

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 internet outages and weather events, but our procedures would apply to hurricanes, tornados, blizzards and other natural or 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 staff 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

Our corporate business continuity plan describes guidelines and response procedures for event management for TIMI.

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 or other interruption event, it will be the intended plan to operate within the central office location, if permissible, but remote capabilities will be

the optional protocol. If the weather or other event could or will result in the inability to access the primary site, an alternate site(s) would be prepared for use and personnel would relocate, as needed and according to the timing of such events. Personnel have remote access so that they can work from home or similar locations with internet access. Employees can access phone mail and e-mail messages remotely and continue communications accordingly.

- **Designated Contingency Site.** There are pre-established, tested, processes for re-routing of critical phone numbers in the event of a site outage. From an alternate site, primary office phone calls would be re-directed to secondary phone systems and cell phones. Clients should experience minimal downtime in their ability to contact TIMI.
- **Notifications to Clients.** Procedures for notifying TIMI staff of outages have been established which TIMI employees will follow in the event of such an outage. If such event may interrupt services for more than a few hours, or for a time period deemed to impede customary client services, TIMI staff will make notification to clients which will include information regarding expected length of outage, as well as 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.