

**WAINWRIGHT INVESTMENT COUNSEL, LLC
WFS, LLC
WAINWRIGHT CAPITAL PARTNERS, LLC**

Business Continuity Disclosure Statement

Wainwright Investment Counsel, LLC, WFS, LLC and Wainwright Capital Partners, LLC (collectively, “Wainwright”) have developed and implemented a Business Continuity and Disaster Recovery Plan (the “BCDR Plan”) which addresses how Wainwright will respond in the event of an emergency or significant business disruption (“SBD”). Due to the vast number of possibilities that could result in an SBD, the BCDR Plan focuses on the nature of the interruption itself and not the cause of the interruption. With that in mind, we are providing you with this information on our business continuity plan.

Contacting Us - Throughout any business disruption you may contact us at (617) 531-3100, or by email: compliance@winvcounsel.com, operations@winvcounsel.com or finance@winvcounsel.com.

Our Business Continuity and Disaster Recovery Plan - The primary objectives of the BCDR Plan are to both minimize the impact of an SBD and continue with or return to normal business operations as efficiently as possible. Wainwright shall respond in a manner that ensures the safety of its employees while securing its property, protecting client information, making a financial and operational assessment, protecting the firm’s books and records, while continuing to provide the highest level of investment advisory (WIC), broker-dealer related (WFS), or commodity pool operator related (WCAP) client services, as the case may be.

Wainwright’s 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, banking impact; regulatory reporting; and assuring our customers prompt access to information regarding their business relationship with Wainwright.

Varying Disruptions - Significant business disruptions can vary in scope, such as affecting a single organization, physical address, business district, the city where we are located, or the entire region. Further, the severity of a disruption can vary from minimal to severe. For disruptions affecting only Wainwright or our office building, Wainwright will conduct business operations from pre-determined alternate locations. Wainwright’s recovery time objective for business continuity, including those involving a relocation of personnel or technology, is generally one business day. This recovery objective may be negatively affected by the unavailability of external resources and circumstances beyond our control. Various external factors surrounding a disruption, such as time of day, scope of the disruption, and status of critical infrastructure – particularly telecommunications – can affect actual recovery times.

Maintaining a Secure Environment – Throughout an SBD, Wainwright will make every effort to maintain physical, technical, and administrative safeguards for the protection of customer and Wainwright employee records and information.

For more information - If you have questions about our business continuity and disaster recovery planning, please contact us at (617) 531-3100 or by email: compliance@winvcounsel.com.