



Business Continuity Statement

January 31, 2023

G.A. Repple & Company

Business Continuity Statement

The independent financial advisor that you have chosen is associated with, and supervised by, G.A. Repple & Company, a registered Broker/Dealer and Investment Advisor. Together, your financial advisor and this firm recognize the importance of maintaining the highest possible quality of services for your accounts with us.

The Financial Industry Regulatory Authority (FINRA) [formerly National Association of Securities Dealers] which makes rules to protect you, the investor, has directed us to devise plans to respond to a variety of possibilities that might disrupt our ability to provide continuous service to you. They have also directed us to provide a summary of this information to you.

Business Interruptions:

Our team has developed plans that include the ability to recover from situations of varying severity that include, but are not limited to, unplanned evacuations, power outages, major water leaks, fire, severe weather, earthquakes, pandemics and any facilities failure that may cause business interruptions. We are designing our plans to prioritize our responses according to their time cruciality. Key features of the plans would include employee safety considerations, annual reviews and testing by various departments to assure that our plans are effective.

Our Business Partners:

- If a business interruption occurs at G.A. Repple and Company, you should be able to access your account information by contacting either your financial advisor or the investment company with whom you have your account. You should consult a recent statement for a phone number to contact the investment sponsor.
- If your account is a brokerage account with National Financial Services [NFS], you may have account access via Wealthscapeinvestor.com, or by calling your financial advisor. NFS is also required to have and distribute to all customers a copy of their own plan for handling any business interruptions. You may receive a copy of that summary in addition to this one.

Business Continuation:

It is our intent to recover from any business interruptions as quickly as possible. Our plans call for the use of generators in the event of loss of power lasting longer than four hours. In the event that our physical plant is damaged, it would be our intent to move to a secondary location in order to resume normal operations as quickly as possible. To protect our computer data, we have installed information backup systems and redundancy methods. We have also implemented an off site storage process to safeguard our backup copies. In the event that damage was extensive and widespread, we would plan to re-locate our offices in an unaffected location and resume operations from there.

Notifications:

- In the event G.A. Repple & Company's business is interrupted, we would attempt to notify our associated financial advisors as quickly as possible. We will request NFS to assume control of trading and account functions until we can resume normal operations. We may also delegate supervisory responsibility to other management level personnel at other locations in the event of a business interruption.
- G.A. Repple & Company will communicate with its regulatory agencies regarding the nature and extent of any significant outage as required by law.

Plan available for review:

You may request a copy of the current Business Continuity Plan at any time by writing to us at the address on this letter.

NATIONAL FINANCIAL SERVICES, LLC

Business Continuity Statement

As you may know, your broker/dealer and National Financial Services LLC (NFS) have an agreement in which NFS may provide trade execution, clearing, and other related services for your brokerage account. In connection with these services, NFS is required to communicate its position on business continuity practices.

At NFS, we recognize how heavily you and your broker/dealer rely on our systems and services. We also recognize that the unexpected can and does occur—from simple situations to major outages. NFS has successfully supported critical business activities during disruptions of normal business processes resulting from hurricanes, tornados, blizzards, and other natural and man-made disasters. NFS wants you to know that we have an extensive plan in place to safeguard your assets and protect vital account information in the event of a business disruption.

NFS departments have pre-established contingency and disaster recovery plans. Components of these plans are tested periodically to ensure effectiveness. NFS and its affiliated companies consider contingency planning to be an iterative process, requiring ongoing review to assess various risks and appropriate responses. As a result, this plan may change as necessary. Please feel free to contact your broker/dealer at any time to receive the most recent version of our Business Continuity Statement.

NFS Continuity Planning Guidelines

NFS has developed plans that include the ability to recover from situations including, but not limited to, unplanned evacuations, power outages, major water leaks, fire, loss of water, severe weather, and any facilities failures that may cause business interruptions. Plans are designed to account for business interruptions of various lengths and scope and require that NFS is able to recover critical functions according to their time criticality. Key features of NFS's corporate disaster recovery planning include annual reviews of the following:

- Identification of all mission critical systems (and system backup and recovery for such systems)
- A review of financial and operational risks
- Alternate communications between NFS and your broker/dealer
- Employee safety strategies and communications
- Systems and telecommunications accessibility
- Alternate physical site location and preparedness

A corporate business continuity division articulates planning guidelines and coordinates response and event management across all NFS departments. Each NFS department has dedicated business contingency planners to prepare and test its specific plan. Each NFS department also follows enterprise-wide guidelines for contingency planning and disaster recovery from various scenarios.

NFS Contingency Planning and Business Recovery

NFS mitigates risks to reduce potential issues and impact. In the event of an outage, NFS has tested plans to support recovery of its critical business functions. In addition to following the guidelines stated above, NFS's recovery plans also include the following:

- **Employee Safety** – NFS companies place an emphasis on employee safety. We conduct regular evacuation drills which are led by trained floor wardens and supervised by on-site security personnel.
- **Backup Power** – Sites that support trading and operations are located in buildings with Uninterrupted Power Supply (UPS) and backup generators.
- **Separate Sites** – NFS is located in two primary locations in separate cities. NFS also has additional offices for certain trading and relationship support functions. These separate sites provide backup for certain critical functions.
- **Contingencies for Inclement Weather** – If there is a forecasted weather emergency, hotel rooms are obtained for essential personnel. If the weather emergency could result in an inability to access the primary site, the alternate site would be prepared for use and personnel would be sent there prior to the event. A number of personnel have remote access so they can work from home. Employees can access phone mail and e-mail messages remotely.
- **Contingencies for Pandemic** – If there is a pandemic such as the COVID-19, the firm has put in place procedures that are flexible to address. Protocols may include the following:
 - implementation of social distancing policies and capabilities;
 - distribution of hand sanitizers, masks, gloves and hygiene products;
 - increased sanitizing and disinfecting of facilities;
 - increased use of communication channels to disseminate important health and safety;
 - travel restrictions and quarantines (voluntary and/or mandatory) often based on CDC recommendations;
 - minimization or elimination of group meetings;
 - enhanced use of remote meeting and conference call capabilities;
 - reassessment and revision of human resource policies and testing of information technology (IT) and remote work capabilities; and
 - increased allowable sick time and encouragement to use such time.
- **Designated Contingency Site** – There are pre-established, tested processes for rerouting of critical hotline numbers. In the event of a site outage, customers should experience minimal downtime in their ability to contact NFS.

- **Alternate Site Tests** – NFS conducts alternate site tests for its critical functions at least twice per year. Tests include verification of desktops, records, and re-routing of key hotlines.
- **Notification to Clients** – Procedures for notifying your broker/dealer have been established for NFS associates to follow in the event of an outage. Notification will include information regarding length of outage, instructions for contacting NFS, and support information (e.g., where to send faxes, issues pertaining to data transmissions and communications).
- **Regulatory Reporting** – NFS’s business contingency plans are designed to ensure that, regardless of the length of an outage at a primary location, NFS’s ability to continue to meet regulatory requirements, as mandated by the Securities and Exchange Commission, NYSE, and FINRA, would not be impacted.
- **Communications With Regulators** – NFS will communicate with its regulatory authorities regarding the nature and extent of any significant outage at a primary location, as required by applicable law and regulation.
- **Access to Your Funds** – A site outage at NFS would not impact your ability to have access to your available funds, as NFS’s business continuity plans are designed to ensure sustained service. However, your ability to trade your available funds may be impacted by market events outside of NFS’s control, such as when the market was closed following the September 11 tragedy. Our tested business continuity plans result in necessary personnel being available to approve transactions that result in the disbursement of available funds. In the event that your broker/dealer ceases operations, customers can call the NFS Customer Service Line at 617-563-5977.

If you have any questions, please contact your broker/dealer G. A. Repple & Company 407-339-9090.