

Execution Access, LLC

Summary of Business Continuity Plan

Execution Access, LLC (“EA” or the “Company”) has, among its primary goals, the safety of its personnel, protection of its clients’ interests and security of its assets. To this end, EA maintains a comprehensive Business Continuity Program (“BCP”), which seeks to promote firm-wide recovery capabilities including such areas as Technology, Trading and Operations and to address the impact of an unplanned business disruption.

The NASDAQ OMX Group, Inc. (“Nasdaq”), the parent company of the Company, has in place a contingency framework, which focuses on the continuation of business processes essential to the operation of critical business areas throughout the organization.

While the specific response may vary based on the extent of the situation, the methodologies, as well as associated recovery strategies are designed to provide an appropriate response to a wide range of business interruptions of varying severity.

BUSINESS CONTINUITY PROGRAM /

The BCP is tested for critical business areas across each division consistent with the methodologies used by Nasdaq and its subsidiaries. The BCP identifies key processes, criticality, key personnel and customers, internal and external dependencies, and alternative strategies for continuing business operations during a crisis. These alternative strategies provide for social distancing necessary during a pandemic event as outlined in our Pandemic Plan. The BCP is reviewed at least annually.

BUSINESS RECOVERY FACILITIES /

EA maintains multiple internal recovery locations for the continuation of business operations in the event of a business disruption that results in relocation of personnel or functions at its primary business locations.

These locations are in geographically-diverse areas, a strategy that minimizes the risk of a catastrophic event impacting both locations. Additionally, recovery locations are supported by different utility power grids and telephone carrier central offices.

Within Nasdaq, business recovery facilities are equipped to accommodate critical business processes, personnel and associated applications/services. These facilities are designed with the objective of continuing essential operations at an activity level comparable to that handled in the primary facility.

BUSINESS CONTINUITY TESTING

The Company's BCP methodology requires that a comprehensive review be conducted at least annually to validate the effectiveness of the procedures as well as the availability and functionality of the critical services at the backup locations in order to demonstrate the ability of business areas to recover critical business functions within specified recovery time objectives.

Data Center Resiliency In support of critical technology applications, systems and client connectivity, EA will be supported by technology infrastructure at two production data center facilities in the US, designed to promote a secure, resilient environment for processing capabilities.

The two locations are geographically diverse, supported by separate power grids and telephone company central offices. The design fosters resiliency, continuous availability and failover for critical network/telecommunications services. Data centers have the capability to failover critical system components, and these processes operate in conjunction with procedures to support restoration of critical functions of the Company's business, including client connectivity and transaction processing.

INTEGRATED MANAGEMENT STRUCTURE

Senior management provides oversight and support for contingency planning activities within the BCP to promote the effectiveness of planning initiatives.

Additionally, Nasdaq's corporate Risk Management Team consists of seasoned managers who provide a centralized and structured response during adverse events. EA's incident management and recovery activities are guided by, and operate in direct conjunction with this structure.

More Information

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RESPONSE

EA strives to provide a prompt response and subsequent recovery from any business disruption. It is important to note that actual response activities and recovery times will be determined by a number of factors related to the scope and severity of the specific situation

EA will make every effort to provide clients with information on the status of operations as quickly as possible, using the most effective method of communication available based on the specific impact of the disruption.

MODIFICATIONS TO BCP

EA's BCP is subject to modification and will be updated periodically, as a result of recovery testing, site activation, or whenever there is a material change to a business area's critical functions.

COMMUNICATION

EA discloses in writing to its customers a summary of its BCP upon account opening, and makes it available on Nasdaq's website. EA will provide a summary of its BCP to customers by requesting a written copy by mail:

Chief Compliance Officer

Execution Access, LLC

One Liberty Plaza

165 Broadway, 51st Floor

New York, NY 10006

or by calling (212) 381-6440.

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