

Business Continuity Plan

This Business Continuity Plan (“**BCP**”) is the process involved in creating a system of prevention and recovery from potential threats to Neon Money Incorporated (“**Neon**” or the “**Company**”). The plan ensures that personnel and assets are protected and are able to function quickly in the event of a disaster. 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.

Interactions: If after a significant business disruption, you cannot contact us as you usually do through the Neon website, you should contact our clearing firm, DriveWealth, LLC, at 800-461-2680 for instructions on how it may provide prompt access to funds and securities, enter orders and process other trade-related, cash and security transfer transactions for our clients. For reference, see the DriveWealth Business Continuity Plan at <https://drivewealth.com/bcp>.

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 assuring our customers prompt access to their funds and securities if we are unable to continue our business.

Our clearing firm: DriveWealth, LLC, backs up our important records in a geographically separate area. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, we have been advised by our clearing firm that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments within 24 hours. Your orders and requests for funds and securities could be delayed during this period.

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 a local site when needed. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of

the affected area. In either situation, we will aim to recover as quickly as possible, plan to continue in business, transfer operations to our clearing firm if necessary, and notify you through our website www.joinneon.com how to contact us. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer's prompt access to their funds and securities.

For more information: If you have questions about our business continuity planning, please contact Neon support at support@neonmoneyclub.com.