Pure Portfolios has developed a business continuity plan to provide our customers with an overview of our business continuity and disaster recovery plans, including a description of the policies and procedures that we will employ in the event of a business interruption. Our mission for contingency planning is to ensure the continuous, reliable delivery of service to our customers while maintaining regulatory compliance.

Our plan anticipates two kinds of Significant Business Disruptions (SBDs), internal and external. Internal SBDs affect only our firm’s ability to communicate and do business, such as a fire in our building. External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a city flood, or a wide-scale, regional disruption. Our response to an external SBD relies more heavily on other organizations and systems, especially on the capabilities of the custodians where our customers’ securities are held. Our plan outlines the steps we will take in reaction to a SBD.

In the event of a SBD, our personnel are assigned to various outside locations to continue our operations and to communicate with our customers. In the event of a SBD, we will post additional telephone numbers on our website within 6 hours to which customers may call to reach our personnel. This recovery objective may be negatively affected by the unavailability of external resources and circumstances beyond our control.

We do not maintain custody of customers’ funds or securities, which are maintained at our custodians. In the event of an internal or external SBD, if telephone service is available, our customers can contact the custodians to directly provide transaction instructions.