

DriveWealth, LLC
Business Continuity Plan
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This "Business Continuity Plan" has been created to meet the requirements described in FINRA Rules 4370. This Business Continuity Plan is reasonably designed to enable our firm to meet its obligations to customers in the event of a Significant Business Disruption.

Authorized Approval Signature: _____

Printed Name & Title: _____

Date: _____

This Plan is effective from the date approved until the date of its authorized revision, update or replacement (see below).

Date this Plan was no longer effective (date of revision, update or replacement): _____

Recordkeeping: Discard after _____ (date three years from termination of use).

Introduction

On April 7, 2004, the Securities and Exchange Commission approved NASD Rule Series 3500 dealing with emergency preparedness. On December 14, 2009, these Rules were converted to FINRA Rule 4370 as part of the FINRA Rule Consolidation process. Rule 4370 requires each member to create and maintain a Business Continuity Plan (BCP) that identifies procedures relating to an emergency or significant business interruption that are “reasonably designed to enable the member to meet its existing obligations to its customers.” In addition, the plan must address the firm’s existing relationships with other members and counterparties. This plan must be promptly made available to the FINRA staff upon request.

Rules 4370(b) requires that each member review its plan at least annually to determine if any changes are needed and update its plan more frequently in the event of any material change to its operations, structure, business or location.

The plan should reflect the firm’s business and operations. Therefore, the requirements of the plan, as identified in Rule 4370, are flexible and should be tailored to the firm’s size and needs.

However, at a minimum, DriveWealth, LLC’s plan must address the following areas:

- Data back-up and recovery (hard copy and electronic);
- All mission critical systems;
- Financial and operational assessments;
- Alternate communications between customers and the member;
- Alternate communications between the member and its employees;
- Alternate physical location of employees;
- Critical business constituents, banks, and counter-party impact;
- Regulatory reporting;
- Communications with regulators; and
- How the member will assure customers’ prompt access to their funds and securities in the event that the member determines that it is unable to continue its business.

Each firm is required to only address the elements applicable to its business, but the plan must contain an explanation if any element above is not included.

Rule 4370 requires each member to designate two individuals as emergency contacts that the FINRA may contact in the event of a significant business disruption. Each contact must be a registered principal or member of senior management. However,

- If the member has only one principal but has other employees, the second contact should be another firm employee, or
- If the firm has only one principal and no other employees, the second contact may be someone who has knowledge of the firm’s business, such as an accountant, attorney, etc.

Rule 4370 also requires that each member enter this information into the FINRA’s Contact System (NCS) at https://regfiling.finra.org/contacts/ncs_contacts.aspx and that required changes are made promptly.

1. Emergency Contact Persons

DriveWealth, LLC has designated the following individuals to act as contact persons for the firm as required under Rule 4370:

Primary Contact

Name, Title: Michael Dugan, CFO and Chief Operations Officer
Address: 15 Exchange Place, 10th Floor, Jersey City, NJ 07302 USA
Telephone Number: 973-559-6746
Fax Number: 973-998-5302
E-mail Address: mdugan@drivewealth.com

Secondary Contact:

Name, Title: Mark Bulger, Head of Partner Solutions Group
Address: 15 Exchange Place, 10th Floor, Jersey City, NJ 07302 USA
Telephone Number: 973-250-6091
Fax Number: 973-998-5302
E-mail Address: mbulger@drivewealth.com

These contacts will be reported through FINRA's Contact System. This system may be accessed directly at https://regfiling.finra.org/contacts/ncs_contacts.aspx or through the Firm Gateway at www.finra.org/firmgateway and must be updated in the event of a material change. In addition, DriveWealth, LLC'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.

Executive Representative:

DriveWealth, LLC's Executive Representative is Robert Cortright, CEO.

Disaster Recovery Coordinator/Team:

The Company has designated Michael Dugan, CFO and Chief Operations Officer, as the "Disaster Recovery Coordinator". In his absence, Mark Bulger, Head of Partner Solutions Group, will assume his responsibilities.

The "Disaster Recovery Coordinator" has the responsibility to make an immediate preliminary assessment of the nature and extent of the disruption by assessing the following: electricity supply; condition of computer network/phones; damage to the building; HVAC in extreme weather; and other hazards.

If the Coordinator determines that personnel should evacuate the affected location(s), he must make an announcement to all personnel as to appropriate procedures. The announcement may be

given via personal contact, e-mail, intercom or other methods as appropriate given the systems available and size of staff and building. This announcement should be short and concise, should calmly identify the situation and should provide instructions to employees on how to respond. This announcement should be repeated as often as necessary to avoid confusion and to ensure all employees are aware of the situation. After ensuring the physical safety of Company personnel, the Coordinator must then implement this BCP.

If the situation does not merit evacuation, steps should be taken to alert designated persons of necessary actions to facilitate ongoing operations in the face of limited disruption. In this case, the Coordinator will determine which, if any, procedures in this BCP should be implemented.

In the event the Significant Business Disruption (SBD) has directly affected other areas of the building but has not directly impacted the Company's office, the Coordinator will contact building security or emergency personnel for instructions on how the Company should respond and proceed accordingly.

2. Firm Policy

DriveWealth, LLC's policy is to respond to a Significant Business Disruption 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 allowing its customers to transact business. In the event that it is determined the firm is unable to continue its business, the firm will assure customers prompt access to their funds and securities.

DriveWealth will be using industry-standard technology and procedures to respond to events that significantly disrupt our business. Our order taking and order entry system utilizes an N+1 architecture that facilitates continued system availability in the event of a component failure. Orders are routed to multiple executing brokers. In the event of a significant business disruption at one of these brokers, flow will be routed away from the impacted broker.

Books and records as required by FINRA will be maintained in house via the IntelliClear system and by our clearing broker. Data related to order taking and order entry will be stored on multiple servers intraday. Daily, the data will be encrypted and electronically vaulted off-site. Our back-office and middle-office systems are web-based and can be operated remotely in the event of a SBD at our primary office.

Data Security

DriveWealth incorporates many levels of security to protect data integrity. To secure against unauthorized access to the front-facing app, all communication through front-facing applications is via SSL with a minimum key length of 2048 bits. Also, user passwords are required to be a minimum length of 8 characters and include at least 1 letter and 1 number. A password cannot be the same as the username or email address. Passwords are stored using a cryptographically secure one-way hash algorithm and salted to prevent attackers from using cracking techniques such as rainbow tables. Additionally, personal identifiable information is encrypted using a rotating key.

To protect our network from threats, the network design secures all application and data servers in a private network, completely inaccessible from the public. We manage these servers only via a secured VPN tunnel from the DriveWealth offices. Forward-facing API servers are the only conduit between the client applications and the secured servers in the private network. These servers reside in a protected “DMZ” network and only specified TCP ports with source and destination IP addresses are permitted between networks. All Internet facing web services are secured behind a DDoS mitigation service. In addition, all management access to the network requires 2-factor authentication and client certificates.

DriveWealth collects multiple data points on various aspects of our network so we can get a view of exactly what is happening throughout the environment. Each data point has thresholds in which it will alert upon in the case of any suspicious activity. Application, system, and access logs are collected centrally and will alert IT staff to any unauthorized or unexpected access. The effects of viruses are mitigated through the above mentioned segregated network; anti-virus software on all company desktops, laptops and email services; and ingress/egress filtering on all servers.

Significant Business Disruptions (SBDs):

DriveWealth, LLC’s plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only the Company’s ability to communicate and to do business, such as a fire or loss of electrical power in the office or building.

External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a natural disaster, or another event that causes a wide-scale, regional disruption in essential services. The Company’s response to an external SBD will rely on its internal redundant systems and on other organizations and systems, including the capabilities of its clearing firm, federal emergency authorities, local officials and utility companies.

Approval and Execution Authority:

Jeffrey Pasquerella, Chief Compliance Officer, a registered principal, is responsible for approving the plan and for conducting the required annual review.

Michael Dugan, CFO and Chief Operations Officer, has the authority to execute this BCP.

Plan Location and Access:

DriveWealth, LLC 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 in its main business location and may be accessed by contacting Mark Bulger at 973-250-6091 or by email at mbulger@drivewealth.com.

An electronic copy of the Company’s plan is located internally on our server labeled as “Business Continuity Folder”.

A copy of the BCP will be provided to FINRA District Office #9 located in Woodbridge, NJ upon request.

3. Business Description

The Company conducts business in certain U.S. Exchange listed equities. The Company has an omnibus clearing relationship with clearing broker. It maintains a special reserve account for the benefit of customers and has a minimum net capital requirement of \$250,000. The Company does not hold customer funds or securities. The Company accepts and enters orders through its proprietary execution platforms and utilizes the routing services of third party executing brokers. Currently the Company utilizes Cuttone & Co. and SpeedRoute, LLC as its executing brokers. All account transactions and account data is managed by the firm then sent to the clearing firm. The Company does not hold customer funds or securities. Money market funds are held at Federated Investors, Inc. The firm provides services to retail customers and business partners.

4. Office Locations

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

Type of Location, Registered or Unregistered	Address and Main Phone Number	Located in a Personal Residence? (Y or N)	Means of Transportation Employees Use to Reach Office	Mission Critical Systems Taking Place at Office
Home Office	97 Main Street, Second Floor, Chatham, New Jersey, 07928	N	foot, car, or public transportation (bus or rail)	Execution, customer services and operations

Alternative Physical Location(s) of Employees:

In accordance with Rule 4370(c)(6) requires that each member designate a location at which business will be conducted in the event the primary office of the Company must be evacuated. DriveWealth, LLC has no other office locations, therefore, in accordance with this requirement; members of the Company's staff will relocate to the location at 15 Exchange Place, 11th Floor, Jersey City, NJ.

5. Customers' Access to Funds and Securities

The Company does not maintain custody of customers' funds or securities. Customer accounts are maintained in house and customer funds and securities are held at CGMI. The Firm is ultimately responsible for providing its customers with access to their account balances and information. Customer account data is maintained by the Company in redundant locations.

In the event of an SBD:

1. If telephone service is available, our registered persons will make efforts to assist customers in contacting these entities, if so requested.
2. If Web access is available, the firm will post on its Web site information designed to assist customers reach these entities.

The Company will make this and additional information regarding accessing funds and/or securities available to customers through its disclosure policy (below).

If SIPC determines that the Company is unable to meet its obligations to its customers or if the Company's liabilities exceed its assets in violation of Securities Exchange Act Rule 15c3-1, SIPC may seek to appoint a trustee to disburse the Company's assets to its customers. DriveWealth, LLC will assist SIPC and the trustee by providing applicable books and records identifying customer accounts subject to SIPC regulation.

6. Data Back-Up and Recovery (Hard Copy and Electronic)

DriveWealth, LLC maintains its primary books and records in hard copy and electronically at 97 Main Street, Second Floor, Chatham, New Jersey. Michael Dugan, CFO and Chief Operations Officer, is responsible for the maintenance of these books and records.

Back-up of Paper Records:

DriveWealth, LLC maintains a back-up copy of its paper books and records electronically. Michael Dugan, CFO and Chief Operations Officer, is responsible for the maintenance of these back-up books and records. The firm backs up its paper records by scanning important documents and saving the file to its server.

In the event of an internal or external SBD that causes the loss of the DriveWealth, LLC's paper records, the Company will physically recover them from its back-up site. If the Company's primary site is inoperable, it will continue operations from its back-up site or an alternate location.

Back-up of electronic records:

The firm backs up its electronic records monthly by copying all files remotely. Copies can be obtained by the Firm's Head of Partner Solutions Group, Mark Bulger.

In the event that electronic records are lost, the Company will either physically recover the storage media or electronically recover data from its back-up site, or, if the Company's primary site is inoperable, continue operations from its back-up site or an alternate location.

7. Financial and Operational Assessments

Operational Risk:

In the event of an SBD, DriveWealth, LLC will immediately identify any methods available that will permit personnel to communicate with customers, other employees, critical business constituents, critical banks, critical counter-parties, and regulators.

Although the effects of an SBD will determine the means of alternative communication, the communications options the Company may employ will include its website, telephone voice mail, and secure email. In addition, DriveWealth, LLC will retrieve key activity records as described in the section above, *Data Back-Up and Recovery (Hard Copy and Electronic)*.

Financial and Credit Risk:

In the event of an SBD, DriveWealth, LLC's FINOP will determine the value and liquidity of its investments and other assets to evaluate the Company's ability to continue to fund its operations and remain in capital compliance.

DriveWealth, LLC will contact its critical banks, and investors to apprise them of the Company's financial status. If the Company determines that it may be unable to meet its obligations to those counter-parties or otherwise continue to fund its operations, DriveWealth, LLC will request additional financing from our bank or other credit sources to fulfill its obligations to our customers and clients. If DriveWealth, LLC cannot remedy a capital deficiency, the FINOP will file appropriate notices with applicable regulators and immediately take appropriate steps, including suspension of certain business activities, contacting SIPC, temporary lay-off of non-essential personnel.

In the event of a suspension or termination of the Company's business, the Company will attempt to notify customers regarding the situation and provide them with instructions for accessing their funds or securities, if applicable, for verifying transactions in process or for conducting future business. Notification will be a form allowed based on the circumstances permitted by regulatory authorities and may include telephone calls, letters or a posting on the Company's website.

8. Mission Critical Systems**Internal Mission Critical Systems**

DriveWealth, LLC's "mission critical systems" are those that ensure prompt and accurate processing of securities transactions, including execution and the maintenance of customer accounts. The firm currently utilizes proprietary execution software for its business.

The Company has primary responsibility for establishing and maintaining business relationships with customers and has sole responsibility for the Company's mission critical functions.

System and Infrastructure Redundancies

- 1) Data Center Redundancy: DriveWealth operates in dual, redundant, data center facilities located in Virginia, USA. A "warm" datacenter is also available in the state of Oregon, USA to provide redundancy in the case of a catastrophic loss of the primary facilities. This facility contains pre-configured systems which can be brought online to resume operations in the event of a failure to the primary site.
- 2) Data Resiliency and Redundancy: Backups are performed daily and transferred offsite to our warm datacenter facility. Additionally, data is electronically replicated between active datacenters in real-time.
- 3) Server Hardware Redundancy: All aspects of the DriveWealth trading application have no single point of failure. Should a server go offline, load is immediately directed to an

available server. In addition, additional server resources will immediately be brought on line to account for the transfer of load.

- 4) Security Against Both Cyber and Physical Intrusion: Physical datacenter security is multi-tiered and includes 24×7 facility-owned security. In order to maintain data security and defend against cyber intruders, DriveWealth employs a host of defenses and disciplines. All transactions sent to and from the data center are encrypted using one or two encryption standards. All web transactions are secured by at least 128-bit SSL encryption, while messages data streams are encrypted using AES encryption. Access to the systems for management is only provided via a secured, encrypted VPN tunnel. All web traffic is protected by a DDoS mitigation service.

Application/ Execution Clients

Currently, the Company deals with customers via telephone, fax, e-mail, and through our proprietary online trading platforms. During an SBD, the Company will continue to conduct transactions through any of these methods that are available and reliable.

The Company will inform its customers what alternatives they have to transact business in the event traditional methods are interrupted. Customers will be informed of alternatives by disclosure information provided when a new business relationship is established and by calls from personal cell phones, and, if phone services are affected, through messages via email or other means available.

Other Services Currently Provided to Customers

In addition to those services listed above the Company also provides other services, including typical account maintenance: address changes and general service related items.

In the event of an internal or external SBD, the Company will attempt to continue to offer these services provided that doing so does not place our employees or customers in harm's way. These services may be temporarily suspended if the Company determines that safety cannot be assured or if critical systems necessary for offering these services, such as telephone or Internet systems, are disrupted.

The Company maintains an execution platform for execution of customer orders off site. This platform currently has redundant capabilities (see above). Furthermore, the clearing firm and Federated Investors, Inc. are responsible for ensuring that they have policies and procedures in place to ensure their business continuity in the event of an SBD. The Company, in the event of an SBD, will notify customers how to access their account information. Customers will obtain assistance directly from the Company.

Order Taking

Currently, the Company receives orders from customers via its order entry system. During an SBD, we will continue to take orders through any method that is available and reliable (i.e. phone or alternative trading system).

The Company will inform our customers what alternatives they have to send their orders to us in the event traditional methods are interrupted. Customers will be informed of alternatives by

disclosure information provided when a new business relationship is established and by calls from personal cell phones, if phone services are affected, through messages via email or posted on the Company's website or other means available. If necessary, we will advise our customers to place orders directly with our clearing firm.

Order Entry/Submission

In the event of an internal SBD, the Company will send information to its clearing firm by the fastest alternative means available, which may include alternative facilities or external e-mail connections. In addition, during an internal SBD, the Company may utilize third party execution platforms for placing orders.

In the event of an external SBD, the Company will maintain the order in electronic or paper format, and deliver information to the clearing firm by the fastest means available when it resumes operations.

Mission Critical Systems- Company Software and Those Provided by Our Clearing Firm

The Company's clearing firm provides, through contract, clearance and settlement of securities transactions. The maintenance of customer accounts, account data, access to customer accounts, and the delivery of funds and securities will be conducted by the Company using the IntelliClear platform.

The Company's clearing agreement, or addendum thereto, provides that the clearing firm will maintain its independent business continuity plan and the capacity to provide clearing services.

The Company expects that its clearing firm will:

1. Advise the Company of any material changes to its plan that might affect the Company's ability to maintain its clearing business with our clearing broker(s).
2. Notify the Company of its plan execution and provide the Company equal access to clearing services as provided to its other customers.
3. Assist the Company in seeking clearing services from an alternative source if it has not or cannot put its plan in place quickly enough to meet the Company's needs, or is otherwise unable to provide access to such services.
4. Back up the Company's clearing records at a remote site and operate a back-up operating facility in a geographically separate area with the capability to conduct the same volume of business as its primary site.

In addition, the Company's clearing firm has also confirmed the effectiveness of its back-up arrangements to recover from a wide scale disruption by testing.

Recovery-time objectives provide concrete goals to plan for and test against. They are not, however, hard and fast deadlines that must be met in every emergency situation, and various external factors surrounding a disruption, such as time of day, scope of disruption, and status of critical infrastructure—particularly telecommunications—can affect actual recovery times. Recovery refers to the restoration of clearing and settlement activities after a wide-scale

disruption; resumption refers to the capacity to accept and process new transactions and payments after a wide-scale disruption.

9. Alternate Communications Between the Firm and Customers, Employees, and Regulators

Customers

The Company currently communicates with our customers using the telephone, e-mail, fax, U.S. mail, and in-person visits at our firm.

In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party. For example, if we have communicated with a party by e-mail but the Internet is unavailable, we will call them on the telephone and follow up where a record is needed with paper copy in the U.S. mail.

Employees

The Company currently communicates with its employees using the telephone, e-mail, and in person.

In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party.

The Company will also employ a call tree, below, so that senior management can reach all employees quickly during an SBD, if telephone service is available. The Disaster Recovery Coordinator and/or Emergency Management Team will be responsible for invoking the call tree.

Regulators

The Company is currently a member of FINRA and is registered with the SEC, is a member of the National Futures Association, and is registered with the NJ Bureau of Securities.

The Company is registered to conduct business in all fifty (50) States in the United States, plus the District of Columbia and the territories of Puerto Rico and Virgin Islands.

DriveWealth, LLC communicates with applicable regulators using the telephone, e-mail, fax, U.S. mail, and in person. In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party.

10. Critical Business Constituents, Banks, and Counter-Parties

Business Constituents

DriveWealth, LLC has contacted our critical business constituents (businesses with which the Company has an ongoing commercial relationship in support of its operating activities, such as vendors providing critical services), and determined the extent to which the Company can continue its business relationship with these businesses in light of the internal or external SBD. The Company will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services because of a SBD affecting them or our firm.

Banks

DriveWealth, LLC has contacted its banks and lenders to determine if they can continue to provide the financing that the Company or its customers may need in light of the internal or external SBD. The Company's accounts are currently with the institutions listed on Annex I. If our banks and other lenders are unable to provide the financing, we will seek alternative financing immediately.

Counter-Parties

DriveWealth, LLC will contact our critical counter-parties, such as other broker-dealers or institutional customers, to determine if we will be able to carry out our transactions with them in light of the internal or external SBD. Where the transactions cannot be completed, we will contact those counter-parties directly to make alternative arrangements to complete those transactions as soon as possible.

11. Regulatory Reporting

DriveWealth, LLC is subject to regulation by FINRA and the SEC, as well as various state and other securities regulators (see list of states in Part 9 – Regulators)

The Company currently files reports with our regulators via WEB CRD, WEB FOCUS, using paper copies in the U.S. mail, and electronically using fax, e-mail, and the Internet. In the event of an SBD, we will check with the SEC, FINRA, and other regulators to determine which means of filing are still available to us, and use the means closest in speed and form (written or oral) to our previous filing method. In the event that we cannot contact our regulators, we will continue to file required reports using the communication means available to us.

The Company's current regulators can be reached as follows:

FINRA District Number 9:
581 Main Street, 7th floor
Woodbridge, NJ 07095-1164
(732) 596-2000
Fax: (732) 596-2001

U.S. Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549
(202) 942-8088

NJ Bureau of Securities
153 Halsey Street, 6th Floor
Newark, NJ 07102
(973) 504-3600

12. Disclosure of Business Continuity Plan

The Company will disclose in writing a summary of our BCP to customers at account opening or at the time a business relationship is established. The Company will notify customers in writing when material changes are made to the Plan that may affect their business relationship with the Company. The Company will also post the summary on our Web site and mail it to customers upon request. A full of the Company's Business Continuity Plan is available via a link in the summary, of which the attached Customer Disclosure Statement is included.

13. Updates and Annual Review

The Company will update this plan whenever there is a material change to its operations, structure, business or location or to those of the clearing firm.

The Company's BCP will be reviewed and modified, if necessary, at least annually, but no later than within 12 months of the date on which this Plan was put into effect or previously reviewed, to take into account any changes in the Company's operations, structure, business, or location or those of our clearing firm.

Customer Disclosure Statement

DriveWealth, LLC

DriveWealth plans to quickly recover and resume business operations after a significant business disruption (SBD) and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our company's business continuity plan (BCP) is designed to permit us to resume operations as quickly as possible, given the scope and severity of the SBD.

The BCP addresses: data back up and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

We have implemented the following in order to recover and resume our operations in the event of a significant business disruption:

- Redundancy at our primary and offsite locations protects critical hardware, software and telecommunications systems.
- Our offsite facilities are supported by major recovery systems vendor(s) with adequate infrastructure and proven performance during large-scale emergencies.
- Tests are performed of individual components as an ongoing effort, including, but not limited to, functionality of proprietary systems, connectivity with our clearing broker, information vendors, and market data providers, email and other internet services, and remote access.
- Data from our production environment is mirrored to our offsite facility. This eliminates the need to rebuild intra-day data if recovery is required during the business day, as well as the time, effort and uncertainty associated with restoring data from tape or other off-line media.
- Our offsite facilities are constantly monitored by software tools that provide immediate notification to critical persons should an incident require attention.
- Our plan provides specific direction on where critical personnel will continue to function from should a SBD occur. As a further safeguard, secure remote access allows our staff to work effectively from alternate locations if they cannot access our recovery site.
- Contact information is maintained at our recovery location and at a private, secure website so that we can remain in contact with clients at all times and from any location.

Significant Business Disruptions: The Company's plan takes into account two kinds of Significant Business Disruptions, internal and external. Internal SBDs affect only the

Company's ability to communicate and do business, such as a fire or loss electrical power in the office or building.

External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a natural disaster, or another event that causes a wide-scale, regional disruption in essential services.

Internal SBDs: In the event of a disruption in the Company's business operations due an internal SBD, the Company will attempt to continue to conduct business as usual by utilizing alternative communication methods (if available), such as the Internet, cell phones, etc., or by moving its operations to an alternative location. If personnel or operations must be moved to an alternative location, the Company anticipates that it will resume regular operations within 5 hours.

External SBDs: In the event of a disruption in the Company's business operations due to an external SBD, the Company will attempt to continue to conduct business as usual by moving its operations to an alternative location outside the effected area, if possible, or by providing customers with alternative communication arrangements, as indicated below, to conduct business or to access their funds and securities.

The Company will attempt to resume business within 24-48 hours and to keep its customers informed regarding relevant events to the best of its ability based on the circumstances.

In all cases, the Company will resume normal business operations as soon as it is able to do so, based on the type and the extent of the disrupting event.

If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer's prompt access to their funds and securities.

Communications: In the event you are unable to reach the Company at our main phone number(s), please proceed as follows:

1. Contact the Company by emailing us at support@drivewealth.com, or by calling us at the following alternate telephone number: 973-559-6750.
2. Contact the Company directly to process transactions or for information on your holdings maintained at the Company, CGMI or Federated Investors, Inc.
3. Access the Company website (www.drivewealth.com) for more information on contacting the Company and its business continuity plans.
4. Contact FINRA's District office at the following telephone number for more information on the company's status and additional instructions: 732-596-2000.

Contact information: Any questions regarding the Company's Business Continuity Plan should be addressed to: Jeffrey Pasquerella, 97 Main Street, Second Floor, Chatham, New Jersey, 07928. Email: jpasquerella@drivewealth.com.

ANNEX I

Types of account (i.e. checking, savings, PAIB, escrow)	Name of Financial Institution	Address of Financial Institution	Telephone Number	Contact Name
Customer Money Market Accounts	Federated Investors, Inc.	The Federated Funds ATTN: FBD P.O. Box 8600 Boston, MA 02266-8600	1-888-400-7838	Customer Service
Customer Reserve Accounts	M & T Bank	45 Eisenhower Drive Paramus, NJ 07652	1-201-368-4550	Michael Weiss
Clearing Account	Wedbush	1000 Wilshire Blvd. , Los Angeles, CA 90017	(213)688-4578	Sean Thompson
	Velox	2400 E Katella Avenue Anaheim, CA 92806	(949)392-5731	Alfred Valenzuela
Custody	Citibank NA	390 Greenwich Street, 3rd Floor, New York, NY 10013	(212)723-9206	Gilbert Maddock
Reserve for Proprietary Account of Broker- Dealers	Texas Capital Bank	2350 Lakeside Boulevard Richardson, TX	1-877-415-1518	Customer Service
	M & T Bank	45 Eisenhower Drive Paramus, NJ 07652	1-201-368-4550	Michael Weiss