

Important Client Notices — FINRA Rule 4370

Effective: May 2026 / Member: FINRA / SIPC

Business Continuity Plan — Client Notice

ICA, LLC has developed a Business Continuity Plan ("BCP") to address how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions are unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our BCP.

Contacting Us During a Disruption

If after a significant business disruption you cannot contact us as you usually do at 615-467-7609 or maggie@reitig.com, you should call our emergency number 615-467-7600 or access our websites at www.reitinvestmentgroup.com or www.iroquoiscapitalgroup.com.

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 customers to transact business. Our BCP is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the disruption.

Our BCP addresses: data backup and recovery; all mission-critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical locations; critical supplier and contractor arrangements; regulatory reporting; and assuring our customers prompt access to their funds and securities.

Varying Disruption Scenarios

Our BCP addresses two kinds of significant business disruptions:

- Internal disruptions affecting only our firm (e.g., fire in our building). We will recover and resume business from an alternate site within 24–48 hours.
- External disruptions affecting the surrounding area (e.g., a city-wide emergency). We will transfer operations to an alternate location and resume client access within 24–48 hours depending on the severity of the disruption.

FINRA Rule 4370 Compliance

Our BCP is consistent with FINRA Rule 4370 and is reviewed and updated at least annually. An executive summary of our BCP is available to customers upon request. Please contact us at 615-467-7609 or maggie@reitig.com to request a copy.

Questions or Additional Information

If you have questions about our Business Continuity Plan please do not hesitate to contact us:

Phone: 615-467-7609 • Email: maggie@reitig.com
www.reitinvestmentgroup.com • www.iroquoiscapitalgroup.com