its parent affiliate web site and send an updated copy to all of its clients.

The information contained in this disclosure is provided by the Firm for informational purposes only, and nothing contained herein shall be construed to amend, supplement or otherwise modify any of the terms and conditions set forth in any customer agreement between you and the Firm.