

Comprehensive Asset Management & Servicing, Inc.
(And Affiliated Companies)
Business Continuity Plan (BCP) Summary

A variety of events could occur that would disrupt our ability to work with clients. This plan summary is designed to provide information on these types of potential events (referred to as “Significant Business Disruptions”, or SBDs), and how we intend to respond to them should such an event occur.

Although not all-inclusive, SBDs that might occur fall into these types of categories:

Internal/Company-wide: Events that affect only our company. These might include a fire, local blackout, local earthquake, or other serious but localized events.

External: Events could occur that would affect our company as well as others with which we do business, primarily our clearing firm (Pershing, LLC) and mutual fund or variable product companies, which hold client assets. Such events could include terrorist attacks, financial system disruptions, or other large-scale physical or information/communication systems damage.

Regardless of the type of event, it would be our plan to continue to operate our business. We would plan to be operating again in a timeframe ranging from 4 hours to one business day, depending upon the severity of the SBD.

In the event of a company-wide SBD, customers can contact their individual registered representative; our clearing firm, Pershing, LLC; or their individual mutual fund or variable product company, if their assets are held there.

In the event of an external SBD, affecting us and either our clearing firm or our mutual fund/variable product providers (or both), customers can reach us at alternate phone numbers which we will provide on our website, www.aurorapw.com. Our external asset custodians (Pershing and mutual fund/variable product providers) have redundant information systems. If possible, they will switch over to such systems in order to resume operations within a period of hours to one business day, in most cases.

Our clearing firm, Pershing, LLC, has provided information that can be viewed on its website at http://www.pershing.com/business_continuity.htm. Individual mutual fund/variable product companies also maintain websites, and those could be checked for more information as needed in the event of an SBD affecting those assets.

Our company has redundant electronic information backups, using both tape and offsite data storage. In the event of an SBD that affects such information, we would restore the information from the backup.

Our company maintains most of its paper records both at the home office and in our numerous branch and non-branch locations. In the event of damage to the home office, such records would be restored from the offsite locations. In the event of damage to the offsite location, the records would be restored from the home office.