

Walton Securities, Inc. Business Continuity Plan Summary

Walton Securities, Inc. (“WSI”) has developed a Business Continuity Plan. The plan sets forth the firm’s policies related to business interruptions that may result from a significant business disruption (“SBD”). This document summarizes the key features of the plan.

Firm Policy: Walton Securities, Inc.’s policy is to respond to a SBD by: safeguarding employee’s lives and firm property; making a financial and operational assessment; quickly recovering and resuming operations; and protecting all of the firm’s books and records.

The plan anticipates two kinds of SBDs: internal and external. Internal SBDs affect the firm’s ability to communicate and to conduct business. An example of an internal SBD would be a fire in the building. External SBDs prevent the operation of business in general or that of any of the organizations with whom WSI transacts business. External SBDs might include terrorist attacks, a major flood, or other wide-scale regional disruption. Disasters are unpredictable in timing and scope and WSI must maintain flexibility in its response to events as they become known and assessable.

Copies of the Plan: WSI will maintain copies of its Business Continuity Plan and will perform annual reviews of such plan, making changes as required to keep the plan current and up to date. Copies of the plan are available for inspection at the offices of Walton Securities, Inc. 4800 N Scottsdale Rd., Suite 4000, Scottsdale, AZ 85251, and at Walton International Group Inc. 23rd Floor 605-5th Avenue S.W., Calgary, Alberta T2P 3H5, Canada.

Office Locations of WSI: The firm’s main office and corporate headquarters is located at 4800 N. Scottsdale Rd., Suite 4000, Scottsdale, AZ 85251. The main telephone number is (602) 264-1298, alternatively (602) 224-8959. The firm has no other places of business or branch offices.

In the event of a business disruption, information will be posted on the firm’s web site www.waltoninternational.com

The Business Continuity Plan:

- Discusses data back-up and recovery practices and safeguards,
- Addresses the assessment of financial and operational risks
- Defines all mission critical systems
- Identifies business constituents, banks and counterparties
- Sets forth procedures for communicating with key stakeholders
- Addresses alternate methods of communicating with key stakeholders, including contracted selling dealers, clients of contracted selling dealers, firm personnel and regulators
- Addresses means to restore systems, processes and records

Secure duplicate copies of investor subscriptions records are maintained off-site in distant geographic locations and plans are in place to restore critical data processing systems. SBDs can vary in severity and duration, and WSI is committed to restoring operations as quickly as possible given the uncertainty of any given situation.