BUSINESS CONTINUITY PLAN

BWIS clears through Pershing. Pershing’s disclosure statement for their Business Continuity Plan (“BCP”) is available on their website. We will also mail a BWIS BCP brochure to customers upon request. Our plan addresses the possibility of a future Significant Business Disruption (“SBD”) and how we plan to respond to events of varying scope. The disclosure is as follows:

CONTACTING US

If after a SBD you cannot contact us as you usually do by accessing your account at www.bankofthewest.com, you should call our alternative number at 888-808-2947. If you cannot access us through either of those means, you should contact our clearing firm, Pershing, at 201-413-3635 or their website located at www.pershing.com. Pershing will provide prompt access to funds and security, enter orders and process other trade-related, cash and security transfer transactions for you.

OUR BUSINESS CONTINUITY PLAN

We plan to quickly recover and resume business operations after a SBD 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 BCP is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the SBD.

Our BCP addresses: data backup and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate 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, 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 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 complete existing transactions and accept new transactions and payments no later than the next business day following a business disruption. Your orders and requests for funds and securities could be delayed during this period.

VARYING DISRUPTIONS

SBDs can vary in their scope, such as only our firm, a single building used by the firm, the business district where our firm is located, a specific city where our firm is located, or the whole region or country. 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 as quickly as possible. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area, and recover and resume business within 24 hours and as quickly as possible. In either situation, we plan to continue in business and
transfer operations to our clearing firm if necessary, our customer emergency number 888-808-2947 or Pershing's customer number at 201-413-3635. 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 through Pershing.

For more information – If you have questions about our business continuity planning, you can contact us at BWIS and submit a written request.

Securities and insurance products are not deposits with or obligations of, are not guaranteed or endorsed by Bank of the West or its affiliates, and are not insured by FDIC, the Federal Reserve Board or any other federal government agency. Securities are subject to investment risk, and an insurance product or annuity that involves an investment risk, there is an investment risk associated with the product, including possible loss of principal.