



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

**RE: TRADITION AMERICAS
BUSINESS CONTINUITY PLAN EXECUTIVE SUMMARY**

To Whom It May Concern:

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

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 necessary to support our business processes in a compliant manner, as quickly as is feasible given the circumstances.

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 that enable 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 prepare them to react better to emergency situations.

Respectfully,

A handwritten signature in black ink, appearing to read "M. Martuscello, II".

Michael H Martuscello, II
Head of Compliance for the Americas Region

Date: 2 February 2026