



Business Continuity Plan

Thurston Springer is committed to providing reliable, trustworthy service that represents the best interests of our clients. The firm has developed a Business Continuity Plan to protect clients and employees in the event of an emergency or significant business disruption. Since the timing and impact of disasters and disruptions are unpredictable, we anticipate needing to be flexible in responding to actual events as they occur.

The Plan is designed to protect client assets and help prepare for securing employees' safety and firm property, making financial and operational assessments, promptly recovering and resuming operations, protecting the firm's books and records, and allowing our clients to transact business and to access their funds and securities. In short, our Business Continuity Plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

The Business Continuity Plan considers various scenarios that range in severity - from just our office to the entire building, to our local area, to a regional level. In the event Thurston Springer's office location is inaccessible, alternative locations have been established and prepared to facilitate business operations. The firm has redundancies in place for its business-critical systems and our phone system has a forwarding feature when it is not working. Depending on the severity of the issue, we believe that we can resume most business functions within the same day as the disruption. Our goal in all situations is to return to normal business conditions as soon as possible, with minimal impact to our clients and employees. In an extreme situation where continuing business may not be possible or practical, Thurston Springer ensures clients the ability to transact business and to access to their funds and securities.

- **Corporate Headquarters Location and Telephone Numbers**

Thurston, Springer, Miller, Herd & Titak
9000 Keystone Crossing, Suite 740
Indianapolis, IN 46240

Local (317) 581-4000
Toll Free (800) 433-8049
Fax (317) 581-4014

Website www.ThurstonSpringer.com

- **Custody of Assets**

Our clearing firm backs up our important records in a geographically separate area. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, we have been advised by our clearing firm that should it experience a significant business disruption, its objective is to provide the best possible recovery to our firm and clients.

Clients with accounts held directly at a mutual fund, annuity, life insurance or other financial services company will have the ability to call those respective companies directly if needed.

- **Limited Ability**

Thurston Springer does not guarantee that for every disaster or business disruption, such plans will be successfully implemented or that such plans will be sufficient and appropriate to avoid, deter or mitigate the disaster or business disruption.

If you have questions about our Business Continuity Plan, contact Compliance at (317) 581-4000 or (800) 433-8049.

- **Change in Policy and Updates**

Thurston Springer's Business Continuity Plan is subject to change at any time without notice. Updated plans will be promptly posted on our website: www.ThurstonSpringer.com.