

Business Continuity Plan (BCP)

This letter provides a summary of the plan Transamerica Financial Advisors, Inc. has in place to continue operations and serve your needs should an unexpected disruption of our business occur. Business Continuity Planning is a process which identifies critical business systems and processes enabling us to plan how we respond to events which interfere with our ability to conduct normal business operations. Our Business Continuity Plan ("Plan") is intended to identify what preparations must be made in advance of a disruption, as well as the steps to be taken when an event actually occurs. The Plan is reviewed periodically to determine which business processes are most critical and what resources - people, equipment, records, computer systems and office facilities - are required for operation. The Plan covers TFA's most critical operating areas, such as Order Desk, Registered Representative Support, Information Technology, Mail Facility, and other functions vital to supporting your business. We then consider various events which could disrupt those processes and how we would respond to each type of event. The Plan is reviewed, updated and tested annually or when significant changes in our operations occur. The information below lists the types of events we consider and summarizes our planned response to each.

1. Critical System or Technology Disruption

We have designed our critical information systems to withstand minor disruptions, such as equipment failure, through the use of redundant equipment, telecommunications facilities and backup electrical power. We store copies of critical records at a secure off-site location where they can be retrieved in case information is lost or destroyed. If an event, damaged our technology facilities and rendered them inoperable, we have agreements in place which provide alternate computing facilities and equipment where we can resume our operations. Our goal is to recover critical systems within 24 hours while less important systems would be restored over a period of three to five days.

2. Single Facility Disruption

In the event our offices become unusable, we have leased space in another building where we can move our operations. This facility is configured with enough furniture and office equipment to support our critical business processes. Telephone service would be rerouted to this alternate facility to restore communications with our customers and business partners. Our goal is to establish emergency operations within 24 to 48 hours following an event.

3. Business District/Metropolitan/Regional District Disruption

If a natural disaster or other widespread business disruption occurs, it may not be possible to resume operations using local facilities. In such a significant event, we plan to provide only our most critical services, such as ensuring you access to your account, by establishing emergency operations at the office of an affiliate. Our goal is to have critical services available within 24 hours of such an event. While we have been diligent in our efforts to plan for unexpected events, it is impossible to consider every possible scenario and develop detailed responses to each. We believe we have addressed the major threats to our business and can continue operating with minimum impact to our customers and business partners. It is possible, however, that in spite of our efforts, our ability to function after a catastrophic event may be adversely impacted by the actions (or failure to act) of third parties beyond our knowledge and control.

This information is provided solely to our customers and no further distribution or disclosure is permitted without our prior written consent. No person other than our customers may rely on any statement herein. Our Plan is reviewed and updated regularly and is subject to change. Please visit our web site at www.tfaconnect.com for the most current copy of this disclosure or you may request an updated copy by writing us at the following address: Transamerica Financial Advisors, Inc., Information Security and Business Continuity Officer, 570 Carillon Parkway, St. Petersburg, FL. 33716.