

Voya Financial Continuity Management Program - Voya Financial Advisors, Inc. *Updated August 2018*

Voya Financial, Inc. together with each of its subsidiaries and affiliates, including its broker-dealer affiliate Voya Financial Advisors, Inc. (collectively “Voya Financial”), is committed to safeguarding the interests of its clients and customers in the event of an incident or crisis. Voya Financial’s comprehensive business continuity strategy is designed to enable Voya Financial to meet its existing obligations to its customers in the event of an emergency or incident or crisis by safeguarding employees’ lives and firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of Voya Financial’s books and records, and allowing customers to transact business.

Business units within Voya Financial have fully developed business continuity plans (hereinafter “Business Continuity Plans”). Voya Financial’s Business Resilience Office (“BRO”) coordinates the development, testing, and maintenance of Voya Financial’s Business Continuity Plans. The BRO also manages contracts with recovery services vendors and is responsible for management reporting on all aspects of continuity.

Business Continuity Plans have been developed, tested, and approved by management for applicable Voya Financial business locations, production IT systems and applications. The plans reside in a Governance Risk Compliance database and are updated by business units semi-annually, reviewed by BRO staff semi-annually, and validated & digitally approved by the business continuity plan owner annually. The database is externally hosted outside of Voya Financial networks and infrastructure, and replicated between three sites that are several hundred miles apart. In addition, annual Business Impact Analyses are used to keep the Business Continuity Plans aligned with business requirements. Recovery resources are identified in advance and are obtained from several sources. These resources exist either within Voya Financial’s capabilities or are obtained from recovery services vendors under contract.

Local crisis management teams are in place in all Voya Financial locations. These local crisis teams are charged with recording and managing any potential or actual crisis at the site from the time a situation occurs to the resolution of the incident and resumption of normal business operations. Voya Financial’s Business Continuity Plans address advance preparations and actions to be taken in response to disruptions of various magnitudes. The Business Continuity Plans address the potential impact of varying levels of disruptions to Voya Financial employees, equipment, computer and telecommunications systems, and office facilities.

While it is impossible to anticipate every type of disruption that could affect Voya Financial’s businesses, examples of the incidents covered by the Business Continuity Plans include, but are not limited to, terrorists attacks, hurricanes, floods, fires, bomb threats, earthquakes, public transportation strikes, IT disruptions, and cyber-threats. Voya Financial maintains back-up systems and power supplies that allow critical computer and telecommunications systems and facility functions to be maintained in the event of minor, local disruptions.

The duration of the disruption will depend on the nature and extent of the incident or crisis. In the event of an incident or crisis where it is not possible to conduct business from any Voya Financial office, the company has contracted with a recovery services vendor for use of a remote alternate site equipped with sufficient resources to support critical business operations. Telephone service may be re-routed to this site. Voya Financial’s networks and major business applications are replicated across data centers hosted in different geographical locations, enabling access to systems from a secondary site should the local systems become

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unavailable. In the event of a significant business disruption at a Voya Financial Advisors, Inc. representative's branch office, customers of that representative may contact Voya Financial Advisors, Inc.'s home office at 800.356.2906.

Voya Financial is generally prepared to restore critical business functionality at the alternate site no later than 48 hours after declaration of an incident or crisis. In addition, certain employees have the ability and capability to work from home or other non-office remote locations during periods of major disruptions.

The Voya Financial's Business Continuity Plans are reviewed semi-annually and ad-hoc as needed, to ensure they account for technology, business and regulatory changes, operational modifications, process changes, organizational structure, or location. The Business Continuity Plans are subject to change, and material changes will be updated promptly on the Voya Financial public website and all affiliates' websites.

You may obtain a current written copy of this notice by contacting your Voya Financial Advisors, Inc. representative, by calling the home office at (800) 356 2906, or by writing Voya Financial Advisors, Inc. at the following address:

Voya Financial Advisors, Inc.
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