



Program Summary for Members
Business Continuity

March 2017

Purpose

In accordance with mandates set by the Federal Financial Institution Examination Council (FFIEC) Business Continuity Planning Information Technology Handbook (March 2008), and the National Credit Union Administration's Corporate Credit Union Guidance Letters 2004-04 and 2004-05, Alloya Corporate Federal Credit Union (Alloya) would like to make you aware of our Business Continuity Program (BCP).

Our program is designed to help ensure that we can continue to do business with little or no disruption, that your assets will be secure and accessible, and that you will be able to reach us regardless of an unplanned business interruption or scope of the situation.

Recovery Plan Objectives

Alloya's BCP addresses all essential elements of the corporate's business infrastructure to enable timely response to an event that proves disruptive to critical business functions. Representatives of Alloya's leadership team oversee and direct the corporate's business continuity preparedness efforts by supporting each of the following objectives:

- Ensure the allocation of sufficient resources with the knowledge to evaluate and maintain a thorough and effective BCP.
- Establish policies for business continuity and business resumption efforts by determining how the corporate will manage and control identified risks.
- Review simulated recovery test results.
- Approve the corporate's business continuity plan annually.
- Ensure the BCP is kept up-to-date and affected employees are aware and trained of individual roles.

To ensure BCP objectives set forth by Alloya's leadership, the planning process involves collaboration with executive leaders on the Business Continuity Executive Management Team (BCEMT) and operations managers on the Business Continuity Planning & Response Team (BCPRT). The Business Continuity Department works with both the BCEMT and BCPRT to develop department business continuity plans, and executes continuity program development, implementation, maintenance, and testing activity.

Additionally, the Business Continuity Department coordinates disaster management activities for the BCEMT and BCPRT from recovery, restoration to resumption of normal operations. Members of the BCEMT and the BCPRT establish recovery teams to address the immediate response to an incident and management of the situation from the time an incident occurs until the matter is resolved. Recovery team members are assigned specific responsibilities within each business continuity plan (BCP).

In creating the BCP, we assume the locations identified as “pre-designated recovery sites” are available, that we have sufficient personnel, and that external organizations such as the Federal Reserve, government agencies and market systems, are operational.

Nevertheless there can be no assurance service will continue without interruption in certain circumstances, such as a regional blackout, a natural disaster or a terrorist attack. However, in the unlikely event Alloya determines it cannot resume operations within a reasonable amount of time; Alloya will provide as much advance notice as possible regarding its ongoing operations.

In the event Alloya is impacted by a pandemic situation, we have identified staff to perform the essential job functions required to continue operations. A detailed plan documents the procedures Alloya initiates in preparation for, and in response to, a pandemic outbreak. Our pandemic plan complies with FFIEC and NCUA guidance by: incorporating a preventative program to reduce the likelihood operations will be significantly impacted by a pandemic event; documenting our strategy for scaling pandemic efforts; outlining a framework for facilities, systems and procedures if staff is unavailable for prolonged periods; and testing our capacity to operate in a pandemic situation.

Program/Plan Testing and Updating

While no business continuity plan can eliminate all risk or delay resulting from an unplanned business interruption or disruption in service, Alloya conducts annual tests and updates our recovery plans to ensure that we have taken the steps necessary to protect our members. The last disaster recovery test was conducted on January 21, 2017, and successfully met the established recovery time objectives.

Preparation

Although Alloya is confident members will continue to have access to their accounts and access to the settlement funds and payment systems in the event of a significant business disruption, it is possible there may be some temporary disruption or change in the manner in which you can access your account. Alloya will notify members of any such changes or disruptions by posting a notice on the corporate's website or through a message on our telephone system.

To best prepare for such contingencies we suggest you become familiar with the various means through which you can access Alloya headquarters and major operations centers:

Headquarters – Naperville, Illinois

184 Shuman Blvd., Suite 400
Naperville, IL 60563
800-782-2431

Southfield, Michigan

26555 Evergreen Road, Suite 330
Southfield, MI 48076
800-482-2647

Albany, New York

4 Tower Place, Suite 500
Albany, NY 12203
800-253-0053

Westminster, Colorado

10170 Church Ranch Way, Suite 375
Westminster, CO 80021
877-786-2677