EXHIBIT M.5.

PAXOS SECURITIES SETTLEMENT COMPANY, LLC
BUSINESS CONTINUITY/DISASTER RECOVERY SUMMARY

I. PURPOSE AND MANAGEMENT

Pursuant to the requirements applicable to covered clearing agencies set forth in Rule 17Ad-22(e)(3)(ii) under the Securities Exchange Act of 1934 ("Securities Exchange Act"), Paxos Securities Settlement Company, LLC ("PSSC") maintains a risk management framework and associated processes for business continuity ("BC") and disaster recovery ("DR") to respond in the event of a disaster. As part of this risk management framework, PSSC maintains a Business Continuity and Disaster Recovery Plan ("BC/DR Plan") to respond to and recover from a significant business disruption.[1] Under the BC/DR Plan, a "disaster" (also known as a "significant business disruption") is a natural or man-made event that renders (or could render) any or all of PSSC's departments unable to perform some or all of their regular roles and responsibilities in the manner they normally operate and may affect: services/operations; suppliers; facilities; staff; PSSC's Participants; and/or the broader securities markets. As such, a "disaster" for the purpose of the BC/DR Plan is any event that meets this definition, and the definition covers events that fall on a spectrum of severity. For example, some events that meet the definition of a "disaster" under the BC/DR Plan may pose less significant risks to PSSC or be less difficult for PSSC to recover from than other events that nonetheless are treated as a "disaster" under the BC/DR Plan.

PSSC has dedicated staff responsible for managing PSSC's BC/DR processes, including PSSC's Business Continuity/Disaster Recovery Working Group (which leads PSSC's BC/DR processes), Disaster Management Team, Disaster Recovery Team, Disaster Communications Team and People & Facilities Team. PSSC's BC/DR strategy and processes are sponsored by the board of directors and senior management of PSSC to ensure sustained leadership, commitment and support.

PSSC makes available an informational document entitled "Business Continuity for Paxos Settlement Service" (the "Participant BCP Notice") for the purpose of providing Participants information regarding the use of PSSC's services in the event of a significant business disruption. The Participant BCP Notice will be available on PSSC's website and provided to Participants as part of onboarding.

II. BUSINESS CONTINUITY/DISASTER RECOVERY PLANNING AND TESTING

[1] PSSC has separately submitted a request for confidential treatment to the Commission regarding the BC/DR Plan. PSSC has provided the BC/DR Plan to the Commission in confidential Exhibit M.3. to PSSC's Form CA-1 application for clearing agency registration. This Exhibit M.5 provides a non-confidential summary of the BC/DR Plan submitted as confidential Exhibit M.3.

The BC/DR Plan documents the information necessary for PSSC employees, affiliates and partners to operate effectively during a significant business disruption and to recover from its effects. The Business Continuity/Disaster Recovery Working Group is responsible for the ongoing development and maintenance of the BC/DR Plan, including coordination of testing and reviews.

The BC/DR Plan applies to all aspects of PSSC, including: people; networks; office facilities; communications systems; end-user equipment (*e.g.*, computers, mobile devices); business services; and documentation. Key objectives of the BC/DR Plan include:

- protecting the safety and well-being of employees, contractors and guests;
- making a financial and operational assessment;
- quickly recovering and resuming operations to enable continuity of business;
- maintaining the security of all business and information assets (confidentiality, integrity and availability);
- preventing the loss of PSSC resources and customer information including books and records (*e.g.*, data, equipment); and
- allowing customers to transact business in accordance with PSSC's policies and procedures.

To ensure that PSSC's BC/DR Plan is effective, the BC/DR Plan requires that BC/DR testing be performed at least annually and be documented and reviewed. The BC/DR Plan provides that PSSC's Chief Information Security Officer will act as, or nominate, a Testing Coordinator to coordinate and document testing. The Testing Coordinator will promptly share test results with the Business Continuity/Disaster Recovery Working Group, which will be responsible for reviewing test results, developing recommendations to improve processes and directing the implementation of any improvements.

III. SYSTEMS COMPLIANCE AND INTEGRITY ("SCI") PREPAREDNESS

PSSC maintains, pursuant to Regulation Systems Compliance and Integrity under the Securities Exchange Act ("Regulation SCI"), a separate policy ("Regulation SCI Compliance Policy") that describes PSSC's "SCI Systems" (including "Critical SCI Systems") and, for purposes of security standards, "Indirect SCI Systems" (as such terms are defined in Regulation SCI) and PSSC's testing and disaster recovery procedures that are reasonably designed to comply with the requirements of Regulation SCI. The BC/DR Plan provides that a disaster could trigger both the Regulation SCI Compliance Policy and the BC/DR Plan. In such a case, the BC/DR Plan states that PSSC will follow the Regulation SCI Compliance Policy with respect to SCI Systems and will follow the BC/DR Plan with respect to all other systems and operations.

Pursuant to Regulation SCI, the PSSC's BC/DR procedures must be reasonably designed to ensure business continuity to, among other things:

- have backup and recovery capabilities sufficiently resilient and geographically diverse and that are reasonably designed to achieve next business day resumption of trading (because PSSC does not facilitate trading, this does not currently apply to PSSC) and two (2)-hour resumption of Critical SCI Systems following a wide-scale disruption;

- provide for annual failover testing; and

- provide for annual coordinated disaster recovery testing with industry participants and other SCI Entities.

The Regulation SCI Compliance Policy sets forth, among things, the procedures for addressing a significant business disruption with respect to PSSC's SCI Systems, ensuring business continuity with respect to the SCI Systems and compliance with Regulation SCI requirements, including testing requirements. The PSSC Regulation SCI Policy describes PSSC's procedures for conducting system disaster recovery (*i.e.*, failover) testing of SCI Systems no less than once per year (including with Participants that PSSC determines are at least the minimum necessary to maintain fair and orderly markets in a disaster scenario), and coordinating such testing on an industry- or sector-wide basis with other SCI Entities. PSSC will also perform periodic assessments of any PSSC systems that directly support functionality relating to, among other things, clearance and settlement of securities transactions, and for processes and programs that, if breached, would be reasonably likely to pose a security threat to such systems.

IV. PANDEMIC PREPAREDNESS

PSSC monitors health-related alert levels, recommendations and notices from world governments and health organizations (*e.g.*, the World Health Organization, Centers for Disease Control, Department of Health and Human Services), and maintains preparedness procedures to respond to and maintain business operations in the event of a health-related significant business disruption.

V. SIGNIFICANT BUSINESS DISRUPTION MANAGEMENT AND RECOVERY

The BC/DR Plan provides that in the event of a significant business disruption, PSSC's Disaster Management Team will be responsible for evaluating the effect of the disruption on PSSC, making decisions related to the management of the disruption and monitoring disaster recovery activities. The Disaster Recovery Team will be responsible for performing all activities related to the restoration of normal service, including interactions with essential service providers. The Disaster Communications Team will be responsible for managing communications with external parties during the disruption, including: PSSC's Participants; regulators; appropriate authorities (*e.g.*, police, fire department); business partners; service providers/vendors; the media; and any other relevant stakeholders, as appropriate. Finally, the People & Facilities Team will be responsible for managing activities supporting the health,

safety and welfare of people, as well as the status of PSSC's office facilities, during the disruption. The BC/DR Plan provides that contact details for these PSSC support teams will be provided to Participants on a regular basis. Additionally, as noted above, PSSC will provide Participants with a copy of the Participant BCP Notice, which provides guidelines relating to business continuity.

The BC/DR Plan provides that the Disaster Communications Team will communicate to appropriate external parties information regarding a significant business disruption. This may include, for example: the anticipated impact of the disruption on services and/or delivery schedules; the anticipated impact of the disruption on security of non-public Participant information; expected timelines for recovery; expected timelines for situational updates; and/or any changes to contact information.

Finally, the BC/DR Plan provides that in the event that PSSC determines it is unable to continue its business, Participants will have prompt access to their funds and securities in accordance with PSSC's Rules and policies and procedures.

VI. BUSINESS CONTINUITY/DISASTER RECOVERY TRAINING AND AWARENESS

The Business Continuity/Disaster Recovery Working Group is responsible for promoting awareness of the BC/DR Plan, and the responsibilities and processes related to the BC/DR Plan, throughout PSSC. Business continuity awareness training is provided to relevant personnel at least annually, and personnel periodically participate in a variety of business continuity tests.