

Business Continuity Plan Disclosure Statement

Atlas Clearing, Inc. (“Atlas Clearing”, or “we,” “us,” or “our”) has developed a Business Continuity Plan (“BCP”) designed to respond to events that significantly disrupt our business operations (“Disruption”). Due to the unpredictable nature of Disruptions, our response will be flexible and will consider the specific circumstances of each Disruption.

Our BCP anticipates two types of Disruptions: internal and external. Internal Disruptions affect only our ability to communicate and conduct business, such as a fire at our office. External Disruptions prevent the operations of securities markets or a number of firms and may include events such as earthquakes, epidemics, pandemics, or other forms of regional or national disruption.

The BCP

We intend to resume operations as soon as reasonably able in the event of a Disruption. To accomplish this, our BCP is designed to address the following operating areas:

- Alternative Business Locations
- Access to Funds and Securities
- Data Back-Up and Recovery
- Mission Critical Systems
- Financial and Operational Assessments
- Regulatory Reporting
- Business Constituent, Bank, and Counter-Party Impact

In addition, our BCP addresses widespread health emergencies, employee training and education, and procedures for the updating, reviewing, and testing of our BCP. Our BCP also addresses our back-up site, where back-up records are located, and our arrangements relating to back-up records.

In the event of a Disruption, regardless of whether the Disruption is in our building, our business district, our city, or our whole region, we strive to satisfy the following recovery and resumption objectives: recovery within 4 hours and resumption within the same business day. Recovery refers to the restoration of clearing and settlement activities and resumption refers to the capacity to accept and process new transactions and payments. However, the severity of the Disruption may affect recovery and resumption times.

Contacting Us

If you are unable to contact us through your normal means in the event of a Disruption, you should use the following contact information:

Contact: Lincoln Eggertz

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