Voya Financial Continuity Management Program -Voya Financial Advisors, Inc. Updated February 2023

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. Business Continuity Plans address steps required for the restoration of operations within their Recovery Time Objective (RTO) following a disruptive event. The plans reside in a Governance Risk Compliance database and are updated by business units & digitally approved by the business continuity plan owner annually. The database is externally hosted outside of Voya Financial networks and has appropriate redundancy. 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.

Site and Enterprise Crisis Management Plans provide a framework for how Voya Financial prepares and responds to events that pose a threat to the safety of staff, facilities, systems, and third-party providers essential for the continuity of operations. The Crisis Plans ensure that all stakeholders are adequately trained through meetings, walkthroughs, and tabletop exercises.

While it is impossible to anticipate every type of disruption, Voya Financial's approach to having contingencies for impacts to staff, workspace, technology and third-party vendors can be applied for many disruptions, i.e., pandemics, terrorist 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.

Voya Financial also maintains a workplace recovery program that provides alternate vendor workspace in the event Voya and home offices become unavailable. Most Voya Financial business processes can work from home, which remains the primary recovery strategy. However, other functions that do not have the ability to work from home can invoked cross-site coverage or utilize a workplace recovery arrangement.

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

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become 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.

The Voya Financial's Business Continuity and Crisis Management Plans are reviewed annually and ad-hoc as needed, to ensure they account for technology, business and regulatory changes, operational modifications, process changes, organizational structure, or location. Material changes in the Plans will prompt update to this disclosure and will be stored on 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:

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