



**BUSINESS CONTINUITY PLAN**  
**CLIENT DISCLOSURE**  
(Last Amended: March 2018)

Businesses may experience varying degrees of business disruption. These disruptions may last from a few minutes to more than one week. RhumbLine Advisers Limited Partnership (“RhumbLine”) has assessed the risks of a disruption to its business and has devised a Business Continuity Plan (“Plan”) intended to permit us to continue critical business operations during a range of disruptions, including a significant business disruption (“SBD”) (e.g., a major destruction or incapacity of our facilities and/or systems). As a valued client, you should be aware of the steps RhumbLine has taken to be able to continue operating in the event of some form of disruption. RhumbLine maintains a “**three tier**” approach to business continuity with each tier addressing business disruptions of increasing severity:

**Tier 1** is defined as a business disruption where physical access to our office space at 265 Franklin Street is not possible but our computer network at the site is functioning normally. In this situation, all key RhumbLine employees including account operations, investment management and trading, compliance and client service personnel have full and secure access to the primary RhumbLine network from any remote location where Internet access is available.

In addition, all primary network servers are imaged to a local storage device in real-time. Should any of the primary servers become unavailable a backup version of the server can be brought on-line within a short period of time.

**Tier 2** is defined as a business interruption of a third party which impacts the use of services or products deemed mission critical. To reduce the risk of this type of disruption, RhumbLine has performed a risk assessment and business impact analysis on its key vendors. These vendors have provided information about their own business continuity plans and in many instances, RhumbLine also has multiple sources or back up providers for critical data and products such as accounting records, constituent data, pricing information, trading platforms, etc.

**Tier 3** is defined as a business disruption where both physical access to 265 Franklin Street is not possible and our primary computer network is not functioning. For this situation RhumbLine maintains a fully replicated, backup network at a secure, commercial hosting facility located approximately 35 miles from our Boston office. All data and application changes to the primary network are refreshed to the backup network on an hourly basis and all key employees have secure, remote access to the backup network in the event of a “tier 3” business disruption. The backup network is maintained and monitored by RhumbLine’s Managed Service Provider (MSP) and a fully documented test of the backup network is performed annually.

Contacting Us – If after a significant business disruption you cannot contact us as you normally do at 617-345-0434 or via email (employee’s [initials@indexmng.com](mailto:initials@indexmng.com)), we advise you to visit our website at <https://rhumblineadvisers.com> to see if our business continuity plan is in effect. RhumbLine will also contact its employees, clients and key vendors as quickly as possible to alert them of the business disruption and provide them with our alternate contact information.

Clients should be aware that RhumbLine does not maintain custody of clients’ funds or securities, as these assets are maintained independently at the custodian banks. In the event of any SBD, our clients will be directed to contact their custodian for access to their accounts.

This Plan will be subject to on-going review and may be modified as the need arises. A copy of this document will be distributed to our clients annually and is also available on our website at <https://rhumblineadvisers.com>.