

DRIVE LOYALTY



DriveLoyalty

Business Continuity Management Statement

Approved: June 10, 2022

CONFIDENTIALITY STATEMENT

The contents of this document are for exclusive use of DriveLoyalty. All information provided in this document is confidential and should not be shared with any department or person without written authorization from the Business Continuity Management Department at DriveLoyalty.

Business Continuity Management Program Summary

At DriveLoyalty, we provide world-class service to preserve the integrity, availability, and protection of your data that you expect and deserve. DriveLoyalty's business units are committed to establishing and maintaining a comprehensive business continuity planning program which will ensure the timely and effective recovery of mission critical business functions. DriveLoyalty uses an integrated planning approach, maintaining a business continuity program staffed with full time, highly qualified business continuity professionals. The DriveLoyalty Business Continuity Program has a guiding philosophy which it uses to inform and direct its decision making. Basic principles include:

1. Maximize the safety and security of all associates and stakeholders
2. Minimize the destruction to the building and plant assets. Maintain continuity of mission critical services to our clients.
3. Minimize legal consequences
4. Maintain compliance with the SEC FINRA requirements

SEC FINRA Requirements

On April 7, 2004, the Securities and Exchange Commission ("SEC") approved NASD Rule 3500 Series, which requires members to establish emergency preparedness plans and procedures. As part of the Rule Consolidation Process NASD Rule 3500 (Series) became FINRA Rule 4370. FINRA Rule 4370 requires member firms to create and maintain a Business Continuity Plan ("BCP" or "Plan") and enumerates certain requirements that each plan must address. In addition, this Rule requires firms to update their business continuity plan upon any material change, and to conduct an annual review of the plan. FINRA Rule 4370 also requires member firms to disclose to its customers how the firm's business continuity plan addresses the possibility of a future significant business disruption and the firm's plans to respond to events of varying scope. In addition, FINRA Rule 4370 requires member firms to designate two emergency contact persons and provide this information to FINRA via electronic process. FINRA Rule 4370 can be found here:



<https://www.finra.org/rules-guidance/rulebooks/finra-rules/4370>

To comply with FINRA 4370 and protect its stakeholders: employees, customers, investors, and the communities within which it operates, DriveLoyalty has established a comprehensive Business Continuity Management Program.

Business Continuity Management Program

The Business Continuity Management Program (BCMP) has many components that occur annually that ensure a successful outcome in the event of a wide range of business disruptions.

Governance Summary

Governance for the BCMP is to be carried out by members of the DriveWealth Enterprise Risk Management Steering Committee (“ERMSC”). This steering committee was established in 2021 to provide executive oversight for DriveWealth’s Enterprise Risk Management Program.

Policy Statement Summary

DriveLoyalty is committed to the safety of employees and high availability of its operations when faced with a Business Disruption. DriveLoyalty shall implement, maintain, and continually improve a comprehensive Business Continuity Management Program (“Program”) that protects stakeholder interests from the risk of a Business Disruption. The Business Continuity Management Policy (“Policy”) and supporting documentation all apply to all DriveLoyalty entities. Where applicable, third parties conducting Program activities on behalf of DriveLoyalty must demonstrate analogous policy elements.

Scope and Organization

The Business Continuity Plan addresses business functions across all DriveLoyalty entities. Design and execution are managed and maintained by the Business Continuity Management team with support from DriveLoyalty business process owners, support organizations, external partners, and regulators.

Business Impact Analysis

Identify the critical business functions, “mission critical systems” and support resources, the impact of a business function disruption, and minimum tolerable periods of disruption for each critical business function including “finance and operations” as defined in FINRA rule 4370.

Risk Assessment

Identify relevant threats and hazards and evaluate those threats/hazards in terms of probability of occurrence and impact.

Business Recovery Strategies

Develop recovery strategies and procedures to recover disrupted business functions at defined service levels that address customers and existing relationships with other broker-dealers and counterparties.

Business Continuity Plan Development

Develop business continuity plans using the results of the Business Impact Analysis, the Risk Assessment, recovery strategies, and targeted business disruption recovery times.

Training & Awareness

Conduct targeted training and awareness campaigns that are custom tailored to the specific audience to educate stakeholders of DriveLoyalty’s business continuity capabilities and prepare for business continuity plan testing and exercise.

Testing & Exercise

Test and exercise the business recovery strategies documented within the business continuity plan to identify strengths/weaknesses and validate the viability of recovery strategy and operational execution.

Lessons Learned and After Action (Continuous Improvement)

After each test/exercise and/or actual business disruption, conduct a Lessons Learned process to learn what went well and what did not go well. Summarize and publish findings and recommendations for improvement in an After-Action Report.

Business Continuity Plan Review and Update

Review and update the business continuity plan annually to reflect any material changes to DriveLoyalty operations, structure, business, location, or the macro-environment. Also, update the business continuity plan after the Lessons Learned process to incorporate learnings acquired during the Lessons learned process.

Executive Oversight, Review, and Approval

Bill Beatty, Chief Compliance and Risk Officer, is responsible for approving the plan and for conducting the required annual review.

Scott Hall, Business Resilience Manager, has the authority to execute the BCP under the authority of the Crisis Management Team.

Plan Location and Access:

DriveLoyalty will maintain copies of its BCP plan, a record of the firm's annual reviews, and the changes that have been made to the BCP for inspection by regulators. A hard copy of the Company's Plan is located at its main business location and may be accessed by contacting Mark Bulger at (518) 424-2909 or by email at mbulger@driveloyalty.com. A copy of the BCP has been provided to FINRA District Office #9 located in Woodbridge, NJ.



Plan Communication and Distribution

DriveLoyalty will document and review/update/approve annually DriveLoyalty business continuity plans for ongoing use. The plans are stored electronically and maintained on the internal business continuity planning in a protected site.. The plans are distributed electronically to the key contingency personnel and these associates are also encouraged to keep soft and hard(printed) copies off site.

Emergency Contact Persons

DriveLoyalty has designated the following individuals to act as emergency contacts and provide information to FINRA:

Primary Contact

Name, Title: Mark Bulger, Chief Regulatory Officer

Address: 15 Exchange Place, Jersey City, NJ 07302

Telephone Number: (518) 424-2909

E-mail Address: mbulger@driveloyalty.com

Secondary Contact:

Name, Title: Bill Beatty, Chief Compliance and Risk Officer

Address: 15 Exchange Place, Jersey City, NJ 07302

Telephone Number: (609) 751-4762

E-mail Address: wbeatty@drivewealth.com

Tertiary Contact:

Name, Title: Scott Hall, Business Resilience Manager

Address: 15 Exchange Place, Jersey City, NJ 07302

Telephone Number: (404) 558-9922

E-mail Address: shall@drivewealth.com

Contact Information Reporting

These contacts will be reported through FINRA's Contact System. This system may be accessed directly at <https://gateway.finra.org/app/contacts> or through the Firm Gateway at www.finra.org/firmgateway and must be updated in the event of a material change. In addition, DriveLoyalty's Executive Representative or his/her written designee must review and update this information, if necessary, within 17 business days of the end of the calendar year. The Executive Representative or his/her designee will also ensure that contact information is updated promptly if changes occur at any time during the year.

Office Locations

The Company or its registered personnel currently operate from the following locations:

Type of Location, Registered or Unregistered	Administrative Headquarters
Address and Main Phone Number	15 Exchange Place, 10 Floor Jersey City, NJ 07302 USA Phone: 914-471-0231 Fax: 973-998-5302
Located in a Personal Residence (Y or N)	N
Means of Transportation Employees Use to Reach Office	By foot, car, or public transportation (bus or rail)
Mission Critical Systems Taking Place at Office	Execution, customer services, and operations