



## NWF Advisory Services, Inc. Business Continuity Plan

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NWF Advisory Services, Inc. (“NWF”) is committed to providing timely service to our Advisory Representatives and their clients. We recognize the importance of preparing for various disaster scenarios that could hamper our ability to provide such services. NWF has taken steps to provide for business contingency and continuity planning under a variety of potential scenarios. We continue to upgrade our continuity plans and expand our resources in order to provide for the recovery and timely resumption of critical business operations to our clients.

NWF maintains a business continuity plan and intends to continue business in the event of a significant business disruption. NWF provides regular training to all personnel to ensure advisers and staff know what to do in the event of an emergency. In addition, NWF recommends that Advisory Representatives review the business continuity plan with their clients annually, to ensure clients are aware of all alternate means of communication in case of a disaster emergency. Please be aware that NWF relies on its correspondent-clearing firm (Pershing, LLC) to perform certain functions on its behalf, including the execution of security transactions and the maintenance of client funds and securities.

In the event of a significant business disruption at the main office in Los Angeles, NWF may route calls to an office location in a separate geographic location. We can also route calls to multiple cell phones for answering. Although NWF intends to continue business in the event of a significant business disruption, there are some disruptions that may render NWF or your Advisory Representative(s) unable to continue business. Under such circumstances, NWF will assist so clients will be able to access their funds and securities within a reasonable time. If the client’s Advisory Representative is not available, please contact Shehab Mohammad, Heather Scully and/or Cade Thornton for assistance.

### Types of Business Interruptions

The following are some common examples of business disasters/interruptions that can occur anywhere at any time:

- Environmental incidents – tornadoes, hurricanes, mud slides, wildfires, floods and earthquakes
- Equipment or system failure – power grid shutdown, blackouts, rolling blackouts, computer viruses and security breaches
- Loss of utilities and service – electrical power failure, loss of water supply, loss of fuel supply and fuel shortage
- Personnel issues – illness, resignations and maternity leave
- Organized and/or deliberate disruption – acts of terrorism and sabotage, theft, arson and labor disputes
- Legal/regulatory action – lawsuits and SEC violations
- Pandemic - Widespread national/global health issues as declared by local or federal government.

## **I. NWF's Response to Events of Varying Scope**

The following sections describe specific events and NWF's corresponding general response to those events. Clients, however, should note that these responses are subject to modification and, depending on the severity of a specific event; NWF cannot guarantee that it will be able to follow the stated course of action. If these responses are modified, NWF will distribute the updated disclosure statement.

Under the following scenarios, NWF intends to continue its business:

### Single Building Disruption – Alternative worksite

These disruptions may be caused by physical damage, technology problems, or an inability to have personnel arrive at an office. In the event that there is a significant business disruption to a single building or NWF's internal primary system, NWF may, if necessary, transfer its operations or route incoming calls to another office or remote location in a separate geographic area. From this separate location, NWF will accept client orders. In this process, clients may experience a minor delay in reaching NWF due to increased clients calls, technology delays, or other minor difficulties arising from the transfer of operations. NWF expects that operations could be disrupted for up to eight (8) hours. If NWF's trading platform is affected, there may be a more significant delay. NWF, however, will be able to place orders outside the trading platform.

### Business-District, City-Wide, or Regional Disruption

In the event that there is a significant business disruption that affects the business district, city, region or country where any of NWF's primary systems are located, NWF may, if necessary, transfer its operations or route incoming calls to another office in a separate geographic location office. In the process, clients may experience a minor delay in reaching NWF due to increased client calls, technology delays, or other minor difficulties arising from the transfer of operations. In addition, if our clearing firm is affected by a business-district, citywide, or regional disruption, clients may experience additional delays. Nevertheless, NWF expects that operations could be disrupted for up to twenty-four (24) hours.

### Critical System Disruption

In the event that there is a disruption to our operation systems that are critical for operations, such as server failure, phone failure, loss of internet connection, inability to connect to client databases, and/or inability to access online trading system, NWF has put in place back-up systems to be able to operate. In the event that the server fails NWF expects that operations could be disrupted for up to eight (8) hours, however, all information stored on the server is backed up daily on a cloud-based network. Should our phone system have difficulties, within one (1) hour or less we are able to program incoming calls to ring to a cell phone for assistance, it can be programmed to any number. During an inability to connect to client databases we have alternative locations with client information that can be accessed, so there should be no down time. Also, should the online trading system go down, we are able to place trades over the phone and still process orders in a timely manner.

**II. Business Emergency Directory**

Shehab Mohammad – President	(562)972-2646
Heather Scully – Chief Compliance Officer	(805)444-7033
Cade Thornton – Assistant Compliance Director	(314)576-1166
Cathy Gonzalez – Operations & Event Coordinator	(213)265-4898

*East Coast Time Zone*

<b>Osaic Wealth, Inc.</b> (Home Office)	(800)821-5100
10 Exchange Place Suite 1410	
Jersey City, NJ 07302	

- Equity Trading Desk (800)821-5100, Dial 1-3-2
- Fixed Income Trading Desk (800)821-5100, Dial 1-3-3
- Mutual Fund Trading Desk (800)821-5100, Dial 1-3-1
- Field Supervision Dept. (800)821-5100, Dial 3-4
- Technical Support (800)821-5100, Dial 2-1

Client Website – brokerage account access only [https://www2.netxselect.com/home\\_028.htm](https://www2.netxselect.com/home_028.htm)

**III. Our Clearing Firm may be contacted in Limited Situations**

In the unlikely event that NWF is unable to continue business; clients may directly contact our clearing firm, Pershing, LLC (“Pershing”), to process limited trade-related transactions, cash disbursements, and security transfers. Instructions to Pershing must be in writing and transmitted via facsimile or postal service as follows:

Pershing LLC  
 One Pershing Plaza  
 Jersey City, NJ 07399  
 (800) 445-4467  
 Fax: (201) 413-5368

All client checks and retirement account contributions that need to be physically mailed for deposit, are to be mailed to the following addresses:

<b><u>U.S. Mail</u></b>	<b><u>Overnight Mail</u></b>	<b><u>Retirement Account Contributions</u></b>
Pershing LLC	Pershing LLC	Pershing LLC – Transfer Processing
PO Box 382121	Attn: 382121	Attn: 382091
Pittsburgh, PA 15250-8121	500 Ross Street 154-0455	500 Ross Street 154-0455
	Pittsburgh, PA 15262-0001	Pittsburgh, PA 15262-0001

For additional information about how to request funds and securities when NWF cannot be contacted due to a significant business interruption, please refer to the information below or call (877) 604-8967 for recorded instructions. If you cannot access the instructions from the previously noted telephone number, Pershing may be contacted at (213) 624-6100 and dial 5 as an alternate telephone number for recorded instructions.

Through our clearing firm, you may process the following transactions:

A. Trades

Pershing will process the following closing security trades: (1) Sale of security held long in your account or (2) Purchase of a security to close-out a short security position. These orders will only be handled as market orders.

In order to place these specific orders, you must provide Pershing with the following information:

1. Your **Osaic Wealth, Inc. ("Osaic Wealth")** brokerage account number
2. Your name (as registered on the brokerage account)
3. Security description, including symbol or CUSIP® number
4. Number of shares

B. Cash Disbursements

Pershing will process cash disbursements upon written instructions that must include the following information:

1. Your brokerage account number
2. Your name (as registered on the brokerage account)
3. Exact amount to be disbursed
4. Indicate method of disbursement (as follows) and provide the information indicated:
  - a) For a check which is payable to account name only, indicate name and address of record check it is to be mailed out to
  - b) For federal funds wire, please indicate receiving bank name, ABA number, and receiving bank account number. Please note that the receiving bank account name and brokerage account name must be identical unless we have a letter of authorization on file indicating alternate instructions.

C. Securities Transfers

Pershing will process security transfer requests upon written instructions that must include the following information:

1. Your brokerage account number
2. Your name (as registered on the brokerage account)
3. Description of the securities to be transferred, including symbol(s) or CUSIP number(s)
4. Quantity to be transferred
5. Receiving account information for securities, as follows:
  - a) In order to transfer your account, to another brokerage account at Pershing, please provide receiving account number at Pershing (name and address on both accounts must be the same

b) In order to transfer your account to another financial organization, please also provide the following information:

- Name of the receiving financial organization
- DTC number (if the receiving financial organization is a registered broker-dealer)
- Account number at the receiving financial organization

#### IV. Variable Product Holdings and Certain Mutual Fund Holdings

NWF does not place its variable annuity and variable life transactions through its clearing firm; rather, transactions are placed directly through the variable annuity life carrier. Accordingly, in the unlikely event that NWF is unable to continue business; clients may directly contact their variable annuity life carrier, as indicated on their periodic account statements, to process limited trade-related transactions. Certain mutual fund transactions also may not be placed through our clearing firm. If this is the case, in the unlikely event NWF is unable to continue business; clients may directly contact their mutual fund provider, as indicated on their periodic account statements, to process limited trade-related transactions. Please contact your Advisory Representative to determine whether your mutual fund orders are placed through our clearing firm or directly through the mutual fund provider.

#### V. Key Personnel

**Shehab Mohammad**, *President* – supervises day-to-day operations and advisers. In the event that Shehab is unable to perform his duties Heather Scully will assume responsibility. Series 7, 63, 66, 24, and 51.

**Heather Scully**, *Chief Compliance Officer* – assists with supervision of day-to-day operations, advisers and human resources. In the event that Heather is unable to perform her duties, and Shehab is also unable to perform his duties, John Chitwood, **Osaic Wealth** Regional Vice President, will assume responsibility. Series 7, 63, 66, 24, and 51.

**Cade Thornton**, *Assistant Compliance Director* – assists Heather with day-to-day operations, compliance requirements and human resources. Series 7, 24, and 66.

#### Conclusion

Please be aware that, while we have continuity plans in place, we cannot guarantee that we will be successful in achieving recovery in the times noted above. For example, we may not be able to implement a plan during a disaster as quickly as we expect, or there may be disasters that we have been unable to anticipate and for which we have no plan. Additionally, if parts of our plan are dependent on third parties, we will have no control over the success or failure of the third party to respond appropriately to the challenges posed at the time of the disaster. These plans are periodically updated and modified. Updated plan summaries will be made available upon your request. If you have any questions, please contact your NWF Advisory Representative.

