

## **Attachment A - Business Continuity Plan Summary Disclosure Statement**

### **TSPF Business Continuation Plan Summary**

TSPF is committed to providing timely service to TSPF clients. TSPF recognizes the importance of preparing for various disaster scenarios that could hamper TSPF's ability to provide investment advisory services. TSPF has taken steps to provide for business contingency and continuity planning under a variety of potential scenarios. TSPF continues to evaluate its operations and take the necessary actions to ensure the proper resources are available to provide for the recovery and timely resumption of critical business operations to internal business units, third-party business partners, and clients. Since the timing and impact of disasters and disruptions is unpredictable, TSPF is providing you with this information on its business continuity plan.

**Contacting Us** – If after a significant business disruption you cannot contact us as you usually do at (772)400-6880 / [ted.zamerski@tspffinancial.com](mailto:ted.zamerski@tspffinancial.com), you should go to our website at [www.tspffinancial.com](http://www.tspffinancial.com).

If you cannot access us through either of those means, you should contact our custodian, Charles Schwab at (800) 435-4000 or Fidelity Investments at (800) 343-3548 for instructions on how you may have prompt access to your funds and securities, enter orders and process other trade-related, cash and security transfer transaction.

**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 reasonable, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data backup and recovery; mission critical systems; financial and operational assessments; alternative communications with clients, employees, and regulators; alternate physical location of employees; critical providers, custodians, banks and counterparties; regulatory reporting; and alternative means to providing clients access to their accounts and funds, if TSPF is unable to provide its normal services.

TSPF custodians backs up important records in a geographically separate area. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, TSPF has been advised by its approved custodians that the objective is to restore custodial operations and be able to complete existing transactions and accept new transactions and payments within a timely manner. Your orders and requests for funds and securities could be delayed during a business disruption or disaster.

**Varying Disruptions** – Significant business disruptions can vary in their scope. For example, only TSPF's primary office location could be impacted, the entire business district where TSPF's primary office is located, the city where TSPF is located, or the whole region as in the case of a pandemic. Within each of these areas, the severity of the disruption can also vary from minimal to

severe. In a disruption to only TSPF's primary office location, TSPF will transfer operations to a local site or remotely, when needed, and recover and resume business as soon as possible. In a disruption affecting a business district, city, or region, TSPF will transfer our operations to a site outside of the affected area or remotely and recover and resume business as soon as possible. In either situation, TSPF plans to continue in business, transfer operations to approved custodians, if necessary, and notify you through our website, [www.tspfinancial.com](http://www.tspfinancial.com), or our customer emergency number, (772)-400-6880 how to contact us. If the significant business disruption is so severe that it prevents TSPF from remaining in business, TSPF will work with its approved custodians to provide clients access to their accounts and funds.

**For more information** – If you have questions about TSPF's business continuity planning, you may contact TSPF's Chief Compliance Officer, Ted Zamerski via email [ted.zamerski@tspfinancial.com](mailto:ted.zamerski@tspfinancial.com) or phone (772) 400-6880.