



Business Continuity Plan Disclosure

JUNE 2011

Atalanta Sosnoff Capital, LLC, together with its subsidiary Atalanta Sosnoff Management, LLC, (“Atalanta Sosnoff” or the “Firm”) is committed to safeguarding the interests of our clients and customers in the event of an emergency or significant business disruption. This Business Continuity Plan Disclosure (the “BCP”) summarizes the Firm’s effort to mitigate risks inherent with unforeseen business interruptions. The Firm’s comprehensive business continuity strategy is designed to enable us to meet our existing obligations to our clients and customers even in the event of an emergency or significant business disruption. This BCP is intended to comply with the rules promulgated by the Investment Advisors Act of 1940.

Overview

Atalanta Sosnoff maintains one primary facility to house the backbone of our trading, sales, operations and information technology systems. The data is backed up and stored off site daily. The Firm maintains a backup network in a remote location which provides complete redundancy to our critical systems.

Communication with Our Employees in the Event of a Disruption

The safety and well-being of our employees is a vital concern. In the event of an emergency or significant business disruption, the Firm will communicate with its employees in several different ways. We will use a combination of general broadcast and direct targeted outreach. General information such as office closures and operating hours will be posted on the Firm’s internal and external websites and similar recorded updates will play around-the-clock on the Atalanta Sosnoff emergency telephone hotline. Senior management will be contacted directly via telephone and/or email.

Redundancy of Mission Critical Information Technology Systems

Atalanta Sosnoff has an information technology processing and backup site that, collectively, provide the redundancy required to protect the firm’s books and records, balance sheet and capital, and provide business continuity and client protection. The recovery capability for certain of the Firm’s mission critical processing capabilities is achieved through the use of a specialized vendor facility that provides disaster recovery services to many large corporations. Unlike many shared facilities that allocate computer capacity to several different clients on a first-come-first-serve basis, Atalanta Sosnoff owns fully dedicated backup equipment located at the vendor facility. Other mission critical systems are protected by the use of daily backup data stored at a remote location. Recovery times for mission critical systems range between real time recovery and 4 to 12 hours.

Back-Up Trading, Sales and Operations Site

Atalanta Sosnoff does not maintain a backup trading floor and operations center because the Firm can effectively and timely conduct client transactions remotely via telephone, facsimile and alternative technology. In the event that we are unable to enter our building, we will be able to perform necessary procedures remotely. The functionality of the backup facility is routinely tested by our information technology team. The Firm has access to office facilities in New York City if a prolonged business interruption were to occur.

Protection of Primary Facilities

Protecting the infrastructure of our primary facility is a high priority because it will allow the firm to continue operations in the event of many disaster situations, by permitting our employees on a limited basis to have access to and use of our facility during that situation. Our primary facility has a limited life safety system and infrastructure designed to permit the building to operate despite failures of external power, water, or telecommunications. If Firm employees were not afforded access to the building for a prolonged period of time we would utilize the remote back up system and work remotely via internet, telephone and facsimile. The Firm’s backup data center is located in a low-risk area and it has sufficient backup power to operate for a long period of time.

(continued on reverse)

Disclaimer

The Firm's comprehensive business continuity strategy is designed to enable us to meet our existing obligations to our clients and customers even in the event of an emergency or significant business disruption; however it is not infallible. The plan is designed to work in many different emergency situations; but these events are, by their nature, unpredictable and it is impossible to anticipate every scenario that could cause a business disruption. Furthermore, although we are confident in our own preparedness, Atalanta Sosnoff has no control over the various entities that we must rely upon in the event of an emergency. Our business continuity plans are tested periodically to ensure readiness; yet such tests may not be able to replicate the actual conditions we experience in a real emergency. This BCP is subject to change without notice. In the event that this BCP is modified, the updated document will be promptly posted on the Firm's internet website. Alternatively, customers may obtain an updated hard copy BCP upon request. The information contained in this disclosure is provided by Atalanta Sosnoff for informational purposes only. Nothing contained herein shall be construed to amend, supplement or otherwise modify any of the terms and conditions set forth in any customer agreement between you and Atalanta Sosnoff.