

Business Continuity and Contingency Plan

Disclosure Summary

Morningstar Investment Services (MIS) is committed to safeguarding the interests of our customers and employees in the event of an emergency or other significant business disruption (SBD). Our Business Continuity Plan details how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we have to be flexible and respond to actual events as they occur. With that in mind, we are providing you with this summary of our business continuity plan.

Significant Business Disruptions

Our business continuity plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only our firm's ability to communicate and do business, such as a major power outage or fire in our building. External SBDs prevent the operation of the securities markets or the operation of a number of firms, such as a terrorist attack, a city flood, or a wide-scale regional disruption.

Our response to an external SBD relies more heavily on other organizations and systems, especially on the capabilities of our service providers. We use PNC Inc. and other service providers, all provide systems that enable our customers to trade.

Our service providers maintain all "mission critical systems" pertaining to MIS' business except for a web site used to create proposals and address functions.

Our Business Continuity Plan

We plan to, as quickly as practicable, safeguard our employees and property, make financial and operational assessments, protect our books and records, help our customers transact business and recover and resume business operations.

Our business continuity plan covers data back-up and recovery; critical systems; financial and operational assessments; alternate physical location of employees; alternative communications with customers, employees, independents, and regulators; critical suppliers of services and products, banks and counter-parties; regulatory reporting; and customers access to their funds and securities in the event we are unable to continue our business.

Should a SBD occur, we will assess which means of communication are still available to us and use the means closest in speed and form (written or oral) to those we have used in the past to communicate with a customer. For example, if we have communicated with a customer by email but the Internet is unavailable, we will call them on the telephone and follow up where a record is needed with a paper copy through the U.S. mail.

We conduct daily tape backups of all systems. Tapes leave our data centers and move to an Iron Mountain facility on a weekly schedule. Databases also employ a second disk backup for more rapid restore in the event of a minor data loss.

The actual impact of a SBD will depend on the event and the severity of that event. In all cases, both for internal and external disruptions that prevent us from using our main office, to the extent possible, we will relocate to an alternate location, continue in business and assist our customers in transacting business. The systems we deem critical are telecommunications, computer systems, and books and records.

Our mission during a SBD is to provide for the safety of our employees, stay in contact with our customers and resume normal business activities, in as little time as reasonably possible and with as little disruption as possible, generally within 24 to 48 hours of the event.

MIS has staff on location to handle critical functions should we experience a business disruption. If work volume dictates, additional staff will either be held over and/or called in.

All employees receive a copy of MIS's business continuity plan and, as appropriate, have been advised of their responsibilities in the event of a significant business disruption.

Access to Your Accounts

Our firm does not maintain custody of customers' funds or securities, which are maintained by our service providers. In the event of an internal or external SBD, if telephone service is available, your investment adviser representative will take customer orders or instructions and contact the custodian on your behalf, and if Web access is available, we will post on our Website that customers may access their funds and securities by contacting their custodian and provide their toll-free number.

For More Information

Our business continuity plan is subject to modification at any time. An updated summary will be promptly posted on our web site and customers may also obtain a copy of our current business continuity plan summary by sending a written request to:

Morningstar Investment Services, Inc.
Attn: Client Services
22 W. Washington St
Chicago, IL 60602

If you have questions about our business continuity plan, you can contact us at +1 877 626-3227.