Trust

Trust Company of America

BUSINESS CONTINUITY PLAN DISCLOSURE

Trust Company of America (the Trust Company) and its affiliates are committed to safeguarding the interests of our clients, customers and employees in the event of an emergency or significant business disruption. This Business Continuity Plan Disclosure summarizes our efforts to mitigate risks inherent with unforeseen business interruptions. Our comprehensive Business Continuity Plan (BCP) is designed to enable us to meet our existing obligations to our clients and customers, even in the event of an emergency or significant business disruption, as quickly as possible given the scope and severity of the disruption. The BCP is intended to comply with the rules promulgated by the regulatory entities that govern our businesses, which includes the Federal Deposit Insurance Corporation (FDIC), the Securities and Exchange Commission (SEC) and the Financial Industry Regulatory Authority (FINRA).

Overview

While we operate principally out of a single facility, we have established a number of processes that assure all mission critical operations can be restored quickly using back up systems and facilities. Our BCP addresses:

- All mission critical systems
- Data backup and recovery
- Financial and operational assessments
- Alternative communications with customers, employees and regulators
- Alternate physical location of employees
- Critical supplier, contractor and third party resource impacts and procedures
- Alternative operational platform resources
- Proper regulatory reporting
- Periodic verification and testing of our plan
- Review of the BCP's of critical suppliers and business partners

Significant business disruptions can vary in their scope, such as affecting only our office location, the business district we are located in, the city where we are located, or the entire region. Within each of these areas the severity of the disruption can also vary from minimal to severe. In a disruption to only our location, we will transfer our operations to a local site when needed. In a disruption affecting our business district, city or region, we will transfer our operations to a site available to us outside the affected area and recover

and resume business. In any of these situations our intent is to safeguard our clients data and assets and to restore critical operations as quickly as possible.

Communication

Communication is the key to mitigate confusion that can be caused by a business disruption, for our employees, customers and venders. The firm will utilize multiple strategies to communicate with its stakeholders throughout the disruption including:

- System messages (as clients and employees remotely access our system)
- Dedicated 800 phone number for customers and employees - **(800) 955-5779**
- Email Notices and Updates
- Facsimile Notices and Updates
- Telephone Contact

Disclaimer

The firm's Business Continuity Plan is designed to be prepared for significant business disruptions and to resume our business operations as quickly as possible if an event did occur. The information contained within is only a summary of our BCP, because of the confidential nature of much of our plan; it is not possible to distribute the entire plan to clients, customers or other external entities.

Our Business Continuity Plans are tested periodically to ensure readiness, yet such tests may not be able to replicate the actual conditions we may experience in a real emergency. Our recovery time objectives, used when performing tests of our BCP, are not hard and fast deadlines that are to be met in every situation as various external factors surrounding the disruption, such as time of day, scope of disruption and status of critical infrastructure can affect actual recovery times.

Our Business Continuity Plan is subject to change without notice. We may modify this disclosure at any time with such modifications becoming effective upon posting to our website at www.trustamerica.com. Alternatively, you may obtain a hard copy of this disclosure by mail upon request.