

FTB ADVISORS, INC.

Business Continuity Statement

FTB Advisors, Inc. provides trade execution and other related services for your investment account. In connection with these services, FTB Advisors, Inc. ("FTB Advisors") is required to communicate its position on business continuity practices.

FTB Advisors is committed to remain operational to service our customers even if we experience a business interruption. At FTB Advisors, we recognize you rely on our systems and services. We also recognize that the unexpected can and does occur—from simple situations to major outages. FTB Advisor's business continuity plan is designed to support critical business activities during disruptions of normal business processes resulting from natural causes such as storms, floods, an act of terrorism or vandalism, or a power outage. FTB Advisors wants you to know that we have an extensive plan in place to safeguard your assets and protect vital account information in the event of a business disruption.

FTB Advisors has pre-established contingency and disaster recovery plans. Components of these plans are tested periodically to ensure effectiveness. FTB Advisors considers contingency planning to be an iterative process, requiring ongoing review to assess various risks and appropriate responses. As a result, this plan may change as necessary. Please feel free to contact us at any time to receive the most recent version of our Business Continuity Statement at 800-238-1111.

FTB Advisors Continuity Planning Guidelines

FTB Advisors has developed plans that include the ability to recover from situations including, but not limited to, unplanned evacuations, power outages, major water leaks, fire, loss of water, severe weather, and any facilities failures that may cause business interruptions. Plans are designed to account for business interruptions of various lengths and scope and require that FTB Advisors is able to recover critical functions according to their time criticality. Key features of FTB Advisor's corporate disaster recovery planning include annual reviews of the following:

- Identification of all mission critical systems (and system backup and recovery for such systems)
- A review of financial and operational risks
- Employee safety strategies and communications
- Alternate physical site locations and preparedness

FTB Advisors Contingency Planning and Business Recovery

FTB Advisors mitigates risks to reduce potential issues and customer impact in the event of a business disruption. In the event of a business disruption, FTB Advisors has tested plans to support recovery of its critical business functions. In addition to the guidelines stated above, FTB Advisor's recovery plans also include the following:

- **Employee Safety** FTB Advisors places an emphasis on employee safety. Evacuation plans are retained by several supervisors and on-site security personnel.
- Backup Power Sites that support trading and operations are located in buildings with Uninterrupted Power Supply (UPS) and backup generators.
- Separate Sites FTB Advisors has additional offices for certain trading and support functions in the event an office is not available. These separate sites provide backup for certain critical functions.
- Contingencies for Inclement Weather If the weather emergency could result in an inability to access the primary site, the alternate site would be prepared for use and personnel would be sent to that location prior to the event. A number of personnel have remote access so they can work from home. Phone mail and e-mail messages can be accessed remotely.
- **Designated Contingency Site** There are pre-established, tested processes for rerouting of critical telephone numbers. In the event of a site outage, customers should experience minimal downtime in their ability to contact FTB Advisors.
- Alternate Site Tests- FTB Advisors conducts alternate site test for its critical functions at least twice per year. The test includes verification of desktops, records, and re-routing of key phone lines.
- Notification to Clients In the event of interruption, notification to clients will include information regarding anticipated length of outage, instructions for alternate contacts for FTB Advisors, and support information (e.g., where to send faxes, issues pertaining to communications).
- **Regulatory Reporting** FTB Advisor's business contingency plans are designed to ensure that, regardless of the length of a business disruption at a primary location, FTB Advisor's ability to continue to meet regulatory requirements, as mandated by FINRA, would not be impacted.
- Communications with Regulators FTB Advisors will communicate with its regulatory authorities regarding the nature and extent of any significant outage at a primary location, as required by applicable law and regulation.
- Access to Your Funds A site outage at FTB Advisors would not impact your ability to have access to your available funds, as FTB Advisors's business continuity plans are designed to ensure sustained service. However, your ability to trade your available funds may be impacted by market events outside of FTB Advisor's control, such as when the market was closed following the September 11, 2001 tragedy. Our tested business continuity plans provides that necessary personnel be available to approve transactions that result in the disbursement of available funds.
- Contact Information In the event that customers are not able to contact FTB Advisors at 800-238-1111 or 901-523-4444, customers can call the mutual fund companies or insurance providers directly. Those customers whose accounts are carried by National Financial Services LLC ("NFS") may contact NFS directly at 617-563-7000. Customers whose accounts are carried by NFS will receive a separate summary of NFS business continuity plan.