BUSINESS CONTINUITY POLICY

The Board of Directors and management of Exclusive Change Capital Ltd, located at Theodorou Potamianou 56, which operates in Financial Services sector, are committed to preserving the continuity of Exclusive Change Capital Ltd processes, products, services and other functions in the face of disruptive incidents in order to preserve its competitive edge, cash-flow, profitability, legal, compliance with applicable CySEC, MiFID II and DORA requirements.

In order to satisfy applicable legal, regulatory and contractual obligations, and reduce operational (continuity-related) disruption risks to acceptable levels, a business continuity management system (BCMS) will be implemented, in accordance with MiFID, CySEC Laws/Directives and DORA (EU 2022/2554).

Exclusive Change Capital Ltd current strategic business plan and risk management framework provide the context for identifying, assessing, evaluating and controlling continuity-related risks through the establishment and maintenance of a BCMS. The business impact analysis, risk assessment and risk treatment plan identify how continuity-related risks are controlled.

Exclusive Change Capital Ltd aims to achieve specific, defined business continuity objectives, which are developed in accordance with the business objectives, the context of the organisation, the results of risk assessments and the risk treatment plan. These objectives are recorded in the Assurance Programme (BCMS Objectives tab – BCMS REC 9.1).

Individuals that have specific responsibilities in terms of the BCMS are identified in the Document Management and Roles Tool and the Head of HR is responsible for ensuring that the detailed BCMS requirements of individual roles are contained in their job descriptions and reflect responsibilities for critical or important functions.

All Employees of Exclusive Change Capital Ltd and certain external parties identified in the BCMS are expected to comply with this policy and with the BCMS that implements this policy. All Employees, and certain external parties, will receive appropriate training. The consequences of breaching the business continuity policy are set out in the disciplinary policy, and in contracts and agreements with third parties.

Exclusive Change Capital Ltd is committed to the continual, systematic review and improvement of the BCMS, including ICT business continuity and disaster recovery arrangements required under DORA.

Exclusive Change Capital Ltd has established a top-level management steering group Business Continuity Committee, chaired by Director, Chief Information Security Officer (CISO),

Classification: Public

Exclusive Change Capital Ltd (HE 337858), operating under the trade name EXCA Prime, has its registered office located at 56 Theodorou Potamianou, 4th Floor, Kato Polemidia, 4155, Limassol, Cyprus and is regulated by CySEC with License no. 330/17.

MSO, DPO, CIO, Head of Risk and including the Business Continuity Manager and [other executives/specialists/risk specialists] to support the BCMS framework and to periodically review this policy.

Exclusive Change Capital Ltd is committed to achieving certification of its BCMS to ISO 22301:2019.

This policy will be reviewed to respond to any changes in the risk assessment or risk treatment plan and at least annually, or following significant operational or ICT incidents, as required under CySEC and DORA.

In this policy, 'business continuity' is defined as the "capability of the organization to continue delivery of products or services at acceptable predefined levels following disruptive incident" (ISO 22301:2019, Clause 3.3).

The BCMS is the Business Continuity Management System, of which this policy, the Business Continuity Manual (the Manual'), the Business Continuity Plan (BCP) and other supporting and related documentation is a part, and which has been designed in accordance with the specification contained in ISO 22301:2019.

A **disruptive incident** is any situation that might be or could lead to a disruption, loss, emergency or crisis. Major incidents that significantly impact operations will be reported to CySEC in line with regulatory requirements.

Classification: Public

Exclusive Change Capital Ltd (HE 337858), operating under the trade name EXCA Prime, has its registered office located at 56 Theodorou Potamianou, 4th Floor, Kato Polemidia, 4155, Limassol, Cyprus and is regulated by CySEC with License no. 330/17.