

**GENERAL AMERICAN DISTRIBUTORS, INC.
BUSINESS CONTINUITY PLAN DISCLOSURE
NASD RULE 3510**

I. INTRODUCTION

The policy of MetLife and its affiliated companies, including General American Distributors, Inc. (“GAD”) and all other MetLife-affiliated NASD member firms (collectively “MetLife”), is to respond to a Significant Business Disruption (“SBD”) by safeguarding employees’ lives and firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of MetLife’s books and records, and allowing customers to transact business. In the event that MetLife determines a specific affiliated company is unable to continue business, MetLife will assure customers prompt access to their funds.

MetLife has a documented corporate policy requiring each Business Unit to develop a business continuity plan (hereinafter a “BCP”). Pursuant to this policy, MetLife’s I/T Risk and Business Recovery (ITRBR) department has the full-time responsibility of coordinating the development, testing and maintenance of all MetLife BCPs. The ITRBR also manages contracts with recovery services vendors and is responsible for management reporting on all aspects of continuity. A formal process that includes a continuous review of internal controls enforces the corporate policy on continuity.

BCPs have been developed, tested and approved by management for all MetLife business locations and production IT systems and applications. The plans reside in a common, best of breed, database and are routinely updated by business unit and ITRBR staff. The database is replicated between two sites that are several hundred miles apart. Business Impact Analyses (BIAs) are used to keep the BCPs aligned with business requirements.

Recovery resources are identified in advance and are obtained from several sources. These resources exist either within MetLife’s capabilities or are obtained from recovery services vendors under contract.

Local crisis management teams are in place in all MetLife 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.

II. GENERAL AMERICAN DISTRIBUTORS, INC.

GAD is an NASD member firm, and as such has documented the following supplement to the MetLife BCP in response to NASD Rule 3510. As a registered broker dealer, GAD is a wholesale distributor of annuities and life insurance products issued by affiliated MetLife insurance companies to other registered broker dealers, financial institutions and insurance agencies. The interaction by GAD with these entities is solely at the wholesale level, and the firm has no retail customers. Customer accounts, annuity contracts, and insurance policies are underwritten, issued, maintained, and services at administrative sites operated by the affiliated

MetLife issuing insurance company. The BCPs for these sites are maintained in accordance with the MetLife BCP corporate policy described above.

GAD has developed a BCP that addresses advance preparations and actions to be taken in response to disruptions of various magnitude. The BCP addresses the potential impact of varying levels of disruptions on GAD's employees, equipment, computer and telecommunications systems, and office facilities. While it is impossible to anticipate every type of disruption that could effect GAD's business, the incidents that the BCP covers include, but are not limited to, the following:

Personnel Related:

- Personal injury or illness
- Workplace disruptions
- Terrorist attacks

Weather Related:

- Hurricane
- Tornado
- Rainstorm
- Wild fires

Facility Related:

- Fires
- Gas leaks or explosions
- Power outages
- Suspicious mail
- Bomb threats
- Earthquakes

Transportation Related:

- Local traffic events or street closures
- Public transportation accidents or strikes
- Hazardous material spills
- Interruption of mail services

Computer/Technology Related:

- IT disruptions
- Telephone or network disruptions
- Cyber threats
- Loss of network operations

GAD maintains back-up systems and power supplies that allow critical computer and telecommunications systems, as well as facility functions, to be maintained in the event of minor, local disruptions.

For all SBDs described above, the BCP in place will permit GAD to remain operational and service its customers. The duration of the disruption will depend on the nature and extent of the SBD.

In the event of an SBD, where it is not possible to conduct business from GAD's offices, 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 would be rerouted to this site. GAD's networks and major business applications are replicated daily at a location in a different geographical location from the company's offices, enabling it to access these systems from the remote site should the local systems become unavailable. Per GAD's BCP, the company is generally prepared to restore critical business functionality at the alternate site no later than 48 hours of declaration of an SBD. Other employees have been designated to work from home during periods of major disruptions.

Please note that GAD's BCPs are reviewed as necessary, and at least annually, to ensure they account for technology, business and regulatory changes, operations, structure or location. The BCPs are subject to change, and material changes will be updated promptly on our website, www.genamerica.com. You may obtain a current written copy of this notice by contacting a GAD representative or writing to us at:

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