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Commonwealth
TRUST COMPANY

Commonwealth Trust Company Policies

PRIVACY POLICY.

This policy covers Client Information, which means personally identifiable information about a consumer or a consumer's current or former relationship with Commonwealth Trust Company ("Commonwealth"). Keeping financial information secure is one of our most important responsibilities. Protecting the privacy of our clients, including Grantors, their beneficiaries and trusts and their personal account information is the highest priority at Commonwealth. We maintain physical, electronic and procedural safeguards to protect Client Information. As a result, under no circumstances will Commonwealth sell, share or otherwise provide your Client information to any non-affiliated third party entity, except as set forth in this policy. In order to maintain and service client accounts, Commonwealth will gather and store information about our clients and the trusts they establish. This information, collected via our account profile and other account documentation, is critical to open and administer trust accounts. In addition to this collected information, transactions facilitated for your account through Commonwealth will be kept for reporting purposes and pursuant to out regulatory requirements. To provide superior service to our clients, it may be necessary for Commonwealth to share information with third parties that provide services to trusts and that may be currently involved in a contractual relationship with Commonwealth or, in the case of your trust's custodian and/or investment advisor, may have a relationship with the trust under the terms of its governing instrument or under arrangements made by a Co-Trustee Investment Advisor or other fiduciary. This sharing of Client Information is carried out on a strictly professional basis and is incidental to servicing your account. Through the normal course of servicing your account, certain agents and employees may have access to your confidential account information. This may include operations and support personnel. Access to this information is limited and held in the strictest confidence. Employees are authorized to access Client Information only when they have a reasonable business need for the information. Our employees are required to give confidential treatment to Client Information and are subject to disciplinary action if they fail to do so. Information about former clients, who do not currently maintain an account relationship with Commonwealth, is not shared with any outside party. Due to the relationships that Commonwealth has with financial institutions that provide investment services to the trusts we administer, sharing of information with these financial institutions is critical to serving your account. Allowing this sharing process to continue uninterrupted will allow you to take full advantage of the value offered by the relationship between your trust's investment advisor and Commonwealth. We may also share Client Information when required or permitted by law. For example, Client Information may be disclosed in connection with a subpoena or similar legal process. We may also share any Client Information outside of Commonwealth if we have your consent, such as when we respond to the service requests. If you would like more information about Commonwealth's Privacy Policy, please notify us in writing at the below address or email.

Commonwealth Trust Company Policies (Continued)

FEE POLICY.

In addition to the foregoing, CTC requires that fees be paid on or before the date that the trust documentation is executed by CTC. If you would like to wire these funds rather than remit payment by check, your assigned Trust Administrator assigned to your trust can provide the appropriate wiring instructions.

FIDUCIARY INCOME TAX RETURNS POLICY.

CTC's duties under most trust agreements (or Delaware law) typically include the preparation (or arrangement for the preparation) of the trust's income tax returns. As such, unless prior arrangements are made with CTC for your CPA to prepare the relevant fiduciary filings, CTC will do so.

REAL PROPERTY POLICY.

Due to jurisdictional issues, CTC: (i) cannot accept contributions of real property directly to a trust, and (ii) will not serve as Trustee of a trust that acquires direct ownership of real property. Real property must be owned by a closely-held entity (such as an LLC or Limited partnership), and the interests in that entity may be contributed or assigned to the Trust.