

Summary of the Business Continuity Plan

General Purpose

This summary of the HK Financial Services Business Continuity Plan (“Plan”) is intended to provide our customers with information about the actions we will take if an emergency or another event of an internal or external nature substantially disrupt our normal business operations – either for the entire firm or one or more of our offices. We lay out several scenarios below to give you a general understanding of the policies that we have established and the steps that we will employ in our response to significant business disruptions of varying lengths and severity – such as a fire in one of our offices, a hurricane or flood that forces the evacuation of a city or county, or a terrorist attack that disrupts business for weeks throughout an entire region.

Our firm’s mission is to ensure the continuous delivery of services to our customers while maintaining our compliance with applicable regulatory requirements.

Contacting Us

You may contact HK Financial Services by phone (toll: 563-582-2855 | toll-free: 800-791-8994), by email (info@hkfs.com, or at our website using the Contact option. If you cannot access us by any of these means, you should contact your financial planning consultant for instructions.

The Plan is subject to modification at any time. Updates to this summary of our Plan will be promptly posted on our website. You may also obtain an updated plan by requesting a written copy of the plan by mail, at 3390 Asbury Road, Dubuque, IA 52002.

Scenarios & Responses

The following Significant Business Disruptions (“SBDs”) will prompt HK Financial Services to activate the Plan.

	Estimated Length of Time for Recovery	Steps that HK Financial Services Will Take
SBD – Internal		
A disruption that affects the ability of HK Financial Services to conduct business, such as a failure of our computer systems.	< 1 hour	Staff will be able to place trades via phone directly to our custodians.
One of our buildings must be evacuated or is unavailable because of a specific building-related issue.	4-8 hours to relocate employees to alternate location	Staff will be relocated to an alternative location and will service customers from that location.

SBD – External		
<i>An event occurs that . . .</i>		
<i>. . . forces the evacuation of a business district, or prevents people from having access to the area.</i>	4-12 hours to relocate staff to an alternative location.	Staff in the affected area will be relocated locally and will be able to service customers from that location.
<i>. . . affects an entire city.</i>	1-2 days to relocate affected staff to an alternative location.	Staff in the affected area will be relocated and will be able to service customers from that location.
<i>. . . affects an entire regional area, such as a county or multiple counties.</i>	2 days or more to relocate staff to another area.	Staff in the affected area will be relocated to another regional office (or to a mobile office unit, if necessary).

Assumptions

Our ability to take the actions described in this notice will depend on several factors, some of which may be beyond our control. They include:

- Availability of critical infrastructure (such as electricity, water, heat, ventilation, telecommunications, air conditioning, U.S. Mail or overnight delivery service, etc.) for as long as the alternative location is needed
- Availability of adequate staffing.
- Accessibility of roads or public transportation available to allow staff to reach alternative locations.
- Availability of our custodial firms: Charles Schwab & Co., Inc., SEI Investments, Inc., Fidelity Investments, Inc., TD Ameritrade Institutional, Inc.
- Accessibility and operation of alternative locations, customer sites, and other facilities to be used by the displaced staff of HK Financial Services.