



BUSINESS CONTINUITY PLAN
CLIENT DISCLOSURE
(Last Amended: April 2019)

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, key RhumbLine employees, including account operations, investment management and trading, compliance and client service personnel, should have full and secure access to the primary RhumbLine network from any remote location where Internet access is available.

Tier 2 is defined as a business interruption of a third party service or the temporary loss of one or more primary network servers 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. If the disruption is caused by the temporary loss of one or more of its production servers, the Director of IT is authorized to bring online a fully-imaged backup copy of the affected server.

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 30 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 should 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.

Contact with 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@indexmngr.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 SBD 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 ongoing 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>.