

**Ladder Capital Corp**  
**Business Continuity and Disaster Recovery Plan**

**I. Overview and Scope**

Ladder Capital Corp (“LCC”), operating through its subsidiaries (collectively, “Ladder” or the “Company”), including Ladder Capital Securities LLC (“LCS”), a registered broker dealer, and Ladder Capital Asset Management LLC (“LCAM”), a registered investment adviser, is a real estate investment trust that is a leader in commercial real estate finance. Ladder has developed this Business Continuity and Disaster Recovery Plan (“BCP” or the “Plan”) to endeavor to provide an appropriate and timely response to disasters and emergency situations, protect its employees,<sup>1</sup> minimize disruptions to borrower and client services and protect the assets of the Company and its clients and investors.<sup>2</sup>

This BCP anticipates two kinds of significant business disruptions (“SBD”), internal and external. Internal SBDs affect only the Company’s ability to communicate and do business, such as a fire in the building. External SBDs prevent the operation of the securities markets in whole or in part or a number of companies, such as a terrorist attack, hurricane, earthquake or other wide-scale, regional disruption.<sup>3</sup> The Company’s response to an external SBD will likely rely more heavily on outside organizations and systems, especially on the capabilities of the area’s utility companies and municipal authorities. This BCP addresses employee safety; financial and operational risk assessments and recovery time; counterparty and regulator communications; data backup and recovery; and maintenance and testing of the Plan. See Section VII. Maintenance and Testing of the Plan for details regarding who has the authority to execute this BCP, where it is located and how to access it.

The failure or temporary loss of Ladder’s network or certain of its hardware infrastructure or software applications (“IT Failures”) shall be addressed on a case-by-case basis by Alphaserve Technologies (“Alphaserve”), the Company’s information technology consultant. Ladder has determined that it is more likely for the Company to encounter sporadic IT Failures rather than

---

<sup>1</sup> For purposes of this policy, employees shall include consultants. In addition, this Plan is not an express or implied contract of employment and does not create any contractual rights of any kind between the Company and employees and consultants.

<sup>2</sup> Specifically regarding LCS and LCAM, FINRA Rule 4370 requires all FINRA-registered broker dealers to create and maintain a BCP and that all emergency contact information regarding the BCP be provided to the FINRA through the FINRA Contact System (“FCS”). LCS has designated two BCP contact persons to FINRA. As detailed in Footnote 4, this contact information is reviewed and affirmed annually through FCS. In Compliance Programs of Investment Advisers, Investment Advisers Act Release No. 2204 (December 17, 2003), the SEC indicated that an investment adviser has a fiduciary duty to take steps to protect clients’ interests in the event of a natural disaster or, for a smaller Company, the death of the owner or other key personnel. LCS acts as a mutual fund distributor and mutual fund retailer. LCS does not hold customer accounts or securities. During a business disruption, mutual fund investors, may contact the fund’s transfer agent, Ultimus, directly to access their funds.

<sup>3</sup> Ladder has a Pandemic Preparedness Plan in place, attached hereto as **Exhibit A**. Ladder also maintains a Security Incident Response Plan (“SERT”) attached hereto as **Exhibit B**.

permanent or multiple simultaneous IT Failures. Consequently, IT Failures are not covered by this BCP. Robert Perelman, Ladder's Information Technology Officer (the "IT Officer"), or in his absence, Kelly Porcella and/or Michelle Wallach, shall endeavor to work with Alphaserve to resolve any such issues if and as they arise.

## **II. Business Continuity and Disaster Recovery Management Team**

Ladder's Business Continuity and Disaster Recovery Management Team<sup>4</sup> (the "BCMT" and each member a "BCMT Member") comprises:

Aga Bonura (IT Administrative Assistant)

Work: (212) 715-3178

Cell: (516) 851-9448

Email: [Aga.Bonura@laddercapital.com](mailto:Aga.Bonura@laddercapital.com)

Barbara Dechbery (Office Manager/Fire Warden)

Work: (212) 715-3168

Cell: (347) 552-0937

Email: [Barbara.Dechbery@laddercapital.com](mailto:Barbara.Dechbery@laddercapital.com)

Marc Fox (Finance & Accounting; Member of Senior Management)

Work: (212) 715-3181

Cell: (267) 474-7348

Email: [Marc.Fox@laddercapital.com](mailto:Marc.Fox@laddercapital.com)

Anthony Frattone (Legal & Compliance)

Work: (212) 715-3154

Cell: (215) 317-1737

Email: [Anthony.Frattone@laddercapital.com](mailto:Anthony.Frattone@laddercapital.com)

Sarah Gochberg (Transaction Management)

Work: (212) 715-3161

Cell: (917) 207-0318

Email: [Sarah.Gochberg@laddercapital.com](mailto:Sarah.Gochberg@laddercapital.com)

Stephanie Lin (Legal & Compliance)

Work: (917) 369-3250

Cell: (347)720-7263

Email: [Stephanie.Lin@laddercapital.com](mailto:Stephanie.Lin@laddercapital.com)

---

<sup>4</sup> The names of at least two (2) members of the BCMT (who are also co-employed by LCS) are provided on FINRA's Contact System. These names will be updated on FINRA's Contact System no later than 30 days following any change, and the Chief Compliance Officer will review them within 17 business days after the end of each calendar year.

David Merkur (Capital Markets)  
Work: (212) 715-3160  
Cell: (516) 680-6311  
Email: [David.Merkur@laddercapital.com](mailto:David.Merkur@laddercapital.com)

Robert Perelman (Information Technology/Asset Management; Member of Senior Management; Registered Principal; Emergency Contact)  
Work: (212) 715-3175  
Cell: (917) 714-4462  
Email: [Robert.Perelman@laddercapital.com](mailto:Robert.Perelman@laddercapital.com)

Kelly Porcella (Legal & Compliance; Member of Senior Management; Emergency Contact)  
Work: (212) 715-3186  
Cell: (347) 668-9558  
Email: [Kelly.Porcella@laddercapital.com](mailto:Kelly.Porcella@laddercapital.com)

Michelle Wallach (Legal & Compliance)  
Work: (212) 715-3193  
Cell: (914) 844-6781  
Email: [Michelle.Wallach@laddercapital.com](mailto:Michelle.Wallach@laddercapital.com)

Robert Perelman (with Michelle Wallach as back up), with Alphaserve's assistance (Michael Cafaro, (917) 340-1689, [mcafaro@alphaserveit.com](mailto:mcafaro@alphaserveit.com)), will be responsible for assessing the extent of damage and verifying the usability of all essential services during any SBD. Following this assessment, Robert Perelman will communicate the action plan to Ladder employees as set forth below. The BCMT will support Mr. Perelman in analyzing the situation and helping with the recovery.

### **III. Employee Safety**

#### ***A. Employee Communication***

To the extent that a particular SBD, such as a hurricane, is being predicted, the BCMT shall endeavor to update employees on the nature of the expected SBD, provide a contingency plan and obtain employee contact information for employees who will not be in their homes.<sup>5</sup>

In the event of an SBD during regular business hours, the employee discovering the emergency should immediately contact a BCMT Member via email and/or phone in a manner in which the employee can confirm receipt of the communication. Based on the circumstances, the BCMT shall determine the method of notifying employees about the nature of the SBD and instruct personnel regarding appropriate action.

---

<sup>5</sup> Employees under evacuation shall endeavor to provide their respective managers with their new location and contact information.

In order to maintain operations during the commencement of an SBD during off-hours, the BCMT shall endeavor to contact all employees, including those who are in the office<sup>6</sup>, via email or phone to confirm their well-being and to inform employees about alternative work arrangements. Based on the circumstances, the BCMT shall endeavor to assess which means of communication are still available. The Company may communicate with its employees using telephone, text messages and e-mail, and in person. The Company shall endeavor to employ a call tree, pursuant to the organization chart, allowing the officers of LCC (“Senior Management,” each a “Senior Manager”) and their designees to reach all employees in each of their respective departments quickly during an SBD. The BCMT would invoke the call tree by contacting members of Senior Management, who in turn would be instructed to contact their direct reports. Those who report directly to Senior Management would then endeavor to contact their direct reports, if applicable, and report back to the Senior Manager. All Senior Managers will endeavor to report to Office Manager the status of the employees within their department and Office Manager shall endeavor to maintain a master status list.

Ladder maintains a group phone list, which is updated each time a new employee joins or an existing employee is terminated. The most up-to-date employee contact spreadsheet, which includes home and cell phone numbers, can be found in S:\General Reference\Phone List. The Office Manager shall endeavor to circulate this spreadsheet to the BCMT and Senior Management quarterly. Each BCMT Member should maintain a hard copy at their desk and residence in the event the S:/Drive is not accessible.

### ***B. Physical Facilities***

If any of Ladder’s facilities become unusable or uninhabitable for any reason prior to office hours, the BCMT shall communicate the notice from building management to the applicable employees via email or phone. If such facilities become unusable or uninhabitable during office hours, the BCMT shall endeavor to assess the nature and extent of the SBD with building management and provide instructions to employees, as applicable.

Employees shall endeavor to listen to all announcements and await further instruction. If an evacuation is required, employees should use the stairs. Employees that may need physical assistance in an emergency should inform the BCMT in advance if possible, so that they can coordinate with building management.

#### **1. Emergency Evacuation Meet-up and Gathering Points**

Emergency Evacuation Meet-up and Gathering Points for Ladder’s respective offices are as follows:

---

<sup>6</sup> Employees working in the office over a weekend or holiday shall endeavor to notify Barbara Dechbery or another member of the BCMT so that he or she, with the assistance of the administrative assistants, can help coordinate an evacuation with building management if necessary.

Office Address	Emergency Evacuation Meet-up and Gathering Points
345 Park Avenue, 8 <sup>th</sup> Floor, New York, NY 10154	Central Park @ 60 <sup>th</sup> & 5 <sup>th</sup> Ave.; and (b) Bryant Park @ 42 <sup>nd</sup> St & 6 <sup>th</sup> Ave.
110 Front Street, Suite 300 Jupiter, FL 33477	Circle center located at Breakwater Center
520 Broadway, Suite 200, Santa Monica, CA 90401	Corner of 5th Street and Broadway (Safe Refuge zone)
Kiawah Island Club BizHub 660 Freshfields Drive, Suite 200, Johns Island, SC 29455	Dependent on circumstances – see building Emergency Action Plan (EAP)
170 Meeting Street Charleston, SC 29401	Washington Square located at 80 Broad St.

The BCMT and admins shall endeavor to help coordinate with authorities at the scene and Senior Managers shall account for their respective teams.

## 2. Citrix

During an SBD, employees may be expected to work remotely from their residences or another secured location using Citrix. The Company has confirmed that all critical software is available on Citrix or through respective vendor websites. Attached hereto as **Exhibit C** is a list of Ladder’s key business programs and user groups, which designates the type of remote access available in the event of an SBD.

## 3. Alternative Work Sites

The New York office acts as a backup space to the Santa Monica, Jupiter and Charleston offices. If the SBD is expected to continue indefinitely, such as a building power outage, critical New York employees may be required to report to the Company’s alternative work site at McDermott Will & Emery LLP, located at 340 Madison Ave., New York, NY 10173. The BCMT shall coordinate with Senior Management to notify such employees. However, until notified, all employees should work remotely.

## IV. Risk Assessments and Recovery Time

### A. Key Business Processes

#### Commercial Real Estate Investments

The Company conducts its commercial real estate business through three major business lines: commercial mortgage lending, investments in securities secured by first mortgage loans, and investments in selected net leased and other commercial real estate assets. Its key commercial real estate business processes are listed below. An objective of this BCP is to ensure that these processes continue to function as necessary.

- **Origination** – The origination team (“Origination”) is responsible for sourcing and directly originating new commercial first mortgage loans from the brokerage community and directly from real estate owners, operators, developers and investors.
- **Credit and Underwriting** – The credit and underwriting team (“Underwriting”) conducts a thorough due diligence process for each prospective investment. The team coordinates in-house and third-party due diligence for each prospective loan as part of a checklist-based process that is designed to ensure that each loan receives a systematic evaluation. Each loan is presented to Ladder’s internal investment committee for approval prior to funding.
- **Transaction Management** – The transaction management team (“Transaction Management”) is generally responsible for coordinating and managing outside counsel, working directly with originators, underwriters and borrowers to manage, structure, negotiate and close all transactions, including securitizations.
- **Finance and Accounting** – The finance and accounting team (“Finance and Accounting”) is responsible for ensuring that the Company has available funds to fund its loan originations and coordinating the financing of the loans Ladder originates. LCS’ Financial and Operations Principal (“FinOp”) is also responsible for LCS’ financial and net capital computation reporting. In the FinOp’s absence, the Chief Financial Officer (“CFO”) will be responsible for LCS’ financial reporting.
- **Asset Management** – The asset management team (“Asset Management”), together with third-party servicers, monitors Ladder’s investment portfolio, working closely with borrowers and/or their partners to monitor performance of Company’s assets.
- **Securitization and Other Dispositions** – The securitization team (“Securitization”) works with Transaction Management and Underwriting to sell first loans into CMBS securitization trusts. Asset Management manages the disposition of our balance sheet loans and assists the trading team (“Trading”) with the sale of securities.
- **Trading** – Trading is responsible for the Company’s purchase and sale of commercial real estate-related securities, the pricing of Ladder’s loans and for hedging the Company’s portfolio. Trading is also responsible for the purchase and sale of assets for the Ladder Select Bond Fund (the “Bond Fund”).
- **Investor Relations** – Finance and Accounting, along with the Company’s capital markets team (“Capital Markets”) is primarily responsible for Ladder’s communications with its public debt and private equity investors. Capital Markets is also responsible for maintaining

the relationships with intermediaries distributing the Bond Fund and any retail mutual fund investors for which LCS maintains accounts.

- **Legal and Compliance** – The legal and compliance team (“Legal and Compliance”), is primarily responsible for communications with the Company’s regulators, among them, FINRA, the NYSE and the SEC.
- **Human Resources** – Human Resources (“HR”) is primarily responsible for managing Ladder’s Professional Employer Organization, TriNet Ambrose, through which Ladder’s employee benefits and payroll are handled.

### **Investment Management**

The Company, through LCAM, manages the Bond Fund, an open end mutual fund that invests principally in commercial real estate debt securities, seeking a combination of current income and capital preservation. The Bond Fund’s portfolio management and Investor Relations teams consist of members of Trading and Capital Markets. Legal and Compliance manages compliance by LCAM with SEC regulations and the Bond Fund has engaged third-party service providers to assist its operations, namely Ultimus Fund Solutions, LLC as fund administrator, Ultimus Fund Solutions, LLC as Transfer Agent and U.S. Bank as custodian.

### **Mutual Fund Distributor, Mutual Fund Retailer, and Securitizations**

LCS acts as a mutual fund distributor and mutual fund retailer. In both capacities, LCS does not hold the customers’ funds or securities. LCS’s retail activities are limited to friends and families and the accounts are held at U.S. Bank. Investors in the Bond Fund must contact Ultimus Fund Distributors to access their funds and securities. LCS from time to time also acts as co-manager of Ladder securitizations. Investors in the securitizations maintain relationships with custodians independent of LCS.

### ***B. Assessing Risks Related to Key Business Processes***

#### **1. Risks Related to the SBD**

In addition to, or following, a call with Alphaserve, if applicable, the BCMT shall endeavor to email and/or hold a call with Senior Management to convey the nature of the SBD, any expected impact and estimated amount of time it will take Ladder to recover from the SBD. See Section C below for more information regarding recovery time.

#### **2. Operational Risk**

For Ladder’s commercial real estate investments, each member of Transaction Management, Origination, Trading, Securitization, Finance and Accounting and Underwriting, in addition to Senior Management, shall endeavor to hold an update call to discuss investment committee meetings and fundings and other transactions such as sales, securitization settlements, margin calls and receipts of good faith deposits that are scheduled to occur during the time of disruption. Asset

Management shall endeavor to contact servicers, borrowers and property managers to determine the status of properties owned by Ladder, and for which Ladder holds outstanding debt, that might be impacted by the SBD and report back to Senior Management. Asset Management shall also endeavor to distribute to Senior Management the master asset list, detailing all of Ladder's investments, and a client asset list, for their reference during the SBD.

In the event of an LCAM SBD, Craig Sedmak or Michelle Wallach shall endeavor to contact the Bond Fund's Chief Compliance Officer (currently, Charles Black) or the President and relationship manager for the Fund and Ultimus Managers Trust (currently, Dave Carson) to advise them of the disruption and plan next steps.

### **3. Financial and Credit Risk**

Finance and Accounting shall endeavor to contact Ladder's critical banks and financial counterparties, as applicable, to apprise them of its status and to coordinate transactions during the course of the SBD.<sup>7</sup> If the Company determines that it may be unable to meet any of its obligations to those counterparties or has other operating or funding concerns, it may request additional financing from its banks or other credit sources to fulfill its obligations to its customers and vendors.

In the event of a SBD for LCS or LCAM, each respective entity shall endeavor to determine the value and liquidity of its investments and other assets to evaluate its ability to continue to fund its operations and, in the case of LCS, remain in capital compliance. If LCS cannot remedy a capital deficiency, it shall endeavor to file appropriate notices with its regulators and immediately take appropriate steps, including directing our customers to another qualified broker-dealer to complete any remaining contractual services related to securities business.

#### ***C. Recovery Time***

Recovery time objectives provide concrete goals to plan for and test against, and are dependent on the nature of the specific SBD. They are not, however, hard and fast deadlines that must be met in every emergency situation, and various external factors surrounding a disruption, including time of day, scope of disruption, and status of critical infrastructure, particularly telecommunications, can affect actual recovery times for Ladder's key business processes. During an SBD, the Company cannot control the business continuity and disaster recovery capabilities of external vendors, such as funding banks, or employee's ability to access the internet from their homes or alternative site locations. Recovery refers to the restoration of critical infrastructure and facilities after a wide-scale disruption; resumption refers to the capacity to accept and process new transactions after a wide-scale disruption.

---

<sup>7</sup> Ladder has relationships with multiple, redundant service providers for banking, finance and trade support so that the Company can continue to operate even if one of its vendors cannot function. Ladder shall endeavor to review the relationships with these third parties on an annual basis including obtaining a copy of the BCP of each of its major banking, finance and trade support vendors and the results of their annual tests.

Upon the completion of the SBD, Alphaserve will first power on and test Ladder's domain controllers to enable Argus and internet-based applications including Closer and ShareFile. Next, Alphaserve will bring up and test Ladder's shared network drive, followed by Ladder's email servers. Upon successful powering on and testing of the aforementioned components, Alphaserve will bring up the remainder of the Ladder environment (i.e., Print, Great Plains, Citrix, Symantec Enterprise Vault, etc.). Although this entire exercise should take approximately 1.5 hours, due to the unforeseen circumstances surrounding an SBD, the Company's SBD recovery time and resumption objectives are twelve (12) hours and the next business day, respectively.

## **V. Counterparty and Regulatory Communication**

The BCMT shall endeavor to immediately identify what means will permit the Company to communicate with its borrowers, clients, employees, critical business constituents, critical banks, critical counterparties and regulators. Although the effects of the SBD will determine the means of alternative communication, the communication options Ladder may employ include updates to its websites, messages on its main phone line, and communications via cellphone, text message, secure email and Citrix.

### **1. Infrastructure-Related Vendors**

Certain third-party vendors may provide critical support services following an SBD. The IT Officer, in conjunction with Alphaserve, shall endeavor to contact the phone and internet providers as appropriate. Office Manager shall endeavor to contact the building management of Ladder's physical facilities. Contact information for the infrastructure-related vendors is included in **Exhibit D** attached hereto.

### **2. Borrowers/Clients/Investors**

Following a discussion with the BCMT, if appropriate under the circumstances, each originator shall endeavor to contact his or her active borrowers with loans under application with Ladder to confirm their well-being and convey the nature of the SBD, any expected impact and the estimated amount of time it will take Ladder to recover from the SBD. The Company's Chief Executive Officer (the "CEO") shall endeavor to contact by phone, if possible, the Company's Board of Directors while Investor Relations, in consultation with the Chief Compliance Officer and Chief Administrative Officer and General Counsel, shall endeavor to, either through a press release, Company's website or another efficient public method of communication, advise the Company's debt and equity investors of Ladder's status. The CEO will be responsible for designating the person(s) to communicate with the media.

The Bond Fund's Chief Compliance Officer oversees the Bond Fund's third party vendors and reviews their BCPs and DRPs. Business continuity outages, including those incurred by LCAM or a critical third-party service provider, are monitored by both the Bond Fund's Chief Compliance Officer and Michelle Wallach and other pertinent staff, and are reported to the Bond Fund Board as warranted. Depending on the nature of the SBD, Ultimus may reach out to individual Bond Fund investors.

### **3. Other Counterparties and Vendors**

Each employee shall maintain up-to-date Outlook contact information for his or her counterparties to be notified in the case of an SBD. The member of Senior Management overseeing each department or a designee shall endeavor to coordinate and confirm the notification of such vendors.

### **4. Regulators and Regulatory Reporting**

Legal and Compliance shall endeavor to communicate with the regulators set forth in **Exhibit E** using email, telephone, fax, U.S. mail, and in person. In the event of an SBD, the Company shall endeavor to assess which means of communication are still available, and use the means closest in speed and form (written or oral) to the means that the Company has used in the past to communicate with the other party. Ladder is subject to regulation by FINRA, the SEC, the NYSE and certain states. The Company shall endeavor to file reports with our regulators using paper copies in the U.S. mail, electronically using fax, email and the Internet. The Company shall also endeavor to check with the SEC, NYSE and FINRA to determine which means of filing are still available, and use the means closest in speed and form (written or oral) to its previous filing method. If the Company cannot contact its regulators, it shall endeavor to continue to file required reports using the communication means available.

## **VI. Direct Data Back-Up**

### ***A. Electronic Records***

The Company's electronic records are backed up daily, weekly and monthly to onsite and offsite servers. Daily records are kept for 9,999 days. Weekly and monthly backups are kept for six (6) years at an offsite server. In the event of a loss of electronic records, the Company shall endeavor to either physically recover the storage media or electronically recover data from the back-up site. All remote offices use the New York servers, and therefore, all data is stored on the servers and backed up per the same backup retention schedule as above.

Business critical applications, including file and email data are stored on redundant storage area networks in both the New York office and in the Cyrus One datacenter located 62 miles north of Manhattan. All offices are configured with multiple internet and telecom circuits for redundancy. Data is replicated from the production site in New York to the Disaster Recovery/BCP ("DR/BCP") site in Cyrus One in real time. If one of the sites goes down, users will access redundant servers at the other facility.

The Company also maintains certain records on ShareFile and contracts with a third-party (Global Relay) to archive email and Bloomberg correspondence for the Company. The Company's contact information at Global Relay is Dan Threfall, [Dan.Threfall@globalrelay.net](mailto:Dan.Threfall@globalrelay.net), (866) 484-6630.

### ***B. Paper Records***

Copies of critical paper documents are scanned and stored electronically, with originals kept with outside counsel or the Company's document custodian or stored in fire resistant cabinets in a

locked file room in the New York office. If an SBD causes the loss of paper records, the Company shall endeavor to recover them from the electronic backups either from its existing file servers, if they are accessible, or from back-ups.

LCS and LCAM maintain their records (hardcopy and electronic) at the Company's New York office. Employees as assigned in each of LCS' Written Supervisory Procedures and LCAM's Compliance Program, respectively, are ultimately responsible for the maintenance of required books and records.

### ***C. Data Recovery***

The BCMT shall endeavor to ensure that the Company is able to retrieve its books, records and other data. The IT Officer shall oversee Ladder's document recovery processes. Once an SBD is imminent or declared, he or she shall endeavor to convene a conference call with the core disaster recovery team members from Alphaserve.

## **VII. Maintenance and Testing of the Plan**

### ***A. Approval and Review***

Michelle Wallach is responsible for approving this BCP on behalf of the Company and LCAM. Robert Perelman is responsible for approving and conducting the required annual review for LCS. All members of the BCMT shall endeavor to remain fluent in this Plan at all times.

The BCMT shall endeavor to update this Plan whenever it has a material change to its operations, structure, business or location and in connection with its annual review, as applicable.

### ***B. Plan Location and Access***

The Company maintains electronic copies of this BCP and the annual reviews, and the changes that have been made to it for inspection. The Company will provide the New York FINRA District Office a copy of the Plan upon request.

An electronic copy of the Plan is located in S:\General Reference\BCP and is available to all employees. Employees receive a copy of the BCP annually.

### ***C. BCP Disclosure Statement***

The Company's BCP disclosure statement, attached hereto as **Exhibit F**, is available on the Company's website ([www.laddercapital.com](http://www.laddercapital.com)) and provided to clients upon request.

### ***D. Testing***

The Company shall endeavor to test its BCP at least annually, share the results with Senior Management and document material results of the test, as applicable.

The annual testing will consist of at least one representative from each department logging in remotely and testing their applications to ensure proper functionality with the latest copy of data. Alphaserve will shut down the connection to the New York office and activate the offsite servers in the DR/BCP site in Cervalis datacenter. Once the servers are verified as up by Alphaserve, the Ladder users will begin their testing noting the success or failure of each business function, application and data. Once completed, all results will be compiled into the annual testing report and any issues will be resolved and re-tested. After the test, Alphaserve will re-activate the server in the New York office and restore connectivity.

### ***E. Training***

In addition to fire drills and similar emergency preparedness drills conducted by building management, the BCMT shall endeavor to conduct annual training on this BCP for all employees.

### **VIII. BCP Testing and Senior Management Approval**

I have approved this BCP as reasonably designed to enable the Company to meet its obligations in the event of an SBD.

Signed: /s/ Michelle Wallach  
Michelle Wallach

Title: Chief Compliance Officer, Ladder Capital Corp and Ladder Capital Asset Management LLC

Date: October 25, 2019

Signed: /s/ Robert Perelman  
Robert Perelman

Title: Chief Compliance Officer, Ladder Capital Securities LLC

Date: October 25, 2019

## Exhibit A

### **Pandemic Preparedness Plan**

#### **I. Overview and Scope**

Ladder Capital Corp, and its subsidiaries and affiliates, including Ladder Capital Securities LLC (“LCS”), a registered broker dealer, and Ladder Capital Asset Management LLC (“LCAM”), a registered investment adviser (collectively, “Ladder” or the “Company”) takes the health of its employees seriously and has adopted this Pandemic Preparedness Plan (the “Plan”) to prepare for and respond to an outbreak of influenza or other pandemic that causes widespread illness. This Plan should be read in conjunction with the Company’s Business Continuity and Disaster Recovery Plan (the “BCP”). Unless otherwise noted, capitalized terms used herein and not otherwise defined herein shall have the respective meanings given to such capitalized terms in the BCP.

#### **II. Preventative Measures**

The Company has established a culture of infection control in the workplace, including through the availability and use of antibacterial hand soap and alcohol-based hand sanitizer, paid sick leave and options for working offsite while ill through Citrix. In addition, tissues are widely available, waste cans are emptied and filled with fresh trash can liners nightly and frequently touched surfaces are regularly cleaned with disinfectant. This culture of infection control is reinforced by the Company during the annual influenza season by encouraging employees to be vaccinated for influenza and, if practical, also by providing free influenza shots at the Company’s New York office. Further, in most cases, there are multiple employees in similar roles that can perform each other’s responsibilities if necessary. In other cases, employees within a department, such as Finance and Accounting, are cross-trained in the key areas that may be affected by an outbreak.

The Company’s Business Continuity and Disaster Recovery Management Team (“BCMT”) will coordinate the Company’s response to a pandemic as well as monitor issues and information relating to pandemics (see **Schedule 1** for a list of government agencies providing pandemic alerts). The BCMT shall endeavor, annually prior to the influenza season, to provide information to all employees regarding those practices that are recommended by public health officials that will reduce the spread of infection. Based on the Centers of Disease Control and Prevention’s recommendation, the BCMT will also develop a list of recommended infection control supplies (e.g. hand soap, tissues, etc.) and ensure that each office location has a sufficient supply of each.

#### **III. Business Continuity and Disaster Recovery Management and Emergency Response**

In addition to the procedures set forth in the Company’s BCP, the BCMT may, after consultation with knowledgeable health officials, if applicable, take the steps described below in the event of a pandemic.

1. Communicate with public health agencies, emergency responders and others regarding this Plan.

2. With the consent of Senior Management, implement an emergency sick leave policy that is non-punitive and requires employees who have been exposed or who exhibit symptoms of illness to remain at home.
3. Monitor staffing levels and assist Senior Management in finding ways to maintain critical operations in light of any staffing shortage. Should the closing of any locations be a consideration due to inadequate staffing availability, the BCMT will first contact Senior Management to obtain their advice and consent prior to closing. Should an office be closed, telephone and other lines of communication will be routed to a location where they will be staffed by employees so the public's attempts to reach us do not go unanswered.
4. Adjust hours of operation as needed to cope with staff shortages and call upon ancillary employees to help fill in staff shortages.
5. Limit access to offices by vendors, examiners, or other outsiders to a strictly as needed basis.
6. If ordered to close by the health authorities, place proper notices and set up operations remotely, electronically, and with minimal staff to perform necessary posting functions.
7. Stockpile necessary items that may be in short supply, such as latex examination/procedure gloves, alcohol-based hand sanitizer, hand soap, surgical/treatment masks, disinfectant, tissues, trash can liners and paper towels.

#### **IV. Maintenance and Testing of the Plan**

The BCMT shall endeavor to assess the Plan at least annually and share the results with Senior Management, as applicable. The BCMT shall endeavor to update this Plan as necessary and may conduct random drills to test the effectiveness of the Plan at certain locations as warranted.

## **Schedule 1**

### Government Agencies Providing Pandemic Alerts

#### **United States Department of Agriculture**

[www.usda.gov](http://www.usda.gov)

U.S. Department of Agriculture

1400 Independence Ave., S.W.

Washington, DC 20250

Information Hotline: 202.720.2791

Email: [feedback@oc.usda.gov](mailto:feedback@oc.usda.gov)

#### **United States Department of Health and Human Services**

<https://www.hhs.gov/>

200 Independence Ave SW

Washington DC 20201

PH: 877 696-6775

#### **Center for Disease Control and Prevention**

[www.cdc.gov](http://www.cdc.gov)

1600 Clifton Rd.

Atlanta, GA 30329

PH: 800 232-4636

#### **World Health Organizers (WHO)**

<http://www.who.int/en/>

Regional Office for the Americas

525 23rd St. NW

Washington, DC 20037

PH: 202 974-3663

#### **State and Local Health Departments**

New York: <http://www.health.ny.gov/>

New York City: <http://www.nyc.gov/health>

California: <http://www.cdph.ca.gov>

Santa Monica: <http://www.smgov.net/Departments/OEM/>

South Carolina (including Charleston): <http://www.scdhec.gov/>

Florida: [www.floridahealth.gov](http://www.floridahealth.gov) (email: [health@flhealth.gov](mailto:health@flhealth.gov))

Jupiter: [palmbeach.floridahealth.gov](http://palmbeach.floridahealth.gov)

## Exhibit B

### **Ladder Capital Corp Security Incident Response Plan**

#### **I. Overview**

Security and privacy-related issues can occur in all areas across an organization, from an individual's desktop to a sensitive document in the possession of an unauthorized person. They can originate outside of the workplace and anywhere around the world. These types of issues may be accidental or deliberate and may range in severity and consequence. Each event must be responded to at a level commensurate with its severity, and resolved as quickly and appropriately as possible. During response and recovery, measures must be enacted to contain any damage caused and minimize any additional risk to the environment, affected individuals and/or entities. These types of events have the ability to gravely impact an organization. Accordingly, it is vital to establish procedures to ensure the appropriate individuals and teams are notified of the event, kept abreast of the latest developments, and are actively involved in addressing it. All security and privacy-related concerns should be reported as soon as practical to the IT Officer, and in his or her absence, Legal and Compliance.

Ladder Capital Corp and its subsidiaries and affiliates (collectively, "Ladder" or the "Company") have created the Security Emergency Response Team ("SERT") to address security or privacy-related events. The SERT is comprised of representatives from various departments within Ladder including the IT Officer, Legal and Compliance, Finance and Accounting, Investor Relations, and Human Resources, as well as Alphaserve Technologies ("Alphaserve," the Company's information technology consultant) and Kirkland & Ellis, our legal counsel (see Section III for SERT members). The SERT has designated a leader (the "SERT Leader," currently Robert Perelman) who is responsible for coordinating the response to a security or privacy event and for determining whether and to what extent to activate the SERT. The SERT leader will also determine when to notify Alphaserve.

This Security and Privacy Incident Response Plan (the "Plan") supplements Ladder's Business Continuity and Disaster Recovery Plan ("BCP") and its Information Technology Policies and Procedures.

#### **II. Protocol for Security and Privacy Incident Handling**

##### ***A. Assemble the Security Emergency Response Team ("SERT")***

The SERT Leader or his or her designee should review the facts surrounding the issue to make an initial assessment of its severity. The severity levels are as follows:

- **Level 3: A security event involving loss of data or services.**<sup>1</sup>
  - An event involving known data loss would require assembly of the SERT and escalation to Senior Management.<sup>2</sup>

---

<sup>1</sup> This SERT Plan should also be read in conjunction with Ladder's BCP.

<sup>2</sup> Terms not otherwise defined herein are as defined in Ladder's BCP.

- The event may be a result of an interruption of service, malicious code/malware, phishing, unauthorized access, application hacking attempt, inappropriate use, or a physical security issue (including loss or theft of physical documents, mobile devices or other system hardware).
- **Level 2: A security event involving no known loss of data.**
  - This type of event would require assembly of the SERT.
  - An investigation should occur as practical to determine, what, if any, loss of data occurred.
  - The event may be a result of an interruption of service, malicious code/malware, phishing, unauthorized access, application hacking attempt, inappropriate use, or a physical security issue (including loss or theft of physical documents, mobile devices or other system hardware).
- **Level 1: A security event that has been immediately confined and eradicated from the Ladder environment with no impact.**
  - The SERT leader will determine if this type of event requires assembly of the SERT or a subgroup. If not, he/she will provide a summary of the issue and its resolution to the group.
  - These events usually involve attempted malicious code/malware.

### ***B. Confine the Security Event***

The SERT should endeavor to confine the security or privacy event. To confine a security event involving electronic data, lost or stolen electronic devices or electronic storage media and/or unauthorized access to Ladder systems, the SERT will coordinate with the IT Officer and take appropriate measures as described in the Ladder's Information Technology Policies and Procedures.

Initial steps the SERT should take in confining the event are as follows:

- Disconnect the device from the network.
- Reach out to support (Email: [help@laddercapital.com](mailto:help@laddercapital.com); Phone: 212-763-5555).
- Determine the scope of the breach.
- Determine if notifications are required.

### ***C. Investigate the Security Event***

Once the event has been confined, the SERT should investigate the event to determine its scope and nature. The SERT should consider factors including, but not limited to:

- The nature of the data (e.g., lost laptop, hacking, lost files, etc.)
- Did the data include client or employee information, or both?
- Was the information removed or merely accessed?
- How was the information removed or accessed?
- Was the event intentional or accidental?

- Have clients or employees been affected by the event? If so, how?
- Who accessed the data? (e.g, private or state actor? foreign or domestic?)
- What are the short term/long term repercussions of the event?
- How can the data that is lost be utilized?

#### ***D. Escalate the Event***

Depending upon the nature of the event, the SERT should consider whether members of Senior Management should be notified. In making this determination, the SERT should consider the magnitude of the event, the business units impacted by or involved in the event, or any potential monetary or reputational impact on the Company. If the SERT concludes that the event is material, the SERT Leader or his or her designee will escalate the event details to Senior Management. Senior Management will determine when it is necessary to notify the Board of Directors.

#### ***E. Maintain Evidentiary Integrity***

Depending on the nature of the event, the SERT should consider whether evidence should be documented and maintained. If malware is determined to be far spreading and targeted, the information collected should be admissible in a court of law. It is imperative for Ladder to be able to hold responsible parties accountable.

#### ***F. Notification of Regulators***

Depending upon the nature of the event, the SERT should consider whether notification to regulators is appropriate. The Chief Compliance Officer (“CCO”) in conjunction with the General Counsel (“GC”), or his or her designee, will determine what, if any, regulatory notifications are required and also consider what, if any, communication is appropriate under the circumstance. The SERT should consider contacting, as appropriate, entities including but not limited to: the SEC, FINRA, FHLB, the Attorney General Offices in the states where affected, and local or federal law enforcement authorities.

#### ***G. Notification of Clients or Employees***

Depending upon the nature of the event, the SERT should consider whether client or employee and/or investor notification is required and/or advisable. Many states require customer notification of incidents within a specific period of time. The SERT should coordinate with the CCO and GC to determine what states are affected, whether state notification laws are triggered and how and when any required notification should be made.

Even if state event notification laws are not triggered, there may be circumstances in which client or employee notification is advisable. The SERT should coordinate with the CCO and GC as appropriate, to determine whether notification should be made and what information should be communicated.

## ***H. Third Party Service Providers***

Depending upon the nature of the event, the SERT should consider whether service providers should be contacted to advise them of the security event. The SERT should consider whether the event will extend to or have an impact on service providers and notify them, as appropriate.

In addition, if a breach occurs at one of the Company's service providers, the SERT should work with Legal and Compliance to determine what, if any, reasonable steps to take to mitigate any potential consequences. In connection with this determination, the CCO and/or GC will review the service provider's relevant contract provisions.

## ***I. Press Communications***

The SERT should work with Legal and Compliance and Investor Relations to determine whether a press release or other form of public communication is appropriate depending upon the nature of the event. All media inquiries received by Ladder employees, at any location, should be forwarded to Investor Relations.

## ***J. Document the Response***

The SERT (including Alphaserve) should conduct a post incident review that includes documenting the results of the event investigation and the steps taken to remedy the event.

## **III. SERT Contact Information**

<b>SERT Bridge Number: 1-866-469-3239   Conference Code: 21882588   Leader Pin<sup>3</sup></b>				
<b>Last Name</b>	<b>First Name</b>	<b>Role / Dept.</b>	<b>Work Phone</b>	<b>Primary Cell Phone</b>
<b>Information Technology/SERT Leader</b>				
Perelman	Robert	IT Officer	212-715-3175	917-714-4462
<b>Legal, Compliance and Human Resources</b>				
Fratton	Anthony	Associate Counsel	212-715-3154	215-317-1737
Lin	Stephanie	Associate Counsel	917-369-3250	347-720-7263
Porcella	Kelly	Chief Administrative Officer and General Counsel	212-715-3186	347-668-9558
Wallach	Michelle	Senior Regulatory Counsel and Chief Compliance Officer	212-715-3193	914-844-0938
<b>Investor Relations</b>				
Merkur	David	Executive Director- Capital Markets	212-715-3160	516-680-6311
<b>Finance and Accounting</b>				
Fitzgerald	Matt	Treasurer	917-369-3225	917-797-6807
Fox	Marc	Chief Financial Officer	212-715-3181	267-474-7348
JeanBaptiste	Benjamin	Director - Accounting	212-715-3191	917-709-7708

<sup>3</sup> K. Porcella will supply the Leader Pin.

Miceli	Paul	Director of Finance	212-715-3150	516-680-6311
Mocclair	Kevin	Chief Accounting Officer	212-715-3188	201-995-7253
Tannure	Tara	Controller	917-369-3229	845-988-6531
Wieland	Andrea	Director- Treasury	212-715-3148	787-372-1825
Kirkland & Ellis				
Korff	Josh	Legal Counsel	212-446-4943	917-975-1194
Traxler	Seth	Legal Counsel	312-862-2241	312-285-5464
Alphaserve				
Cafaro	Michael	Account Manager	212-763-5532	917-340-1689
Lebron	Hilario	IT Consultant	212-763-5555	
Schwartz	Steven	Director – Security Solutions	212-850-8807	
Zadok	Elan	IT Consultant	212-763-5555	
-	-	General Help Desk	212-763-5555	<a href="mailto:help@laddercapital.com">help@laddercapital.com</a>

## Exhibit C

### Business Programs and User Groups

Program Name	Department	Description	User Group	Remote Access Type
TriNet Ambrose	All	HR Information	All Employees	Website - <a href="http://www.trinet.com">www.trinet.com</a>
Microsoft Office	All	Business Platform	All Employees	Citrix
ShareFile	All	Document Sharing System	All Employees	Website - <a href="https://lcf.sharefile.com/">https://lcf.sharefile.com/</a>
Snipping Tool	All	Cut and Paste Tool	All Employees	Citrix (Desktops)
CLOSER	Asset Management	Loan Pipeline System	Origination, Underwriting, Asset Management, Securitization	Website - <a href="https://ladder.cjcsites.com">https://ladder.cjcsites.com</a>
ComplySci	Legal & Compliance	Pre-Clearance System	Wallach, Porcella, Perelman	Website - <a href="https://laddercapitalam.com/plysci.com/">https://laddercapitalam.com/plysci.com/</a>
Global Relay	Legal & Compliance	Email Tracking	Fox, Wallach, Perelman, Porcella	Website - <a href="https://archiver.globalrelay.com/archivewebmail/archivewebmail.fpl">https://archiver.globalrelay.com/archivewebmail/archivewebmail.fpl</a>
Bank Accounts (Various)	Finance & Accounting	Bank Accounts	Fox, Moclair, FitzGerald, Wieland, Chamberlain, Perelman, Curcio, Taylor, Swan, Tannure	Website - Bank Websites & Tokens (JPM, Wells (deposit accounts for equity properties), HSBC)
Concur	Finance & Accounting	Expense Tracking and Payment	Finance & Accounting, Admins, Human Resources	Website - <a href="http://www.concur.com">www.concur.com</a>
FHLB Memberlink	Finance & Accounting	Monitor Ladder's FHLB Account	Fox, Fitzgerald, Wieland	Website - <a href="http://www.fhlbi.com/Common/prelogin.asp">http://www.fhlbi.com/Common/prelogin.asp</a>
Great Plains	Finance & Accounting	General Ledger	Finance & Accounting	Citrix
Morcom Prime	Finance & Accounting	Prime Broker/ Cash Trades	Fox, Moclair, Fitzgerald, Wieland	Website - <a href="http://morcom.jpmorgan.com/">morcom.jpmorgan.com/</a>
SS&C	Finance & Accounting	Trade Log/ Cash Management	Finance & Accounting	SS&C Emails
TradeDesk	Finance & Accounting/ Trading	Trade Management	Finance & Accounting/ Trading	Website - <a href="https://tdasp1m.rtsintranet.com/sgd/">https://tdasp1m.rtsintranet.com/sgd/</a>
S&P Credit Portal	Securitization/ Underwriting	Research	Henschke	Website - <a href="http://www.GlobalCreditportal.com">www.GlobalCreditportal.com</a>

<b>Program Name</b>	<b>Department</b>	<b>Description</b>	<b>User Group</b>	<b>Remote Access Type</b>
Bloomberg	Trading	Market/Rate Information	Harris, McCormack, Peterson, Henschke, Statfeld, Sedmak, Greenwald, Robertson	Citrix / Bloomberg Anywhere
Trepp	Trading/ Underwriting	CRE Information	Trading and Underwriting	Website - <a href="http://www.trepp.com/">http://www.trepp.com/</a>
Argus	Underwriting	Property Cash Flow Analysis Software	Underwriting	Remote desktop on Citrix - <a href="Remote.laddercapital.com">Remote.laddercapital.com</a>
RCG Portal	Underwriting	Market Information from Rosen Consulting Group	Underwriting	Website - <a href="http://www.rosenconsulting.com/">http://www.rosenconsulting.com/</a>
Adobe Professional	Underwriting/ Capital Markets/ Legal & Compliance	Document Publishing	Underwriting, Capital Markets, Legal	Citrix

**Exhibit D**

Infrastructure-Related Vendors

Product / Service	Vendor	Vendor Contact Information
Physical Facilities	New York - Rudin Management	Building Office – Level A – Sub basement 345 Park Avenue, N.Y. N.Y. 10154 Contact 1: Robert Hirst (Building Manager) Contact 2: Bryan Lederman Tel: 212 284 8474 / 8470 <a href="mailto:rhirst@rudin.com">rhirst@rudin.com</a> <a href="mailto:blederma@rudin.com">blederma@rudin.com</a>
	Los Angeles – JMB	Shelby Hoefling Community Manager 222 Broadway, 22 <sup>nd</sup> Floor, New York City, NY 10038  Tel: 424-228-8836 <a href="mailto:Shelby.hoefling@wework.com">Shelby.hoefling@wework.com</a>
	South Carolina	Townsend Clarkson The Kiawah Island Club 1 Kiawah Island Parkway Kiawah Island, SC 29455 Tel: 843-768-6120  Gary Childress Regus Management Group LLC 170 Meeting Street, Suite 110 Charleston, SC 29401 Tel: 843-790-5300
	Florida	Regus Management Group LLC <a href="mailto:jupiter.harboursideplace@regus.com">jupiter.harboursideplace@regus.com</a>

Telephone	<p>Smartchoice Communications</p> <p>Verizon (for LA office)</p>	<p>Jarrett Wolfe  Smart Choice Communications, LLC  16 West 45th Street  New York, NY 10036  Tel: 212-660-7303  Fax: 212-660-7333  <a href="mailto:jarrett@smartchoicews.com">jarrett@smartchoicews.com</a></p> <p>800-837-4966  Circuit ID-13/HCGS/813348</p>
Internet	<p>Cogent Communications</p> <p>Dynalink Communications</p> <p>Transbeam</p>	<p>Edward Van Brusselen  Regional Account Manager  Cogent Communications  32 Avenue of the Americas, 22nd Floor  Tel: 212-625-4764  <a href="mailto:evanbrusselen@cogentco.com">evanbrusselen@cogentco.com</a></p> <p>Chris Kenney  221 West 17th Street  New York, NY 10011  Tel: 212-620-8777  <a href="mailto:cjkenney@dynalinktel.com">cjkenney@dynalinktel.com</a></p> <p>212-631-8100  Circuit ID: 96ardu633770ny</p>
Bond Fund Administrator	Ultimus Fund Solutions, LLC	<p>Charles Black  Ultimus Fund Solutions, LLC  Senior Compliance Officer  225 Pictoria Drive  Suite 450  Cincinnati, OH 45246  Tel: 513-346-4184  <a href="mailto:cblack@ultimusfundsolutions.com">cblack@ultimusfundsolutions.com</a></p>

## **Exhibit E**

### Regulatory Contacts

Stephen Bucchere, Principal Regulatory Coordinator  
FINRA New York  
200 Liberty Street New York, NY 10281  
Phone: (212) 858-4282  
Email: [Stephen.bucchere@finra.org](mailto:Stephen.bucchere@finra.org)

SEC New York Regional Office  
Marc Berger, Regional Director  
200 Vesey Street, Suite 400  
New York, NY 10281-1022  
Email: [newyork@sec.gov](mailto:newyork@sec.gov)

SEC Office of Information Technology  
100 F Street, NE  
Washington, DC 20549  
Phone: (202) 551-8800  
Email: [help@sec.gov](mailto:help@sec.gov)

NYSE  
11 Wall Street, 14th Floor  
New York, NY 10005  
Phone: (212) 896-2830  
Email: [nysealert@nyse.com](mailto:nysealert@nyse.com)

Office of the Attorney General  
Investment Protection Bureau  
28 Liberty Street, 15<sup>th</sup> Floor  
New York, NY 10005  
Phone: (212) 416-8222

David Piner  
Office of Insurance Evaluation  
Michigan Department of Insurance and Financial Services  
530 W. Allegan Street, 7th Floor  
P.O. Box 30220  
Lansing, MI 48933  
Phone: (517) 335-1734  
Fax: (517) 241-4610  
Email: [pinerd@michigan.gov](mailto:pinerd@michigan.gov)

## **Exhibit F**

### BCP Disclosure Statement

The following is the Company's disclosure statement that will be available on the Company's website ([www.laddercapital.com](http://www.laddercapital.com)) and provided to clients upon request:

Ladder Capital, including Ladder Capital Securities LLC ("LCS"), a registered broker dealer, and Ladder Capital Asset Management LLC ("LCAM"), a registered investment adviser (collectively, "Ladder" or the "Company") has developed a Business Continuity and Disaster Recovery Plan ("BCP") to describe how we shall endeavor to 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 the following information on our BCP.

**Contacting Us** – If, after a significant business disruption you cannot contact us as you usually do at 212-715-3170, you should call our alternative numbers, (917) 714-4462 or (914) 844-0938.

**Our Business Continuity and Disaster Recovery Plan** – We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making financial and operational assessments, protecting the Company's books and records, and allowing our customers to transact business. In short, our BCP is designed to permit our Company to resume operations as quickly as possible, given the scope and severity of the significant business disruption. Our BCP addresses: employee safety; financial and operational risk assessments and recovery time; counterparty and regulator communications; data backup and recovery; and maintenance and testing of the BCP.

**Varying Disruptions** – Significant business disruptions can vary in their scope affecting, for example, only our Company, a single building housing our Company, the business districts in which we are located, the cities in which we are located, or a 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 Company or a building housing our Company, we expect to generally recover and resume business within 1–2 days. In a disruption affecting a business district, city, or region, we shall endeavor to recover and resume business within 7 days. In either situation, we plan to continue business, and notify you through our web site at [www.laddercapital.com](http://www.laddercapital.com) or our customer emergency number, 212-715-3170, on how to contact us.

**For more information** – If you have questions about our business continuity and disaster recovery planning, you can contact us at 345 Park Avenue, 8th Floor, New York, NY 10154 and 212-715-3170.