



OMNIBUS AND CARRYING BROKERS AGREEMENT REGARDING IDENTIFYING INFORMATION AND BENEFICIAL OWNERS

Under relevant U.S. rules and regulations, a non-disclosed broker account is considered an omnibus account.

IBKR is required by various futures exchanges ("Exchanges") to maintain a complete list of all omnibus and carrying broker accounts maintained on its books.¹ Such list will include identifying information such as account name, number, address and classification ("Identifying Information") and will be promptly provided to relevant Exchanges upon request. In addition, the identities and positions of the beneficial owners ("Beneficial Owner Information") of any omnibus account will be immediately disclosed to relevant Exchanges upon request. You represent and warrant that (i) you shall provide any such Identifying Information and/or Beneficial Owner Information upon request, (ii) you know of no applicable law that prevents you from providing Identifying Information or Beneficial Owner Information to IBKR for the purposes of this notice and (iii) you will cooperate with IBKR and/or the relevant regulatory body that requests Identifying Information and/or Beneficial Owner Information.

NOTICE TO OMNIBUS ACCOUNTS: ACKNOWLEDGMENT AND AGREEMENT REGARDING RESTRICTIONS ON ACCESS FOR SANCTIONED PARTIES

Under relevant U.S. rules and regulations, a non-disclosed broker account is considered an omnibus account.

U.S. futures exchanges ("Exchanges") prohibit direct and indirect access to a market participant that is a "sanctioned party" (or similar term) as defined by the given Exchange's rules.² For example, Chicago Mercantile Exchange Inc., The Board of Trade of the City of Chicago, Inc., New York Mercantile Exchange, Inc., and Commodity Exchange, Inc. each define "Sanctioned Party" as:

[P]arties that are (i) identified on the Specially Designated Nationals and Blocked Person List of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") ("Restricted Persons"), (ii) 50% or more owned by Restricted Persons, (iii) located in a country or territory subject to comprehensive economic sanctions administered by OFAC ("Restricted Country or Territory " or "Restricted Countries or Territories"), (iv) owned or controlled by the governments of Restricted Countries or Territories, (v) subject to OFAC restrictions where such restriction prohibits a specific activity which would in turn prohibit the party from trading on an exchange or settling a transaction at an exchange, (vi) subject to restrictions administered or imposed by a state or government authority authorized to issue economic sanctions and blocking measures that has jurisdiction over a Clearing Member (each a "Sanctioning Body") or (vii) acting on behalf of any of the foregoing.

Accordingly, omnibus accounts are expressly prohibited from acting for customers, directly or indirectly, that are sanctioned parties (or similar term) under relevant Exchange rules. Moreover, as the holder of an omnibus account with a US futures commission merchant, you must notify all of your omnibus account customers of such prohibition.

If you become aware that a sanctioned party (or similar term) under Exchange rules is directly or indirectly acting through the omnibus account, you must immediately notify Interactive Brokers and, unless permitted (either not restricted or specifically authorized) by OFAC and/or any sanctioning body, as applicable, under Exchange rules, cancel all direct and indirect access to the omnibus account by such market participant.

NOTICE TO NON-DISCLOSED BROKERS: ACKNOWLEDGMENT AND AGREEMENT REGARDING EU RETAIL CUSTOMER RESTRICTIONS

Under relevant U.S. rules and regulations, a non-disclosed broker account is considered an omnibus account.

If you are a non-disclosed broker for one or more retail investors (as defined in Directive 2015/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments) located in the European Union (an "EU Retail Investor"), no packaged retail and insurance-based investment product ("PRIIP"), as such term is used in Regulation (EU) No 1286/2014 (the "PRIIP Regulation"), may be offered, sold or arranged for, on behalf of or with such EU Retail Investor, or otherwise made available to an EU Retail Investor, unless you have made available a key information document ("KID") to the EU Retail Investor.

In the case of an exchange-traded PRIIP, the PRIIP Regulation requires that:

1. the KID must be produced for the PRIIP by the relevant exchange; and
2. the KID must be provided to the EU Retail Investor by you.

If you have omnibus customers, you acknowledge and agree that you will send a similar notice to your omnibus customers.³

¹ For example, see CME Rule 960(A).

² For example, see CME Rule 960(D).

³ See CME Rule 960(F).