

XTX Markets – Business Continuity Plan Summary Disclosure Statement

September 2021

Overview

The XTX Markets group (“XTX” or the “Company”) has a comprehensive Business Continuity Plan (“BCP”) in place to respond to emergencies and/or significant business disruptions. The BCP contains response procedures designed to assess the disruption and maintain trading and operational activities, or, where that is not possible, ensure the timely resumption of such functions.

The objectives of the XTX BCP are to:

- Enable the assessment and response to unanticipated business disruption incidents while mitigating potential impacts to XTX assets, employees, counterparties, and other stakeholders.
- Maintain a high degree of technical resiliency, ensuring XTX can meet its regulatory obligations.
- Continue the appropriate level of business activity after an outage of technical or other resources.
- Ensure personnel understand their responsibilities and duties in an event that compromises the normal operation of the business.

Review and Response

XTX maintains a Business Continuity Task Force (“BCTF”), comprised of members of XTX senior management, that meets regularly to ensure the BCP continues to be appropriate in the context of the firm’s evolving business needs. The BCP is reviewed and tested under the direction of the BCTF and ultimately approved by the BCTF.

In the event of a business disruption, the BCTF will perform the following crisis management functions:

- Identify and classify the relevant risk by assessing the potential impact to XTX business activities and employees.
- Invoke the BCP to decide upon the appropriate course of action and communicate the response to employees.
- Manage the business continuity process for the duration of the event and recovery period.
- Communicate as appropriate with counterparties, regulators, and other external parties.

Event Scenarios

The XTX BCP outlines scenarios of varying severity and gauges both the potential disruption to the Company’s business activities and the expected time of business disruption under each scenario. Although the Company maintains technical and operational redundancies to mitigate a single point of failure, the nature of business disruptions is unpredictable and as such it is impossible to guarantee the resumption of business activities within a specific timeframe.

- Should certain business applications be impacted such as the Company phone or email system, alternative communication applications are maintained that may be used for an interim period with limited business disruption.

- In the event one of the Company's offices becomes unavailable, employees from other offices will provide support and affected employees may use remote access to login to their workstations.
- Should the Company's core trading or post-trade systems become unavailable, the Company would not be able to engage in trading activities and would seek to resume activities as soon as possible.

Contact

If you have any questions regarding the XTX BCP, please contact the XTX Compliance department at +44 20 3198 3300 or compliance@txmarkets.com. If you are a customer of XTX Execution Services LLC and you are unable to contact your XTX representative, you may contact our clearing firm, BofA Securities Inc. at (646) 743-0110 or dq.financing_and_clearing_operations_team@bankofamerica.com