

ROSENBLATT SECURITIES

BUSINESS CONTINUITY PLAN (BCP)

VERSION: 1.81
LAST UPDATED: MARCH 12, 2021

BCP PLAN SIGN OFF

We have approved this Business Continuity Plan as reasonably designed to enable our firm to meet its obligations to customers in the event of an SBD.

Signed Joseph Gawronski (true signed copy on file)

March 12, 2021

Joseph Gawronski, President/COO

Date

Signed Richard A. Rosenblatt (true signed copy on file)

March 12, 2021

Richard A. Rosenblatt, CEO

Date

BCP PLAN LOCATIONS

BCP DISCLOSURE STATEMENT	STORAGE LOCATIONS	Primary: (Shared file Server)	\Shared drives\Compliance\BCP\RSIBCPPlanSummary.pdf
		Secondary	http://rblt.com/disclosure.aspx
		External	Onsite NAS Drive and Offsite Crashplan Cloud Backup
FULL BCP PLAN	STORAGE LOCATIONS	PRIMARY: (SHARED FILE SERVER)	\Shared drives\Compliance\BCP\bcp_plan_completed.docx
		SECONDARY	https://uploads-ssl.webflow.com/5a009fe5519aa500014829ca/5b771e3f84878473928de2h7_BCP%20update%20081518.pdf
		EXTERNAL	Onsite NAS Drive and Offsite Crashplan Cloud Backup

SUPPORTING DOCUMENTATION

CLEARING FIRM (ITG) BCP PLAN LETTER	STORAGE LOCATIONS	PRIMARY: (SHARED FILE SERVER)	\Shared drives\Compliance\ITG_BCP_Plan.pdf
		SECONDARY	www.rblt.com (accessible by clicking on the disclosures link)
		EXTERNAL	Onsite NAS Drive and Offsite Crashplan Cloud Backup

UPDATE HISTORY:

DATE	UPDATE SESSION DETAILS	REVISED BY
08/02/05	Initial Plan Creation. This new version of our DR plan implements the NASD BCP template and meets the requirements of NYSE Rule 446 and Information Memo 04-24	Joseph Gawronski (COO), Ahmed Sako (CTO)
08/10/05	First round of updates	Joseph Gawronski (COO), Ahmed Sako (CTO)
02/21/08	Updated	Joseph Gawronski (COO), Raman Kannan (CTO), Anthony Castelli (CO)

10/23/09	Updated	Joseph Gawronski (COO), Raman Kannan (CTO), Anthony Castelli (CO) Charles Roney (CCO)
10/19/10	Updated	David Torbati (VP), Joseph Gawronski (COO), Charles Roney (CCO)
07/08/11	Updated	David Torbati (VP), Joseph Gawronski (COO), Charles Roney (CCO)
04/02/12	Updated	David Torbati (VP), Joseph Gawronski (COO), Charles Roney (CCO)
04/26/13	Updated	David Torbati (VP), Joseph Gawronski (COO), Charles Roney (CCO)
05/28/14	Updated	David Torbati (VP), Joseph Gawronski (COO), Charles Roney (CCO), Nishant Mittal (Director)
7/23/15	Updated	Tahl Smith-Rapaport (Technology), Jeff Shear (Systems Administrator), Charles Roney (CCO), Scott Burrill (Managing Director), Joseph Gawronski (President & COO)
6/15/16	Updated	Tahl Smith-Rapaport (Technology), Jeff Shear (Systems Administrator), Charles Roney (CCO), Scott Burrill (Managing Director), Joseph Gawronski (President & COO)

6/15/17	Updated	Tahl Smith Rapaport (Technology), Jeff Shear (Systems Administrator), Charles Roney (CCO), Scott Burrill (Managing Director), Joe Gawronski (President & CCO)
6/01/18	Updated	Tahl Smith Rapaport (Technology), Jeff Shear (Systems Administrator), Charles Roney (CCO), Scott Burrill (Managing Director), Joe Gawronski (President & CCO)
10/21/19	Updated	Tahl Smith Rapaport (Technology), Jeff Shear (Systems Administrator), Charles Roney (CCO), Scott Burrill (Managing Director), Joe Gawronski (President & CCO)
3/12/20	Updated	Tahl Smith Rapaport (Technology), Jeff Shear (Systems Administrator), Charles Roney (CCO), Scott Burrill (Managing Director), Joe Gawronski (President & CCO)
3/12/21	Updated	Tahl Smith Rapaport (Technology), Jeff

		Shear (Systems Administrator), Charles Roney (CCO), Scott Burrill (Managing Director), Joe Gawronski (President & CCO)
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I. EMERGENCY CONTACT PERSONS

Our firm's two emergency contact persons are: Richard A. Rosenblatt (phone: 212-607-3100; email: rosenblatt@rblt.com) and Joseph C. Gawronski (phone: 212-607-3110; email: jgawronski@rblt.com). These names will be updated in the event of a material change, and our Executive Representative will review them within 17 business days of the end of each quarter.

II. FIRM POLICY

Our firm's policy is to respond to a Significant Business Disruption (SBD) by safeguarding employees' lives and firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of the firm's books and records, and allowing our customers to transact business. In the event that we determine we are unable to continue our business, we will assure customers prompt access to their funds and securities.

A. SIGNIFICANT BUSINESS DISRUPTIONS (SBDs)

Our plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only our firm's ability to communicate and do business, such as a fire in our building. External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a city flood, or a wide-scale, regional disruption. Our response to an external SBD relies more heavily on other organizations and systems, especially on the capabilities of our clearing firm.

B. APPROVAL AND EXECUTION AUTHORITY

Richard A. Rosenblatt, a registered principal, is responsible for approving the plan and for conducting the required annual review. Joseph C. Gawronski, a registered principal, has the authority to execute this BCP.

C. PLAN LOCATION AND ACCESS

Our firm will maintain copies of its BCP plan and the annual reviews, and the changes that have been made to it for inspection. Electronic copies are available at a variety of locations (please refer to the BCP Plan Location section and related tables at the start of this document).

III. BUSINESS DESCRIPTION

Our firm conducts business primarily in equity securities. Our firm is an introducing firm and does not perform any type of clearing function for itself or others. Furthermore, we do not hold customer funds or securities. We accept and enter orders. All transactions are sent to our clearing firm, which compares them, clears and settles them. Our clearing firm also maintains our customers' accounts, can grant customers access to them, and delivers funds and securities. Our firm services only institutional customers. We do not engage in any private placements.

Our primary clearing firm is Pershing LLC located at, One Pershing Plaza, Jersey City, NJ 07399 and they can be reached at (201) 413-2000. Their web site is at www.pershing.com and our contact person at that clearing firm is John Ciglar who can be reached at (201)-761-5012. Our clearing firm has also given us the following alternative back-up contact: Global Client Services, 888-367-2563, option 5.

IV. OFFICE LOCATIONS

Our Firm has 2 offices.

A. OFFICE LOCATION #1

Our Location #1 Office is located at 40 Wall Street, 59th Floor, New York, NY 10005. Its main telephone number is 212-607-3100. Our employees may travel to that office by means of foot, car, subway, train, bus and ferry boat. We engage in sales and order taking and entry at this location.

B. OFFICE LOCATION #2

Our Location #2 Office is located in the Main Room, Post 10) at the New York Stock Exchange, 11 Wall Street, New York, NY 10005. Its main telephone number is 212-509-7494. Our employees may travel to that office by means of foot, car, subway, train, bus and ferry boat. We engage in order taking and entry at this location.

V. ALTERNATIVE PHYSICAL LOCATION(S) OF EMPLOYEES

All of our critical processes are automated by systems that are hosted by vendors in redundant locations. Consequently, in the event of an SBD, designated employees can continue without any disruption. For example, employees will be able to work from their homes, or any part of the country that is unaffected, as we have made sure that all critical order taking and entry applications and other mission critical systems required for communication and conducting of business, are accessible via the Internet. We have also determined that ability can be maintained during long duration SBD's such as a flu pandemic.

VI. CUSTOMERS' ACCESS TO FUNDS AND SECURITIES

Our firm does not maintain custody of customers' funds or securities, which are maintained at our clearing firm, Pershing LLC. In the event of an internal or external SBD, if telephone service is available, our registered persons will take customer orders or instructions and contact our clearing firm on their behalf, and if our internet access is available, our firm will post on our website (rblt.com) that customers may access their funds and securities by contacting Pershing at 888-367-2563. The firm will make this information available to customers through its disclosure policy.

If SIPC determines that we are unable to meet our obligations to our customers or if our liabilities exceed our assets in violation of Securities Exchange Act Rule 15c3-1, SIPC may seek to appoint a trustee to disburse our assets to customers. We will assist SIPC and the trustee by providing our books and records identifying customer accounts subject to SIPC regulation.

VII. DATA BACK-UP AND RECOVERY (HARD COPY AND ELECTRONIC)

Our firm maintains certain back-up hard copy books and records, as well as older hard copy books and records, at The Robert Lewis Group at 29 Ryerson Street, Brooklyn, NY 11205. These records are paper copies. Our Compliance Officer who can be reached at 212-607-3100 is responsible for the maintenance of these back-up books and records. On a monthly basis, our firm backs up its paper records by shipping them to The Robert Lewis Group for archival purposes. These records can then be accessed and retrieved on short notice for a variety of reasons, including (but not limited to) audits, reviews, DR, etc.).

Our electronic records are backed up daily to external non-regional facilities. As a general policy, any new daily input generated or received through a Firm's computer (servers and individual user workstations), is backed up daily each night after business hours. In addition, a full back-up of all data in the system is performed every week (the backup week cycle starts on Saturday) with one retention copy kept bi-monthly.

Our e-mail is hosted in "the cloud" by Google in their fully redundant infrastructure (e.g., computers, disks, sites, etc.) and is backed up consistently throughout their worldwide datacenters. All of our email is archived by the archival vendor Smarsh. We can access our email through BYOD or "Bring Your Own Device" – i.e. any internet connected device be it computers, tablets, smart phones, or any other device. Regardless of device or platform, all outgoing/incoming emails are archived server side.

A. BACKUP POLICY AND APPROACH

All backups are performed first internally on backup drives, then by hosted solutions using private cloud services. The data is encrypted using 256 bit AES encryption and transferred from the local computer disks to redundant server farms at secure offsite data vaulting centers (hosted at industry leading public cloud facilities such as Amazon S3 facilities, Google, CrashPlan etc. redundantly in the US and Europe).

This approach has proven much more reliable than tape based approaches. In addition, restores (file, partials, etc.) can be initiated (even by the end-user depending on the access rights granted), by accessing a web site. Lastly, all iterative changes (delta) are stored to allow retrieval of previous versions of edited files.

B. IM/E-MAIL ARCHIVING

Our email communication infrastructure is managed by Google and all of our email is processed on their Google Apps for Business servers. We have contracted with Smarsh to

capture and store all corporate e-mail and email communication over Bloomberg.net. All Instant Messaging (Gchat, IRC and other approved services) communications are also processed in real time and monitored by Smarsh. Access to other/personal email services is prohibited. In addition, a select number of approved employees are granted access to Social Networking sites such as Twitter and LinkedIn which are all monitored and archived by Smarsh. The firm is actively seeking means to comply as new communication systems are developed such as blogging and social networks as the firm believes the regulatory measure protects our clients' interests.

C. DATA RECOVERY

In the event of an internal or external SBD that causes the loss of our paper records, we will physically recover them from our back-up site. If our primary site is inoperable, we will continue operations from our back-up site or an alternate location. For the loss of electronic records, we will access the backup sets over the internet or request they be shipped to us on a portable storage device.

VIII. FINANCIAL AND OPERATIONAL ASSESSMENTS

A. OPERATIONAL RISK

In the event of an SBD, we will immediately identify what means will permit us to communicate with our customers, employees, critical business constituents, critical banks, critical counter-parties, and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options we will employ will include email, home and mobile telephones and Voice Over IP (VOIP) services. In addition, we will retrieve our key activity records as described in the section above, Data Back-Up and Recovery (Hard Copy and Electronic).

B. FINANCIAL AND CREDIT RISK

In the event of an SBD, we will determine the value and liquidity of our investments and other assets to evaluate our ability to continue to fund our operations and remain in capital compliance. We will contact our clearing firm, critical banks, and investors to apprise them of our financial status. If we determine that we may be unable to meet our obligations to those counter-parties or otherwise continue to fund our operations, we will request additional financing from our bank or other credit sources to fulfill our obligations to our customers and clients. If we cannot remedy a capital deficiency, we will file appropriate notices with our regulators and immediately take appropriate steps, including alerting our customers and known counter-parties.

IX. Mission Critical Systems

Our firm's "mission critical systems" are those that ensure prompt and accurate processing of securities transactions, including order taking, entry, execution, comparison, allocation, clearance and settlement of securities transactions, the maintenance of customer accounts, access to customer accounts, and the delivery of funds and securities. More specifically, these systems include: Flextrade, ThomsonOne (market data), Bloomberg Anywhere (market data), ACTIV Financial (market data), BBSS (order management on the NYSE floor), Pershing

Front-end (allocations and executions interface), Optimal Applications (account management).

We have primary responsibility for establishing and maintaining our business relationships with our customers and have sole responsibility for our mission critical functions of order taking, entry, execution and allocation. Our clearing firm provides, through contract, the comparison, clearance and settlement of securities transactions, the maintenance of customer accounts, access to customer accounts, and the delivery of funds and securities.

Our clearing firm contract provides that our clearing firm will maintain a business continuity plan and the capacity to execute that plan. Our clearing firm represents that it will advise us of any material changes to its plan that might affect our ability to maintain our business and has presented us with an executive summary of its plan, which is attached (https://www.pershing.com/_global-assets/pdf/disclosures/per-business-continuity.pdf). In the event our clearing firm executes its plan, it represents that it will notify us of such execution and provides us equal access to services as its other customers. If we reasonably determine that our clearing firm has not or cannot put its plan in place quickly enough to meet our needs, or is otherwise unable to provide access to such services, our clearing firm represents that it will assist us in seeking services from an alternative source.

A. Our Firm's Mission Critical Systems

1. Order Taking

Currently, our firm receives orders from most customers via Flextrade over FIX and basket orders in the form of files over the internet via FTP, instant messaging, telephone and email attachments. Orders over Flextrade are directly delivered to most Flextrade clients. During an SBD, either internal or external, we will continue to take orders through any of these methods that are available and reliable, and in addition, as communications permit, we will inform our customers when communications become available to tell them what alternatives they have to send their orders to us. Customers will be informed of alternatives by email, telephone or instant messaging. If necessary, we will advise our customers to place orders directly with our clearing firm.

2. Order Entry

Currently, our firm enters orders electronically into Flextrade, and sends them to our broker booth on the floor or an execution destination directly. Each of these vendors has represented that their infrastructure is fully redundant as a result of employing a variety of carriers, technologies and power sources. Customers' trade data is replicated in real-time between their data centers, protecting valuable information in the event of an SBD related to their own operations.

We anticipated the following SBD scenarios: (1) Our 59th floor location alone is out of commission; (2) Our NYSE Floor location is out of commission; (3) both 59th Floor location and the NYSE Floor location is out of commission;

We have redundant and independent access to Flextrade and the internet from both the 59th Floor location and NYSE floor location. In the event we experience disruption in only one of these locations we will continue our operation from the other functioning location.

In the event we suffer SBD at both our locations, Flextrade are available over the internet and key personnel can access them from remote locations. Specifically, key employees will move to and trade from a designated employee's home in Belmar, NJ, Metuchen, NJ and Ossining, NY. Because email is a hosted and managed service through Google, SBD in either or both of these locations does not impact our communication with our clients, clearing firm or any other business partner.

In particular, we will enter and send records to our clearing firm by the fastest alternative means available, which includes email. In the event of an external SBD, we will maintain the order in electronic or paper format, and deliver the order to the clearing firm by the fastest means available when it resumes operations. In addition, during a total internal SBD (simultaneous failure in 59th Floor, NYSE floor and the offsite), we may need to refer our customers to deal directly with our clearing firm for order entry.

The key trading applications used all provide access via the internet (including Flextrade Bloomberg, Thomson, etc.) which we plan on using in the case of an SBD. The client activity records are available at standard download locations (FTP site or web site) and, after the initial installation; the only additional requirements are the usernames and passwords. We actively require our client facing personnel to install critical systems on their home computers and conduct preparedness exercise throughout the year. We have designated individuals to operate from their offsite locations. Because our corporate FTP servers will likely be unavailable, we will instruct our clients to send us the files (basket orders) by email.

3. Order Execution

We currently execute orders using our brokers on the NYSE floor or by sending them directly to execution destinations such as the NYSE's DOT/Direct + system or ECNs via Flextrade. In the event of an internal or external SBD, our traders would continue to have access to each of our applications used for execution over the internet from their homes or anywhere else they could access a computer and internet connection.

4. Market Data Analytics

We currently offer several web and API based data analytics to our subscribed customers. These are delivered via our load-balanced live-live server configurations that are geographically redundant. A set of servers are hosted at location #1 and the other in AWS cloud. . The servers and processes are mirrored in real-time so in the event of any internal or external SBD at one location, our services are uninterrupted. In the event of both locations being impacted, we notify our clients via email and/or phone.

5. Other Services Currently Provided to Customers

In addition to those services listed above in this section we also provide direct market access solutions hosted externally. They are hosted at more than one location in a live

configuration and are geographically dispersed. We also provide banking, consultative, and bespoke work for certain clients.

B. MISSION CRITICAL SYSTEMS PROVIDED BY OUR CLEARING FIRM

Our firm relies, by contract, on our clearing firm to provide order comparison, the maintenance of customer accounts, delivery of funds and securities, and access to customer accounts.

X. Alternate Communications Between the Firm and Customers, Employees, and Regulators

A. COMMUNICATION INFRASTRUCTURE

We have built redundant pathways to communicate with our clients as follows: we have implemented redundant internet connectivity using two different vendors which are both up in a “live – live” configuration. We can correspond with our customers over email using the internet or other internet enabled devices such as smart phones and tablets. We have IP based telephony in our main office with traditional plain old telephone system as a backup. As a tertiary redundancy, we may rely on Google Chat, Voice, Hangouts and/or other voice, text or video services that are built in to our email infrastructure. Every employee has a cellular telephone. With or without internet connectivity (even if both of our redundant and link balanced internet connections fail) we can continue to serve clients as needed at all times.

B. CUSTOMERS

We now communicate with our customers using the telephone, e-mail, instant messaging, fax, U.S. mail, and the FIX messaging protocol. In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party. For example, if we have communicated with a party by e-mail but the Internet is unavailable, we will call them on the telephone and follow up where a record is needed with paper copy in the U.S. mail.

C. EMPLOYEES

We now communicate with our employees using the telephone, e-mail, and in person. In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party. We will also employ a call tree so that senior management can reach all employees quickly during an SBD. The call tree includes all staff home and office phone numbers. We have identified persons, noted below, who live near each other and may reach each other in person:

The person to invoke use of the call tree is: Joseph Gawronski and/or Dick Rosenblatt

Caller	Call Recipients
Joe Gawronski and/or Dick Rosenblatt	Scott Burrill, Mike Fredrickson, Gordon Charlop, Trish Savarese, Charles Roney,

	Joseph Benanti, Vikas Shah, Justin Schack, Mike Kiernan, Evan Morgan, Jose Baez, Jourdan Frain
Scott Burrill	Manu Agarwal, Rahul Kumar
Justin Schack	Alex Kemmsies, Anish Puaar, Valerie Bogard
Gordon Charlop	Robert Greason, John Mauro, John Santiago, Marc Rudnet, Christian Bader , Dean Lyzak, William Lawrence, , Aman Patel, Ashley Lara
Mike Fredrickson	Frank Ventura
Charles Roney	Rose Coulson, Roseann Chiarelli, Cristobal Zarco, Vincent Welsh
Mike Kiernan	Alice Petrofsky, David Sohnen, Guido Glowania, Selim Sari
Mike Kiernan	Scott Graham, Hans Mosesmann, Ryan Koontz, Mark Zgutowicz, Sean Horgan, Kevin Garrigan, Charlotte Bedick
Manu Agarwal	Jeff Shear, Tahl Smith-Rapaport, Rahul Kumar
Vikas Shah	Atish Shah, Sumeru Sapkota, IB Interns
Evan Morgan	Terry Walsh, Jeff Sheley, Marc Quinn, Jeff Andringa, Brian Hicks, Marek Zejda
Joseph Benanti	Russell Holub, Jeff Marcus,

D. REGULATORS

We are currently members of the following SROs: NYSE, FINRA, NYSE ARCA, NYSE AMEX, Direct Edge, BATS, IEX and ISE. We communicate with our regulators using the telephone, EFP, e-mail, fax, U.S. mail, and in person. In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party.

XI. CRITICAL BUSINESS CONSTITUENTS, BANKS, AND COUNTER-PARTIES

A. BUSINESS CONSTITUENTS

We have contacted our critical business constituents (businesses with which we have an ongoing commercial relationship in support of our operating activities, such as vendors providing us critical services), and determined the extent to which we can continue our business relationship with them in light of the internal or external SBD. We will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services when we need them because of a SBD to them or our firm.

B. BANKS

We have contacted our banks and lenders to determine if they can continue to provide the financing that we will need in light of the internal or external SBD. The bank maintaining our operating account is: Signature Bank, 300 Park Avenue, New York, NY, 10022, (646) 822-1612, Chris Efstratiou. Pershing maintains our Proprietary Account of Introducing Brokers/Dealers (PAIB account), and is located at One Pershing Plaza, 10th floor, Jersey City, NJ 07399. Our contact at Pershing, John Ciglar, can be reached at 201-761-5012. If our banks and other lenders are unable to provide the financing, we will seek alternative financing immediately from one of the major money center banks in the NYC area.

C. COUNTER-PARTIES

We have contacted our critical counter-parties, such as other broker-dealers or institutional customers, to determine if we will be able to carry out our transactions with them in light of the internal or external SBD. Where the transactions cannot be completed, we will work with our clearing firm or contact those counter-parties directly to make alternative arrangements to complete those transactions as soon as possible.

XII. REGULATORY REPORTING

Our firm is subject to regulation by the SEC, FINRA, NYSE, ARCA, ISE, CFTC, BIDS, and BATS Global Markets and various state securities units. We now file reports with our regulators using paper copies in the U.S. mail, and electronically using fax, EFP, e-mail, and the Internet. In the event of an SBD, we will check with the SEC, FINRA, and other regulators to determine which means of filing are still available to us, and use the means closest in speed and form (written or oral) to our previous filing method. In the event that we cannot contact our regulators, we will continue to file required reports using the communication means available to us.

XIII. DISCLOSURE OF BUSINESS CONTINUITY PLAN

We provide in writing a BCP disclosure statement to customers at account opening. We also post the disclosure statement on our Web site and mail it to customers upon request.

XIV. UPDATES AND ANNUAL REVIEW

Our firm will update this plan whenever we have a material change to our operations, structure, business or location or to those of our clearing firm. In addition, our firm will review this BCP annually, to modify it for any changes in our operations, structure, business, or location or those of our clearing firm.

A. PLAN DISTRIBUTION PROCEDURES:

Additional copies will be offsite with the BCP Plan executors.

XV. Testing Procedures

All of our systems described in the BCP above undergo either monthly and/or quarterly testing procedures to assure operability. Results are documented internally and corrective measures are taken when appropriate. In addition, Joseph Benati, MD and Partner, on a bi-monthly basis works from his home which has a generator and full installation of Rosenblatt Mission Critical Systems, including Flextrade and Bloomberg to ensure full operability.

Our systems were simultaneously and forcefully tested due to the COVID 19 Pandemic.

Results from the ongoing work from home pandemic environment and our readiness were as follows:

NYSE Floor Booth was fully operational for BBSS, Bloomberg, and Flextrade during since it reopened in May 2020 and thereafter. Tertiary trading sites at employee home locations were operational. Bloomberg, Flextrade, ISE, Email and other communications systems were operational from the Disaster Recovery Sites. Order taking, entry and execution services continued to perform as expected from these DR sights.

No internal and/or client facing system were severely impacted. All systems have functioned fully as expected throughout the continuing pandemic.