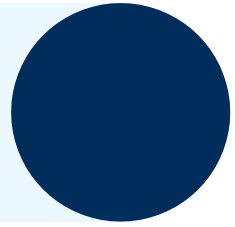


ICD Business Continuity & Disaster Recovery Fact Sheet



Overview

ICD maintains a comprehensive Business Continuity and Disaster Recovery (“BCDR”) Program designed to support the continuity of critical business functions and technology services in the event of a disruption. The primary goal is to minimize client service disruptions for the operating businesses of ICD Holdings, LLC (collectively “ICD” or the “Firm”), which include the following:

- Institutional Cash Distributors, LLC
- Institutional Cash Distributors Limited
- Institutional Cash Distributors Technologies, LLC

The BCDR Program aligns with the Tradeweb Business Continuity and Disaster Recovery Policy and enables ICD to effectively respond to and recover from significant business disruptions, focused on:

- Safeguarding employees and property;
- Continuity of client services and allowing customers to transact business;
- Recovery of key systems and infrastructure;
- Ongoing testing and improvement; and
- Protecting the Firm’s books and records.

The BCDR Program is designed to permit the Firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption. The Program addresses:

- Data backup and recovery;
- All mission critical systems;
- Financial and operational assessments;
- Alternative communications with customers, employees, and regulators;
- Remote working and/or alternate physical locations for employees;
- Critical supplier, contractor, bank, and counter-party impact;
- Regulatory reporting; and
- Assuring ICD customers’ prompt access to their funds and securities if ICD cease business.

The ICD BCDR Program is reviewed periodically and subject to modification without notice. The ICD BCDR Fact Sheet is posted on the website at <https://icdportal.com>. A written copy is provided to customers upon request.

Technology Services

Given ICD's technology setup, technical service functions and recovery can be managed without dependency on ICD offices. ICD's technical services are architected for high availability with full redundancy. All application data is replicated bit by bit every second to a Disaster Recovery site for resiliency. ICD uses commercially reasonable efforts to make ICD's technical services available to clients 24 hours a day, 7 days a week, except for scheduled downtime and uncommon exceptions. Such circumstances may include internet or cloud service provider failure or delay, denial of service attack, DNS failure, or other circumstances beyond ICD reasonable control, including, but not limited to, fire, flood, or other climate events.

ICD Personnel – Global Desk Services

ICD maintains a geographically distributed operational model via the Global Desk services located in:

- San Francisco Bay Area, CA
- Boston, MA (Cohasset)
- Golden, CO
- London, UK

ICD's primary technical service, Portal System, functions independently of physical office locations, enabling both operational continuity and disaster recovery without reliance on ICD offices. This applies equally to services supported by personnel and technical infrastructure. Geographic dispersion provides redundancy and uninterrupted service delivery across regions:

- Annual testing of emergency notification/alerting systems, including staff contact detail validation.
- Annual testing of remote working capabilities, which are utilized regularly by all teams.
- Embedded escalation procedures and communication protocols.
- Periodic simulation of disruption scenarios to test readiness and validate response plans.

Details of Global Desk BCDR plans can be found in numerous internal plan documents, including but not limited to, call-contact tree and emergency details.

Client Communications During a Disruption

During a significant business disruption, clients should use the following contact details to communicate issues they may be facing:

- Phone: +1.800.611.4423
- Email: info@icdportal.com

Should these primary communications be unavailable, the following channels are available:

- US phone: +1.415-820-5317
- UK phone: +44(0)207-968-4774
- E-mail: trading-icd@icdportal.com
- Online: Visit <http://icdportal.com> to obtain additional information

If ICD cannot be accessed through those means, clients should contact their respective clearing firms, custody agents, or direct-investment channels for instructions on how to gain prompt access to funds and securities, enter orders and process other trade-related, cash, and security transfer transactions.

TRADING COUNTERPARTIES

JP Morgan Services (“JPMS”)

JPMS, backs up their important records in a geographically separate area. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, ICD has been advised by its clearing firm that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments within 4 to 12 hours. Orders and requests for funds and securities could be delayed during this period.

In the event ICD is not available, **clearing clients** may contact JPMS at:

- Address: JP Morgan Services 383 Madison Ave, Fl #23, New York, NY 10179
- Phone: +1.212.499.1428
- Email: calm_clearing@jpmchase.com

In the event ICD is not available, **custody clients** may contact US-Bank at:

- Address: US-Bank – U.S. Bank – 1 California Street, Suite 1000, San Francisco, CA 94111
- Email: LiquidityCustody@usbank.com

In the event ICD is not available, **Direct-investment clients** should contact their investment funds' Transfer Agent service groups, in accordance with the funds' prospectus or offering documents.

FOR MORE INFORMATION

Questions about the ICD BCDR Program may be directed to ICD at +1.800.611.4423 and/or info@icdportal.com.