

COVID-19 Preparedness

Nodal Exchange and Nodal Clear (collectively "Nodal") appreciate that the Nodal customer community is addressing the potential for adverse impact that recent developments regarding COVID-19 may have on our financial community. Nodal is closely monitoring the situation. Likewise, multiple companies are responsibly and diligently requesting similar information from us, as we are from them. Nodal understands that we are all in this together and we appreciate and rely upon everyone's roles in serving the needs of our financial community during this time.

In light of recent developments, Nodal is prepared to and will implement, as appropriate, its business continuity-disaster recovery ("BC-DR") plan that will allow us to provide all services and fulfill all operational responsibilities and obligations from alternative locations and remotely using backup facilities. The BC-DR plan always included the issue of dealing with a pandemic. Nodal is prepared to and will implement alternative work arrangements and working remotely for employees as Nodal deems appropriate.

Nodal is regulated by the Commodity Futures Trading Commission ("CFTC") and subject to examination by the CFTC on an ongoing basis. Accordingly, the CFTC oversees Nodal's compliance with the Commodity Exchange Act and CFTC Regulations. In accordance with CFTC Regulation 38.1051(c) and 39.18(c), Nodal maintains a BC-DR plan describing resources, emergency procedures, and backup facilities sufficient to enable timely recovery and resumption of operations, including ongoing fulfillment of Nodal's responsibilities and obligations, following a disruption of operations. Nodal recently demonstrated to the CFTC its preparedness in implementing the BC-DR plan to provide all services and fulfill all operational responsibilities and obligations from alternative locations and remotely using backup facilities.

Nodal is regularly addressing COVID-19 concerns with its employees, providing advisories on how each employee should individually prepare and stay healthy, encouraging any employee to stay home if they either feel sick or feel they would be more comfortable working from home, temporarily providing unlimited sick time for employees that become ill with symptoms related to the COVID-19, and informing every employee that they should be prepared to work remotely when appropriate. Nodal is restricting travel and requiring self-isolation for employees that traveled to high-risk countries or may have otherwise been exposed to COVID-19. Nodal has been in regular contact with its vendors regarding COVID-19 concerns and has requested and received confirmations that these vendors have business continuity and/or pandemic response plans in place to ensure that these vendors can deliver all necessary services to Nodal.

In cooperation with the Nodal customer community, Nodal will continue to monitor the situation. Nodal very much appreciates the efforts by our community.

Sincerely,

Paul Cusenza
Chairman & Chief Executive Officer