



FIRST HILL
TRUST COMPANY

Business Continuity Plan

Summary Disclosure

First Hill Trust Company · BAC Capital Advisors · 2026

First Hill Trust Company (“First Hill Trust” or “FHTC”) and BAC Capital Advisors (“BAC”) maintain a written Business Continuity Plan (the “BCP”) designed to enable the firms to respond to significant business disruptions and to resume operations and services to clients as promptly as reasonably practicable.

This summary describes the principal elements of the BCP. It is not a complete statement of all procedures, contacts, or operational details, certain of which are confidential for security reasons. Clients and prospective clients may request additional information by contacting First Hill Trust at the contact information at the end of this document.

01 Significant Business Disruptions

The BCP addresses a range of disruptions that could affect the firms’ ability to operate, including:

- Loss of access to the primary office location due to fire, natural disaster, building emergency, or other physical event.
- Loss of key technology systems, including recordkeeping platforms, custody systems, communication systems, and supporting infrastructure.
- Loss of access to third-party vendors and service providers on whom the firms rely for operations.
- Cybersecurity incidents affecting firm systems, client data, or operational continuity.
- Disruptions affecting a wider geographic area, including utility outages, transportation disruptions, public health events, and similar events.
- Loss of key personnel.

02 Continuity Strategy

The BCP is designed to enable First Hill Trust and BAC to maintain operations through a combination of remote-work capability, redundant systems, and pre-arranged alternate operating procedures. Key elements include:

- Cloud-based systems and remote-access infrastructure that allow personnel to perform critical functions from secondary locations or remotely.
- Data backup procedures, including off-site and cloud-based backup of critical records, with documented recovery procedures.
- Identified alternate communication methods so that the firms can continue to communicate with clients, vendors, and regulators during a disruption.
- Pre-identified personnel responsibilities and succession arrangements for key functions.

03 Client Access During a Disruption

In the event of a significant business disruption, First Hill Trust and BAC will work to maintain client access to plan information, account records, and key personnel. The firms’ ability to deliver specific services during a disruption depends on the nature and scope of the event.

Clients who need to reach the firms during a disruption should use the contact information at the end of this document. If the primary phone number is unavailable, clients may also use email or the firms’ website.

04 Mission-Critical Systems and Vendors

The firms have identified the systems and third-party vendors that are essential to operations, including recordkeeping, custody, trading, communication, and compliance systems. The BCP includes procedures for monitoring vendor continuity, maintaining alternate vendor relationships where appropriate, and assessing the impact of vendor disruptions on firm operations.

Where the firms rely on third-party providers for critical services, the firms periodically review the providers' own business continuity capabilities.

05 Recovery Time Objectives

The BCP establishes recovery time objectives for resuming critical functions following a disruption. Actual recovery times depend on the nature, severity, and geographic scope of the event, and on the availability of third-party providers and infrastructure. In general:

- For disruptions limited to the primary office location, the firms aim to resume critical functions within one business day through remote-work arrangements and alternate operating procedures.
- For broader disruptions affecting technology infrastructure or third-party providers, resumption of full services may take longer and will depend on factors outside the firms' control.
- For cybersecurity incidents, the firms maintain a separate incident response plan that governs containment, assessment, notification, and recovery activities.

06 Notification to Clients

In the event of a significant business disruption that materially affects the firms' ability to deliver services, First Hill Trust and BAC will provide notice to affected clients through reasonable means, which may include email, website notice, telephone, or written communication. The timing and content of notice will depend on the nature of the disruption and applicable legal and regulatory requirements, including notice obligations under Regulation S-P and applicable state breach-notification laws in the case of cybersecurity incidents.

07 Plan Testing and Updates

First Hill Trust and BAC review the BCP at least annually and update it as needed to reflect changes in operations, systems, personnel, vendors, regulatory requirements, and identified risks. The firms periodically test elements of the BCP, with the scope and method of testing determined by the firms' Chief Compliance Officer.

Material changes to the BCP are communicated to affected personnel, and updates to this summary are made available at firsthilltrust.com/disclosures.

08 Limitations

No business continuity plan can anticipate every possible disruption or guarantee uninterrupted service. The BCP is designed to mitigate the impact of disruptions and to support timely resumption of services, but actual outcomes will depend on the nature and severity of the event, the availability of third-party providers and infrastructure, and other factors outside the firms' control.

This summary is provided for informational purposes and does not create any contractual obligation, warranty, or guarantee regarding the firms' response to any specific event.

First Hill Trust and BAC Capital Advisors are committed to maintaining a business continuity capability appropriate to the size, scope, and complexity of the firms' operations, and to communicating with clients in a timely manner when service interruptions occur.

09 Contact Information

Questions regarding this summary or the underlying Business Continuity Plan may be directed to the Chief Compliance Officer:

First Hill Trust Company

BAC Capital Advisors

(206) 625-1800

firsthilltrust.com

Additional regulatory information, including BAC Capital Advisors' Form ADV Part 2A brochure, Form CRS, privacy notices, and related disclosures, is available at firsthilltrust.com/disclosures.