



Phillip Capital Inc.

BCP Disclosure Statement

Introduction: In this Business Continuity Planning Disclosure Statement, learn how Phillip Capital Inc. (“PCI” or the “Firm”) works to mitigate risks inherent in unforeseen business interruptions.

With Business Continuity in Mind: The Firm has created this Business Continuity Plan (“BCP”) to reasonably ensure its critical business operations continue to function as developed. The BCP includes monitoring and testing of business processes to identify risks that could cause unanticipated business disruptions.

PCI monitoring and testing has enabled (and continues to enable) it to implement prioritized recovery procedures for its various business operations, since some processes have more urgent restoration requirements than others. The Firm develops processes with business continuity in mind, embedding needed resources and knowledge into its day-to-day operations.

A Dedicated Team: PCI established the Business Continuity Team, a dedicated group of professionals that oversees the Firm’s business continuity management strategy. This team works closely with business units and the Information Technology department to maintain and test business continuity. Business continuity plans are created using a multi-hazards approach, including baseline requirements and strategies that address incidents of varying scope.

To assess recovery capability, the Firm conducts detailed periodic testing. In addition, PCI reviews recovery plans on a regular basis to ensure they are compliant with standards and are maintained according to industry guidelines. The Business Continuity Team assists the business to design plans to allow for continued operations of critical business functions, including providing clients with prompt access to their funds and securities.

Leading Incident Management: The Business Continuity Team, comprised of senior management representing key areas of the Firm, manages incidents that might affect PCI’s associates and clients. A key function of the team is to assess and direct PCI’s response to an incident, ensuring the safety and security of all associates and continuity of critical processes.

To diminish risks posed by significant disruptions, PCI (and/or its business partners) maintains system redundancies and/or off-site back-up of business-critical systems and records. In the event of an emergency at PCI’s main office, business critical staff can be relocated to an off-site location to facilitate business continuity. In the event of a disruption, communications occur in several ways. Consistent and timely messages are disseminated to associates, clients, business partners, regulators, and the media (if/as appropriate).

PCI Keeps Clients informed: In the event of a business disruption, clients can obtain information about the status of their accounts and access to their funds and securities via PCI’s website www.phillipcapital.com or by contacting PCI Client Services at 1-312-356-9000 or email info@phillipcapital.com. For questions or more information about Business Continuity at PCI, contact Filippo Lecchini 312.374.2474

The Nature of Events – Limitations Disclaimer: Due to the unpredictable nature of events causing significant business disruptions, PCI does not guarantee that systems will always be available or recoverable after such events. Also, the firm’s business continuity plans are subject to modification.