

Business Continuity Plan

BLS is committed to safeguarding the interests of our customers and employees in the event of an emergency or other significant business disruption. BLS has developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this summary of our Business Continuity Plan.

We use Pershing LLC as our clearing agent and provider of systems to enable our customers to trade. Pershing maintains all “mission critical systems” pertaining to the line of business, except for a cluster of e-mail servers used primarily for employee-to-employee communication, as well as a comprehensive disaster recovery plan.

BLS' Business Continuity Plan

After a significant business disruption (“SBD”), BLS plans to, as quickly as practicable and to the extent reasonably feasible, given the scope and severity of the significant business disruption: safeguard our employees and our own property, recover and resume business operations, make financial and operational assessments, protect our books and records and assist our customers to transact business.

Our business continuity plan covers data backup and recovery; all critical systems; financial and operational assessments; alternative communications with customers, employees, independents, and regulators; alternate physical location of employees; critical suppliers of services and products, banks and counter-parties; regulatory reporting; and helping to assure customers prompt access to their funds and securities if we are unable to continue our business. All employees have a copy of BLS' business continuity plan and, as appropriate, have been advised of their responsibilities in the event of a significant business disruption.

In the event of an internal or external SBD that makes telephone service unavailable, our registered persons will take the customer orders or instructions and contact Pershing on their behalf, and if web access is unavailable, we will post on our website that customers may access their funds and securities by contacting Pershing at 201-413-3635. In the event of an SBD we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with a customer. For example, if we have communicated with a party by e-mail but the Internet is unavailable, we will call them on the telephone and follow up, where a record is needed, with a paper copy in the U.S. mail. As practicable, alternate work locations would be assigned, data restored, other records restored, and communication reestablished with employees and customers. Pershing and BLS backup all electronic data on a daily basis for BLS, in compliance with all federal, state and industry regulations. All records are packed and labeled for storage at the off-site facility.

Varying Disruptions – Significant business disruptions can vary in their scope. Our business continuity plan anticipates two kinds of significant business disruptions, internal and external. Internal disruptions affect only BLS' ability to communicate and do business, such as a flood or fire in our building. External disruptions prevent the operation of the securities markets or a number of firms, such as a blackout, terrorist attack, or a wide-scale, city or regional disruption. Within each of these areas, the severity of the disruption can also vary from minimal to severe.

The actual impact to BLS of a disruption of business is dependent upon the event and the severity of that event. BLS is dependent, as is everyone, on electrical power and telephone lines. In certain instances, we can overcome these obstacles. In all cases, both for internal and external disruptions that prevent us from using our main offices, we plan, to the extent possible, to relocate to a disaster recovery site, continue in business and assist our customers in transacting business. The systems we deem critical are telecommunications, computer systems, books and records, and location. Our mission in a business disruption situation is to provide for the safety of our employees, to stay in contact with our customers and resume normal business activities in as little time and with as little disruption as reasonably possible, generally within 24 to 48 hours. As stated above, BLS relies heavily upon Pershing in order to enable it to continue to provide securities to its customers in the case of an SBD.

BLS has staff on location to handle critical functions should we experience a business disruption. If work volume dictates, additional staff will either be held over and/or called in.

For More Information

The business continuity plan is subject to modification at any time. Material updates to this summary will be promptly posted on our website and customers also may be able to obtain a copy of our current business continuity plan summary by request. If you have questions about our business continuity plan, you can contact us at 844-553-9082.

Disclosure Required by FINRA Rule 4370(e)

Clearing Agent maintains a business continuity plan, including redundant data centers and alternate processing facilities to address interruptions to the normal course of business. These plans are reviewed annually and updated as necessary. The plans outline the actions Clearing Agent will take in the event of a building, city-wide, or regional incident, including relocating technology and operation personnel to pre-assigned alternate regional facilities. Technology data processing can also be switched to an alternate regional data center. All Clearing Agent operational facilities are equipped for resumption of business and are tested several times per year. Clearing Agent's recovery time objective for business resumption, including those involving a relocation of personnel or technology, is four (4) hours. This recovery objective may be negatively affected by the unavailability of external resources and circumstances beyond our control. In the event that BLS experiences a significant business interruption, Clearing Agent may be contacted directly to process limited trade-related transactions, cash disbursements, and security transfers. Instructions to Clearing Agent must be in writing and transmitted via facsimile at 201-413-5368 or by postal service as follows:

Pershing LLC P.O. Box 2065 Jersey City, New Jersey 07303-2065

For additional information about how to request funds and securities when BLS cannot be contacted due to a significant business interruption, please visit the “About Pershing” section of the Clearing Agent website at www.pershing.com or call 201-413-3635 for recorded instructions. If you cannot access the instructions from the website or the previously noted telephone number, Clearing Agent may be contacted at 213-624-6100, extension 500, as an alternate telephone number for recorded instructions.

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Investments are: Not Guaranteed—Involve Risk—May Lose Value.