

## NATIONS FINANCIAL GROUP, INC. PRIVACY STATEMENT

During the normal course of business, Nations Financial Group, Inc. (NFGI) gathers information about you, which can be considered nonpublic personal information. We at NFGI take great care to ensure that your personal information is protected and treated with respect. To this end NFGI has created policies to protect your personal information.

In order to facilitate the servicing of your account and comply with regulatory requirements, NFGI collects nonpublic personal information about you:

- From your account applications or forms (examples include name, address, Social Security number, birth date, assets and income)
- From personal contact with you
- From transactional activity in your account (examples include trade history and balances)
- From verification services and consumer reporting agencies (to ensure accuracy of application data and credit worthiness)
- From other sources with your consent, such as past broker/dealers, mutual fund companies, advisory services or "First Clearing," which is our clearing firm.

NFGI does not disclose any nonpublic personal information about our customers or former customers except as necessary to establish and manage your account(s), as permitted by law or in certain circumstances as mentioned below.

We may disclose nonpublic personal information about you to our staff, affiliates, representatives, their affiliated businesses, and third parties who provide you with financial products and services. Nonaffiliated third parties may include retirement plan sponsors or third-party administrators, mutual fund companies, insurance companies and agencies, other broker-dealers and clearing firms. Also, included may be companies that provide NFGI services, such as printing and mailing account statements or confirmations. Our privacy policy is the same for current, as well as former clients. If you close your account, in the process of transferring your investments we may share your information with the new broker-dealer or custodian that you or your representative selects. If the representative servicing your account leaves us to join another broker-dealer, the representative is permitted to retain copies of your new account information so that he or she can assist with the transfer of your account. The representative's continuing use of your information will be subject to the new firm's privacy policy.

We may disclose information such as your name, address, social security number, date of birth, transactional information, or other financial information when necessary for us to provide you with financial products and services or report on your account, or where disclosure is required by law. For example, we may disclose information during the course of an audit or to law enforcement or regulatory agencies. NFGI does not sell your personal information to anyone.

If you do not want us to share your information (other than as required by law) with any nonaffiliated third parties, including the registered representative servicing your account when they leave NFGI to join another firm, you may contact our Compliance Department at 800-351-2471.

We restrict access to nonpublic personal information about you to those employees who need to know that information to provide products or services to you. They are required to follow our reasonably designed procedures to keep your information secure and confidential. We maintain physical, electronic and procedural safeguards that comply with federal standards to guard clients' nonpublic information.

Important Information About Procedures for Opening A New Account: To help the government fight the funding of terrorism and money laundering activities, Federal law requires all financial institutions to obtain, verify and record information that identifies each person who opens an account.

What this means to you: When you open an account, we will ask for your name, address, date of birth and other information that will allow us to identify you. We may also ask to see your driver's license or other identifying documents.

If you have any questions regarding this policy, you may contact us at 800-351-2471 or by writing us at Nations Financial Group, Inc., Attn: Compliance Department, 3925 Fountains Blvd. NE Suite 200 Cedar Rapids, IA 52411.

## NATIONS FINANCIAL GROUP BUSINESS CONTINUITY PLAN

Nations Financial Group, Inc. (NFGI) has developed a Business Continuity Plan detailing how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information regarding our Business Continuity Plan.

The majority of the branch offices served by NFGI, where most of our clients interact with their representatives, are located out of the immediate area of the home office in Cedar Rapids, IA. In the event of a business disruption we urge you to first contact your local branch. It is possible if not probable that your local location would be unaffected by

an event that would cause a disruption at our home office location and would be able to operate independently and transact business for you normally. If you are unable to contact your local branch, please contact us directly here at the home office at (800) 351-2471.

Contacting Us – During a significant business disruption, we will re-establish telephone service with our clients as soon as possible. Our clients should check our website [www.nationsfg.com](http://www.nationsfg.com) for our latest information. As a client of NFGI we recognize you may need access to your account to sell a position or request a check before we re-establish telephone or other communication services with you. During this time, First Clearing, our clearing firm, will assist you with sell or liquidation orders and provide check disbursements, as required. If you cannot contact our firm by any means, please call First Clearing for assistance at 877-496-3223. For assets held directly with Schwab, or product sponsors, they will need to be contacted directly.

Our Business Continuity Plan – We plan to quickly recover and resume business operations after a significant business disruption 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 business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our Business Continuity Plan addresses: data back up 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.

For brokerage clients, our clearing firm, First Clearing, regularly backs up its important information 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, First Clearing, has a thorough Business Continuation Plan in place. First Clearing has advised us that its objective is to restore its own operations in order to complete existing transactions and accept new transactions and payments in a timely manner.

Clients holding assets directly with Schwab, or product sponsors will need to contact them directly and should refer to their specific policies for guidance.

Varying Disruptions – Significant business disruptions can vary in their scope, a single building, a business district, city or an entire region. 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 within 4 hours. 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 1 business day. In either situation, we plan to continue in business, transfer operations to our clearing firm if necessary, and notify you through our web site, [www.nationsfg.com](http://www.nationsfg.com), how to contact us. 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.

For more information – If you have questions about our Business Continuity Plan, you can contact us at (319)-393-9541 or (800)-351-2471 or e-mail us at [compliance@nationsfg.com](mailto:compliance@nationsfg.com). Nations Financial Group, Inc. is a member of FINRA, SIPC and is a Registered Investment Advisor.

## PROTECTING YOUR ASSETS

NFGI and First Clearing are members of SIPC. Securities and cash in client accounts held at First Clearing have two sources of protection in the event of First Clearing's insolvency. SIPC coverage insures each client up to a maximum of \$500,000 (including \$250,000 for claims for cash). For more information about SIPC, please visit [sipc.org](http://sipc.org). In addition, First Clearing maintains a program of additional protection provided through London Underwriters, led by Lloyd's of London Syndicates. ("Lloyd's"). For clients who have received the full SIPC payout limit, First Clearing's policy with Lloyd's provides additional coverage above the SIPC limits for any missing securities and cash in client brokerage accounts up to a clearing-firm aggregate limit of \$1 billion (including up to \$1.9 million for cash per client).

SIPC and the additional protection of Lloyd's do not protect against losses from the failure of a security, nor do they insure the quality of investments or protect against losses from fluctuating market value. All coverage is subject to the specific policy terms and conditions. First Clearing's SIPC and additional coverage do not apply in the event of Nations Financial Group's insolvency.

## About Lloyd's of London Syndicates

Lloyd's is the world's specialist insurance market. The business written at Lloyd's is brought to a specialist syndicates, who price and underwrite risk, via brokers and cover holders. Currently, A.M. Best has given Lloyd's a financial strength rating of "A (Excellent) Stable Outlook." For more information about Lloyd's, please visit [lloyds.com](http://lloyds.com).

## ANNUAL ACCOUNT FEES (First Clearing)

Account fees, if applicable, will be assessed for the following account types unless one of the waiver criteria is met:

- Advantage Account (\$125 charged annually as described in your original account agreement). Excludes Advantage Basic Accounts. (Advantage Basic Accounts do not include credit/debit cards and other features)
- Investment Account (\$65 fee charged annually). Includes Standard Brokerage and Advantage Basic Accounts.
- Individual Retirement Account (\$50 fee charged annually) An invoice will be mailed to you in August. Includes Traditional, Spousal, Roth, SEP, and SIMPLE IRAs and Advantage IRA.
- UGMA/UTMA Account (\$45 fee charged annually)

The Annual Account Fees will be charged in September each year and will be based on the type of account you maintained on June 30 of that year.

### Waiver Criteria

Annual Account Fees will be waived if one of the following criteria is met:

1. One or more accounts that contain assets totaling \$500,000 or more as of June 30. This includes all personal brokerage accounts householded by your brokerage firm.
2. Any Investment Account, IRA, or Advantage Account with mutual fund positions of \$100,000 or more. (Money market funds, closed-end funds and exchange-traded funds do not count toward this exemption.)
3. Accounts with four open end mutual fund positions with each mutual fund position having a value greater or equal to \$1,000.
4. Investment Accounts, UGMA/UTMA Accounts (Non-Retirement) that have completed at least six trades between July 1 of the prior year and June 30 of the current year.
5. Managed accounts that pay a fee in lieu of commissions. Some exceptions may apply. (Normal quarterly asset management fees will continue to apply.)
6. Delivery Versus Payment accounts.
7. Investment Accounts opened on or after January 1.
8. Individual participant's accounts that are part of a Qualified Retirement Plan (QRP), excluding IRA accounts.
9. 529 Education Savings Plan accounts.

### Payment Options

For all accounts except IRAs, the annual account fee will be deducted automatically from the respective account(s) in September. Clients with IRAs will receive an invoice in August. Clients will have the choice of paying the fee by returning the invoice with a check or having the fee automatically deducted from the IRA account in September. If you have any questions regarding the applicability of these fees, please contact the financial professional who services your account.

If the fee causes a debit balance due to insufficient money market funds, we may have to liquidate enough of one or more security positions to cover the fee, and regular commission(s) will be charged on the trade(s).

### MSRB G-10 Notification

Nations Financial Group, Inc. is registered with the U.S. Securities and Exchange Commission and the Municipal Securities Rulemaking Board ("MSRB").

The website address for the MSRB is [www.msrb.org](http://www.msrb.org).

On its website, the MSRB has posted an investor brochure that describes the protections that may be provided by the MSRB rules and how to file a complaint with an appropriate regulatory authority.

## MISC ACCOUNT & PRODUCT FEES (First Clearing)

ACAT Out Fee.....	\$95.00
Advantage Basic – (Basic Checking).....	No Annual Fee
Initial Order - Standard.....	Free
Initial Order - Duplicate.....	\$20.00
Initial Order Corporate .....	\$201.73
Check Re-Order Fees (Standard Individual) .....	\$9.00
Check Re-Order Fees (Standard Duplicate).....	\$20.00
Check Re-Order Fees (Corporate).....	\$135.31
Check Copies .....	3 free/month. \$15 each copy over 3
Check Research.....	\$5.00 each
Stop Payment (check or ACH Transaction) .....	\$15.00
Debit Card - Additional Card .....	\$15.00 each
Debit Card - Fast Card Fee.....	\$20.00
Insufficient Funds.....	\$20.00
Outside Investments in IRA Account.....	\$100.00 per position/yr. Max \$600/account
American Depository Receipt (ADR) Fees.....	As Charged by Depository
Direct Registration (DRS) Reject Fee.....	\$75.00
DWAC (Deposit or Withdrawal at Custodian) .....	\$150.00 per transaction
Wells Fargo Advisory Programs.....	\$4 per month minimum account fee
Lost Certificate Replacement – Issued by First Clearing	
Within 90 days.....	No Charge
After 90 days .....	\$50 + Transfer Bonding
Lost Certificate Replacement – Lost by Customer.....	\$100 + Transfer Bonding
No-Load Mutual Fund Accommodation .....	\$35.00 maximum
Option Regulatory Fee - ORF (OCC) <sup>1</sup> .....	\$0.0038 per contract
Overnight Fee.....	\$15.00
Prepay Margin Fees – Trades .....	\$15 or Margin Interest (whichever is greater)
Regulatory Transaction Fee (SEC) <sup>1</sup> .....	(Sell Order Principal) x \$0.0000278
Reorg Activity	
Physical Reorganization Item.....	\$30.00
Instructions received after expiration.....	\$100.00
Research or Doc Retrieval.....	\$15/hr (1 hr min)
Retirement Account (IRA) Termination Fee .....	\$95.00 (Waived at age 70.5)
Returned Check Deposit Fee .....	\$10.00 per item
Safekeeping Presentment Fee.....	\$500.00 (one time)
Trading Activity Fee - Equity - TAF (FINRA) <sup>1</sup> .....	\$0.000166 per share sold
Trading Activity Fee - Option - TAF (FINRA) <sup>1</sup> .....	\$0.00279 per contract sold
Trading Activity Fee - Bond - TAF (FINRA) <sup>1</sup> .....	\$0.00105 per bond sold
Trade Extension.....	\$10.00
Transfer and Ship Certificates	
Standard Delivery – Non-DRS eligible.....	\$500.00 per item
Rush Delivery – Non-DRS eligible.....	\$500.00 per item
Re-registration of Physical Cert (Non-DRS).....	\$125.00 per item
Rush Withdrawal Registration (3-5 days) .....	\$500.00 per item
Delivery of GNMA certificates .....	\$35.00 per item
Foreign Securities (order out).....	\$500.00 per item
Rejection of Ineligible Physical Cert for Deposit .....	\$50.00
Postage & Handling.....	\$6.00 per trade (non-advisory trades)
Wire Transfer .....	\$25.00
Alternative Investment .....	\$100.00 per position annually (\$600 max)

All service fees are subject to change with 30-day notice. Some fees may differ from above as disclosed by your financial professional. Other fees may not be applicable depending upon the services being provided. For example, advisory versus brokerage. Please contact your financial professional for additional information.

<sup>1</sup> Fees are passed directly to the regulatory agencies - SEC, FINRA, OCC. The fee rates may change per the discretion of each agency. Apply to Equity, ETF, and Option transactions.