

**Attachment B**  
**AFL-CIO ITC Financial, LLC**  
**Business Continuity Plan**  
**Client Disclosure Statement**

AFL-CIO ITC Financial, LLC has developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions are unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

*Contacting Us* – If, after a significant business disruption, you cannot contact us as you usually do by phone at 202-898-9190 or by e-mail at [wlittle@itcfinancial.com](mailto:wlittle@itcfinancial.com), you may call our alternative numbers: William Little (202) 365-4693 or Gary Fox (603) 325-5125. You may also call or email your normal point of contact for the Firm. If you cannot access us through any of these means, you should contact the entities in which you have invested directly for instructions on how you may access investment information, invest additional funds and or provide you with prompt access to funds and securities.

*Our Business Continuity Plan* – We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the Firm's books and records, and allowing our clients to transact business. In short, our business continuity plan is designed to permit our Firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data backup and recovery; all mission critical systems; financial and operational assessments; alternative communications with clients, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our clients prompt access to their investments if we are unable to continue our business.

Since you invest directly, the entities in which you have invested are responsible for those records they maintain on your behalf. Additionally, when you invest with our assistance, we take steps to assure that you have paper or electronic copies of everything that you have signed and or obligated yourself to, which results in your having access to essentially the same records as us, should you be unable to contact us during an emergency situation. Finally, while most transactions done through us are not time sensitive, every emergency poses unique problems based on external factors, such as time of day and the severity of the disruption. Thus, while each entity with which you have invested desires to restore its own operations and be able to complete existing transactions and accept new transactions and payments within a short period of time, your orders and requests for funds and securities could be delayed during this period.

*Varying Disruptions* – Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In the event of an Internal or External SBD, employees are to use an alternate workplace. The system that ITCF has in place allows for employees to work remotely by accessing data and emails through Citrix ShareFile and Microsoft Office 365 services. Employees can use their home computer or any computer that has Internet access to work remotely to access the same data as if they were in the office. In either situation, we plan to continue in business, and notify you on how to contact us. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our clients prompt interface with the respective companies and entities that have provided investment products to you through us.

*For more information* – If you have questions about our business continuity planning, you can contact us at 202-898-9190.

*This plan is subject to modification and clients may alternatively obtain updated summaries by requesting a written copy by mail.*

Last Updated: January 7, 2021