ICE Overview

**Business Continuity
Disaster Recovery
Major Incident Response**

Version 3.5

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1. Introduction

Intercontinental Exchange's Disaster Recovery and Business Continuity Plans are designed to provide an effective response to an emergency that may threaten the company's normal business cycle. These are intended as a guide to recovery and are flexible in structure so they can handle any type or scale of disaster.

The Plans consist of separate documents for each business unit that can be used independently or together if the emergency impacts are felt across multiple business units. The Major Incident Response Plan (MIRP) has been developed to provide management with a framework for evaluating and responding to major incidents. It details the roles and responsibilities of the Senior Managers and Executives who control response to an emergency and the communication strategy to our customers and third parties.

2. Purpose

These plans provide a documented, defined structure for response in the event an emergency that threatens the normal operating cycle of one or more of Intercontinental Exchange's business units. They outline the sequence of responses to an emergency situation and the designated resources responsible for the execution of predetermined action plans designed to suppress the emergency, mitigate its impact, and recover from its effect.

3. Objectives

The objectives of the Disaster Recovery and Business Continuity Plans are to provide program and essential logistical information to achieve the following ends in the event of a disaster to the facilities, products or services of Intercontinental Exchange, Inc. and its subsidiaries:
- Provide for the safety and well-being of staff and visitors.
- Provide for the protection of corporate assets, critical records and client information.
- Establish priorities and estimate time scales for the resumption of critical operating functions.
- Identify critical resources required to resume normal operations.
- Achieve the resumption of normal business operations while minimizing impact on the corporation's financial status, its clients' normal operations and its clients' customer product utilization.
- Effectively communicate internally and externally throughout an event.

The Major Incident Response Plan (MIRP) defines the membership of the Major Incident Response Team ("MIRT"), the circumstances in which the team is to convene, the communication methods the team is to use and the associated procedures to be executed based on the event type.

4. Assumptions

During the development of Business Continuity and Disaster Recovery plans the following assumptions are made:
- Vital records have been identified and secured.
- Each business unit plan is structured around the most common impacts to provide for a broad scope of potential emergencies, facility unavailability, absenteeism or technology failure and third-party provider interruptions.
- A sufficient number of personnel capable of implementing the Business Recovery Plan will survive the emergency event.
- The designated alternate operating sites will be available if needed.
- Providers of alternate materials, equipment and other resources will respond as planned.
- Immediate response to an emergency at any location (i.e., alarms, evacuation, etc.) will occur as directed by Intercontinental Exchange's existing emergency procedures.

5. Responsibilities

5.1. Management

- Review and approve the Business Recovery Plan(s) at the corporate and business unit levels.
- Be prepared to actively participate in the execution of a Plan(s) if an emergency should occur.
- Ensure business unit level plans are compatible with overall corporate objectives and requirements.
- Ensure that organizational commitment is provided to test, refine and perpetuate the Plan(s) as required over time

5.2   All Employees

It is required that all employees have mandatory BCP training which is also included in new hire training.

5.3   BCP Staff

Dedicated business continuity planning staff is responsible for the co-ordination of testing and validation of plans. They will prepare reports outlining the success, or lack thereof, of each Plan's test cycle. In concert with business unit managers, they will recommend changes or refinements to individual business unit plans; support these plans, or the Intercontinental Exchange, Inc. Major Incident Response Plan (MIRP) as a whole. In addition, should an emergency occur, they are responsible for the preparation of an after-action report which will critique the response of business unit with recommended refinements if necessary. The BCP Director serves as a member of the Major Incident Response Teams (MIRT).

5.4   Incident Response Teams

An Incident Response Team (IRT) is established at the business unit level and reports to the Intercontinental Exchange, Inc. Major Incident Response Team (MIRT) if the size of an event warrants MIRT activation. An Incident Response Team manages incidents at the business unit level. Recovery Teams are established at the business unit/department level, responsible for executing their individual action plans.

The IRT provides a common co-ordination and communication focal point for all business response and subsequent business recovery activities. Functional team members coordinate, direct and report on the activities of their respective teams. The Incident Response Team organizational structure develops in a modular fashion based upon the incident. The organization's structure builds from the top down.

The Incident Response Team coordinates the activities of all the recovery efforts upon an emergency event. Based on the size of the event, the IRT can receive information from the MIRT that allows informed decisions regarding the magnitude, whether or not business units must be relocated, what information can be released or made available, whether additional resources may be required, and the operational and financial impact. It is the IRT's responsibility to provide high-level assistance to the business unit(s) as needed, through established communication channels until the emergency subsides or the affected business unit(s) resumes "normal service."

The IRT is responsible for ensuring the following information is available to enable the pro-active management of day-to-day business in the event of a disaster:
- Status of emergency response activities
- Description of incident
- Report on injuries and fatalities
- Areas potentially affected
- Business Continuity Plan status

6. Incident Categories

Incidents, which interrupt normal production, fall into the following categories: -
* IT system issues / network issues
* Facilities failure / interruption
* Environmental disaster (fire, flood, wind, earthquake, etc.)
* Malicious damage (bomb threat, terrorist attack, criminal damage)
* Loss of key personnel (reduced staff strategy)

7. Risk Analysis

Intercontinental Exchange, Inc. undertakes risk analysis assessments at appropriate stages for environmental and physical conditions. Upon identification of risk and probability, mitigating actions are documented and implemented where feasible.

8. Plans

8.1 Business Continuity Plans

Each business unit has a specific Business Continuity Plan (BCP), which identifies each member and their alternates, along with a clear recovery strategy in the event of a disaster. Action plan priorities are predetermined and documented and support critical function(s). If required, sufficient detailed information, including task checklists, critical references, and resource listings are included to ensure maximum team effectiveness if called into action

These Plans provide predetermined responses to an emergency situation at the business unit or operating level of the company. These plans include:
* Ensure staff safety and well being
* Protect corporate assets, records and critical client information
* Locations of and access methods to a complete and current copy of the Business Continuity Plan
* Contact details of key resources assigned to the business unit's response team
* Escalation practices
* Key contacts
* Critical information, equipment or materials required to resume operation on an interim or permanent basis
* Identification of an alternate location for critical functions to continue processing if recovery is not possible at its existing site
* Reduced staff resource plan (pandemic planning)
* Return to home strategy

8.2 Disaster Recovery Plans

Intercontinental Exchange maintains Disaster Recovery Plans for all critical systems and services, which will be initiated upon the MIRT decision to invoke recovery procedures.

The Disaster Recovery Plans provide predetermined and prioritized responses to an emergency situation and the recovery of critical systems and applications. These plans include:

* Protect corporate assets, records and critical client information
* Locations of and access methods to a complete and current copy of the Disaster Recovery Plan
* Contact details of key resources assigned to the business unit's response team
* Critical information, equipment or materials required to resume operation on an interim or permanent basis
* Identification of the alternate location for critical functions to continue processing
* Defined steps in priority sequence to be completed by assigned teams in the event of an emergency
* Test and maintenance strategy

8.3 Major Incident Response Plans

Major Incident Response plans governs the initial response to events that either through their scope or unexpected nature threatens to materially disrupt core business operations and cannot be handled by normal operational measures. The Major Incident Response Plan (MIRP) defines the membership of the Major Incident Response Team ("MIRT"), the circumstances in which the team is to convene, the communication methods the team is to use and the associated procedures to be executed based on the event type.

9. Plan Maintenance

Intercontinental Exchange, Inc. identifies BCP coordinators across all business units. These individuals are committed to the review, amendment and development of BCP and DR planning, and are responsible for identifying business changes, risk, and preventative measures through the following practices:

•   Regular communication
•   Annual (minimum) review of BCP / DR Plan
•   Fully documented and supported DR tests
•   Fully documented and supported BCP tests
•   Environmental and Physical reviews within appropriate timeframes
•   On-going Risk Analysis
•   Business Impact Analysis

10. Testing and Exercising

In accordance with the Intercontinental Exchange, Inc. Business Continuity and Disaster Recovery policies, critical Business Continuity and Disaster Recovery plans are tested at least annually.