Summary
Business Continuity Plan Disclosure

T.R. Winston & Company, LLC is committed to safeguarding the interests of our clients and customers in the event of an emergency or significant business disruption ("SBD"). This Business Continuity Plan Disclosure (the"BCP") summarizes T.R. Winston's efforts to mitigate risks inherent with unforeseen business interruptions. Our comprehensive business continuity strategy is designed to enable us to meet our existing obligations to our clients and customers even in the event of an emergency or significant business disruption. This BCP is intended to comply with the rules promulgated by The Financial Industry Regulatory Authority ("FINRA").

Contacting Us

In the event of an internal or external SBD, if telephone service is available, our registered persons will take customer orders and contact our clearing firm on their behalf. If you cannot contact us as you usually do at our main number (908) 234-0300, you should, if internet access is available, go to our website (www.trwinston.com) where our firm will post contact information so that customers may access their funds and securities. If you cannot access us through either of those means you should contact our clearing firm, Pershing, LLC (201) 413-3635 for instructions on how you can have prompt access to your funds and securities, enter orders and process other trade related cash, and security transfer transactions.

Overview

T.R. Winston clears its securities transactions through Pershing, LLC our clearing agent. Pershing maintains a business continuity plan, including redundant data centers and alternate processing facilities, to address interruptions to our normal course of business. These plans are reviewed annually and updated as necessary. In the event of an SBD, we will move our staff from affected offices to the closest of our unaffected office locations. It would also be possible to allow employees to work from home or other appropriate locations, as most systems are internet based and can be remotely accessed. Backup copies of critical systems are maintained on computers offsite or shared drives.

Communication with Our Employees in the Event of a Disruption

The safety and well being of our employees is a vital concern. In the event of an emergency or significant business disruption, T.R. Winston will communicate with its employees via telephone call tree and or email.

Redundancy of Mission Critical Information Technology Systems

T.R Winston and Pershing have several information technology processing and backup sites that, collectively, provide the redundancy required to protect books and records, balance sheet and capital, and provide business continuity and client protection. Pershing's plans outline the actions they will take in the event of a building, city-wide, or regional incident, including

relocating technology and operational personnel to preassigned alternate regional facilities. Technology data processing can also be switched to an alternate regional data center.

Back-Up Trading, Sales and Operations Site

All Pershing operational facilities are equipped for resumption of business and are tested several times per year. Our recovery time objective for business resumption, including those involving a relocation of personnel or technology, is four (4) hours. This recovery objective may be negatively affected by the unavailability of external resources and circumstances beyond our control. For further information please visit www.pershing.com.

T. R. Winston's trading systems are all internet based and could, in an internal or external SBD, be accessed from a remote location.

Protection of Primary Facilities

Protecting the infrastructure of our primary facilities is a high priority because it will allow T.R Winston to continue operations in the event of many disaster situations, by permitting our employees to have access to and use of our facilities during that situation. Many of our systems are alternatively accessible via the internet which would allow many of our employees to have the ability to work from our other office locations or remote locations including their homes.

Disclaimer

T.R. Winston's comprehensive business continuity strategy is designed to enable us to meet our existing obligations to our clients and customers even in the event of an emergency or significant business disruption; however, it is not infallible. The plan is designed to work in many different emergency situations; but these events are, by their nature, unpredictable and it is impossible to anticipate every scenario that could cause a business disruption. Furthermore, although we are confident in our own preparedness, T.R. Winston has no control over the various entities that we must rely upon in the event of an emergency. This BCP is subject to change without notice. In the event that this BCP is modified, the updated document will be promptly posted on the T.R. Winston internet website. Alternatively, customers may obtain an updated hard copy BCP upon request. The information contained in this disclosure is provided by T.R. Winston for informational purposes only. Nothing contained herein shall be construed to amend, supplement or otherwise modify any of the terms and conditions set forth in any customer agreement.