



BUSINESS CONTINUITY PLAN

PGR Solutions, LLC has developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

CONTACTING US

If, after a significant business disruption, you cannot contact us as you usually do at 408-871-1590, you may be able to obtain information on our web site at www.pgrsolutions.com. In addition, even though our telephone service may be unavailable, it is likely possible to communicate with us via facsimile at 1-866-294-7650. Most clients can also access their account information via the Trust Company of America web site at www.trustamerica.com. You can also find phone numbers on the Trust Company web site for contacting them directly when the PGR Solutions offices are closed due to a significant business disruption. For Retirement Plan clients using either Alliance Benefit Group or Spectrum Pension Consultants for plan administration services, please contact your plan administrator directly.

OUR BUSINESS CONTINUITY PLAN

We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data back-up and recovery, all mission critical systems, financial and operational assessments, alternative communications with customers, employees, and regulators, alternate physical location of employees, critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

VARYING DISRUPTIONS

Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover within 24 hrs. In a disruption affecting our business district, city, or region, we may transfer our operations to a site outside of the affected area, and recover and resume businesses in a timely fashion with emphasis on recovery of critical functions according to their time criticality. In either situation, we plan to continue in business and notify you through our web site www.pgrsolutions.com or direct email how you may contact us. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer's prompt access to their funds and securities.

FOR MORE INFORMATION

If you have questions about our business continuity planning, you can contact us at 408-871-1590 or email our compliance department at info@pgrsolutions.com.