

Business Continuity Statement for Clients

At Toomey Investment Management, Inc. ('TIMI'), we recognize how heavily our clients rely on our systems and services. We also recognize that the unexpected can and does occur – from simple situations to major outages. TIMI has successfully supported critical business activities during disruptions of normal business processes resulting from hurricanes, tornados, blizzards and other natural man-made disasters.

TIMI has pre-established contingency and disaster recovery plans. Components of these plans are tested periodically to ensure effectiveness. TIMI considers contingency planning to be an iterative process, requiring ongoing review, to assess various risks and appropriate responses.

Continuity Planning Guidelines

TIMI plans 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 interruption. Plans are designed to account for business interruptions of various lengths and scope and require that TIMI business units are able to recover critical functions according to their time criticality. Key features of TIMI's corporate disaster recovery planning include annual reviews of the following:

- Identification of all mission critical systems and system back up and recovery for such systems
- A review of financial and operational risks
- Alternate communications between TIMI and our clients
- Employee safety strategies and communications
- Systems and telecommunications accessibility
- Alternate physical site location and preparedness

A corporate business continuity division articulates planning guidelines and coordinates response and event management across TIMI. TIMI also has dedicated business contingency planners to prepare and test its specific plans.

Contingency Planning and Business Recovery

TIMI mitigates risks to reduce potential issues impact. In the event of an outage, TIMI has tested plans to support recovery of its critical business functions. In addition to following the guidelines stated above, TIMI's recovery plans also include the following:

- **Contingencies for Inclement Weather.** If there is a forecasted weather emergency, hotel rooms may be obtained for essential personnel. 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 there prior to the event. Personnel have remote access so they can work from home. Employees can access phone mail and e-mail messages remotely and continue communications accordingly.
- **Designated Contingency Site.** There are pre-established, tested, processes for rerouting of critical hotline numbers in the event of a site outage. Clients should experience minimal downtime in their ability to contact TIMI.
 - **Notifications to Clients.** Procedures for notifying your advisor have been established for TIMI employees to follow in the event of an outage. Notification will include information regarding length of outage, instructions for your advisor to contact TIMI and support information (e.g., where to send faxes, issues pertaining to data transmissions and communications).
 - **Access to Your Funds.** A site outage should not impact your ability to have access to your available funds, as TIMI's business contingency plans are designed to ensure sustained service. However, your ability to trade securities may be impacted by market events outside of TIMI's control, such as when the market was closed following the September 11th tragedy. Our tested business continuity plans result in necessary personnel being available to approve transactions that result in the disbursement of available funds.

Please note that TIMI's business continuity plans are reviewed as necessary, and at least annually, to ensure they account for technology, business and regulatory changes, operations, structure or location. The plans are subject to change. You may obtain a current written copy of this notice by contacting TIMI directly.