

MFD BUSINESS CONTINUITY PROGRAM

SUMMARY

Overview

As part of the firm's risk control framework, MFS Investment Management ("MFS") maintains a firm-wide Business Continuity Program which addresses all business units, including MFS Fund Distributors, Inc. ("MFD"). The Business Continuity Program is designed to enable MFD to respond to events of varying scope that could interrupt normal operations.

Risk-Reducing Controls

In order to avoid business disruptions, MFS has implemented redundancy of certain critical systems and infrastructure components, including telephone service. Our primary and secondary datacenter facilities have emergency power generators, redundant fire suppression systems, key card access, network firewalls and multiple system security controls designed to protect our facilities and systems. All critical data is replicated to disk at our secondary data center or stored off site.

Recovery Facilities and Incident Response

MFS has off-site recovery sites available for both workspace and datacenter recovery which also address the needs of MFD. Should an event cause disruption at our office locations or surrounding areas, senior management will activate the MFS Crisis Management Plan to quickly assess the situation, and implement the aspects of the Business Continuity Program necessary to ensure rapid resumption of critical operations. Depending on the nature of the disaster, MFS may continue operations in a modified manner, or deploy recovery teams to the workspace and/or datacenter recovery sites.

Recovery of the most critical business functions, including transaction processing and Call Center operations is designed to occur within four hours of the disaster.

Plan Maintenance and Testing

The MFS Business Continuity Program and each of the Departmental Business Continuity Plans are updated semi-annually, and whenever there is a material change impacting critical business functions.

Regular testing, including both workspace and datacenter recovery procedures validates the continuity and recovery capabilities defined in the Business Continuity Plans, and ensures that MFS has the capabilities to perform critical business functions following an event disrupting normal operations.

Contact Us with Questions

Anyone who has questions about this Summary can call the MFS Investor Information Line at 1-800-225-2606. Phone service representatives are available during business hours.