

Business Continuity and Contingency Planning

BIDS Trading L.P. (“BIDS” or the “Firm”) is committed to safeguarding the interests of our subscribers in the event of an emergency or significant business disruption. This Business Continuity Plan (the “BCP”) disclosure summarizes BIDS’ efforts to mitigate risks inherent with unforeseen business interruptions. The Firm’s comprehensive business continuity strategy is designed to enable us to meet our existing obligations to our subscribers even in the event of an emergency or significant business disruption (“SBD”). This BCP is intended to comply with the rules promulgated by the Financial Industry Regulatory Authority (“FINRA”).

BIDS’ policy is to respond to significant business disruptions by safeguarding employees’ lives and Firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of the Firm’s books and records, and ensuring that our clients can continue to transact business.

The following are some potential scenarios that might cause some changes to our regular business operations:

1. In the event an SBD of any type affects our primary business operations center in New York, we will transfer our client service and business operations to our technology services affiliate in Alberta, Canada, or to one or more remote recovery sites in the United States.
2. In the event an SBD of any type affects our technology services affiliate in Alberta, Canada, we will support our clients from our New York City location, or one or more remote sites in the United States.
3. In the event an SBD affects our primary production data center facility, the BIDS platform (“the Platform”) will be transferred to a geographically distant secondary production data center facility, with a recovery time objective of the following trade date and a recovery point objective of the preceding trade date.
4. We do not anticipate that power outages at the primary production data center facility will require us to shut down operation of the Platform because our primary production data center facility maintains a supplemental power supply, and alternative power generation capabilities (i.e., battery and diesel generation).
5. Our production data is maintained at our primary data center production facility. We also maintain copies of our production data in our backup facility and off-site at a facility maintained by our data retention service provider.



No contingency plan can eliminate all risk of service interruption or temporarily impaired access to the Platform. We will evaluate and revise our BCP to address risks to the extent possible. In developing our BCP, we have made certain assumptions regarding accessibility and availability of alternative facilities, the ability of a sufficient number of our personnel to man our systems, and external organizations including securities markets and government agencies being operational. If these assumptions are not valid under particular circumstances, we will evaluate possibilities for minimizing the disruption to services as feasible at that time.

We will update the BCP as needed in the event of changes to our business processes, technology and staff. We will continue to post updated information on our website. Users may also obtain our current BCP summary by submitting a written request to *BIDS Trading L.P., ATTN: Business Continuity Plan, One Liberty Plaza, 165 Broadway, 23rd Floor, New York, New York 10006 USA.*

Disclaimer

The Firm's comprehensive business continuity strategy is designed to enable us to meet our existing obligations to our clients even in the event of an emergency or significant business disruption. However, it is not infallible. The BCP is designed to work in many different emergency situations, but these events are, by their nature, unpredictable, and it is impossible to anticipate every scenario that could cause a business disruption.

Although we are confident in our own preparedness, BIDS has no control over the various entities that we must rely upon in the event of an emergency. Our BCP is tested periodically to ensure readiness. However, such tests may not be able to replicate the actual conditions we experience in a real emergency.

This BCP is subject to change without notice. In the event that this BCP is modified, the updated document will be promptly posted on the BIDS website. Alternatively, subscribers may obtain an updated hard copy BCP upon request. The information contained in this disclosure is provided by BIDS for informational purposes only. Nothing contained herein shall be construed to amend, supplement or otherwise modify any of the terms and conditions set forth in any subscriber agreement between you and BIDS.