

DRIVEWEALTH PANDEMIC PLAN

(Supplement to DriveWealth’s BCP)

TABLE OF CONTENTS

•	INTRODUCTION	1
•	PURPOSE.....	1
•	CONCEPT OF OPERATIONS	1
•	CONTINUITY PLANNING	2
•	PANDEMIC PLANNING ASSUMPTIONS	3
	A. National Strategy for Influenza Implementation Assumptions.....	3
	B. Organizational Assumptions	5
•	VI. PANDEMIC RESPONSE.....	5
	A. Pandemic Coordinators and Pandemic Response Teams:.....	5
	B. Risk Communications:	6
•	VII. ELEMENTS OF A VIABLE PANDEMIC INFLUENZA CONTINUITY CAPABILITY ..	6
	A. Essential Functions.....	6
	B. Orders of Succession	7

C. Delegations of Authority.....	7
D. Continuity Facilities.....	7
E. Continuity Communications.....	7
F. Essential Records Management.....	7
G. Human Resources.....	7
H. Test, Training and Exercises.....	8
I. Devolution of Control and Direction.....	8
J. Reconstitution.....	8
• VIII. CONCLUSION.....	8

Pandemic Influenza Continuity Plan

• INTRODUCTION

DriveWealth recognizes that organizations across the Nation perform essential functions and services that may be adversely affected in the event of a natural or man-made disaster. Continuing to perform essential functions and provide essential services is vital to an organization's ability to remain a viable entity during times of increased threats from all hazards, manmade or natural. Since the threat to an DriveWealth's continuity of operations is great during a pandemic outbreak; it is important for DriveWealth, to have a Pandemic Continuity of Operations Supplemental Plan in place to ensure it can carry out its essential functions and services. While organizations may be forced to suspend some operations due to the severity of a pandemic outbreak, an effective Continuity of Operations Plan can assist an organization in its efforts to remain operational, as well as strengthen the ability to resume operations.

• PURPOSE

DriveWealth's Supplemental Plan provides guidance to its staff, counterparties and their underlying customers as to how DriveWealth will react to a Pandemic. This Supplemental Plan serves as the plan for maintaining essential functions and services during a pandemic. This Supplemental Plan neither replaces nor supersedes any DriveWealth's business continuity plan; rather it supplements it, bridging

the gap between the traditional, all-hazards continuity planning and the specialized continuity planning required for a pandemic by addressing additional considerations, challenges, and elements specific to the dynamic nature of a pandemic. This Supplemental Plan stresses that essential functions can be maintained during a pandemic outbreak through mitigation strategies, such as social distancing, increased hygiene, the vaccination of employees and their families, and similar approaches. Influenza may not, in itself, require a traditional continuity response, such as partial or full relocation of the organization's essential functions, although this response may be concurrently necessary due to other circumstances.

- CONCEPT OF OPERATIONS

DriveWealth will monitor the severity of the pandemic and establish continuity activation triggers to address the unique nature of the pandemic threat. The Pandemic Continuity Supplemental Plan will be implemented as needed to support the continued performance of essential functions. This plan is to be read in conjunction with DriveWealth Business Continuity Plan (BCP), as appropriate. It supplements the BCP plan by addressing considerations and elements specific to pandemic events and emerging infectious diseases.

- CONTINUITY PLANNING

DriveWealth personnel are to be informed regarding protective actions and/or modifications related to this plan. Messaging and risk communications to DriveWealth staff during an emerging infectious disease or pandemic will be conducted by Kevin Cortright.

Guidance and instructions on established infection control measures such as social distancing, personnel protective equipment and telework policies are provided by Kevin Cortright to assist in limiting the spread of influenza, disease or other virus at the primary and alternate worksite.

Within the workplace, social distancing measures could take the form of: modifying the frequency and type of face-to-face employee encounters (e.g., placing moratoriums on hand-shaking, substituting teleconferences for face-to-face meetings, staggering breaks, posting infection control guidelines); establishing flexible work hours or worksite, (e.g., telecommuting); promoting social distancing between employees and customers to maintain three-feet spatial separation between individuals; and implementing strategies that request and enable employees with influenza to stay home at the first sign of symptoms.

DriveWealth is focused on ensure there are communications to our employees, particularly any who are in harm's way. Frequent, weekly contact is important to keep employees informed about developments in the organization's response, impacts on the workforce, and to reassure employees that the organization is continuing to function as usual.

Planners and pandemic response teams should include deliberate methods to measure, monitor, and adjust actions to changing conditions and improved protection strategies.

- Implement a formal worker and workplace protection strategy.

- Monitor and periodically test protection methods.
- Track and implement changes in approved or recommended protection measures.
- Pre-position material and equipment onsite.
- Ensure essential personnel are available at appropriate locations given pandemic circumstances and government regulations.

- PANDEMIC PLANNING ASSUMPTIONS

DriveWealth's Supplemental Plan includes overarching planning assumptions that were used in developing this Supplemental Plan such as those provided in the National Strategy for Pandemic Influenza Implementation Plan, as well as information from the CDC and WHO's websites.

- NATIONAL STRATEGY FOR INFLUENZA IMPLEMENTATION ASSUMPTIONS

- Susceptibility to the pandemic influenza virus will be universal.
- Efficient and sustained person-to-person transmission signals an imminent pandemic.
- Some persons will become infected but not develop clinically significant symptoms. Asymptomatic or minimally symptomatic individuals can transmit infection and develop immunity to subsequent infection.
- While the number of patients seeking medical care cannot be predicted with certainty, in previous pandemic about half of those who become ill sought care. With the availability of effective antiviral drugs for treatment, this proportion may be higher in the next pandemic.
- Rates of serious illness, hospitalization, and deaths will depend on the virulence of the pandemic virus and differ by an order of magnitude between more and less severe scenarios. Risk groups for severe and fatal infection cannot be predicted with certainty but are likely to include infants, the elderly, pregnant women, and persons with chronic or immunosuppressive medical conditions.
- Rates of absenteeism will depend on the severity of the pandemic. In a severe pandemic, absenteeism attributable to illness, the need to care for ill family members and fear of infection may reach 40 percent during the peak weeks of a community outbreak, with lower rates of absenteeism during the weeks before and after the peak. Certain public health measures (closing organizations, quarantining household contacts of infected individuals, "snow days") are likely to increase rates of absenteeism.
- The typical incubation period (interval between infection and onset of symptoms) for influenza is approximately two days
- Persons who become ill may shed virus and can transmit infection for up to one day before the onset of symptoms. Viral shedding and the risk of transmission will be greatest during the first two days of illness. Children usually shed the greatest amount of virus and therefore are likely to post the greatest risk for transmission.

- On average, infected persons will transmit infection to approximately two other people.
- A pandemic outbreak in any given community will last about six to eight weeks for each wave of the pandemic.
- Multiple waves (periods during which community outbreaks occur across the country) of illness could occur with each wave lasting two-three months. Historically, the largest waves have occurred in the fall and winter, but the seasonality of a pandemic cannot be predicted with certainty.

- ORGANIZATIONAL ASSUMPTIONS

- DriveWealth will be provided with guidance and/or direction by Federal, State, local and/or Tribal governments regarding current influenza pandemic status in its area.
- DriveWealth will have actionable plans and procedures to assist in the ability to remain operational during a pandemic. Plans and procedures may include social distancing protocols, personal protection equipment (PPE), and temporary suspension of some nonessential activities.
- DriveWealth has a viable Agency-wide continuity capability and BCP.
- DriveWealth will review its continuity communications programs to ensure they are fully capable of supporting pandemic and other related emergencies, and give full consideration to supporting social distancing operations, including telework and other virtual office options.
- DriveWealth controlled locations will be accessible, but right of entry may be limited.
- DriveWealth may deploy to its alternate facilities or move to working remotely.
- Essential functions, operations, and support requirements will continue to be people dependent. However, human interactions may be remote or virtual, resulting in the employment of appropriate teleworking and other approved social distancing protocols.
- Travel restrictions, such as limitations on mass transit, implemented at the Federal, State, tribal, territorial, and local levels may affect the ability of some staff to report to work.
- Additional funding will be budgeted for the acquisition of additional equipment required for a possible surge in teleworking capabilities.

VI. PANDEMIC RESPONSE

- PANDEMIC COORDINATORS AND PANDEMIC RESPONSE TEAMS

DriveWealth's Pandemic Coordinator will oversee a Pandemic Response Team (PRT) to anticipate the impacts of a pandemic on DriveWealth and to assist with developing strategies to manage the effects of a pandemic outbreak. The Chief Operating Officer has been designated as the Pandemic Coordinator who will work with a team of advisors.

DriveWealth's Pandemic Team is comprised of the following:

- Mark Bulger (Pandemic Coordinator/COO)
 - Jeffrey Pasquerella CCO
 - Kevin Cortright
 - Julie Coin
 - Chris Yamaguchi
 - Ryan Burke
- RISK COMMUNICATIONS:

DriveWealth will develop pandemic risk communications strategy for communicating with all internal and external stakeholders. This includes the use of existing notification rosters with names and telephone numbers for Pandemic Team personnel and DriveWealth personnel. These rosters are maintained and updated by Kevin Cortright and posted (see DriveWealth Call Tree). In addition, DriveWealth will periodically send email updates and communications to all staff during pandemic sheltering in place.

VII ELEMENTS OF A VIABLE PANDEMIC CONTINUITY CAPABILITY

- ESSENTIAL FUNCTIONS

Given the expected duration and potential multiple waves of pandemic outbreaks, DriveWealth will monitor the process involved in carrying out essential functions and services in order to develop plans that mitigate the effects of the pandemic while simultaneously allowing the continuation of operations which support essential functions. DriveWealth has identified

essential Pandemic Continuity functions and services needed to sustain its mission and operations during a pandemic.

DriveWealth's Essential Functions are:

1. Trading technology
2. Trading Operations
3. Finance/accounting
4. Technology support
5. Operations
6. Compliance
7. Legal
8. Customer support

- **ORDERS OF SUCCESSION AND DELEGATIONS OF AUTHORITY**

Since pandemic may affect regions of the United States differently in terms of timing, severity, and duration, DriveWealth has identified orders of succession and delegation of authority that are at least two deep per position while considering dispersing successors to various geographically separated locations, as appropriate. The DriveWealth's process is to develop Orders of Succession specific to each pandemic incident.

- **CONTINUITY FACILITIES**

The traditional use of continuity facilities to maintain essential functions and services may not be a viable option during a pandemic. Rather, safe work practices, which include social distancing and transmission interventions, reduce the likelihood of contacts with other people that could lead to disease transmission. DriveWealth has developed preventative practices such as social distancing procedures, hygiene etiquette, and cancellation of organizations non-essential activities to reduce the spread of the pandemic. Plans have also been established to relocate to an alternate facility and have the staff work remotely from home, if applicable.

- **CONTINUITY COMMUNICATIONS**

Workplace risk can be minimized through implementation of systems and technologies that facilitate communication without person to-person contact. DriveWealth has identified communication systems needed to perform essential functions. DriveWealth staff will utilize tele-conferences and video conferences (e.g.- Zoom) to minimize social contact while continuing operations.

DriveWealth will reach out to counterparties and key vendors to communicate its implementation of the Pandemic Plan. DriveWealth will request prompt notification if the counterparty or vendor has enacted its pandemic plan and for information on how to best communicate with key personnel within each entity.

- **ESSENTIAL RECORDS MANAGEMENT**

DriveWealth shall identify, protect, and ensure the ready availability of electronic and hardcopy documents, references, records, and information systems needed to support essential functions during a pandemic outbreak. DriveWealth has identified systems, databases, and files that are needed to ensure essential functions remain operational.

- **HUMAN RESOURCES**

Although a pandemic outbreak may not directly affect the physical infrastructure of an organization, a pandemic will ultimately threaten all operations by its impact on an organization's human resources. The health threat to personnel is the primary threat to maintaining essential functions and services during a pandemic outbreak. DriveWealth has established plans to protect the entire employee population and their families, with additional guidance for key personnel, Pandemic Team members, and other essential personnel, should a pandemic outbreak occur.

- **TEST, TRAINING AND EXERCISES**

Testing, training, and exercising are essential to assessing, demonstrating, and improving an organization's ability to maintain its essential functions and services. The organization conducts annual tests, training, and exercises to ensure sustainable social distancing techniques, and to assess the impacts of reduced staff on the performance of essential functions. The organization conducts continuity exercises to examine the impacts of pandemic influenza on performing essential functions, and to familiarize personnel with their responsibilities. The organization has identified resources and trained continuity personnel, needed to perform essential functions.

- **DEVOLUTION OF CONTROL AND DIRECTION**

Devolution is the process of transferring operational control of one or more essential functions to another responsible party or parties. Pandemic outbreaks will occur at different times, have variable durations, and may differ in the severity; therefore, full or partial devolution of essential functions may be necessary to continue essential functions and services. Should Circumstances require DriveWealth to enact a devolution in response to a pandemic incident, DriveWealth will notify FINRA and SEC of such need to discuss to whom and how it should transfer operations, if pandemic renders leadership and essential staff incapable or unavailable.

- RECONSTITUTION

Reconstitution is the process whereby an organization has regained the capability and physical resources necessary to return to normal (pre-disaster) operations. The objective during reconstitution is to effectively manage, control, and, with safety in mind, expedite the return to normal operations. When DriveWealth with counsel and notification from FINRA and SEC had enacted a Devolution, it will contact FINRA and SEC to discuss reconstitution plans and procedures, in conjunction with local public health authorities, to ensure facilities/buildings are safe to return.

- CONCLUSION

Maintaining DriveWealth's essential functions and services in the event of pandemic requires additional considerations beyond traditional continuity planning. Unlike other hazards that may necessitate the relocation of staff performing essential functions to an alternate operating facility or even remote work arrangements, a pandemic may not directly affect the physical infrastructure of the organization. As such, a traditional "continuity activation" may not be required during a pandemic outbreak. However, a pandemic outbreak threatens an organization's human resources by removing essential personnel from the workplace for extended periods of time. Accordingly, the DriveWealth's continuity plan addresses the threat of a pandemic outbreak. Continuity Plans for maintaining essential functions and services in a pandemic should include implementing procedures such as social distancing, infection control, personal hygiene, and cross-training (to ease personnel absenteeism in a critical skill set). Protecting the health and safety of key personnel, Pandemic Team members, and other essential personnel must be the focused goal of the organization in order to enable the organizations to continue to operate effectively and to perform essential functions and provide essential services during a pandemic outbreak.