



Bruce Markets LLC

Business Continuity and Disaster Recovery Plan

EXTERNAL VERSION

Last Updated: 03/03/2026

INTRODUCTION

Regulators and internal corporate policies require that Bruce Markets LLC's ("**Bruce**" or the "**Company**") develop Business Continuity Planning and Disaster Recovery Programs. Bruce's Business Continuity and Disaster Recovery Plan ("**BCDR Plan**" or the "**Plan**") was designed to address potential business continuity or disaster recovery incidents. While developing and maintaining the Plan, Bruce considered the organizational, managerial and technical environments in which disaster recovery plans will be implemented and assessed the types and likely parameters of disasters most likely to occur and their resultant impacts on Bruce's ability to perform its critical business processes.

The Plan is intended to provide a framework to ensure the safety of employees, the reconstructing of vital business operations, and the resumption of time-sensitive operations and services in the event of an emergency. At the same time, it is intended to be a guide to maintain flexibility and not a series of defined instructions. The nature of the interruption will determine how the business continuation plan is applied.

The Bruce ATS™ platform is hosted by Nasdaq Execution Platform, also known as Ocean, which significantly reduces the number of disaster recovery actions that Bruce would have to conduct by itself. Bruce conducted an analysis of the potential threats to Bruce's business continuity, and the threats that remain are addressed by this Plan, which is currently tailored to meet the requirements of FINRA Rule 4370.

The BCDR Plan enables the Company to maintain or restore operations and ensure availability of information to its subscribers following the interruption or failure of critical business processes.

POTENTIAL THREATS TO BRUCE'S BUSINESS CONTINUITY

Bruce has identified the following threats:

- Ocean's failure or outage
- Loss of connectivity
- Third party breach of the Bruce ATS™ platform

- Availability of personnel
- Legal challenges
- Financial crisis

IDENTIFYING CRITICAL CONTINUITY COMPONENTS OF THE BUSINESS

- A. Elements that are essential to the Bruce's business:**
- (1) Data, including Subscriber confidential trading information**
 - (2) Infrastructure**
 - (3) Critical Third Party Services**
 - (4) Personnel**

BUSINESS CONTINUITY & DISASTER RECOVERY PROCEDURES

A. Addressing Service Outages

Bruce relies upon Ocean's business continuity and disaster recovery processes to ensure continuity of service for the Bruce ATS™ platform and services. Bruce architects their systems to follow Ocean best practices and survive the extended loss of individual availability zones. Currently, Bruce does not maintain a fully-redundant recovery site for its ATS trading platform.

In the event that Ocean outages affect Bruce ATS™ subscribers' ability to access and use the Bruce ATS™ service, Bruce will:

- Communicate with subscribers during the outage.
- Work with Ocean to recover the data in a catastrophic data center outage.

Bruce has contingencies in place for regulatory reporting, including Consolidated Audit Trail (CAT) Reporting and TRF Reporting.

A. Data Redundancy and Recovery

(1) Service Code

Bruce licenses its platform from a third-party service to host and provide its foundational service code. Ocean redundantly stores the service code in a backup data center.

(2) Database and Transactions

Bruce backs up, archives and maintains duplicate or redundant databases that can fully recover the Bruce ATS™ Service and all content on a daily basis.

(3) Bruce Operations Documents and Files

Bruce maintains copies of critical operations documents and files. Bruce employs the following procedures to ensure the continued safety of its operations documents and files.

B. Office Space and Additional Resources

Bruce employees are all equipped to work from anywhere with secure access and cloud-based infrastructure.

If the need for alternative staffing arises, Bruce will first look to its parent and affiliated companies for potential personnel to fill the void. If that is insufficient, Bruce will contract or hire additional personnel.

COMMUNICATIONS DURING A DISRUPTION

In the event of a disruption to the operations of Bruce, Bruce maintains the following plans to communicate to:

- A. Founders, employees and legal counsel
- B. Counterparties
- C. Subscribers
- D. Regulatory authorities
- E. Disaster recovery specialists
- F. Any other person essential to the recovery of documentation and the resumption of operations

MAINTENANCE AND TRAINING

Bruce will distribute a copy (and any revisions or updated versions) of the BCDR Plan to all relevant founders, employees, and counsel via email.

Bruce will provide relevant training to all employees responsible for implementing the Plan regarding their roles and responsibilities.

The Plan will be assessed and revised internally on at least an annual basis and made available to Subscriber's upon request.

FINANCIAL AND OPERATIONAL ASSESSMENTS

In the event of a disaster that affects the operations of both Bruce and its clearing firm, Bruce will exert reasonable efforts to communicate with its designated emergency contacts of its clearing firm to assess the impacted areas of operations. Bruce, in conjunction with its clearing firm, will determine the viability of continuing to uphold the functions of the impacted operations, or, in the event of a more extreme disaster, the viability of continuing to function at all until the disaster is remedied.

In the event of an internal disaster at Bruce and/or its clearing firm, the CEO will promptly discuss how best to circumvent the pertinent impairments with the intent to avoid any interruption in the services and functionality expected of Bruce by its subscribers. Any resulting decisions made by the CEO will be disseminated to Bruce employees if their knowledge of such decisions is required in order to execute and/or support the temporary remedies.

Bruce’s CEO will be in communication with Bruce’s critical financial and operational vendors, as warranted, depending on the scope of the disaster at hand.

EMERGENCY CONTACTS

Bruce maintains the Firm’s current primary emergency contact persons with FINRA via the FINRA Contact System (‘FCS’). Additionally, Bruce maintains an internal list of emergency contacts and communication protocols in the event of business disruption.

VERSION HISTORY

Version History	Changes	Approver	Date
1.0	New version	Andrew Tourney	March 12, 2025
2.0	Annual Review, de minimis updates to language	Kathy Inglot	March 3, 2026