

Business Continuity Plan Summary

As part of its service to its clients, Trumid Financial, LLC adopted a Disaster Recovery / Business Continuity Plan ("BCP") to provide for Trumid's recovery from an emergency or disaster. The plan provides for resumption of business operations as quickly as possible.

1. Trumid employs the following resources to implement its recovery efforts:

- · Dual AWS cloud infrastructure located in separate or distinct Amazon Availability Zones
- · The ability to conduct business securely from any geographical location with internet connectivity
- · Crisis management frameworks, policies, and procedures

2. Key Features of the BCP Strategy:

- · Periodic review and sign-off from senior management
- · Formal emergency response procedures
- · Emergency notification procedure to communicate with all Trumid personnel
- · Mandatory team member training and awareness
- · Periodic Disaster Recovery testing of the relevant systems and procedures
- · Communication of emergency situations via emails and phone calls

3. Key Contacts for more information on Trumid's approach to business continuity and recovery processes:

- · For Swarm issues & general inquiry clientservices@trumid.com; 212-618-0999
- · For post-trade issues operations@trumid.com; 212-618-0333
- · For general information info@trumid.com; 212-618-0300

4. ATS Platform Connectivity and Availability:

The Trumid ATS is cloud-hosted by Amazon Web Services ("AWS") and accessed via the internet. Connectivity is inherently subject to the quality and availability of internet access. The platform is strategically located in two, geographically distinct, AWS data centers which provide load-balanced capabilities. Issues with any one data center are opaque to users as either data center is fully capable of supporting the application. In the event both data centers are lost due to regional issues, the platform may require up to 72 hours to be rebuilt and deployed from a different region.

Updated: 4/9/18