

## **Pruco Securities, LLC: A Summary of Our Business Continuity Plan**

### **I. Introduction**

While Pruco Securities, LLC (“Pruco”) strives to provide uninterrupted service to our customers, certain events outside of our control could impact our ability to conduct business. Such events could be weather-related or man-made, and could impact a wide geographic area or a single Pruco facility.

Pruco has a comprehensive Business Continuity Plan (BCP) in place to facilitate our ability to operate and serve our customers if such a business disruption were to occur. The following is an overview of our Business Continuity Plan and how we will respond to such situations.

### **II. Our Business**

We will first briefly describe how we conduct our business so that you may have a better understanding of our Business Continuity Plan. Pruco, a subsidiary of Prudential Financial (“Prudential”), is a registered broker dealer and investment adviser, offering variable life insurance and variable annuity products, mutual funds, and securities brokerage accounts through its registered representatives. Pruco also distributes individual variable life insurance products for Prudential and its affiliates. Pruco has sales offices throughout the United States, with many of the operational facilities located in New Jersey, Pennsylvania, Florida and Minnesota. Each Pruco office maintains its own business continuation plan that provides for alternative operating sites, back-up facilities and systems. For our brokerage accounts, Pruco clears customer trades on a fully disclosed basis through First Clearing, LLC.

### **III. Overview of Our Business Continuity Plan**

Pruco, as part of Prudential, has access to extensive resources, both in terms of alternative physical locations from which to conduct business, as well as systems resources to provide disaster recovery planning. Because Pruco conducts its business activities from multiple locations, it has made arrangements to relocate associates to one of several backup locations in the event that a primary work location is unavailable.

In accordance with Prudential’s enterprise-wide business continuation policies and standards, all critical business systems, including those used by Pruco, are fully tested on a periodic basis, at least once yearly.

Pruco will follow decisions made by the Financial Industry Regulatory Authority (“FINRA”) and major stock exchanges concerning opening and closing of the markets during a disruptive event. Pruco will not conduct trading on days when U.S. securities markets are closed.

In the following sections (A) – (C), we describe how our Business Continuity Plan will be deployed in a variety of potential business disruption scenarios.

#### **A. Disruption to One or More Pruco Offices**

Impacted associates whose functions are deemed critical report to designated recovery sites, which are designed to be operational within 48 hours after a disruptive event. In some cases, impacted associates may work from home. Essential information systems and data are similarly restored and made available following our regularly tested, back-up and recovery procedures.

#### **B. Disruption to a Business District or City**

Certain designated backup sites may be located within the same business district or city as a primary work location. In the event one or more backup sites are unavailable, impacted associates would use an

alternative site outside the business district or city. For example, associates from Pruco's main office in New Jersey may be directed to one of several other proprietary or third party locations in New Jersey or other states, depending on availability. In some cases, impacted associates may work from home. Our goal is to provide critical personnel an operational backup site within 48 hours.

### **C. Disruption to an Entire Region**

As discussed above, multiple backup locations are typically available to Pruco associates in the event of a disruptive event. In the event no sites are available due to a large-scale disruption, it may be necessary for Pruco to temporarily suspend its operations until alternative arrangements can be made. Pruco will maintain communications with and assist our customers and business partners to the best of our ability under the circumstances. While we strive to restore our critical operations within 48 hours, our actual recovery time under this scenario will depend on the nature and extent of the business disruption.

### **IV. Market Closings**

Pruco will not open for trading unless the U.S. equity markets are open. Both FINRA and the New York Stock Exchange have contingency plans in place to allow for trading in the event of a disruption to the markets, including the possibility of trading other market's products in the event one cannot open.

### **V. First Clearing, LLC**

*Pruco's clearing firm, First Clearing, LLC, 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, LLC 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.*

*As a client of Pruco, we recognize you may need access to your account to sell a position or request a check before Pruco can re-establish telephone or other communication services with you. During this time, our clearing firm, First Clearing, LLC, 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, LLC for assistance at 877-496-3223. First Clearing, LLC may also be reached at the following address and/or website:*

*First Clearing Correspondent Services  
1 North Jefferson Avenue  
St. Louis, MO 63101  
[www.firstclearingllc.com](http://www.firstclearingllc.com)*

### **VI. Contact for Further Information**

Our Business Continuity Plan is subject to change from time to time. Notice of any updates will be posted on Prudential's web site, [www.prudential.com](http://www.prudential.com). You may obtain a written copy of this Summary by writing to Pruco Securities, LLC, 751 Broad Street, Newark, NJ 07102.

Pruco Securities, LLC, 751 Broad Street, Newark, NJ 07102, member SIPC and a Prudential Financial company.