

Business Continuity Disclosure Statement

KeyCorp's Business Resiliency unit ensures that the corporation is prepared for and is capable of successfully recovering from any service interruption.

In addition, Key Investment Services LLC ("KIS"), part of Cleveland-based KeyCorp, maintains a Business Continuity Plan ("BCP") in accordance with FINRA Rule 4370 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 – KIS will utilize KeyCorp's established communication plans, which include but are not limited to television and radio broadcasts, print media, email and online notification, proprietary call centers and a toll-free crisis management line to inform and update employees and clients during times of service disruptions. If you cannot access us through the KIS Service Center at 888-KIS2YOU in the event of a significant business disruption, you should contact our clearing firm, Pershing LLC, at 201-413-3635 for recorded instructions on how they will provide prompt access to funds and securities, enter orders and process other trade-related, cash and security transfer transactions for our customers.

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 backup 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.

Our clearing firm, Pershing LLC, backs up our important records in a geographically separate area. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, we have been advised by our clearing firm that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments within 4 hours. Your orders and requests for funds and securities could be delayed during this period.

Varying Disruptions – KIS fully intends to conduct business during times of business disruptions. Every effort will be made to minimize the impact on service to our clients. 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. All KIS operational facilities are equipped for resumption of business and are tested. Regarding all circumstances within our control, KIS's recovery time objective for business resumption, including those involving a relocation of personnel or technology, is 24 hours depending upon the availability of external resources. In any situation, we plan to continue in business, transfer operations to our clearing firm if necessary, and notify you through KeyCorp's established communication plans on how to 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 888-KIS2YOU.