

StoneX (“the Company”) and its affiliates have established a global business resiliency (“BR”) planning policy and program to assess and manage the effects of an emergency or significant business disruption on its operations to provide resiliency of critical business functions. Since the timing and impact of disasters and disruptions is unpredictable, the Company needs to be flexible in responding to actual events as they occur. The Company’s business resiliency plan addresses: data back-up and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location for employees; counter-party impact; regulatory reporting; and assuring customers prompt service. With that in mind, the Company is providing you with this information about its business resiliency plan.

The BR planning program begins with a review of each department and an analysis of its business resiliency risk via a Business Impact Analysis (“BIA”). This BIA process encompasses all aspects of the Company’s key business functions. The analysis defines, for each business process, its department, department manager, the process criticality/recovery time objective, applications and third parties required to perform the process, alternate processing strategies, financial or legal/regulatory impacts, etc. This information is all used and built into a department level BR plan.

The department level BR plans are reviewed and updated as significant business changes occur and regulatory sign off takes place annually. The BR plan is designed to account for the actions the company will take in the event of disruptions that can vary in terms of scope and severity. The company BR plans encompass alternate processing strategies for 7 major disruptions buckets: Loss of Applications, Phones, Staff, Power, Building, Critical third parties and Pandemic. By utilizing this type of methodology, the company feels that it can respond to various incidents and continue critical business processes. This includes incidents involving an office building where any of the company’s offices may reside. It also includes information regarding staff unavailability, where staff members may be unable to work at their normal business location.

The Company is diversely dispersed with its regional and out-of-region office locations to back up critical functions, data and system applications including alternative manual procedures identified to enable continued functionality. The BR plan has been reasonably designed to allow the company to continue its business operations and safeguard the interests of its clients. The Company expects to be able to meet its client obligations within the day. While the company’s business resiliency plan has been reasonably designed to allow it to operate during emergency incidents of varying scope, such potential incidents are unpredictable. The Company’s business resiliency plan is subject to change without notice. Nothing contained in this document amends or changes any of the terms set forth in any agreements between the company and any of its customers.

For further information, please feel free to contact us at: business.resiliency@stonex.com.