Executive Summary – Business Continuity Plan

Ameritas Investment Company, LLC Member FINRA/SIPC **/ Ameritas Advisory Services**

General

Ameritas Investment Company, LLC has developed a comprehensive business continuity plan ("the Plan") that covers the broker-dealer and advisory services of Ameritas Advisory Services (collectively "AIC/AAS"). AIC is owned by Ameritas Life, a part of the Ameritas Mutual Holding Company ("Ameritas"). Subsidiaries of Ameritas Mutual Holding Company include Ameritas Life Insurance Corp., Ameritas Life Insurance Corp. of New York and Ameritas Investment Partners, Inc. These entities may share certain personnel, systems, governance, and facilities in providing, as necessary and appropriate, administrative and support services for their respective clients. The Business Continuity Plan is administered at the enterprise level for all affiliated companies. The Plan is designed to ensure that AIC/AAS is prepared to continue providing service to our clients if we experience a significant disruption of any kind to our business operations.

Purpose

The business continuity plan was developed to allow for continuous business operations in the event of a disruption or disaster. A disaster is an unplanned catastrophic event causing unacceptable damage or loss. A disruption is an event which may impact or interrupt services and may lead to a disaster. This plan can be used as the basis for controlling any recovery in conjunction with management's discretion. Execution of this plan will facilitate the timely recovery of business processes, minimize financial and operational impact, protect corporate assets, and meet or exceed regulatory compliance.

This plan depends upon the experience and knowledge of associates to serve as the foundation for any recovery effort, regardless of the level of disruption. The plan outlines the documented procedures that govern actions taken to deal with the disruption, identifies the personnel designated to carry out certain responsibilities and contains a framework for how recovery from the disruption will be conducted.

Ongoing Maintenance and Exercising

Business continuity team leaders are responsible for keeping their business continuity recovery strategies current. Call trees are an integral part of the recovery process. As a result, contact information is maintained in an emergency notification system and updated daily.

Exercises are conducted on an annual basis. The purpose of a technology recovery exercise is to:

- Validate usability, accessibility and integrity of data being replicated to the secondary data center.
- Validate the replication of data to the secondary data center.
- Validate the redundancy capabilities of the core utility layers and applications systems to the secondary data center.
- Validate restoration and usability of application systems to the secondary data center.

A business continuity exercise validates the business recovery strategies. These exercises include tabletop scenarios, work-from-home tests and online assessments designed to analyze and measure a business area's readiness to respond to an incident.

Organizational Structure

The business continuity practice reports to the Ameritas Senior Vice President – Compliance & Risk and is led by a business continuity corporate team who is accountable for the organization's business continuity program.

The business continuity steering team ensures alignment to the organization's strategic goals and sets strategic direction for business continuity and technology recovery.

The technology recovery team is responsible for recovering systems following a disruption and is responsible for conducting technology recovery exercises.

The business continuity management team, comprised of officers from each business unit, sets strategic direction for their business unit and is responsible for implementing recovery strategies during a disruption. During a disruption, this team will coordinate and direct restoration efforts of their teams, make strategic and financial decisions as appropriate, and resolve problems arising throughout the recovery process.

In the event of a disaster, the entire recovery process will be directed through an Emergency Operations Center. The Emergency Operations Center will be operational once a disaster has been officially declared by the Mission Team, and instructions have been given to implement the business continuity plan. Senior management responsible for controlling the recovery process will be located at the Emergency Operations Center.

Plan Structure

The plan documentation resides on a secured, highly-available distributed file system. Recovery strategies have been developed for three scenarios – loss of location, loss of resources and loss of people. The recovery strategies include a brief description of the business process/service followed by the minimal functionality that must be continued to offer the service, an overall summary of actions and strategies to continue/recover the service and specific actions and strategies for the three scenarios.

Escalation Procedures

- **Loss of Location:** The First Response Team will present their findings to the Mission Team who has authority to declare a disaster. Once declared, the business continuity management team determines the severity of the disaster on their operations and begins to implement their recovery strategies.
- **Loss of Resources:** Depending on the disruption, Information Technology or Corporate Facilities associates will assess the situation and provide an estimated length of outage to the appropriate Incident Response Team who will determine next steps.
- **Loss of People:** Recovery strategies are in place for continued operation and recovery of processes should a workforce shortage impact any of our locations.

Recovery Process

- **Assessment:** The First Response Team analyzes and assesses damage to the impacted location, including an estimate as to how long the building may be inaccessible. If it is determined the building will be in accessible for an extended period, arrangements will be made to locate to a more permanent temporary location.

- **Recovery of Systems:** The information technology recovery teams perform a series of tasks to facilitate the resumption of critical mainframe and network systems based on priorities identified by the business in the secondary data center. The secondary data center in Cincinnati eliminates the need for a third-party hot site. Replication of data is continuous and bidirectional between the data centers for both mainframe and distributed systems.

- **Recovery of Business Unit Operations:** The primary responsibility of the business units is to provide mission critical services to our customers until systems are restored. If necessary, business units are also preparing to operate at an alternate site once systems are available. Operations may initially function in a reduced capacity, buy they should be sufficient to provide an acceptable level of service to our clients.

- **Restoration of Operations at Original Site:** Coordination of activities necessary to move from the alternate site(s) to the fully restored facility.

The business continuity plan utilizes a "team concept" to carry out each of the phases. This approach makes the teams accountable for recovery of the critical business processes while allowing them the flexibility to adapt to the specifics of the actual situation.

Client Access to their Funds

A site outage should not impact a client's ability to access their available funds, as the Plan is designed to ensure sustained service. As a general practice, AIC/AAS does not hold customer funds or securities. Funds and securities are held either by the clearing firms at which the client's account is established or directly at the product sponsor. Since client funds and securities are not held by AIC/AAS, they remain accessible directly through the clearing firm or product sponsor, despite any site outage. Telephone numbers at which the client may reach the clearing firm or direct sponsor company that maintains custody of their account are listed in the client's account statements. Please note that a client's ability to trade securities may be impacted by market events outside our control, such as when the markets are closed. Our Plan provides for necessary personnel being available to approve transactions that result in the disbursement of available funds.

Communication with Regulators

In the event of a business interruption that disables Ameritas' communication systems, AIC/AAS's compliance department management staff all maintain back-up access to electronic data storage and reporting systems through multiple independently networked work sites, including wireless access. Moreover, AIC/AAS's primary transaction reporting is done through third party market participants.

We continue to devote substantial resources to the enhancement of our business continuity planning. We are continuing to assess how our Plan takes into consideration our critical third-party relationships; and ensure its coverage of all AIC/AAS locations. In the event of a disruption, we may enter into agreements with other firms to perform certain clearing services and administrative functions on our behalf until we have the capability to resume performing those tasks.

AIC/AAS's Plan is subject to modification. We will publish information regarding updates or modifications to the Plan on our website at https://www.ameritas.com. Updated information about the Plan can be obtained by mailing a request for a written copy. All requests for updated information should be sent to the following address:

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