

SunTrust Investment Services, Inc.

Business Continuity Plan

SunTrust Investment Services, an affiliate of SunTrust Banks, Inc., has a comprehensive Business Continuity Plan that is designed to mitigate business disruption in varying degrees of severity. This plan includes our retail sales and processing operations in Atlanta, GA and Richmond, VA. The firm maintains a remote recovery location to facilitate the continuation of business should a disruption occur. The firm's intent is to continue business should a localized event take place. A remote facility, which is within reasonable proximity to our main locations but remote enough to be on a different utility infrastructure, will be up and running within one business day or a disaster being declared.

REDUNDANT DATA FACILITIES

Currently, the critical applications that support the core businesses of the firm are backed up frequently throughout the business day. Additionally, each night the data is backed up to electronic storage media and housed at a secured off-site location. Should a disruption occur intra-day, it is estimated that a maximum of one business day of transactions would have to be restored.

DISPERSION OF PERSONNEL

SunTrust Investment Services, Inc. has personnel in several geographical locations within the United States. Should a disruption occur that would impede the operations of any remote branch office, the personnel in the headquarters facilities and/or in a regional branch office would assume functionality for that location. Should a disruption occur at the headquarters, personnel in a selected city will provide critical support to ensure continued service is provided to our clients.

DEGREES OF DISRUPTION

SunTrust Investment Services, Inc. has primary operations in two separate locations. Should an incident occur at either location, the critical functions of that division will be resumed at the partner location or the remote facility within one business day of disruption.

The plan of the firm is designed to continue business within one business day should a disruption occur at a business district level or at a city-wide level depending on the extent of that disruption. Should a major disruption occur at a regional level that would have a devastating effect on regional infrastructure, the intent of the firm is to first ascertain the estimated duration of the disruption and then make a determination of which course to take. If the disruption is of such a magnitude that it is estimated that the regional infrastructure will be disabled for an undetermined period of time, the firm will evaluate the alternatives available through our major business constituents and remote facilities to provide clients with quickest service available. It is the intention of the firm to draw on all of the available resources within the SunTrust Banks, Inc. resource pool to provide service to our clients via the most immediate means.

A summary of SunTrust Bank's recovery planning overview is available upon request.

SunTrust Investment Services, Inc.

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