

Tradition

Tradition America Holdings, Inc.
32 Old Slip – 28th Floor
New York, NY 10005

To whom it may concern:

Thank you for your inquiry regarding Tradition's Business Continuity Plan.

Tradition – Americas Business Continuity Plan Executive Summary

Tradition has developed and implemented its Business Continuity Management program to ensure that we are able to continue to provide services to our clients, third party service providers and regulators in the event of a manmade, natural or technological disruption. The program revolves around our extensive Corporate Policy and Procedures governance. The program combines Incident Management (Emergency Response), Business Continuity, and Disaster Recovery in a coordinated and holistic manner in order to protect our personnel and resources and be able to communicate to Tradition staff, clients, third parties and regulatory agencies in a time of crisis. It is designed to respond to incidents of all kinds and sizes, from the loss of a server, to the loss of a facility and even the onset of a pandemic. The procedures focus on the restoration of key business elements, as quickly as is feasible given the circumstances, necessary to support our business processes in a compliant manner.

Utilizing a combined strategy of Tradition technology, alternate business operations recovery sites and additional vendor supported systems, we are able to reroute our technology (computers and telephones) and relocate our personnel in an orderly efficient manner. In addition, certain key Tradition employees have remote capabilities which enables such employees to continue business operations where deemed appropriate, if unable to report to the office or an alternate site.

The Tradition Business Continuity Plan is regularly maintained and validated. Business (staff) exercises in conjunction with Technology exercises are conducted on an annual basis. Tradition also participates in third party vendor recovery exercises.

Finally, Tradition provides its employees with internal communications to discuss preventative measures and actions to be taken in the event of an emergency. This ensures staff has an awareness to better prepare them to react to emergency situations.

Respectfully,

/s/ Eric M. Earnhardt

Regional Chief Compliance Officer

Date

10/19/23