

Business Continuity Program Overview

INTRODUCTION

The purpose of this document is to provide TCA clients with an overview of the enterprise's Business Continuity Plan (BCP). Due to the specific and sensitive nature of the information contained in the actual BCP, this summary has been created to give a general overview of the BCP contents, without revealing company sensitive or proprietary data or the private information of TCA personnel.

We value you as our client and your clients' data, TCA is committed to providing a Safe & Soundness platform. TCA has implemented measures to recover from minor through major disruptions of services to our clients and your clients. We fully understand that any loss of services could have substantial impact to your clients, and as such, detailed Disaster Preparedness and Business Resumption Plans have been developed to obtain a full recovery of all our critical business processes in the event of a significant business disruption.

Our Business Continuity Plans has been created to deal with losses resulting from events such as:

- Natural Disasters such as severe storms, floods, tornadoes, and earthquakes
- Man-made disasters such as civil unrest, power outages, hazardous material spills and terrorist attacks.
- Sabotage or major security breaches that require operational shutdown
- System, hardware, network and software failures
- Pandemic and/or any combination of any of the above incidents

We have created an enterprise-wide incident command center and emergency response structure which is fully supported by our leadership team to ensure that our employees and customer assets are suitably protected, that our lines of communication with employees and clients are open, and that we can quickly recover from a significant business disruption. Each of our departments business continuity plans have been designed to give us as much information and preparation as is required to recover from a loss of service.

TCA has contracted with a nation-wide third party provider to support the re-location and restoration of our corporate and customer-facing systems in the event of a disaster or event. Our contract with this third party vendor provides availability to a functional workspace; in-state or out-of state location. Client data, application software, configuration files and other required

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information are replicated instantaneously to an off-site data center and backed up daily and stored at an off-site location.

All business continuity plans are updated on an annual basis with input from all major operating organizations of the company.

We hope this document is helpful to you in understanding TCA's Disaster Preparedness and Business Resumption process. If you have additional questions, please do not hesitate to call your Relationship Manager.

CONTENTS OF THE PLANS

TCA's Business Continuity Plans are organized in a way that facilitates the assignment of specific procedures to key team members. Each department (People & Culture, IT, Finance, Client Services, Operations, etc.) has developed plans that are specific to their operation, but that are fully integrated across TCA's organization. Although they are updated annually, and are therefore subject to change, the following is a listing of representative sections contained within our Enterprise Business Continuity Plan:

- Executive Overview- Discusses Purpose, Scope, Assumptions, Recovery Time Objectives (RTO) and Strategy.
- Business Operations-Describes the business unit's general operations, staffing levels, vital records, mission-critical processes, and provides a Business Impact Analysis (BIA). The purpose of the BIA is to identify which business units/departments and processes are essential to the survival of TCA and our clients. The BIA will identify how quickly essential business units and/or processes have to return to full operation following a disaster situation. The BIA will also identify the resources required to resume business operations.
- Response Organizations-Describes the organization of the recovery teams, and outlines the different phases of recovery, from initial response, intermediate operations plans through final restoration. The following roles and teams have been created:
 - Crisis Management Team-(CMT) is a group of senior executives and key staff members whose role is to advise and assist in making emergency-related policy decisions in the event of an organization disaster.

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- The Communications Response Team (CRT) is responsible for ensuring that lines of communication are established and maintained during a disaster event. Working with the CMT, the CRT utilizes various communication tools such as email, web, conferencing tools to ensure that all team members are kept informed of response and recovery efforts within the affected area.
- The Operational Department Team (ODT) is made up of TCA employees from all departments within the organization. During a disaster event, they are classified as key essential personnel and are aware of their roles during an event.
- Emergency Responders-is a group of TCA team members who assist our employees and clients to either exit the building or relocate to a safe location within the facility.
- Plan Activation and Operations-Describes the Monitoring, Notification and Activation procedures for responding to three different disaster levels:
 - Level One (Minor Incident) Defined as a local event with limited impact, which does not affect the overall functioning capacity of the business. Examples would be a contained hazardous material incident, a limited power outage or a small fire or an event impacting a single area of the building. Our recovery strategy in this event is to relocate team members to other areas of the building or arrange shift work schedules.
 - Level Two (Emergency) Defined as any incident, potential or actual, which seriously disrupts the overall normal processes of the business. Examples would be a building fire, a civil disturbance, or a widespread power outage of extended duration. Our recovery strategy in this event is to relocate to an off-site facility.
 - Level Three (Disaster) Defined as any event or occurrence that has taken place and has seriously impaired or halted the operational processes of the business. Examples would be a damaging tornado, wide spread fire or flooding or other community-wide emergencies of extended time. Our recovery strategy in this event is to relocate team members to another state to perform critical processes.
- Pre-Event Checklist-Details the actions and vital records that must be taken on a continual basis at the main facility to ensure that we appropriately respond to any emergency or disaster. These checklists cover all of TCA operations from Corporate Management to Facilities, Information Technology to Business Operations.

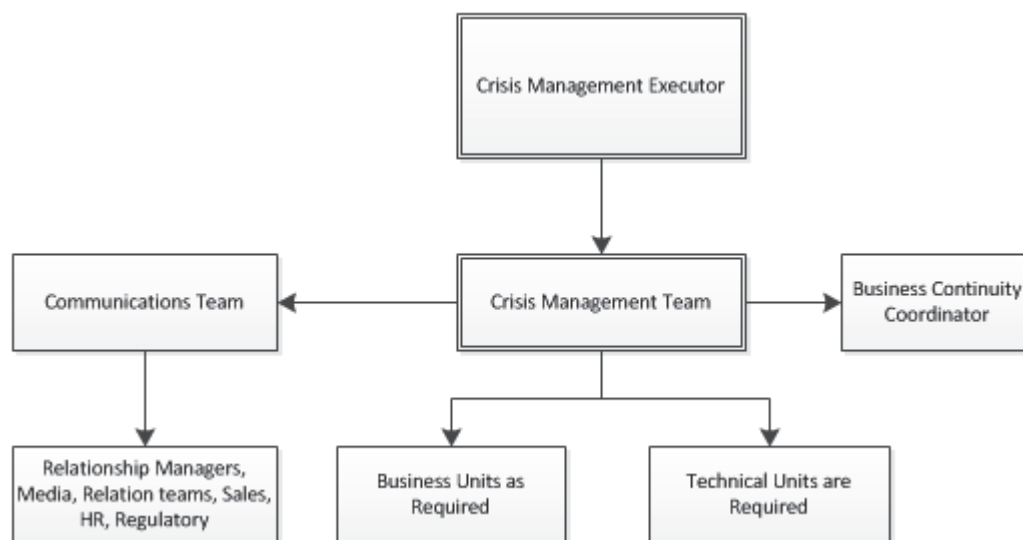
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- Command Centers-Describes the CMT Command Center, their make-up and capabilities, and the procedures for rapid deployment to the affected areas.
- Emergency Communications-Describes the methods for communicating with employees, clients and emergency responders in the event of Level Two or Three event, including in-building announcements, the use of email and web-based notifications, toll-free telephone numbers, mobile voice and data communications. A client contact list and vendor list is stored off-site in a secured location.
- Incident-Specific Checklists-Contains detailed procedures to respond to events with both pre-warning (e.g. Storms, Tornadoes) and without pre-warning (e.g. Earthquake, Fire, Bomb Threat, Violence in the Workplace, Equipment Failure, etc.)

Each business unit Business Continuity Plan also contains critical contacts that will be needed during an emergency event, including all emergency team members, employees, clients, critical vendors, law enforcement and emergency response personnel.

BUSINESS CONTINUITY ORGANIZATION STRUCTURE

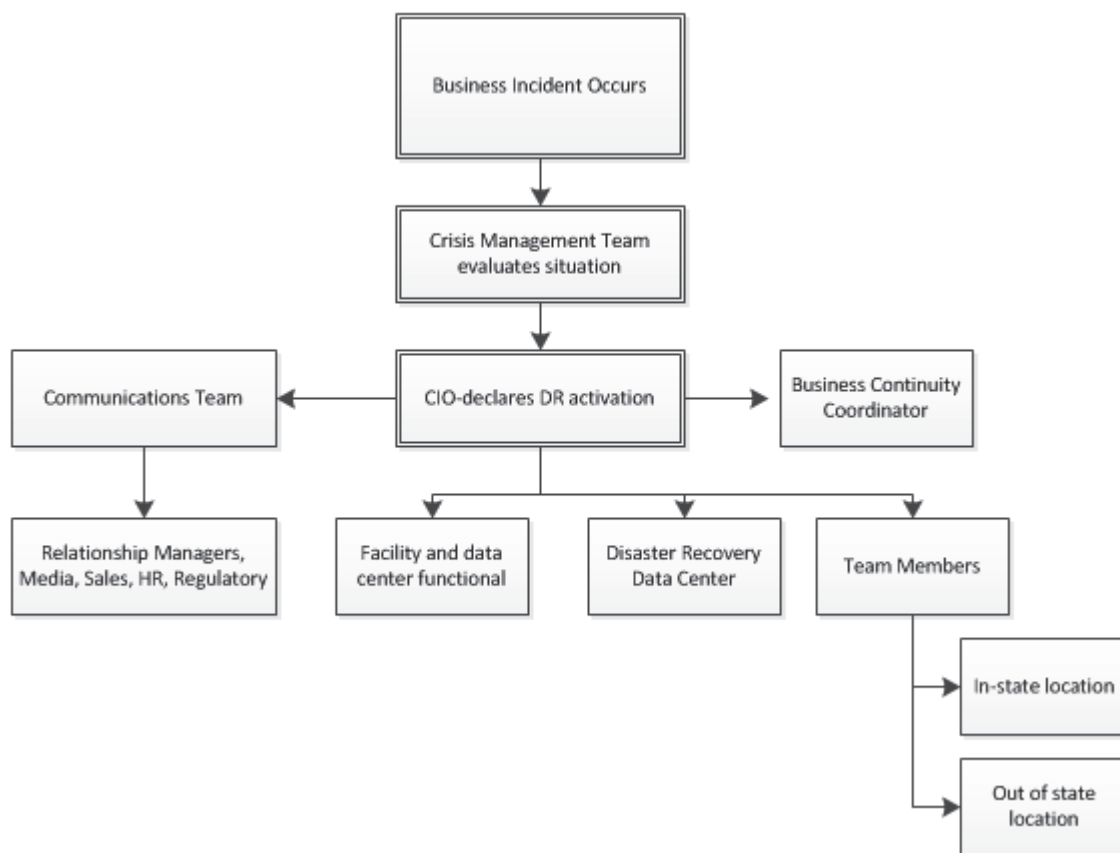
The following diagram describes Trusts Business Continuity Teams.



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BUSINESS CONTINUITY PROTOCOLS

The following diagram generally illustrates the process of responding to and recovering from a disaster. Each Business Unit BCP describes in detail specific responsibilities and action items taken by team members.



PLAN EXERCISE and MAINTENANCE

TCA conducts quarterly disaster recovery tests, planned live tests from an alternate site and annual testing with all business departments. Our goal is to exercise our Business Continuity plans on a minimum annual basis, review results and update plans accordingly.

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SUMMARY

The primary objective of TCA's Business Continuity Plan is to meet the needs of our clients, maintain the well-being and safety of our employees and meet our regulatory obligations. Our commitment is to ensure that we respond to a disaster or other serious business disruption in an organized, effective and professional manner with a goal of minimizing the effect of the disruption on our people, clients, and business operations. Since disasters and significant business disruptions are inherently unpredictable, we need to be flexible in responding to actual events as they occur.

TCA's comprehensive business continuity strategies are designed to enable us to meet our existing obligations to our customers even in the event of an emergency or significant business disruption; however they are not infallible. The plan is designed to work in many different emergency situations but these events are, by their nature, unpredictable and it is impossible to anticipate every scenario that could cause a business disruption. Furthermore, although we are confident in our own preparedness, TCA has no control over the various entities that we must rely upon in the event of an emergency. Our business continuity plans are tested periodically to ensure readiness; yet such test may not be able to replicate the actual conditions we experience in a real emergency. Our business continuity plans are reviewed no less than annually to ensure the appropriate updates are made to account for operations, technology and regulatory changes.

During a level 2 or level 3 incident, TCA will provide our clients with information at www.trustamerica.com or 1-800-955-5779.

We hope that this document is helpful to you in understanding TCA's Disaster Recovery and Business Resumption process. If you have any additional questions, please do not hesitate to call your Relationship Manager.

The information contained in this document is provided by TCA for informational purposes only. Nothing contained herein shall be construed to amend, supplement or otherwise modify any of the terms and conditions set forth in any customer agreement between our clients and Trust.