

Comerica Securities Inc.

Business Continuity Statement



At Comerica Securities (CS), we know that you rely on our systems and services for your financial needs. We also know that disruptions can occur. CS intends to continue critical business activities during disruptions (such as tornadoes, blizzards, power outages etc.). CS would like its customers to know that we have a plan in place to safeguard your assets, protect account information, and to provide critical services in the event of a business disruption. CS considers contingency planning to be an ongoing process, and therefore these plans may change as necessary. Please contact us at (800) 232-6983, or visit our web site at: www.comerica.com/securities at any time to obtain and/or review the most recent Business Continuity Statement.

CS CONTINGENCY PLANNING AND BUSINESS RECOVERY

CS has developed plans that include the ability to recover from a variety of situations including, but not limited to, unplanned evacuations, power outages, severe weather, and facilities failures. The plans are designed to account for business disruptions of various lengths and scope (local, regional or national) and address CS' ability to recover and/or provide business functions according to their time criticality.

Designated Contingency Sites

There are pre-established procedures for re-routing critical hotline numbers. In the event of a site outage, customer should experience minimal downtime in their ability to contact CS while hotline numbers are, if necessary, rerouted to backup locations.

Site/Business District/City-wide Disruptions (power-outage, weather emergency, site evacuation)

CS has access to alternate locations in proximity (one hour or less under normal conditions) to its main office headquarters. Each of these facilities is equipped to provide critical support functions if necessary. While our primary strategy involves employees working remotely, in the event the remote work model is not sustainable due to the nature of the disruption, CS intends to locate essential personnel to facilities that can provide support for critical business activities or to shift such activities, where possible, to geographic locations outside of the impacted area. CS anticipates that if communications are rerouted to a facility outside of the region, it will be in less than one hour from disruption time. Once the alternate facilities within the region have been accessed, CS management will decide from where communications and business processes will originate. CS anticipates that this will occur in less than one hour from disruption time. As noted, critical personnel also have remote access so they can work from home or other locations as deemed appropriate based on the nature of the disruption.

Regional Disruptions (power-outage, weather emergency)

CS maintains an alternate location, outside of the region of its main office headquarters, which is equipped to provide critical support functions if necessary. Personnel who can provide trading, relationship and other critical support functions can access this location. CS anticipates that if communications are rerouted to this facility, business processes can be resumed in less than one hour from disruption time.

Notification to clients

The phone number to contact CS is (800) 232-6983. Procedures for notifying customers have been established in the event of an outage. Notification will be made via telephone, mail, email or web-site or a combination of these, whichever is available. Notification will include information regarding length of outage, instructions for contacting us, and other pertinent information.

A site outage at CS would not impact your ability to have access to your available funds, as CS' plans are designed to provide sustained service. Your ability to have access to your funds may, however, be impacted by events that are outside CS' control, such as a national market closure. Our plan provides for essential personnel to be available to approve transactions that result in the disbursement of available funds. In the event that CS must cease operations, brokerage customers can call the Pershing LLC's (our clearing firm) Customer Service Line at (201) 413-3635. Other customers can contact their product provider at the number indicated on their statement. Questions directed to the Pershing LLC Customer Service Line while CS is still in operation will be directed back to CS Customer Service