

Business Continuity Plan Summary

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XP Investments UK, LLP (“XPI or the Firm”) has developed a Business Continuity Plan (“BCP”) 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 BCP.

Emergency Contact Persons:

Leonardo Moreno - MLRO

Patrick McGovern – CCO

Firm Policy

Our firm’s policy is to respond to a Significant Business Disruption (“SBD”) by safeguarding employees’ lives and firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of the firm’s books and records, and allowing our clients to transact business. In the event that we determine we are unable to continue our business, we will assure client’s prompt access to their funds and securities.

Significant Business Disruptions (SBDs)

Our plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only our firm’s ability to communicate and do business, such as a fire in our building. External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a city flood, or a wide-scale regional disruption. Our response to an external SBD relies more heavily on other organizations.

Plan Location and Access

The Firm maintains copies of its BCP plan and the annual reviews, and the changes that may be made to it for inspection. The Firm will give the FCA a copy of the plan upon request. The Firm operates its own computer systems maintained on its server at the main office location.

Business Description

The Firm is an introducing firm and does not perform any clearing function for itself or others. The Firm does not maintain custody of client’s funds or securities. All client funds and securities are maintained by the custodian or clearing broker /dealer carrying the brokerage account. The Firm maintains clearing relationships where customers may hold their accounts at HSBC Securities (USA) Inc. and Natwest Markets PLC.

Office Locations

The Firm operates its principal place of business at the following address: 70 Gracechurch Street, 3rd Floor EC3V 0HR, London UK. Additionally, XPI has related entities, XP Investments US LLC has offices located at 55 W 46th Street, 30th Floor, New York, NY 10036 and 701 Brickell Avenue, Suite 2120, Miami, Florida 33131.

Alternative Physical Location(s) of Employees

In the event of an SBD, we will move our staff from affected office(s) to the closest unaffected temporary office location(s).

Client’s Access to Funds and Securities

Our firm does not maintain customer of client funds or securities.

Data Back-Up and Recovery (Hard Copy and Electronic)

Our firm maintains its primary hard copy books and records at: 70 Gracechurch Street, 3rd Floor EC3V 0HR, London UK.

Operational Risk

In the event of an SBD, we will immediately identify what means will permit us to communicate with our clients, employees, critical business constituents, critical banks, critical counter-parties and regulators.

Financial and Credit Risk

In the event of an SBD, XPI will determine the value and liquidity of the Firm’s investments and other assets to evaluate the Firm’s ability to continue to fund its operations and remain in compliance with net capital and/or net worth requirements.

Mission Critical Systems

The Firm’s “Mission Critical Systems” are those that ensure prompt and accurate processing of securities transactions, including order taking, entry, execution, comparison, allocation, clearance and settlement of securities transactions, the maintenance of client accounts, access to client accounts, and the delivery of funds and securities. The Firm has primary responsibility for establishing and maintaining our business relationships with our clients and has sole responsibility for our mission critical functions of order taking and order entry. Our clearing firms listed above provide the execution, comparison, allocation, clearance and settlement of securities transactions and the custody of client accounts. Our clearing firm’s agreement requires it to maintain a BCP and the capacity to execute it. Our clearing firm represents that it backs up all records.

Business Constituents

The Firm will contact its critical business constituents (businesses with which we have an ongoing - commercial relationship in support of our operating activities, such as vendors providing the Firm with critical services), and determined the extent to which we can continue our business relationship with them in light of an internal or external SBD.

Regulatory Reporting

The Firm is subject to regulations by the FCA and NFA. In the event that we cannot contact our regulators, the Firm will continue to file required reports using the communication means available to us.

Financial Conduct Authority, 12 Endeavour Square, London, E20 1JN +44 207-066-1000

Disclosure of Business Continuity Plan

The Firm discloses its BCP to clients upon establishing a new account and annually. The Firm will also mail the BCP summary to its clients upon request.

Updates and Annual Review

XPI will periodically, but not less frequently than annually, update this plan whenever there is a material change to our operations, structure, business location or those of our clearing firm.