

Business Continuity Plan Disclosure

At Zions Direct, Inc. (Zions Direct), we recognize how closely our clients rely on our systems and services. In accordance with applicable regulations, Zions Direct has developed a Business Continuity Plan to help the firm operate in response to an emergency or significant business disruption. In order to maintain the security and effectiveness of this plan, Zions Direct does not provide specific details in this disclosure, but Zions Direct plan does include:

- Description of the firm's daily back-up of specified data and records and maintenance of back-up media at a secure offsite location.
- Alternate forms of communication between Zions Direct and its customers, employees, vendors and regulators.
- A review of financial and operational risks.
- Alternate physical location of employees, logistical and safety strategies.
- Identification of the firm's mission critical systems.
- Identification of critical firm operations and, where applicable, how those operations could be re-established in the event of a disruption.
- Identification of how the firm will assure our customers' prompt access to their funds and securities in the event that the firm determines it is no longer able to continue business.

Response to Incidents of Varying Scope

Business interruption will include any event, either external or internal, that creates situations where Zions Direct must alter normal/daily processing procedures caused by extreme operational site disruption. Zions Direct's business continuity plan has been written to respond to building and city-wide disruptions. In these cases, the plan allows Zions Direct to continue to do business, at a limited capacity, and to reasonably meet client obligations within the business day.

- Disruptions that cause evacuation of a particular building, but no damage takes place and systems stay functional.

In the event that we need to evacuate a particular building, the highest ranking company official available will make the decision to activate the continuity plan. All employees will be notified to exit the building per firm-approved evacuation procedures.

All inbound numbers will be re-routed to the backup data center where they will be prompted with messages until the predetermined emergency staff logs into the phone queues via Agents at our alternate site.

In the event of this type of site disruption, customers should experience a minimal amount of downtime in their ability to contact Zions Direct.

- Disruptions that cause immediate evacuation of a particular building, damage takes place and systems are not functional.

All inbound numbers will be re-routed to the backup data center where they will be prompted with messages until the predetermined emergency staff logs into the phone queues via Agents at our alternate site. If the local alternate site is affected by the disruption, all critical personnel will be directed to other disaster recovery sites to resume operations.

Procedures detailing these responsibilities are included in the business continuity plan. Common (probable) examples when disaster recovery site procedures will be enacted for this type of site impact interruption include (but are not limited to):

- Acts of nature—hurricanes, floods, fires, etc.
- Global solar issues—impacting national and/or international communication and power grids.
- Acts of terrorism.

Disclaimer

Zions Direct's business continuity plan is designed for our customers to have full access to our systems and their funds in a timely manner. In the case of an extremely significant disruption, the actual recovery time depends upon the severity of the disruption and how many of Zions Direct's buildings and personnel are affected, the condition of the financial and banking systems, and a myriad of other factors outside of our control.