

## BCP Client Disclosure and Acknowledgement

Date: 02/23/2016

Subject: Business Continuity Plans  
FINRA Rule 3510

Effective Date: 02/23/2016 Purpose of this disclosure

The FINRA recently adopted business continuity rules (FINRA 3510). The rule requires all FINRA member firms to create and maintain written business continuity and contingency plan and procedures relating to an emergency or significant business disruption ("SBD")

### **Firm Policy**

In the event of a SBD it is the policy of **Wells Nelson & Associates, LLC** to react quickly and efficiently and according to pre-tested and pre-planned procedures to ensure the safety of our employees, associates, customers, as well as critical operational and account data. We will provide information to employees, associates and clients both pre and post SBD to ensure operations are run as smooth as possible during this critical time.

### **Significant Business Disruption (SBD)**

#### **Definitions:**

Our firm's business continuity plan covers three types of disruptions:

- **Firm Disruptions (FD)** - Includes but are not limited to firm disruptions such as a building fire, a building power outage, computer or network malfunction or virus infection disruption or disconnection of telephone services.
- **Local Disruptions (LD)** - Includes but not limited to local disruptions such as regional floods, fire, terrorist attack, earthquake, tornado, hurricane, chemical spill or regional power, telephone or internet outages.
- **Regional Disruptions (RD)** - Includes but not limited to regional disruptions such as power grid failure or regionally affected natural disaster or terrorist attack.

#### **FD**

In the event of a FD, clients can call our alternative location at (918) 382-9250 for information and instructions. Under this scenario, Wells Nelson will plan to continue doing business under this scenario with a period of two hours of the FD.

#### **LD**

In the event of a LD, clients can call our alternative location at (918) 382-9250 or if the secondary location is effected by the LD, clients can call Special Projects, Operations, Hilltop Securities, Inc. at (866) 797-5227 for information and instructions. Under this scenario, Wells Nelson will close operations and inform our clients via phone, e-mail or website our recovery time.

#### **RD**

In the event of a RD, clients can call our alternative location at (918) 906-3649 or if the secondary location is effected by the RD, clients can call Special Projects, Operations, Hilltop Securities, Inc. at (866) 797-5227 for information and instructions.

### **Data Back-up**

**Wells Nelson & Associates, LLC** backs up its critical information and stores this information at a designated off-site location in the event of a destruction of critical documents caused during a SBD.

**Plan review and updates**

This Business Continuity Plan is subject to change and is modified and tested at least annually for updates and revisions.

An updated and current copy of this summary is posted and can be viewed at <http://www.wellsnelson.com>. Clients can also request this document by calling the firm and a copy will be mailed via U.S mail to the client.