

BUSINESS CONTINUITY STATEMENT

FINRA Rule 4370 requires each member to create and maintain a written business continuity plan identifying procedures relating to an emergency or significant business disruption.

Coinbase Capital Markets Corporation (“CCM”) has developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

CONTACTING US & ACCESS TO YOUR FUNDS

If after a significant business disruption, you cannot contact CCM as you usually do, please go to our website at coinbase.com/ccm for instructions. You can contact CCM for instructions on how you may process limited trade-related transactions, cash disbursements, and security transfers for brokerage accounts.

Coinbase Capital Markets Corporation, 248 3rd St #434, Oakland, California, 94607. Telephone +1 888-908-7930.

OUR BUSINESS CONTINUITY PLAN

We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm’s books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data backup and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counterparty impact; regulatory reporting; and, through working with our partners and carrying broker, help assure that our customers have prompt access to their funds and securities if we are unable to continue our business.

CCM is committed to protecting the interests of clients at all times. The Business Continuity Plan addresses all critical business processes, including providing clients with the ability to buy and/or sell and providing access to securities and funds. The Business Continuity Plan addresses interruptions that are either localized or regional in scope regardless of the cause. The Business Continuity Plan is reviewed and tested annually and has been approved by senior management. Should a disruption occur at our

headquarters in New York, New York, some operational functions may be temporarily disrupted while staff relocates to predetermined alternative sites. CCM has Information Technology services that are housed and operate concurrently in dual, geographically dispersed sites. Either site is capable of supporting all critical functions should one site be disabled.

Any business disruption at CCM will not result in the loss of your account information, securities or funds. CCM is an introducing broker-dealer that has entered into a clearing relationship with Apex Clearing Corporation that will carry your account. In the event that a disruption occurs that affects CCM, relevant information, including contact information, will be prominently displayed on our website and application and we will work with our partners and carrying broker to help ensure your prompt access to your securities and/or funds.

VARYING DISRUPTIONS

Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or a building housing our firm, we will transfer our operations to an alternative site when needed and expect to recover and resume business within four (4) hours. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area, and recover and resume business within 24 to 48 hours. In either situation, we plan to continue in business and notify you through our website or our customer emergency number, on how to contact us. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customers prompt access to their funds and securities.

IMPORTANT DISCLOSURES

CCM will adhere to the procedures described in its Business Continuity Plan. There are, however, circumstances beyond the control of CCM. Therefore, CCM, in its sole discretion, reserves the right to flexibly respond to any disruption in a situation-specific and prudent manner. Additionally, if parts of our plan are dependent upon third parties, we will have no control over the success or failure of the third party.

FOR MORE INFORMATION

If you have questions about our business continuity planning, you can contact us in writing at:

Coinbase Capital Markets Corporation, 248 3rd St #434, Oakland, California, 94607.

Or call us at: +1 888-908-7930