

Business Continuity (BC) Overview

August 27, 2025

Strategy & Approach

BNY Mellon Capital Markets, LLC, and BNY (collectively "BNY") aims to minimize disruption of the delivery of its products and services to clients. As a global institution, the Company is exposed to the risk of uncontrollable events that can cause varying degrees of disruption to normal business processes. Our Business Continuity (BC) Program is a critical component of our enterprise resiliency strategy, and is designed to plan for, respond to, and recover from business interruptions, with a view to minimize their impact and facilitate service continuity within recovery time objectives, based on prioritization of business objectives and operations.

BNY's Business Continuity Program is based on the current industry-standard FFIEC guidance and strives to follow best-practice recommendations from the Business Continuity Institute, the ISO standards, and other finance and securities industry and regulatory bodies throughout the world.

Business Continuity Plan

To support recoverability and resilience, BNY has established enterprise-wide requirements governing development, maintenance, review, senior management approval, and testing of business continuity plans. We plan for individual or combinations of disruptions stemming from loss of locations, technology, staff and/or third party.

Each plan participates in the recurring BC Lifecycle, comprised of the Business Impact Analysis, Recovery, Strategy/Solution Review, Testing, and Certification. The plans are formally reviewed by the line of business, with senior business management attesting to the viability of the plans' recovery strategies, at least annually; significant changes trigger an interim review.

Our all-hazards approach is scenario agnostic and focuses on the impact stemming from a wide range of possible scenarios including but not limited to application failures, natural disasters, civil unrest, and severe weather.

Recovery Solutions

The BC Program manages a global portfolio of recovery solutions to facilitate the response to disruptions such as the unavailability of a building, workforce, technology, and/or third-party service. Our critical business services leverage BNY's diverse global footprint to geographically disperse operations across multiple locations. This global approach to balancing workload provides the capability to utilize work transfer as a solution for recovering business operations by transferring workload from one geographic location to another.

BNY contingency data centers are dedicated facilities controlled and supported by BNY staff and management. Our business contingency sites as well as the remote strategy are designed to satisfy recovery requirements and support business processes and operations. Sites are located at sufficient distances from the primary facility to mitigate impact from the same event, but within a reasonable travel distance to enable staff to assemble there promptly.

Testing Strategy

Our resiliency posture is continuously enhanced through a rigorous testing and quality program. A

variety of testing enables us to demonstrate and challenge our ability to mitigate disruption risk/impact, identify improvements and validate recovery capabilities.

- *Call Notification Testing*: to validate our ability to communicate instructions and ascertain staff well-being and availability
- *Alternate Site Testing*: to demonstrate our ability to continue working from an alternate facility when the primary facility is unavailable
- *Work Transfer Testing*: to assess our ability to transfer work among multiple locations
- *Alternate Procedures Testing*: to assess our ability to implement workarounds to maintain operations
- *Third Party Strategy Testing*: to validate our ability to either absorb work, utilize an alternate onboarded provider or validate third party's ability to maintain continuity
- *Industry Collaboration and Testing*: to facilitate smooth integration with industry and market partners we participate in industry forums and sector exercises

Training and Awareness

Enterprise resiliency is an extension of ongoing business, and all employees are responsible for maintaining a state of preparedness. All staff are provided training regarding BC concepts to prepare them to react, respond, and recover from a disruption event. In addition, employees with BC roles are required to take annual training to review key responsibilities and accountabilities to properly assess, plan, manage, and verify recovery capabilities, as well as execute and lead during a disruption