

## **Business Continuity Planning Disclosure Statement Country Club Financial Services, Inc.**

In compliance with regulations implemented by the Financial Industry Regulatory Authority, Country Club Financial Services, Inc. has established a business contingency and disaster recovery plan. This plan is designed to ensure that our business will continue to function with little or no interruption, so that your investments will be secure and accessible, and that you will be able to communicate with us regardless of the scope of the situation.

Clients should be apprised that because the firm's plans contain details of a confidential and proprietary nature, they cannot be distributed to the public.

Please be advised that due to the unpredictability of events, this document provides only general guidance, and Country Club Financial Services, Inc. reserves the right to modify its responses to these scenarios as necessary, without advance notice, in order to address additional unforeseen situations. Revised editions of this policy will be posted on our website promptly, as permitted by applicable law.

Certainly, while no contingency plan can eliminate all risk of service interruption, we are extremely diligent about continuing to assess and update our plans to mitigate all reasonable risk.

**Contacting Us** - If after a significant business disruption you cannot contact us as you usually do at your advisor's direct number or Country Club Financial Services, Inc. operations department at (866) 878-2006 or email at: [Securities@countryclubbank.com](mailto:Securities@countryclubbank.com), you should call our alternative number (816) 931-4060 (or go to our web site at [www.countryclubfinancial.com](http://www.countryclubfinancial.com) or our parent company's website: [www.countryclubbank.com](http://www.countryclubbank.com)).

If you cannot access us through those means and your account is held at our clearing firm, Pershing, you should contact Pershing LLC, at (201) 413-3635 or at (213) 624-6100 extension 500 for recorded instructions on how they may provide customer support services. This includes trade-related transactions, cash disbursements, and security transfers. You may obtain additional information by selecting the *Business Continuity and Other Disclosures* link at the bottom of the home page on the Pershing website, [www.pershing.com](http://www.pershing.com).

If you have an account held outside of Pershing LLC, please contact that firm direct. Refer to the prospectus, or statement for contact information and phone numbers.

**Our Business Continuity Plan** - We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our

business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data back up and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternative physical location of employees; critical supplier, contractor, bank and counter-party impact, regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

Our clearing firm, Pershing LLC, backs up our important records in a geographically separate area. While every emergency situation poses unique problems based on external factors, such as time of the day and the severity of the disruption, we have been advised by our clearing firm that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments within a 4 hour time period. Your orders and requests for funds and securities could be delayed during this period.

**Varying Disruptions** - Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business within a two-hour time period. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside the affected area, and attempt to recover and resume business within a four-hour time period. In either situation, we plan to continue in business, transfer operations to our clearing firm if necessary, and provide information to you through our web site [www.countryclubfinancial.com](http://www.countryclubfinancial.com) or our parent company's website [www.countryclubbank.com](http://www.countryclubbank.com) or our customer emergency number, (816) 931-4060, on how to contact us. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer's prompt access to their funds and securities.

**For more information** – If you have questions about our business continuity planning, you can contact us at Country Club Financial Services, Inc., at (866) 878-2006, or email address: [securities@countryclubbank.com](mailto:securities@countryclubbank.com).

Revised: December 2014