



MarketAxess Business Continuity Plan Disclosure

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Entities

This disclosure is relevant to MarketAxess Holdings, Inc. (“MarketAxess”) and all affiliates, including MarketAxess Corporation, member FINRA and SIPC, and MarketAxess Europe Ltd., regulated by the FCA.

Purpose

This document summarizes recovery facilities and plans for continuity of MarketAxess service to its user community.

Our BCP addresses: data backup and recovery; mission critical systems; financial and operational assessments; alternative communications with clients, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our clients prompt access to their funds and securities if we are unable to continue our business.

Assumptions

- MarketAxess has Data Center Facilities in both New Jersey and Virginia, which have redundant capabilities for all critical systems.
- MarketAxess has corporate facilities in both New York and London, a development office in Midvale, UT and satellite offices in Boston, Los Angeles, Chicago, Sao Paulo and Hong Kong.
- Telephone services operate independently in each major office with failover to other sites for Midvale, UT and satellite offices.
- Risk of Pandemic Disease is reduced due to corporate staff in multiple countries with overlapping responsibilities.

Summary of Site/Critical Staff Contingencies

New Jersey

Primary Production Data Center

Contingency Plan

In the event of a failure, MarketAxess would automatically fail over to the backup datacenter location. The service level is to be up and running within two hours after declaration of disaster and decision is made to enable our disaster recovery site.

Virginia

Backup Data Center

Contingency Plan

In the event of a failure, MarketAxess would continue to operate in its New Jersey Primary Data Center.

**299 Park Avenue; New York, NY
New York Main Office**

Contingency Plan

Staffing:

- A designated approver contacts SunGard to initiate our contingency plan.
- MA Infrastructure Team will report to SunGard and will prepare the agreed upon equipment at the disaster recovery facility (designated number of workstations, printers, fax, phones, etc.)
- Designated staff will report to the SunGard disaster recovery facility located in Carlstadt, NJ.

Switchboard # 212-813-6000

Client Services # 877-638-0037

Production Support Hotline # 212-813-6222

**5 Aldermanbury Square, London
UK Main Office**

Contingency Plan

Staffing:

- A designated approver contacts SunGard to initiate the contingency plan
- MA Infrastructure Team will report to SunGard and will prepare the agreed upon equipment (designated number of workstations, printers, fax, phones etc.)
- Designated staff will report to the SunGard facility located at assigned alternate site in London

Client Services - +44 207 719 3105

Switchboard - +44 207 719 3100

Production Support Hotline - +44 207 719 3111

6975 Union Park Center, Suite 340 Midvale, UT, Trade West Systems Office

Contingency Plan

Staffing:

- Trade West/MarketAxess has adequate capacity to handle the entire office via remote access in case of building interruption
- Trade West staff could be relocated to MarketAxess NY office, Chicago Office, or Sungard Disaster Recovery Seats in NJ

- Phone access is out of NY so it would not be impacted
- File shares are replicated to our DR site in real time
- Email is accessed out of our New York site so would be available
- Other key corporate systems (i.e source code repository, build system) will be restored within 48 hours

Satellite Offices (Boston, Los Angeles, Hong Kong, Chicago, Brazil)

Contingency Plan

Staffing:

- NY and London offices would bring in staff to ensure continued operations
- Local staff would be advised to work from home where possible
- If prolonged, arrangements would be made to relocate to another office
- No critical business functions exist in satellite offices that could not be operated from an alternative site

Contingencies for Non-Critical Staff

This section is to document the contingency procedures should an outage of 4+ hours occur at a main facility.

Assumptions

Since certain areas have been deemed non-critical to the operation of the organization, the following assumptions are made:

- PC's will be readily available from local vendors for those employees who do not have a PC to work from home with.
- Analog telephone service is available at home for every employee.
- All Sales employees and critical development staff have laptops and the ability to send and receive email remotely via smartphone or Blackberry pagers.
- A lead-time of 7 days to set up individuals is acceptable since these are not considered business critical functions.

Pandemic Planning

We have a single trading system for both European and US products. The systems are in the US and we have support departments in Asia, London and the United States. The production support team is global and UK and Asia based support team personnel report into a manager in the US. We have the capacity to run our global production support function from any one of our geographic locations.

We have development staff based out of NY and Utah in the US. We have sufficient technological capacity for all staff to work from home if necessary.

Disclaimer

This disclosure summarizing the MarketAxess Business Continuity Plan (the “BCP”) is accurate as of September 3, 2014 and both this disclosure and the BCP are subject to change at the discretion of MarketAxess at any time and for any reason. MarketAxess makes no representations that this disclosure or the BCP will remain intact for any period of time.

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