Interactive Brokers Disclosures

Day Trading Risk Disclosure Statement Interactive Brokers LLC Business Continuity Plan Disclosure Interactive Brokers (U.K.) Limited Order Execution Policy Customer Relationship Summary Nasdaq ISE Disclosure for Option Orders Over 500 Contracts Notice Regarding NFAs BASIC System Interactive Brokers Order Routing and Payment for Order Flow Disclosure Notice Regarding Pre-Arranged Trading On U.S. Futures Exchanges Interactive Brokers Group Privacy Policy Swiss physically settled warrants may lapse worthless unless closed out before expiration date. Risks of After-Hours Trading

IB Disclosure Pursuant to FINRA Rule 5350 Regarding Stop and Stop-Limit Orders in U.S. Listed Stocks and Warrants



Day Trading Risk Disclosure Statement

This Day Trading Risk Disclosure Statement is being provided to you in the event your Interactive Brokers (IB) margin account becomes, or already is, classified as a Pattern Day Trader account. As required by current SEC and SRO rules and regulations, IB will classify an account that effects three (3) day trades within a five (5) day period as a Pattern Day Trader account. (A day trade is a buy and sell of the same security on the same day). The regulations prohibit IB from permitting a Pattern Day Trader account from effecting any transactions unless such account maintains a Minimum Equity Requirement of at least \$25,000.

You should consider the following points before engaging in a day-trading strategy. For purposes of this notice, a "day-trading strategy" means an overall trading strategy characterized by the regular transmission by a customer of intra-day orders to effect both purchase and sale transactions in the same security or securities.

Day trading can be extremely risky. Day trading generally is not appropriate for someone of limited resources and limited investment or trading experience and low risk tolerance. You should be prepared to lose all of the funds that you use for day trading. In particular, you should not fund day-trading activities with retirement savings, student loans, second mortgages, emergency funds, funds set aside for purposes such as education or home ownership, or funds required to meet your living expenses. Further, certain evidence indicates that an investment of less than \$50,000 will significantly impair the ability of a day trader to make a profit. Of course, an investment of \$50,000 or more will in no way guarantee success.

Be cautious of claims of large profits from day trading. You should be wary of advertisements or other statements that emphasize the potential for large profits in day trading. Day trading can also lead to large and immediate financial losses.

Day trading requires knowledge of securities markets. Day trading requires in-depth knowledge of the securities markets and trading techniques and strategies. In attempting to profit through day trading, you must compete with professional, licensed traders employed by securities firms. You should have appropriate experience before engaging in day trading.

Day trading requires knowledge of a firm's operations. You should be familiar with a securities firm's business practices, including the operation of the firm's order execution systems and procedures. Under certain market conditions, you may find it difficult or impossible to liquidate a position quickly at a reasonable price. This can occur, for example, when the market for a stock suddenly drops, or if trading is halted due to recent news events or unusual trading activity. The more volatile a stock is, the greater the likelihood that problems may be encountered in executing a transaction. In addition to normal market risks, you may experience losses due to systems failures.

Day trading will generate substantial commissions, even if the per trade cost is low. Day trading involves aggressive trading, and generally you will pay commission on each trade. The total daily commissions that you pay on your trades will add to your losses or significantly reduce your earnings. For instance, assuming that a trade costs \$16 and an average of 29 transactions are conducted per day, an investor would need to generate an annual profit of \$111,360 just to cover commission expenses.

Day trading on margin or short selling may result in losses beyond your initial investment. When you day trade with funds borrowed from a firm or someone else, you can lose more than the funds you originally placed at risk. A decline in the value of the securities that are purchased may require you to provide additional funds to the firm to avoid the forced sale of those securities or other securities in your account. Short selling as part of your day-trading strategy also may lead to extraordinary losses, because you may have to purchase a stock at a very high price in order to cover a short position.

Potential Registration Requirements. Persons providing investment advice for others or managing securities accounts for others may need to register as either an "Investment Advisor" under the Investment Advisors Act of 1940 or as a "Broker" or "Dealer" under the Securities Exchange Act of 1934. Such activities may also trigger state registration requirements.



Interactive Brokers LLC Business Continuity Plan Disclosure

I. Introduction

In accordance with applicable regulations, Interactive Brokers LLC has developed a Business Continuity Plan to assist the firm in appropriately responding to a significant business disruption as promptly as possible under prevailing conditions. Among other things, IB's Business Continuity Plan:

- Identifies Emergency Contact Personnel to the firm's regulators;
- Describes the systems infrastructure protections that the firm has established in an effort to minimize the potential adverse effects of a disruption (for example, redundancy of telecommunications and power generation, fire protection and building security);
- Describes the firm's daily back-up of specified data and records and maintenance of backup media at secure off-site locations;
- Identifies the firm's Disaster Recovery Site(s) and the methods that the firm would use to recover particular data and operations at the site;
- Identifies important firm operations and where applicable, describes how those operations could be re-established in the event of a disruption;
- Identifies the means by which IB will provide customers prompt access to their funds and securities and/or the ability to transfer their funds and positions to another broker or futures commission merchant in the event of a disruption of such magnitude that IB does not intend to continue business; and
- Describes the means by which IB will communicate with its customers, employees, business constituents and regulators in the event of a disruption.

In the event of a significant business disruption, IB intends to continue its operations to the extent reasonable and practical under the circumstances and will place utmost priority in re-establishing the data and operational systems necessary to provide its customers with prompt access to their funds and securities.

IB intends to respond to disruptions of particular scope as follows:

II. Branch Office Disruption

Basic Access to Funds and Securities in the Event of a Branch Office Disruption: Critical systems and personnel necessary to provide customers with access to their funds and securities generally are not dependent on operation of IB's branch offices (Chicago, London, Hong Kong and Zug, Switzerland). Thus, IB does not anticipate that even a significant disruption to the operations of a single IB branch office would have more than a temporary impact – if any – on customers'

basic access to their funds and securities.

Connection to IB Trading System for Certain Customers: In the event of a significant disruption to certain branch offices, customers that connect to the IB online trading system (e.g., the IB Trader Workstation) through the branch office likely would temporarily lose the ability to connect to the trading system. This likely would last only briefly, as connections for these customers could be reestablished through other IB offices in as little as a matter of hours. Recovery time probably would be minimal (measured in hours or days). Customers would still have the ability to place trades by telephone during the temporary outage. Customers' access to account functions other than trading (e.g., deposits and withdrawals, account management, etc.) likely would be unaffected, as connections for many internet based functions other than trading are not location-dependent.

We remind our customers that electronic and computer-based facilities and systems such as those provided by IB are inherently vulnerable to disruption, delay or failure. As specified in the IB Customer Agreement, customers must maintain alternative trading arrangements in addition to their IB accounts for the placement and execution of customer orders in the event that the IB system is unavailable.

Connection to Market Centers in Same Region as Branch: A significant disruption in a branch office could temporarily impact all IB customers' ability to execute trades on market centers in the same geographic region of the branch office, because necessary communications lines or personnel could be affected. In this case, IB would strive to reconnect to affected markets from its Greenwich, CT headquarters, another branch office, or through a third party. Recovery time to restore some basic ability to trade on local markets probably would be minimal (measured in hours or days).

Other Branch Office Functions: Most important operations performed in IB branch offices, such as Customer Service, Account Application Processing, Compliance, etc. are also performed in other IB offices and could be migrated to similarly-trained personnel in other branch offices promptly. Accordingly, IB does not anticipate that localized failures in a branch office would have a substantial negative impact on the firm's ability to respond to customer needs. Recovery time would be minimal.

III. Headquarters Disruption

In the Event of a Modest Disruption at IB's Headquarters: IB has generally designed its systems, procedures and personnel structure such that there is significant redundancy and cross-capability. Limited disruptions affecting particular communications lines, particular pieces of computer hardware, or particular systems typically can be addressed quickly through use of redundant systems with similar capability. Likewise, the firm has significant capacity and capability in its branch offices, both in terms of systems and personnel, such that limited disruptions in particular areas at the firm's headquarters may be ameliorated quickly.

In the Event of a Very Significant Disruption at IB's Headquarters: IB's response to a very significant disruption at its headquarters necessarily will depend on the extent of the damage caused thereby. In the event of a total loss of IB's headquarters, or the data processing center at its headquarters, IB intends to recover, at its Disaster Recovery Site(s), the relevant data and

operational systems (*e.g.*, trade and account data and modified versions of its market data, credit vetting and customer authentication capability) necessary to provide customers prompt access to their funds and securities. IB's Disaster Recovery Site(s) are located in remote geographic locations that should not be subject to the same communications, electricity and/or transportation restrictions that may be experienced in the firm's Greenwich headquarters.

During the immediate aftermath period of, for example, a terrorist attack resulting in the destruction of the firm's Greenwich headquarters, the firm does not anticipate that customers could continue to place new trades. IB anticipates that it could recover customer data and position information at its Disaster Recovery Site(s) and establish basic customer access to funds and positions within approximately 2 to 5 days of a total loss of its headquarters operations. Thus, while they could not trade, we anticipate that, within this 2 to 5 day window after the loss of the headquarters facility, customers would be able to request a withdrawal of funds or transfer of their positions to another broker whose operations were unaffected by, for example, the terrorist attack. Although IB's Business Continuity Plan is designed to provide customer access to funds and securities within 2 to 5 days, the actual recovery time will depend on the nature of the disruption, how many IB facilities and personnel are affected, the state of the national and global financial and banking system, and a host of other factors.

In the event of a very significant disruption or total loss of IB's headquarters facilities, IB anticipates that IB customers may be able to access either of the following websites: <u>www.ibgdr.com</u> or <u>www.interactivebrokers.co.uk</u> to obtain information about the extent of the disruption and the state of IB's operations (assuming that the public internet remained available). Likewise, because most customer service personnel are in offices other than at IB headquarters, IB anticipates that customers would continue to be able to contact IB telephonically. Of course, in the event of a significant outage or major terrorist or other disaster affecting the markets, large numbers of customers likely would try to contact IB at the same time, potentially causing major delays.

Beyond the initial aftermath of a very significant disruption or total loss of the firm's headquarters (i.e., in the time period after the first 5 days), the firm would evaluate the nature of the disruption, the availability of its systems and personnel, its financial condition, the condition of the national and global financial markets, and other factors, and the firm would determine whether to restore full brokerage operations or to discontinue brokerage operations and require its customers to transfer their accounts to another broker.

IV. City Wide Disruptions and Regional Disruptions

In the event of a significant city-wide or regional disruption in one of the cities in which an IB branch office is located, IB would follow the procedures described in Section II (Branch Office Disruption) above. Since no two IB branch offices are located in the same city or region, we expect that the disruption's effects would be limited (see Section II above). In the event of a significant city-wide or regional disruption, affecting the firm's Greenwich, CT headquarters IB would follow the procedures described in Section III (Headquarters Disruption). IB's Disaster Recovery Site(s) are not located in the same city or region as the firm's headquarters.

V. Important Disclaimers

IB will adhere to the procedures set forth in its Business Continuity Plan and described in this disclosure to the extent commercially reasonable and practicable under prevailing circumstances. However, there are innumerable potential causes of a business disruption. In addition, disruptions (and the events that caused them) may vary significantly in nature, size, scope, severity, duration and geographic location and will result in distinct degrees of harm to human life; firm assets; the banks, exchanges, clearing houses and depositories with which the firm conducts business; and local, regional and national systems infrastructure (e.g., telecommunications, Internet connectivity, power generation and transportation) that could affect the firm's recovery in vastly disparate ways. In recognition of this, IB reserves the right to flexibly respond to particular emergencies and business disruptions in a situation-specific manner which the firm deems prudent, in its sole discretion. **Nothing in this document is intended to provide a guarantee or warranty regarding the actions or performance of IB, its computer systems, or its personnel in the event of a significant disruption.**

IB may modify its Business Continuity Plan and this disclosure at any time. IB will post updates to its Business Continuity Plan Disclosure on its website. Should you wish to receive a copy of an updated disclosure by mail, please contact the IB Document Processing Department at newaccounts@interactivebrokers.com.



Interactive Brokers (U.K.) Limited Order Execution Policy

Introduction

This document sets out Interactive Brokers (U.K.) Limited ("IBUK") order execution policy ("Policy") in respect of its retail and professional clients ("you" or "Client") for transactions in financial instruments covered by the Client Agreement For Certain Products Carried By Interactive Brokers (U.K.) Limited (collectively, "Carried Products"). This Policy does not cover trading in any product carried in accounts held at IBUK's U.S. affiliate Interactive Brokers LLC. This document summarises the arrangements that IBUK has put in place to provide its direct carried-clients with best execution when IBUK executes an order on their behalf in relation to any Carried Products.

General

IBUK provides execution-only electronic brokerage services to you. The orders you submit to IBUK through the Interactive Brokers Group's ("IB") trading platforms are executed by IBUK on your behalf by electronically routing them to markets or dealers using IB's proprietary order routing technology.

What is Best Execution?

When IBUK executes an order on your behalf, IBUK will take all sufficient steps to obtain the best possible result for you taking into account the best execution factors including price, costs, speed, likelihood of execution, size, nature of an order and any other consideration relevant to the execution of the order such as the nature of the relevant market, prevailing market conditions and possible market impact.

The relative importance of each of the execution factors may depend on:

- the characteristics and nature of the order, including any specific instructions you might have given;
- the characteristics of the financial instruments that are the subject of your order; and
- the characteristics of the execution venues (if there is more than one) to which the order can be directed.

How is the relative Importance of Execution Factors Determined?

IBUK determines whether you are a retail or professional client at account opening in accordance with the rules of the UK Financial Conduct Authority ("FCA Rules").

The other execution factors are applied on a trade-by-trade basis taking into account whether the order is marketable or not. A marketable order is a buy order with a price at or above the lowest offer in the market or a sell order with a price at or below the highest bid in the market.

For marketable orders, the primary execution factor is either total consideration or price depending on your

instruction. The total consideration represents the price of the financial instrument and the costs related to execution, which include all expenses incurred by the client which are directly related to the execution of the order, including execution fees, clearing and settlement fees and other fees paid to third parties involved in the execution of the order.

For non-marketable orders, the primary execution factor is typically likelihood of execution followed by cost.

Both in the case of marketable and non-marketable orders, the remaining execution factors – order size, nature of the order and any other consideration relevant to the efficient execution of you order – are generally secondary and applied where they may optimise the primary factors.

Order Execution Process

When submitting an order through the IB trading platforms, you may choose smart order routing or provide specific instructions to directly route your orders to your chosen venue. Your orders may be filled in one or multiple market transactions across one or more execution venues. IBUK will deal fairly and in due turn with all orders received from its clients. To the extent it is reasonably practicable to do so, IBUK will deal with all orders in accordance with this Policy and its general terms and conditions.

Smart Order Routing

IBUK offers smart order routing for products that are listed on more than one execution venue. SmartRouting is a proprietary computerised routing algorithm designed to optimise both speed and either price or total consideration, by continuously scanning the bids and offers at each of those competing execution venues and automatically routing orders directly to the best Electronic Communications Network ("ECN") or market center or dealers.

Approach to Smart Routing

SmartRouting is premised upon the principle that an order is most likely to be executed at the optimal price, at the greatest speed and with the highest levels of accuracy and certainty of completion if that order is submitted via direct access to a fully automated market venue. Moreover, to the extent that an order is associated with a product listed on multiple market venues, smart order routing is achieved by constantly reviewing the bids and offers at each of those venues and by directing the order to the venue offering either the best price or total consideration.

For retail clients, the best possible result achievable for the client is determined by reference to the total consideration. To enable total consideration to be the prioritised factor, the "Cost-Considered when Routing" functionality in the IB trading platforms should be selected. Otherwise SmartRouting will direct the order to the venue providing the best price.

Client Instructions

Clients may provide specific client instructions for any given order. The IB trading platforms offer access to numerous order types, including both native and simulated. The IB trading platforms also enable clients to provide order instructions with respect to pricing, timing, speed, price improvement and other advanced trading functions.

Where you provide specific instructions to route orders directly via the IB trading platforms to the order book of a particular venue of your choice, you should be aware that any specific instructions may prevent IBUK from taking the steps that IBUK has designed and implemented in this Policy to obtain the best execution.

To the extent that IBUK is able to accommodate such requests, IBUK will give the specific instructions precedence over the SmartRouting process, this may result in a different outcome for the trade than that which solely relies on SmartRouting. Where you specify the venue for an order, IBUK will be considered to have satisfied its best execution obligation by directing your order to the specified venue.

Order Types and Algorithms

IB trading platforms provide you with the functionalities to choose your own order types based on the characteristics of the financial instrument, the characteristics of the order, and your own objectives and specific execution strategies.

IB trading platforms support over 60 order types and algorithms that allow you to tailor your orders to, among other things, include instructions concerning pricing or timing of orders or to speed execution, provide price improvement, limit risk, time the market and allow privacy. The information on order types and algorithms is made available on the IBUK website under the Technology menu option and then Order Types and Algos. You may find specific information on the order types and algorithms by sorting the order types and algorithms by product and/or category.

Specifying a Venue

Each ECN and market center administers its own set of trading rules. Accordingly, if you decide not to select SmartRouting, you should be familiar with the various trading and order handling rules of those market venues to which you intend to direct route your orders. A complete listing of market venues along with website links is made available on the IBUK website under the Products menu option and then Exchange Listings.

Where IBUK is a member of a trading venue, IBUK also executes orders on behalf of IBUK affiliates. The IBUK affiliates route their clients' orders to IBUK and IBUK executes these orders as venue-specific orders.

Execution Venues

Our policy is to maintain a choice of venues and entities that are most likely to provide you with best execution on a consistent basis. IBUK considers a wide variety of execution venues and entities based upon the level of relevance the execution venues maintain within their particular region in addition to factors such as product breadth, liquidity, electronic access, costs and speed and likelihood of settlement.

IBUK periodically considers the emergence of new venues which are currently unavailable or changes to existing venues with respect to the product offerings, and takes into account the quarterly execution quality publications to compare possible competing venues. IBUK conducts trading venues review when there is a material change and at least annually.

The venues will typically fall into the classification of regulated markets, Multilateral Trading Facilities, systemic internalisers, and third-party investment firms, brokers and/or affiliates acting as a market maker or liquidity provider.

Third party brokers or IBUK's affiliates

IBUK may execute through one of its affiliates. Where we use a third party broker (including an affiliate) to execute transactions we retain an overarching best execution obligation, subject to the facts and circumstances surrounding the relevant market and the terms and instructions provided by you. We satisfy this obligation by undertaking due diligence to validate the adequacy of the third party broker's execution performance and connectivity and to ensure that there are satisfactory arrangements to ensure the confidentiality of our order flow and execution instructions.

Single Venue

For certain financial instruments IBUK executes on a single venue or with a single liquidity provider, IBUK will consider periodically whether IBUK can reasonably expect that the execution venue or liquidity provider will enable us to obtain results for our clients that are at least as good as the results that we can reasonably expect from using alternative execution venues or dealer.

Over-the-Counter Trades Executed by IBUK

When executing orders in Over-the-Counter ("OTC") products including bespoke products, you may utilise the client interface to check the price of the underlying financial instrument used in the estimation of the price of the OTC product and, where you subscribed for market data, by comparing with similar or comparable products to gauge the fairness of the price of the OTC product proposed to you.

Monitoring & Review

IBUK conducts systematic testing, periodic monitoring of competing quotes received against sample review of executed client orders and considers transaction cost analysis information from a third party provider to assess the effectiveness of our overall execution arrangements. Any exceptions are included within the summary of monitoring results presented to the IB Best Execution Committee.

This Policy is reviewed on an annual basis or on the occurrence of a material change in our execution arrangements or in our underlying regulatory obligations. The purpose of the review is to carry out an overall assessment of whether this Policy and IBUK's execution arrangements are reasonably designed to enable IBUK to obtain the best possible result for the execution of our client orders. The review will include consideration of venue reviews, including any venue removal and selection, any modifications required to this Policy, including the relative importance of the best execution factors.

We will notify you of any material changes to our execution policy. For other updates, including the list of execution venues and entities, please refer to the relevant sections on our website.

Information Regarding Best Execution

This document and other related publications, including the list of execution venues on which IBUK places significant reliance, an annual publication of information on the top five execution venues IBUK has used in terms of trading volumes and execution quality of IBUK and that of the venues IBUK relies on, are made available on the IBUK website.

Customer Relationship Summary

Interactive Brokers LLC ("IB LLC") & Interactive Brokers Corp. ("IB Corp.")

1. <u>Introduction.</u> IB LLC and IB Corp (collectively, "IBKR" or "we") are broker-dealers registered with the Securities and Exchange Commission ("SEC") and Financial Industry Regulatory Authority ("FINRA"). Brokerage and investment advisory services and fees differ and it is important for you to understand the differences. This document is intended to provide you with a high-level overview of IBKR's services, fees, costs, conflicts of interest, standard of conduct, disciplinary history, and the disciplinary history of IBKR's financial professionals. Free and simple tools are available to research firms and financial professionals at <u>Investor.gov/CRS</u>, which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

2. Description of Services: IB LLC is an online broker that provides self-directed trade execution and clearing services. IB LLC offers you the ability to buy and sell investment products like stocks, options, futures, forex, bonds, mutual funds, and others in a brokerage account. IB LLC acts in a broker-dealer capacity and does not make recommendations. All trading at IB LLC is directed by you or your self-selected independent advisor. IB Corp employs registered representatives for the sole purpose of introducing institutions and high net worth individuals to IB LLC. IB Corp sales representatives are prohibited from making recommendations to retail investors.

IBKR does not employ human "brokers" or "advisors" to manage your account. We do not monitor the performance of your account for purposes of recommending changes in investments or make recommendations as to whether you should buy, sell or hold investment products. We do provide tools to assist you with monitoring your own account. We do monitor your account for other purposes such as compliance and to ensure that your account does not present undue risk to IBKR.

IBKR does not provide investment advice or make recommendations to retail investors on account types or pricing plans. All IBKR employees are prohibited from making recommendations or providing investment advice. IBKR does not have discretionary trading authority over your account other than accepting not-held algorithmic orders. You or your self-selected advisor make the decisions regarding the purchase or sale of investments. We do not offer proprietary products. In general, there are no account minimums or other requirements to open or maintain a brokerage account with us. Specific products and services, for example the Stock Yield Enhancement Program, have minimum equity or other requirements.

For more details on services offered by IBKR and our affiliates, please see <u>ibkr.com/products</u> or contact IBKR <u>here</u>. Responses to the questions in each Conversation Starter are available <u>here</u>.

Conversation	• Given my financial situation, should I choose a brokerage service? Why or why not?
Starter:	• What is your relevant experience, including your licenses, education and other qualifications?
	What do these qualifications mean?

What fees will I pay?

3. Fees, Costs, Conflicts, and Standard of Conduct: As an IBKR customer, the principal fees and costs you may incur for our brokerage services are: (i) Commissions; (ii) Exchange, Regulatory, and Clearing Fees; (iii) Account Maintenance Fees; (iv) Subscription Service Fees; (v) Interest and Financing Costs; (vi) Payments for third-party services; and (vii) Other Fees and Costs. Fees and costs will vary depending on the products you trade, the volume of your trading, and the services and pricing plan you choose. You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. IBKR does not compensate employees based on trades or fees paid by you. See below for an overview of the fees and costs:

- **<u>Commissions</u>**: Commissions are transaction-based fees charged by brokers. IBKR offers tiered, fixed and zero-commission pricing plans. Commissions charged will vary depending on the pricing plan that you choose and the product(s) you trade. Please see <u>ibkr.com/commissions</u> for additional details.
- **Exchange, Regulatory, and Clearing Fees**: Exchanges, clearing houses and regulators may charge IBKR fees. These fees may be charged to your account in addition to commissions depending on the commission structure that you choose and the products you trade. Exchange/Regulatory/Clearing fees charged to you may be greater than the corresponding fees paid by IBKR (e.g., IBKR may receive aggregate volume discounts that are not passed on to you). Please see <u>ibkr.com/commissions</u> for additional details.
- <u>Account Maintenance Fees</u>: Some IBKR accounts may be charged a monthly account maintenance fee if the account does not maintain a minimum average equity within a calendar month or does not generate a minimum commission amount within a calendar month. Accounts with the IBKR LITE pricing plan will not be charged Account Maintenance Fees. Please see <u>ibkr.com/minimums</u> for additional details.
- <u>Subscription Service Fees</u>: IBKR offers you access to third-party research, real-time streaming market data, and other subscription services. If you elect to subscribe to any of these services, you will be charged for the cost to IBKR. Please see <u>ibkr.com/researchandnews</u> and <u>ibkr.com/marketdata</u> for additional details.
- <u>Interest and Financing Costs</u>: IBKR may offer you financing, including allowing you to borrow on margin or to borrow stock for purposes of short selling. These services have corresponding costs, which are charged to your account in the form of margin loan interest and stock borrow fees. Please see <u>ibkr.com/interest</u> for additional details.
- **Payments for third-party services**: IBKR receives compensation from third-parties including compensation from fund companies in connection with purchases and holdings of mutual fund shares. Such compensation includes but is not limited to Rule 12b-1 fees paid out of the funds' assets. However, IBKR does not solicit you to invest in specific funds and does not recommend specific funds or any other products to you.
- Other Fees and Costs: IBKR offers products and services in addition to online trading. Such products and services include, but are not limited to, processing corporate actions and dividends, cash movements, and securities transfers. These services are offered at additional cost. Please see <u>ibkr.com/otherfees</u> for additional details.

While the above list includes some of the more common fees and costs that you may encounter, it is not exhaustive. For complete details of services provided by IBKR and corresponding fees and costs, please visit <u>ibkr.com</u>. Commissions and other fees are based on the trading you conduct and the services that you choose. Information regarding specific commissions and fees is available at <u>ibkr.com/commissions</u> and <u>ibkr.com/otherfees</u>.

Conversation• Help me understand how these fees and costs might affect my investments. If I give youStarter:\$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

What are your legal obligations to me when providing recommendations? How else does your firm make money and what conflicts of interest do you have?

We **do not** provide recommendations. IBKR makes money by charging commissions and/or receiving payment for order flow on your self-directed trading, as well as charging interest on financing, receiving interest on uninvested cash in your account, and charging subscription fees for optional services that you decide to engage in. The way we make money can create conflicts with your interests. You should understand and ask us about these conflicts because they can affect the services we provide to you. Here are some examples of potential conflicts of interest:

- **<u>Third-Party Payments</u>**: For certain investment products (for example, certain mutual funds), we receive compensation from third-parties when you purchase and/or hold the product.
- <u>Principal Trading</u>: IBKR does not conduct a proprietary trading business; however, IBKR does engage in a limited amount of principal trading to facilitate customer activity (such as customer fractional share trading).
- **Payment for Order Flow:** IBKR receives payment for order flow from certain exchanges, market makers, and other third parties through whom IBKR executes client orders. We mitigate this conflict of interest through disclosure and by selecting execution venues for individual customers orders based first on the benefit to the client rather than to IBKR, subject to the client's instructions and pricing plan selection. Please see the <u>Order Routing and Payment for Order Flow Disclosure</u> for details.
- **<u>Affiliate Investment Advisor</u>**: Our affiliate, Interactive Advisors, is an SEC-registered Investment Advisor that offers actively managed portfolios. Interactive Advisors uses us as the custodian for its customers' assets.

IBKR mitigates the potential conflicts listed above by applying appropriate controls including information barriers to prevent the disclosure of order and trading information. In addition, IBKR does not provide advice or recommendations to attempt to convince you to purchase, sell or hold a position in any investment product or to use an investment strategy. IBKR does not conduct proprietary trading against customer accounts. IBKR and its affiliates do not sell, distribute, recommend, market, or otherwise encourage you to trade in specific products. IBKR does not act as an investor, placement agent, underwriter, distributor, remarketing agent, structurer, securitizer, investment manager, investment advisor, commodity trading advisor, municipal advisor, market maker, or trader and does not produce any proprietary research. As such, IBKR does not believe that third-party payments it receives pose a material conflict of interest with you. In accordance with applicable rules and regulations, IBKR maintains a strong information barrier that keeps your orders and trading information separate from the proprietary trading information of its affiliates. Please see <u>ibkr.com/disclosures</u> for additional details.

Conversation • *How might your conflicts of interest affect me, and how will you address them? Starter:*

How do your financial professionals make money?

IBKR staff are compensated by salary and merit-based discretionary bonuses. The bonus component is calculated based on factors including company and individual performance and may include cash and non-cash compensation. IBKR staff are **not** compensated based on commissions or fees, performance of your accounts, the amount of your assets they service, the products that you buy or sell, or revenue earned from services chosen by you.

Do you or your financial professionals have legal or disciplinary history?

4. <u>Disciplinary History.</u> Yes. IBKR has legal and disciplinary history. Visit <u>Investor.gov/CRS</u> for a free and simple search tool to research IBKR and our financial professionals. Please be aware that IBKR is regulated by the U.S. SEC, CFTC, FINRA, each of the U.S. stock exchanges and option exchanges, each U.S. state securities regulator, plus several foreign regulators. Given the scope and breadth of our activities and the number of regulators with jurisdiction over us, we believe our regulatory record is excellent compared to other major retail brokers in the United States. Please go to brokercheck.finra.org and compare our record to our competitors.

Conversation • *As a financial professional, do you have any disciplinary history? For what type of conduct? Starter:*

5. <u>Additional Information</u> You can find additional details about IBKR and our brokerage services at <u>ibkr.com</u>. To request up-to-date information or a copy of this Customer Relationship Summary, use the contact information provided at <u>ibkr.com/help</u> or call IBKR Client Services at 1 (877) 442-2757.

IBKR does not assign registered representatives to manage client accounts. Our registered representatives are employed by IBKR, which is a broker-dealer and not an investment advisor. If you have any concerns regarding the service that you receive, you can contact us at (312) 542-6901 or 1 (877) 442-2757.

Conversation	Who is my primary contact person?
Starters:	• Is he or she a representative of an investment adviser or a broker-dealer?
	• Who can I talk to if I have concerns about how this person is treating me?



Nasdaq ISE Disclosure for Option Orders Over 500 Contracts

Interactive Brokers is required to provide to you the following disclosure regarding option orders of over 500 contracts that may be executed using the Nasdaq ISE (ISE) Block Order Solicitation Mechanism:

When handling an order of 500 contracts or more on your behalf, Interactive Brokers may solicit other parties to execute against your order and may thereafter execute your order using the ISE's Solicited Order Mechanism. This functionality provides a single price execution only, so that your entire order may receive a better price after being exposed to the Exchange's participants, but will not receive partial price improvement. For further details on the operation of this Mechanism, please refer to Nasdaq ISE Rule Options 3, Section 11, which is available at ise.cchwallstreet.com under Chapter 7.

Notice Regarding NFAs BASIC System

Interactive Brokers LLC ("IB") is required to inform its customers of the National Futures Association("NFA") Background Affiliation Status Information Center ("BASIC"). The BASIC system compiles various information on registrants and anyone can access this system on the Internet.

The information in the BASIC system includes Commodity Futures Trading Commission ("CFTC") registration information and membership information from the NFA. Also included are regulatory and non-regulatory actions contributed by the NFA, the CFTC and the U.S. futures exchanges regarding futures-related activity.

The NFA BASIC system may be accessed at <u>http://www.nfa.futures.org/basicnet/</u>. To locate information on a registrant, simply enter the registrant's NFA ID number when prompted. For questions regarding this system, you may contact the NFA information center at 312-781-1410 or 1-800-621-3570 between the hours of 8:00 a.m. to 5:00 p.m. CST or by email at information@nfa.futures.org.

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Interactive Brokers Order Routing and Payment for Order Flow Disclosure

<u>IBKR's Order Routing System</u>: IBKR provides brokerage clients two different account offerings:

 (1) IBKR-PRO; and (2) IBKR-LITE. Subject to certain restrictions, clients may choose between either offering depending on which they decide best satisfies their trading objectives and goals.¹
 These offerings are designed to give IBKR clients the flexibility to prioritize the opportunity for zero-commission NMS stock trades and fixed-rate commission US equity option trades versus the amount and likelihood of price improvement they receive on trades.

IBKR-PRO orders are submitted to IBKR's high-speed Best Execution Order Routing System (SmartRoutingSM), which is designed to optimize execution price, speed and total cost of execution for stocks and options. IBKR constantly changes and enhances the SmartRouting system to adapt to changes in markets, new exchanges, new trading rules, etc. IBKR's SmartRouting system continually scans competing market centers and automatically seeks to route orders to the best market, taking into account factors such as quote size, quote price, exchange or ATS transaction fees or rebates and the potential availability of price improvement (execution at a better price than the National Best Bid or Offer ("NBBO"), "Price Improvement"). The IBKR SmartRouting system continually reevaluates market conditions and prices for pending IBKR client orders and dynamically re-routes orders as necessary. With IBKR-PRO, unless you direct your order to a specific market center or "algo" provider, IBKR's SmartRouting system retains control over the routing of your order for execution and does not deliver your order for another broker to route.

For some products, IBKR-PRO clients may directly route their orders to a particular market of their choice, although IBKR recommends that our clients use the IBKR SmartRouting system.

IBKR also operates an Alternative Trading System (the IBKR ATS) in accordance with SEC Regulation ATS, on which it executes IBKR client orders against each other or against one or more professional liquidity providers who send orders into the IBKR ATS. Order executions on the IBKR ATS are faster, eliminate exchange fees, and may offer Price Improvement. Statistical information regarding the quality of executions for orders effected through the IBKR ATS (e.g., average execution speed, percentage of orders receiving Price Improvement, etc.) is available on the IBKR website at: https://ibkr.com/regulatoryreports.

IBKR-LITE clients are charged zero commission for NMS stock orders (except for certain order types and orders to execute at the open or close²) and a fixed rate commission per contract for US equity options³. IBKR-LITE orders for NMS stocks are generally routed to select over-the-counter market-makers ("Market Makers") for handling. IBKR's agreements with the Market Makers provide Interactive Brokers payment for order flow from each Market Maker for trades executed with that Market Maker. IBKR may also route IBKR-LITE orders to another broker, ATS, or exchange (each an "Away Route"), in which case IBKR may collect payment for order flow for trades executed at or through that Away Route; IBKR may also route IBKR-LITE orders in US equity options to Market Makers for handling, and may collect payment for order flow for options trades executed through such Market Makers and/or trades executed at an Away Route. By using the IBKR-LITE service,

clients authorize IBKR to receive and retain such payments from Market Makers and Away Routes, in whole or in part, for IBKR's own account and not that of the client, in consideration for services provided by IBKR to the client. For more details, please see IBKR's quarterly order routing report at https://www.ibkr.com/regulatoryreports.

In the event that IBKR is experiencing technical issues with its connections to all of its Market Makers at the time that an order in an NMS stock is to be routed for an IBKR-LITE client, IBKR may route the order using its SmartRouting functionality (as if the client had chosen the IBKR-PRO offering), but will still charge no commission on any resulting trades.

IBKR may add other products to its IBKR-LITE-specific commission schedule offering from time to time.

If an IBKR-LITE-specific commission schedule is not in place for a product, orders in such products are routed for IBKR-LITE clients in the same way as they are for IBKRPRO clients. For these products, the same commission structure will apply to both IBKR-LITE and IBKR-PRO. Where available, a "Fixed" commission model will apply to IBKR-LITE clients for such products. For more information, see below and at <u>https://www.ibkr.com/en/index.php?f=1590</u>.

- 2. <u>Orders Sent Near the Opening of Trading:</u> Please note that markets can be especially volatile near the opening of a trading session, with prices and available volume often changing rapidly and with data feeds from various markets potentially being slow or temporarily unavailable. IBKR cannot guarantee that orders sent at or near the opening of trading necessarily will receive the best posted price. You may want to consider the use of limit orders at the open, although market orders should be used if certainty of getting a fill is of greater concern to you than fill price.
- 3. Order Conversion and Designation: IBKR may convert certain order types or apply conditions to certain IBKR client orders in order to facilitate an execution. For example, IBKR may simulate certain order types using order designations. Simulated order types may be used in cases where an exchange does not offer an order type or in cases where IBKR does not offer access to the "native" form of certain order types offered by an exchange. In addition, orders may be sent Immediate or Cancel, Fill-Or-Kill, All-Or-None, etc., in order to facilitate an immediate, automatic execution, consistent with the objectives of the client order. To protect client orders from significant and rapidly changing prices, IBKR may simulate market orders on exchanges by establishing a price ceiling for a buy order or a price floor for a sell order at a percentage beyond the inside bid/ask. While this cap or floor is set at a level intended to balance the objectives of execution certainty and minimized price risk, there exists a possibility that an execution will be delayed or may not take place. In addition, IBKR is required by exchanges and regulators to maintain "filters" in its systems that prevent executions at prices that might be deemed to be disruptive to an orderly market (or exchanges may have such filters in their systems). These filters may cause an otherwise marketable order not to be executed or to be delayed in execution, even if the client might want the order to be executed immediately at a certain price. In accordance with our regulatory obligations as a broker, IBKR may also reject orders exceeding certain size thresholds, based upon factors including the normal volume in the product, the type of order, the marketability of the order, and other factors which may affect the likelihood that the order could result in market disruption.
- 4. **Important Characteristics and Risks of Using Stop Orders:** A Stop Order i.e., a Stop (Market) Order is an instruction to buy or sell at the market price once your trigger ("stop") price is reached. Please note that a Stop Order is not guaranteed a specific execution price and may execute significantly away from its stop price, especially in volatile and/or illiquid markets. Stop Orders may be triggered by a sharp move in price that might be temporary. If your Stop Order is triggered under these circumstances, you may buy or sell at an undesirable price. Sell Stop Orders may make price declines worse during times of extreme volatility. If triggered during a sharp price decline, a Sell Stop Order also is more likely to result in an execution well below the stop price. Placing a limit price on a Stop Order may help manage some of these risks. A Stop Order with a limit price a Stop (Limit) Order becomes a limit order when the instrument reaches the stop price. By using a Stop (Limit)

Order instead of a regular Stop Order, you will receive more certainty regarding the execution price, but there is the possibility that your order will not be executed at all if your limit price is not available in the market when the order is triggered.

5. **Important Characteristics and Risks of Using Market Orders:** Please note that a Market Order is an instruction to execute your order at any price available in the market. A Market Order is not guaranteed a specific execution price and may execute at an undesirable price. If you would like greater control over the execution prices you receive, please submit your order using a Limit Order, which is an instruction to execute your order at or better than the specified limit price.

6. **Payment for Order Flow, Dark Pools, Liquidity Provider and Affiliate Relationships:**

A. IBKR-LITE Orders

- a. **IBKR-LITE Orders in NMS Stocks and US Equity Options:** Please see paragraph 1 for a discussion of IBKR's policies regarding payment for order flow in connection with IBKR-LITE orders in NMS stocks and US equity options.
- b. Specific Provisions Regarding IBKR-LITE Orders in US Equity Options:
 - 1. IBKR may route orders in US equity options to Market Makers. For US equity options orders not routed to Market makers, IBKR employs its SmartRouting system to try to achieve the best execution for client option orders. The SmartRouting system is designed to achieve an execution price at or better than the NBBO by utilizing relationships with liquidity providers, who may provide Price Improvement through the various auction and Price Improvement mechanisms offered under U.S. option exchange rules. These relationships benefit IBKR clients, who may receive Price Improvement for their options orders. IBKR may receive payment in the form of commissions or other payments from the liquidity providers for these executions.
 - 2. Several options exchanges impose "maker-taker" fees and rebates, in which exchange members are charged for orders that take liquidity (i.e., marketable orders that trade against a posted quote or limit order) and receive a rebate for orders that add liquidity to the exchange (i.e., non- marketable limit orders that are posted and then trade against incoming marketable orders), or vice versa. By electing IBKR-LITE, you are agreeing to allow IBKR to retain any rebates it receives from an exchange in connection with your order being routed at that exchange.
 - 3. Under certain circumstances, IBKR may route a marketable option order to an exchange that is not currently posting the NBBO but which may be willing to execute the order at the NBBO. Generally, IBKR will do this in order to avoid or reduce the fee for executing the order, compared to routing to a different exchange. In addition, in the limited circumstances where IBKR routes orders in this manner, IBKR generally guarantees a fill at the NBBO at the time the order was routed.
 - 4. Option exchange payment for order flow programs may result in payments to specialists or primary market makers, some portion of which may be paid to IBKR.
- c. **Other Products:** For products not subject to an IBKR-LITE specific commission schedule, entitled to zero-commission trading under IBKR-LITE, the same commission structure will apply to both IBKR-LITE and IBKR-PRO. Where available, a "FIXED" commission model will apply to IBKR-LITE clients for such products. For more information, see below and at https://www.ibkr.com/en/index.php?f=1590.
- B. IBKR-PRO Orders
 - a. **Dark Pool and ATS Executions for Clients' Marketable Stock and ETF Orders:** IBKR maintains connections to "dark pool" ATSs ("Routeaway Dark Pools") that may

execute IBKR-PRO client marketable orders in NMS stocks. IBKR clients benefit from IBKR's access to dark pools. Dark pools provide a source of substantial additional liquidity. Dark pools generally charge no execution fees or lower execution fees than exchanges. Dark pools also provide fast executions and the possibility of executions at prices more favorable than the prevailing NBBO.

IBKR receives rebate payments for routing and executing marketable client orders for Regulation NMS stocks at some Routeaway Dark Pools. As of May 29, 2018, IBKR generally passes the amount (or approximate amount) of any such rebate to (i) Tiered-commission IBKR-PRO clients as a venue rebate; and to (ii) Fixed-commission IBKR-PRO clients in the form of a reduction to the standard U.S. stock commission.

b. Liquidity Provider Relationships in the IBKR ATS and Executions of Client Orders Against Those Liquidity Providers in the IBKR ATS: IBKR has entered arrangements with certain institutions under which such institutions may send liquidity-adding orders in NMS stocks to the IBKR ATS. These orders are held within the IBKR ATS and are not displayed in the national market. If an IBKR-PRO client marketable order could be immediately executed against such an order held in the IBKR ATS (at the NBBO or at a better price than the NBBO), the orders may be crossed and the execution reported to the National Market System. This arrangement provides extra potential liquidity (size) for IBKR-PRO client orders and may provide faster executions (since the orders do not have to be routed out to an exchange), as well as providing the possibility of Price Improvement (since the orders may be executed at a better price than available on an exchange).

IBKR may receive payment in the form of commissions or commission equivalents from the liquidity providers for these executions in the IBKR ATS. In the event IBKR receives any such payment, IBKR generally passes the amount (or approximate amount) of the benefit to the client as follows, to (i) Tiered-commission IBKR-PRO clients as a venue rebate; and to (ii) Fixed-commission IBKR-PRO clients in the form of a reduction to the standard U.S. stock commission.

- c. Client-to-Client Order Crosses in the IBKR ATS: For client orders in Regulation NMS stocks that result in client-to-client crosses on the IBKR ATS, IBKR charges and/or provides the following commissions, fees, and/or rebates:
 - 1. **Non-Marketable Orders Directed to and Executed in the IBKR ATS:** IBKR does not pay rebates or commission breaks to clients for non-marketable orders directed to and executed in the IBKR ATS ("Directed IBKR ATS Order(s)").
 - 2. Orders Smart-Routed to and Executed in the IBKR ATS Against Directed IBKR ATS Orders: If IBKR smart-routes an order to the IBKR ATS and that order is executed against a Directed IBKR ATS Order, IBKR will provide:
 - A fixed per-share rebate to the IBKR-PRO Tiered-commission client who submitted the smart-routed order; or
 - A fixed per-share commission reduction to the IBKR-PRO Fixed-commission client who submitted the smart-routed order.
 - 3. Non-Marketable Orders Smart-Routed to the IBKR ATS Which Were Also

Eligible for Execution at an Exchange: IBKR may smart-route a non-marketable order to an exchange and later re-route that order to the IBKR ATS (the "Eligible Resting Non-Marketable Order") where it executes against another client order. In this instance:

- An IBKR-PRO Tiered-commission client that submitted the Eligible Resting Non-Marketable Order will receive the add-liquidity rebate (or pay the add-liquidity fee, if applicable) that the client would have received (or paid) if their resting order had executed at the exchange on which it had been resting.
- An IBKR-PRO Fixed-commission client that submitted the Eligible Resting Non-Marketable Order will pay the typical fixed commission.
- 4. Orders Smart-Routed to the IBKR ATS Which Are Executed Against Eligible Resting Non-Marketable Order(s): IBKR may smart-route a client order to the IBKR ATS so that it executes against an Eligible Resting Non-Marketable Order. In this instance:
 - An IBKR-PRO Tiered-commission client that submitted the order will be charged the venue take-fee (or receive the venue take-rebate, if applicable) that the client would have paid at the exchange to which the client's order would otherwise have been routed.
 - An IBKR-PRO Fixed-commission client that submitted the order will pay the standard fixed commission.
- d. **IBKR-PRO Tiered Commission Structure for Orders Routed to Exchanges:** Under IBKR's Tiered commission model, IBKR passes to Tiered commission clients some or all of certain rebate payments IBKR receives for executing stock orders at exchanges, although the Tiered commission model is not intended to be a direct pass-through of exchange and third-party fees and rebates. For example, IBKR may receive enhanced rebate payments for exceeding volume thresholds on particular markets, but typically will not directly pass these enhancements to clients. Likewise, IBKR does not pass to clients all of the rebates IBKR may receive for orders in pink sheet or OTCBB stocks.
- e. **Options:** IBKR does not deliver its IBKR-PRO option orders to another broker to handle and route. Rather, IBKR employs its SmartRouting system to try to achieve the best execution for client option orders. The SmartRouting system is designed to achieve an execution price at or better than the NBBO by utilizing relationships with liquidity providers, who may provide Price Improvement through the various auction and Price Improvement mechanisms offered under U.S. option exchange rules. These relationships benefit IBKR clients, who may receive Price Improvement for their options orders. IBKR may receive payment in the form of commissions or other payments from the liquidity providers for these executions.

Several options exchanges impose "maker-taker" fees and rebates, in which exchange members are charged for orders that take liquidity (i.e., marketable orders that trade against a posted quote or limit order) and receive a rebate for orders that add liquidity to the exchange (i.e., non- marketable limit orders that are posted and then trade against incoming marketable orders), or vice versa. The charges imposed or rebates offered by these exchanges affect the total cost of execution, and IBKR's SmartRouting System takes this into account in determining where to route option orders - trying to minimize the costs that clients incur. If multiple exchanges are quoting at the NBBO for an option order and IBKR has discretion as to where to send the order or a portion of it, IBKR generally will "break the tie" by sending the order to an exchange where it will receive the most payment for the order.

Under certain circumstances, IBKR may route a marketable option order to an exchange that is not currently posting the NBBO but which may be willing to execute the order at the NBBO. Generally, IBKR will do this in order to avoid or reduce the fee for executing the order, compared to routing to a different exchange. IBKR generally will share the economic benefit of routing orders in this manner with clients in the form of reduced execution fees, although IBKR does not guarantee that it will share such benefit. In addition, in the limited circumstances where IBKR routes orders in this manner, IBKR generally guarantees a fill at the NBBO at the time the order was routed.

Under IBKR's Tiered commission model, IBKR passes to Tiered-commission clients some or all of certain rebate payments IBKR receives for executing option orders, although the Tiered-commission model is not intended to be a direct pass-through of exchange and third-party fees and rebates.² For example, IBKR may receive enhanced rebate payments for exceeding volume thresholds on particular markets, but typically will not directly pass these enhancements to clients. Likewise, IBKR does not pass to clients all of the rebates IBKR may receive for liquidity taking orders, complex orders or orders executed in price improvement auctions. Traditional exchange payment for order flow programs result in payments to specialists or primary market makers, some portion of which may be paid on to IBKR. IBKR does not pass these payments directly to clients.

- 7. <u>Affiliate Investments in Exchanges:</u> An affiliate or affiliates of Interactive Brokers LLC own(s) minority interests in OneChicago (security futures exchange) and a substantial, minority investment in the Boston Options Exchange Group LLC, which operates the BOX Options Exchange.
- Quarterly Order Routing Reports and Other Order Routing Information Available upon Request: U.S. Securities and Exchange Commission rules require all brokerage firms to make publicly available quarterly reports describing their order routing practices. IBKR's quarterly order routing reports are available on the IBKR website at <u>ibkr.com/regulatoryreports</u>, or you can contact IBKR Client Services.

In addition to the basic quarterly reports, under Rule 606 of SEC Regulation NMS, a broker-dealer is required upon a client request to provide information regarding the identity of the market center to which the client's orders were routed in the six months prior to the request; whether the order was a directed or non-directed order, and the time of the transaction, if any, that resulted from such order. Please contact the IBKR Client Services Desk in writing through the information on the IBKR website at <u>ibkr.com/help</u> if you wish to receive the foregoing routing information for any order(s) within the past six months. Please type "Request for Order Routing Information" in the subject line of your request and please include your name, user id and account number as well as the date of the order, the security, the quantity, and any other information necessary to identify the order (e.g., the time of day if there were several similar orders that day.)

As long as consistent with applicable securities laws and regulations, we may share anonymized account information or anonymized delayed order information with third parties (and/or share such information among our affiliates) for the purpose of analysis, research, market data compilation, product creation, establishing order routing and execution relationships, or for any other lawful purpose.

- 1. For more information about the IBKR-PRO and IBKR-LITE offerings, please visit the IBKR website at <u>ibkr.com</u>.
- 2. IBKR-LITE NMS stock orders that execute at the open or at the close ("OnOpen" or "OnClose" orders, respectively) are commission-free in any given month so long as the account's aggregate OnOpen and OnClose executed order volume in that month does not exceed a certain percentage of the account's aggregate US stock trading volume in that same month. For details, see the section on Free Commissions on IBKR's website.
- 3. IBKR-LITE accounts are charged a fixed rate commission on the first 1,000 U.S. options contracts traded per month (subject to exchange surcharges for certain contracts, as set forth in more detail on the Firm's website under <u>ibkr.com/commissions</u>). For U.S. options volume in excess of 1,000 contracts per month, IBKR may apply the IBKR-PRO U.S. option tiered commission model to the contracts executed above the first 1,000.
- 4. For IBKR-PRO clients trading U.S. options, IBKR only offers the Tiered-commission model. For Direct Routed option orders, the same model applies, but with no volume-tiering for the base commission.

InteractiveBrokers

Notice Regarding Pre-Arranged Trading On U.S. Futures Exchanges

Pre-arranged trading results when a discussion is held by market participants prior to trade execution to ensure that a contra party will take the opposite side of a particular order. U.S. futures exchanges, including, but not limited to, CME, CBOT, NYMEX, ICE-US, CFE and OneChicago have regulations regarding the execution of pre-arranged trades. Interactive Brokers customers are responsible to know and abide by <u>ALL</u> exchange restrictions regarding pre-arranged trading. Interactive Brokers customers should not engage in pre-arranged trading unless such transactions are permitted by the relevant exchange. Customers should review the rules of each exchange to determine whether, and under what circumstances, such transactions are permitted. For your reference, various exchange rulebooks can be found at the following websites:

CME, CBOT, NYMEX

http://www.cmegroup.com/market-regulation/rulebook/

ICE Futures U.S.

https://www.theice.com/futures-us/regulation#Rulebookf

CFE

http://cfe.cboe.com/aboutcfe/rules.aspx

OneChicago

https://docs.onechicago.com/display/PD/Market+Regulation#MarketRegulation-ExchangeRules



Interactive Brokers Group Privacy Policy

At Interactive Brokers, we understand that confidentiality and security of the personal information ("Personal Information") that you share with us is important. The Interactive Brokers Group affiliates (collectively, "IBKR"), are committed to protecting the privacy of Personal Information, including Personal Information related to individuals who may be customers, employees, agents, job applicants or others inside or outside of IBKR. That is why we have developed specific policies and practices designed to protect the privacy of your Personal Information. By opening an account at IBKR or by utilizing the products, services and applications available through IBKR, you have consented to the collection and use of your Personal Information in accordance with this privacy policy ("Privacy Policy" or "Policy"). We encourage you to read this Privacy Policy carefully.

This Policy is based on the privacy and data protection principles common to the countries in which we operate. This Policy is intended to summarize IBKR's data protection practices generally and to advise our customers, prospective customers, job applicants, website visitors and other third parties about IBKR's privacy policies that may be applicable to them.

This Policy is specifically addressed to those who provide Personal Information to IBKR or who visit or use IBKR's websites, trading platforms, software application and social media sites.

Who is responsible for your Personal Information?

IBKR is responsible for the Personal Information that we may collect in the manner discussed below. IBKR includes: Interactive Brokers LLC, One Pickwick Plaza, Greenwich, CT 06830 United States; Interactive Brokers (U.K.) Limited, (03958476) a Private Limited Company with registered office address, Level 20 Heron Tower, 110 Bishopsgate, London EC2N 4AY; and their respective affiliates (the "IBKR Entities"). Specifically, your Personal Information will be controlled by the IBKR Entity that is providing services or communication to you. In some instances your Personal Information will be controlled by more than one IBKR Entity.

How do we collect your Personal Information and what Personal Information do we collect?

IBKR collects and processes Personal Information from you. This may include, among other things, information:

- provided during the IBKR account application process or during use of any of IBKR's website applications (for example, your name, email address, telephone number, birth date, tax ID number, investment objectives, etc.);
- acquired as a result of the transactions you conduct through the IBKR systems or in connection with services offered by IBKR (for example, if you participate in IBKR's debit card program);
- received from consumer-reporting agencies;
- collected through Internet cookies (for further information on our use of cookies, please see our Cookie Policy).

Are you required to provide Personal Information?

In order for you to utilize our services, you will provide us with your Personal Information entirely voluntarily. In most circumstances IBKR cannot take action without utilizing certain of your Personal Information, for example, because this Personal Information is required to process your instructions or orders or provide you with access to our services or marketing materials. In most cases, it will be impossible for us to provide the services to you without the relevant Personal Information.

For what purposes will we use your Personal Information?

We may use your Personal Information for the following purposes ("Permitted Purposes"):

- To provide you with brokerage and other services available on our platforms, and/or to deal with any
 requests or inquiries you may have;
- To pursue legitimate interests, including to carry out, monitor and analyze our business or operations;
- To conduct our recruiting processes;
- To contact you (unless you tell us that you prefer us not to) regarding features and functionality that may be of interest to you;

- To enter into or carry out contracts of various kinds;
- To conduct monitoring by us or any other person on our behalf using various methods, including: (i) the use
 of "intelligent" automated monitoring tools; or (ii) through random monitoring of systems, for example
 systematically via electronic communication recording tools; (iii) specific monitoring of systems for example
 in relation to investigations, regulatory requests, subject access requests, litigation, arbitration or mediation
 or; (iv) data tracking, aggregation and analysis tools that pull data from various disparate data sources to
 draw linkages and/or detect behavioral patterns, interactions or preferences for analysis (including
 predictive analysis); and/or (v) using other similar monitoring technology that may become available from
 time to time;
- To comply with applicable laws or regulations in any country;
- For any other purpose for which your Personal Information was provided to us.

We may process your Personal Information for the following purposes after obtaining your express consent where legally required:

- To communicate with you through the channels you have approved to keep you up to date on the latest developments, announcements and other information about IBKR services, products and technologies;
- To conduct customer surveys, marketing campaigns, market analysis, or promotional activities;
- To collect information about your preferences to create a user profile to personalize and foster the quality of our communication and interaction with you (for example, by way of newsletter tracking or website analytics).

Where legally required, with regard to marketing-related communication, we will only provide you with such information after you have opted in and we will also provide you with the opportunity to opt out at any time if you do not wish to receive further marketing-related communication from us. We like to keep our customers, personnel and other interested parties informed of company developments, including news relating to IBKR that we believe is of interest to them. If you do not wish to receive publications or details of events or seminars that we consider may be of interest to you, please let us know by following this link: https://www.interactivebrokers.com/en/index.php?f=464. Where legally required, we will not use your Personal Information for taking any automated decisions affecting you or creating profiles other than described above.

Depending on which of the above Permitted Purposes we use your Personal Information for, we may process your Personal Information on one or more of the following legal grounds:

- Because processing is necessary for the performance of a client instruction or other contract with you or your organization;
- To comply with our legal obligations (for example, to keep pension records or records for tax purposes);
- Because processing is necessary for the purposes of our legitimate interest or those of any third party
 recipients that receive your Personal Information, provided that such interests are not overridden by your
 interests or fundamental rights and freedoms.
- Because processing is useful or necessary in our discretion, and is not prohibited under the law of the relevant jurisdiction.

In addition, the processing may be based on your consent where you have expressly given that to us.

Who we share your Personal Information with, and in what circumstances

We may share your Personal Information in the following circumstances:

- We may share your Personal Information between the IBKR Entities on a confidential basis as allowed by applicable law or where required for the purpose of providing products or services and for administrative, billing and other business purposes. A list of the countries in which IBKR Entities are located can be found on our website;
- We may instruct service providers within or outside of IBKR, domestically or abroad, to process Personal Information for the Permitted Purposes on our behalf and in accordance with our instructions. For example, if you choose to subscribe to any services provided by a third-party provider listed on an Interactive Brokers Investors' Marketplace, we may disclose such information to the service providers as necessary for them to provide the services that you have requested. IBKR generally requires these service providers to enter into confidentiality agreements with IBKR that limit their use of the information that they receive. Such agreements prohibit the service provider from using IBKR customer information that they receive other than to carry out the purposes for which the information was disclosed. If required by law, IBKR will retain control over and will remain responsible for your Personal Information and will use appropriate safeguards to ensure the integrity and security of your Personal Information when engaging service providers;
- We may share your Personal Information with companies providing services in the areas of fraud and crime prevention and with companies providing similar services, including financial institutions such as credit reference agencies and regulatory bodies;

- We may share your data with third parties to assist us with the conduct of our recruitment processes;
- Consistent with applicable law, we may share your Personal Information with courts, law enforcement authorities, regulators or attorneys or other parties for the establishment, exercise or defence of a legal or equitable claim or for the purposes of a confidential alternative dispute resolution process;
- We may also use aggregated Personal Information and statistics for the purpose of monitoring website usage in order to help us develop our website and our services.

Otherwise, we will only disclose your Personal Information when you direct us or give us permission to do so, when we are allowed or required by applicable law or regulations or judicial or official request to do so, or as required to investigate actual or suspected fraudulent or criminal activities

Personal Information about other people that you provide to us

If you provide Personal Information to us about someone else (such as one of your directors or employees or someone with whom you have business dealings), you must ensure that you are entitled to disclose that Personal Information to us and that, without our taking any further steps, we may collect, use and disclose that Personal Information as described in this Privacy Policy. In particular, you must ensure that the individual concerned is aware of the various matters detailed in this Privacy Policy, as those matters relate to that individual, including our identity, how to contact us, our purposes of collection, our Personal Information disclosure practices (including disclosure to overseas recipients), any right the individual may have to obtain access to the Personal Information and make complaints about the handling of the Personal Information and the consequences if the Personal Information is not provided (such as our inability to provide services).

Keeping Personal Information about you secure

To the extent required by law, we will take appropriate technical and organizational measures to keep your Personal Information confidential and secure in accordance with our internal procedures covering the storage, disclosure of and access to Personal Information. Personal Information may be kept on our Information Technology systems, those of our contractors or in paper files.

Transferring your Personal Information outside the European Economic Area ("EEA") (if GDPR applies)

For Personal Information subject to the General Data Protection Regulation (EU) 2016/679 ("GDPR") we may transfer your Personal Information outside the EEA for the Permitted Purposes as described above. This may include countries that do not provide the same level of protection as the laws of your home country (for example, the laws within the EEA or the United States). We will ensure that any such international transfers are made subject to appropriate or suitable safeguards if required by the GDPR or other relevant laws. You may contact us at any time using the contact details below if you would like further information on such safeguards.

With respect to persons covered by GDPR, in case Personal Information is transferred to countries or territories outside of the EEA that are not recognized by the European Commission as offering an adequate level of data protection, we have put in place appropriate data transfer mechanisms to ensure Personal Information is protected.

Notice to California Residents: As a federally-regulated provider of financial services, IBKR is broadly exempt from the California Consumer Privacy Act (CCPA). Personal information we collect from clients and prospective clients is protected under separate federal legislation. Over the past 12 months, the only type of information we have collected potentially subject to the CCPA is web-browsing information regarding passive visitors to our website who are California residents, but are not our clients and do not provide us with any specific personal information (name, email address, street address, social security number, etc.) to request information about our services, start an account application, or become a client. Information collected from these anonymous, passive visitors to our website may include IP address and browser-specific tags. We do not sell this information to third parties. We only use this information for internal purposes, such as to determine which advertisements are working and which content on our website is most interesting to visitors. Under the CCPA, California residents connected to this type of web-browsing data have a right to request access to it or request that it be deleted. However, we are unable (and not required) to process such requests because we cannot connect such passive web-browsing information collected with an email address or other personal information that we can use to verify that a requesting party is in fact connected to a specific web-browser or IP address.

Updating your Personal Information

If any of the Personal Information that you have provided to us changes, for example if you change your email address or if you wish to cancel any request that you have made of us, please let us know by contacting IBKR Customer Service through the IBKR website at <u>interactivebrokers.com/help</u>. We will not be responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete Personal Information that you provide to us.

How long do we retain your Personal Information?

We retain your Personal Information in an identifiable form in accordance with our internal policies which establish general standards and procedures regarding the retention, handling and disposition of your Personal Information. Personal Information is retained for as long as necessary to meet legal, regulatory and business requirements. Retention periods may be extended if we are required to preserve your Personal Information in connection with litigation, investigations and proceedings.

Further rights for persons or information covered by GDPR

With respect to EEA residents and where your Personal Information is processed by an IBKR Entity established in the EEA ("Covered Individuals"), you have a number of legal rights under GDPR in relation to the Personal Information that we hold about you. These rights include:

- Obtaining information regarding the processing of your personal information and access to the personal information that we hold about you. Please note that there may be circumstances in which we are entitled to refuse requests for access to copies of personal information, (in particular, information that is subject to legal professional privilege);
- Requesting that we correct your personal information if it is inaccurate or incomplete;
- Requesting that we erase your personal information in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal information but we are legally entitled to retain it:
- Objecting to, and requesting that we restrict, our processing of your personal information in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your personal information but we are legally entitled to refuse that request;
- Withdrawing your consent, although in certain circumstances it may be lawful for us to continue processing without your consent if we have another legitimate reason (other than consent) for doing so.

We have designated a Data Protection Officer ("DPO") to enhance and promote compliance with and understanding of privacy and data protection principles. If you wish to do any of the above please send an email to <u>dpo@interactivebrokers.co.uk</u>.

We may request that you prove your identity by providing us with a copy of a valid means of identification in order for us to comply with our security obligations and to prevent unauthorized disclosure of data. We reserve the right to charge you a reasonable administrative fee for any manifestly unfounded or excessive requests concerning your access to your data and for any additional copies of the Personal Information you request from us.

We will consider any requests or complaints that we receive and provide you with a response in a timely manner. If you are not satisfied with our response, you may take your complaint to the relevant privacy regulator. We will provide you with details of your relevant regulator upon request.

Updates to this Privacy Policy

This Privacy Policy was last updated on 17 May 2018. We reserve the right to update and change this Privacy Policy from time to time, for example, in order to reflect any changes to the way in which we process your Personal Information or changing legal requirements. In case of any such changes, we will post the changed Privacy Policy on our website or publish it otherwise. The changes will take effect as soon as they are posted on our website.

How to contact us

We welcome your views about our website and our Privacy Policy. If you have any questions about this Policy, please contact the Data Protection Office at <u>dpo@interactivebrokers.co.uk</u> or please contact IB Customer Service through the IB website at <u>interactivebrokers.com/help</u>.

Interactive Brokers Group Cookie Policy

What are Cookies and Web Beacons?

Cookies are pieces of data that a website transfers to a user's hard drive for record-keeping purposes. Web beacons are transparent pixel images that are used in collecting information about website usage, e-mail response and tracking. Generally, cookies may contain information about your Internet Protocol ("IP") addresses, the region or general location where your computer or device is accessing the internet, browser type, operating system and other usage information about the website or your usage of our services, including a history of the pages you view.

How We Use Cookies and Web Beacons

Interactive Brokers Group collects information from cookies and web beacons and stores it in an internal database. This information is retained in accordance with our Privacy Policy. This website uses the following cookies and web beacons:

Strictly Necessary Cookies

These cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. You can configure your browser to block or alert you about these cookies, but certain areas of the site will not function properly. These cookies do not store any personal data.

Performance Cookies and Web Beacons

These cookies and web beacons allow us to count visits and traffic sources so we can measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how visitors move around the site. All information that these cookies and web beacons collect is aggregated and, therefore, anonymous. If you do not allow these cookies and web beacons our aggregated statistics will not have a record of your visit.

The website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to help analyse how you use this website. The information generated by the cookie about your use of this website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purposes of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google.

Functional Cookies

These cookies enable the website to provide enhanced functionality and personalization. They may be set by us or by third party providers whose services we have added to our pages. If you do not allow these cookies, some or all of these services may not function properly.

Targeting Cookies and Web Beacons

These cookies and web beacons may be set throughout our site by our advertising partners. They may be used by those companies to build a profile of your interests and show you relevant advertisements on other sites. They do not store personal information that could identify you directly, but are based on uniquely identifying your browser and internet device. If you do not allow these cookies and web beacons, you will experience less targeted advertising. The website does not track users when they cross to third party websites, does not provide targeted advertising to them and therefore does not respond to Do Not Track ("DNT") signals.

Managing Your Cookie Preferences

You have many choices with regards to the management of cookies on your computer. All major browsers allow you to block or delete cookies from your system. However, if you do decide to disable cookies you may not be able to access some areas of our website or the website may function incorrectly. To learn more about your ability to manage cookies and web beacons and how to disable them, please consult the privacy features in your browser or visit www.allaboutcookies.org.

This website may link through to third party websites which may also use cookies and web beacons over which we have no control. We recommend that you check the relevant third parties privacy policy for information about any cookies and web beacons that may be used.



Swiss physically settled warrants may lapse worthless unless closed out before expiration date.

You should understand the risks associated with an investment in the Warrants and should only reach an investment decision after careful consideration of those risks and a review of the Warrants' issuance documents as published in the issuers' websites. An investment in the Warrants bears a high risk of losing the entire initial investment.

The vast majority of share warrants listed for trading on the SIX Swiss Exchange (the "Warrants") are physically settled. That means that upon exercise the underlying equity securities are delivered by the Warrants' issuer to the investor.

Interactive Brokers ("IB") does not support physical delivery of the underlying shares and does not provide an exercise facility for you to receive the Warrants' underlying shares. Warrants held in your account with Interactive Brokers cannot be physically settled. Before investing in the Warrants you should understand that you will only be able to realise any market value of a Warrant exclusively by closing out the position with trades before expiration date. **If a position is not closed before the Warrant's expiration date, the Warrant will lapse worthless even if it has theoretical intrinsic market value.**

IB will not automatically close out your position in the Warrants to prevent lapsing events. **It is your sole responsibility to monitor expirations and last trading dates for the Warrants you hold, and manage your positions accordingly.** You understand and acknowledge that bid/offer spreads may widen significantly as the Warrants near expiration, and you should take this into account when deciding when to close out your positions.

Under normal market conditions, the Warrants' Issuers or the Lead Managers, as applicable, intend to provide bid and/or offer prices for the Warrants on a regular basis. However, the Issuers or the Lead Managers, as applicable, have made no firm commitment to provide liquidity by means of bid and/or offer prices for the Warrants, and have assumed no legal obligation to quote any such prices or with respect to the level or determination of such prices.

You should not rely on the ability to sell the Warrants at a specific time or at a specific price. You should note that prices quoted typically include a spread and therefore may deviate from the market value of the Warrants. In special market situations, the spread between the bid and offer prices in the secondary market may be temporarily expanded. Hence you might have to sell at a price considerably lower than the actual value of the Warrants at the time of their sale. **By selling the Warrants in the secondary market you might receive less than the capital invested. If you do not sell the Warrants before expiry date, your investment will expire worthless.**



Risks of After-Hours Trading

There are special characteristics and unique risks associated with trading in securities at times that are outside the ordinary trading hours for the exchange(s) upon which such securities are traded ("After-Hours Trading" or "Extended Hours Trading"). Customers must familiarize themselves with these risks and determine whether After-Hours Trading is appropriate in light of their objectives and experience. Customers are responsible for familiarizing themselves with the hours of the relevant markets upon which they trade and for determining when to place orders for particular securities, how they wish to direct those orders, and what types of orders to use. Interactive Brokers' offer of After-Hours Trading does not constitute a recommendation or conclusion that After-Hours Trading will be successful or appropriate for all customers or trades.

Some risks associated with After-Hours Trading are as follows:

- 1. **Risk of Lower Liquidity.** Liquidity refers to the ability of market participants to buy and sell securities. Generally, the more orders that are available in a market, the greater the liquidity. Liquidity is important because with greater liquidity it is easier for investors to buy or sell securities, and as a result, investors are more likely to pay or receive a competitive price for securities purchased or sold. There may be lower liquidity in extended hours trading as compared to regular market hours. As a result, your order may only be partially executed, or not at all.
- 2. **Risk of Higher Volatility.** Volatility refers to the changes in price that securities undergo when trading. Generally, the higher the volatility of a security, the greater its price swings. There may be greater volatility in extended hours trading than in regular market hours. As a result, your order may only be partially executed, or not at all, or you may receive an inferior price in extended hours trading than you would during regular markets hours.
- 3. **Risk of Changing Prices.** The prices of securities traded in extended hours trading may not reflect the prices either at the end of regular market hours, or upon the opening of the next morning. As a result, you may receive an inferior price in extended hours trading than you would during regular market hours.
- 4. **Risk of Unlinked Markets.** Depending on the extended hours trading system or the time of day, the prices displayed on a particular extended hours system may not reflect the prices in other concurrently operating extended hours trading systems dealing in the same securities. Accordingly, you may receive an inferior price in one extended hours trading system than you would in another extended hours trading system.
- 5. Risk of News Announcements. Normally, issuers make news announcements that may affect the price of their securities after regular market hours. Similarly, important financial information is frequently announced outside of regular market hours. In extended hours trading, these announcements may occur during trading, and if combined with lower liquidity and higher volatility, may cause an exaggerated and unsustainable effect on the price of a security.
- 6. **Risk of Wider Spreads.** The spread refers to the difference in price between what you can buy a security for and what you can sell it for. Lower liquidity and higher volatility in extended hours trading may result in wider than normal spreads for a particular security.
- 7. Risk of Lack of Calculation or Dissemination of Underlying Index Value or Intraday Indicative Value ("IIV"). For certain Derivative Securities Products, an updated underlying index value or IIV may not be calculated or publicly

disseminated in extended trading hours. Since the underlying index value and IIV are not calculated or widely disseminated during the pre-market and post-market sessions, an investor who is unable to calculate implied values for certain Derivative Securities Products in those sessions may be at a disadvantage to market professionals. Additionally, securities underlying the indexes or portfolios will not be regularly trading as they are during Regular Trading Hours, or may not be trading at all. This may cause prices during Extended Trading Hours to not reflect the prices of those securities when they open for trading.

8. **Index Values.** The Exchange will not report a value of an index underlying an index option trading during Extended Trading Hours, because the value of the underlying index will not be recalculated during or at the close of Extended Trading Hours.

During After-Hours Trading, Interactive Brokers ("IB") may provide quotations from and execute Customer trades through various Electronic Communications Networks ("ECNs"), exchanges or other trading systems ("After-Hours Trading Facilities"). Quotations provided during After-Hours Trading may be different than quotations provided during exchange trading hours. Likewise, it is possible that the quotations displayed by IB from After-Hours Trading Facilities on which IB can execute Customer trades may be less favorable than those on other After-Hours Trading Facilities to which IB does not have access. Last sale information provided by IB may not reflect the prices of the most recent trades on all of the various After-Hours Trading Facilities.

For a list of trading hours for exchanges and ECNs, click here.



IB Disclosure Pursuant to FINRA Rule 5350 Regarding Stop and Stop-Limit Orders in U.S. Listed Stocks and Warrants

Interactive Brokers ("IB") is furnishing this document to you to provide information about the manner in which stop and stop-limit orders that you submit to Interactive to buy or sell stocks and warrants will be managed.

The U.S. Securities & Exchange Commission (the "SEC") has stated that a stop order, also referred to as a "stoploss order", is "an order to buy or sell a stock once the price of the stock reaches a specified price, known as the stop price. When the stop price is reached, a stop order becomes a market order. A buy stop order is entered at a stop price above the current market price. A sell stop order is entered at a stop price below the current market price. Investors generally use a sell stop order to limit a loss or to protect a profit on a stock that they own."

The SEC has described a stop-limit order as "an order to buy or sell a stock that combines the features of a stop order and a limit order. Once the stop price is reached, a stop-limit order becomes a limit order that will be executed at a specified price (or better)."

IB offers its customers several ways to submit stop and stop-limit orders in stocks and warrants. On most exchanges, Interactive implements and manages stop (or stop-limit) orders in the firm's systems, submitting market (or limit) orders to the exchange when the customer-specified trigger price has been reached and passed. On some exchanges, Interactive may submit stop and/or stop-limit orders using the exchange's native order type. For each exchange on which a customer may trade, Interactive specifies on the Interactive Brokers website whether stop and stop-limit orders are managed (i.e., "simulated") by IB or submitted using the exchange's native order type. (This information is available under "Order Type" on the page on the IB website concerning each exchange.)

For stop and stop-limit orders that IB simulates, the order will be triggered and a market (or limit) order will be submitted for execution when the following occurs (unless the customer specifies otherwise when submitting the order):

- The Primary Exchange on which the stock trades is open, is holding regular trading hours, and has a valid bid/ask quote for the stock. Regular trading hours are usually between 9:30 a.m. - 4:00 p.m. Eastern Time, Monday through Friday for exchange-listed stocks. (Please note that OTCBB- and Pink-listed securities are not subject to these limitations.); and
- 2. The last sale price for the specific stock is at or above (for buy stop orders) or at or below (for sell stop orders) the customer's specified trigger price; and
- 3. The last trade price is within, or not more than 0.5% outside of, the consolidated bid/ask for the stock.

These additional requirements are subject to change, including the leeway percentage of 0.5% outside of the consolidated bid/ask for the stock. Please check the IB website for the most current information.

Interactive also allows customers to customize the manner in which their stop and stop-limit orders are triggered. Customers may change the trigger method to include or exclude certain trigger criteria (*e.g.*, last price, bid/ask, midpoint of bid/ask, regular trading hours only, etc.) based on the customer's specific trading objectives. Information on how to customize the trigger methodology for stop and stop-limit orders is provided on the Interactive Brokers website and in the IB Trader Workstation User's Guide.

Important notes concerning stop and stop-limit orders:

- <u>Native Stop or Stop-Limit Order Types Offered by Exchanges May Differ from the Traditional Order Type</u>. Stop and stop-limit orders submitted using an exchange's native order type may have additional non-standard attributes or be managed in a way different than the traditional definition of a stop or stop-limit order. Please review the exchange's own website and/or contact the exchange for more information about how an exchange may handle a stop or stoplimit order submitted using the exchange's native order type. Among other things, exchanges may include attributes in native stop orders that result in the order not executing at all.
- 2. There is No Guarantee That a Stop or Stop-Limit Order Will Be Executed At or Near the Trigger Price or Will Be Executed At All. Please be aware that a stop or stop-limit order may not be triggered or be executed at or near the specified trigger price. Among other things, execution venues may fail to honor their posted prices or may experience delays or failures that may prevent or delay a stop order from being executed. In addition, market events may result in a stop order executing far from the customer's specified trigger price. For instance, in situations where many customers submit a stop order with a similar trigger point or there is a lack of liquidity in the market, a stop order may execute a significant amount away from the specified trigger price and a stop-limit order may not execute at all.