



Western Growers Financial Services Annual Notice

Anti-Money Laundering (AML) Notice

It is the policy of the Western Growers Financial Services (WGFS) to prohibit and actively prevent money laundering and any activity that facilitates money laundering or the funding of terrorist or criminal activities.

Please see our [USA Patriot Act Notice](#) on our web site for a more complete description of our AML Program, or contact us to request a written copy.

In addition to the information we must collect under FINRA Rules, we will, at a minimum:

Verify, to the extent reasonable and practicable, the identity of any customer seeking to open an account

Maintain records of information used to verify a customer's identity

Check that a customer does not appear on government terrorist lists, such as the list on Treasury's Office of Foreign Assets Control (OFAC) Web Site. The types of information that we will collect before opening different types of accounts are listed below.

Risk-Based Information On Various Account Types

WGFS will collect the following information for all accounts, if applicable, for any person, entity or organization who is opening a new account (or is being granted trading authority over a new or existing account) and whose name is on the account or has authority over the account:

The name and mailing and residential (or principal place of business) street address of the customer;

The customer's date of birth;

For U.S. persons, the customer's Social Security number or taxpayer identification number (including U.S. tax forms), or, for non-U.S. persons without a taxpayer identification number, an alien identification card number or number and country of issuance of any other government-issued document evidencing nationality or residence and bearing a photograph or other biometric safeguard.

Recognizing that different types of accounts pose different risks and trigger different requirements under the rules, we will gather the additional information specified below for each of the following categories of accounts we provide.

WGFS will identify customers and verify their identity by requesting that the customer provide us with an unexpired government picture ID suitable for copying for our files and will delegate further identification procedures so that we may check the names against the appropriate databases.

Customers Who Refuse To Provide Information

If a potential or existing customer either refuses to provide the information described above when requested, or appears to have intentionally provided misleading information, our firm will not open a new account and, after considering the risks involved, consider closing any existing account. In either case, our AML Compliance Officer will be notified so that we can determine whether we should report the situation to FinCEN.

Verifying Information

Based on the risk, and to the extent reasonable and practicable, we will ensure that we have a reasonable belief that we know the true identity of our customers by using risk-based procedures to verify and document the accuracy of the

information we get about our customers. In verifying customer identity, we will analyze any logical inconsistencies in the information we obtain. We will verify customer identity through documentary evidence, non-documentary evidence, or both.

Client Identification Procedures

As part of WGFS's AML program, the firm has established procedures to ensure that all clients' identities have been verified before an account is opened.

Before opening an account for an individual client, WGFS will require satisfactory documentary evidence of a client's name, address, date of birth, social security number or, if applicable, tax identification number. Before opening an account for a corporation or other legal entity, WGFS will require satisfactory evidence of the entity's name, address and that the acting principal has been duly authorized to open the account. The AML Compliance Officer will retain records of all documentation that has been relied upon for client identification for a period of five years.

Thank you for your patience understanding and support as we conduct our business in a compliant manner and do our part to deny terrorist groups and criminals access to America's financial system.

Annual Notice of Contact Information Regarding Complaints

Any customer who has a complaint regarding any transaction by or the conduct of any associated person of our firm should contact Lori L. Duquette, Chief Compliance Officer, directly. Lori can be reached by telephone at 949-885-2343, by e-mail (lduquette@wga.com), or in writing at 17620 Fitch Street, Irvine, California, 92614.

Annual Offer to Receive Form ADV Part II

As Registered Investment Advisors under the Investment Advisors Act of 1930, WGFS is subject to the "Brochure Rule." Under SEC Rule 240-3A, we are required, on an annual basis, to deliver or to offer in writing to you, without charge, information to be disclosed by the Brochure Rule. The information required in this rule is included as Part II of the "Revised Registration Form For Investment Advisor," (Form ADV).

The most current version of our "Western Growers Financial Services, SEC Form ADV, Part II" booklet in hardcopy is available at no charge upon request.

Business Conduct and Code of Ethics

Western Growers Financial Services (WGFS), a Registered Broker-Dealer and a Registered Investment Adviser, is committed to promoting integrity and maintaining the highest standard of business conduct and all its activities. Effective May 31, 2005 we adopted a Code of Ethics and are prepared to maintain and enforce it. Clients are welcome to request a copy of the Code of Ethics.

Privacy Statement Notice

Western Growers Financial Services (WGFS), a Registered Broker-Dealer and a Registered Investment Adviser, are committed to safeguarding the confidential information of its clients. We hold all personal information provided to our firm in the strictest confidence.

WGFS collects nonpublic personal information about you from the following sources:

Information we receive from you on applications or other forms.

Information about your transactions with us or others, including our parent company, WGA and affiliates.

Information we receive from a consumer reporting agency.

We do not disclose any nonpublic personal information about you to anyone, except as permitted by law.

If you decide to close your account(s) or become an inactive customer, we will adhere to the privacy policies and practices as described in this notice.

WGFS restricts access to your personal and account information to those employees who need to know that information to provide products or services to you. WGFS maintains physical, electronic, and procedural safeguards to protect your nonpublic personal information.

Annual Disclosure of FINRA BrokerCheck

As required by FINRA Rule 2280, WGFS will provide customers with the following information in writing about the FINRA BrokerCheck Program (formerly known as the FINRA Public Disclosure Program).

FINRA BrokerCheck should be your first resource tool to learn about the professional background, registration/license statuses and conduct of FINRA registered firms and their registered brokers. FINRA BrokerCheck was designed to be simple and efficient in its delivery of information. FINRA makes information on securities professionals and firms available online, and, in most cases, detailed report information is returned to you by email within minutes of your request.

The avenues available to obtain BrokerCheck information are as follows:

FINRA BrokerCheck Hotline Number: 1-800-289-9999

FINRA Regulation Website Address: www.finra.org.

For further information on the program you may also obtain a BrokerCheck Program brochure through the FINRA website listed above.

Annual Notice Regarding Customer Account Information

WGFS will furnish each customer who opens an account after May 2, 2003 with a copy of their account record within 30 days of the opening of the account.

WGFS will furnish all active accounts with a copy of their account records or an alternate document that contains the information from the account record within three years of their account opening date (3 year anniversary, every 3 years). Included with the account record or alternate document you will be asked to confirm your investment objectives. If we do not receive notice of changes in your investment objectives from you (the customer), we will assume that your objectives have not changed. Keeping WGFS current with your objectives and life changes is the customer's responsibility.

Customers should mark any corrections and return the document to the firm.

Any change of address or name will result in WGFS sending a notice to the customer's old address.

Western Growers Financial Services' Business Continuity Planning

WGFS has developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. DISCLOSURE REQUIRED BY FINANCIAL INDUSTRY REGULATORY AUTHORITY (FINRA) 4370. 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 on our business continuity plan.

Contacting Us – If after a significant business disruption you cannot contact us as you usually do at (949) 885-2379 or at Matt.Lewis@wga.com, (949) 885-2343, Lori.Duquette@wga.com, or you may call our alternative number, (888) 737-8483, or go to our web site at [Western Growers - Business Continuity Planning](#). If you cannot access us through any of these means, you should contact our introducing clearing firm, Pershing LLC at (201) 413-3635 for recorded instructions. If you cannot access the instructions from the previously noted number, you may call (213) 624-6100 extension 500, an alternate number for recorded instructions or http://www.pershing.com/customer_support.html for instructions on how they may provide prompt access to funds and securities, enter orders and process other trade-related, cash, and security transfer transactions.

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.

Our clearing firm, Pershing, LLC, backs up our important records 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, our

clearing firm has advised us that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments within less than one hour. Your orders and requests for funds and securities could be delayed during this period.

Varying Disruptions – Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole 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 four (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 four (4) to six (6) hours. 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.wgfs.net how to contact us or contact us using our cell phones, (714) 348-7528 or (714) 397-0611. 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 planning, you can contact us at 781-535-6083 or at www.wgfs.net.

Annual Notice Regarding Order Tracking and Routing under SEC Rule 606

Pershing LLC and WGFS have provided the data concerning the routing of order flow (the "Data") on their respective web sites. This statistical data is provided through Pershing, they have used commercially reasonable efforts to provide accurate data, the data is provided to you on an "as is" basis.

If you would like to read this information, visit the [order routing disclosure site](http://www.orderroutingdisclosure.com) for Pershing LLC (www.orderroutingdisclosure.com) and enter Pershing LLC when prompted for the broker-dealer's full name.

For WGFS, visit the same [order routing disclosure site](http://www.orderroutingdisclosure.com) (www.orderroutingdisclosure.com) and enter Western Growers Financial when prompted for the broker-dealer's full name.

Any customer who like this information mailed to them is welcome to request a copy from us.

Disclosure Required by FINRA Rule 2280:

The Financial Industry Regulatory Authority, Inc. ("FINRA") Rule 2280 requires that we notify you in writing of the availability of an investor brochure that includes information describing FINRA's Regulation's Public Disclosure Program ("Program"). To obtain a brochure or more information about the Program or FINRA Regulation, contact the FINRA Regulation Disclosure Department Hotline at (800) 289-9999 or access FINRA's web site at www.finra.org.

Disclosure Required by FINRA Rule 2342:

Information regarding the Securities Investors Protection Corporation (SIPC), including a SIPC brochure, may be obtained by contacting SIPC via its web site at www.sipc.org or by telephone at (202) 371-8300.