

Bloomberg Tradebook

Bloomberg Tradebook Canada Company Compliance Notices/ Business Continuity Statement December 2024

1. Account Protection

Bloomberg Tradebook Canada Company (the “**Firm**”) is a member of the Canadian Investor Protection Fund (“**CIPF**”) and the English/French version of the CIPF official brochure can be found at the link below:

<https://assets.bbhub.io/professional/sites/27/CIPF-Brochure-English-and-French.pdf>

CIPF plays an important role in the overall system of investor protection in Canada.

The Firm is also a member of the Securities Investor Protection Corporation (“**SIPC**”). SIPC plays an important role in the overall system of investor protection in the United States. For more information about SIPC, including a brochure entitled “How SIPC Protects You”, please contact SIPC at:

Securities Investor Protection Corporation

1667 K Street NW, Ste. 1000

Washington, DC 20006-1620

Tele: (202) 371-8300

Fax: (202) 223-1679

Email:

asksipc@sipc.org

Website: www.sipc.org

2. Investor Protection/Education

The Firm is a member of the Canadian Investment Regulatory Organization (“**CIRO**”). CIRO provides investor education resources at <https://www.ciro.ca/office-investor/>.

The Firm is also a member of the Financial Industry Regulatory Authority (“**FINRA**”). FINRA provides investor educational resources at https://www.finra.org/investors#.

FINRA also provides investors access to BrokerCheck, a free tool to research the background and experience of financial brokers and firms. You can access this tool and a copy of a brochure that includes important information concerning FINRA BrokerCheck through the following methods:

- The FINRA BrokerCheck Hotline: (800) 289-9999
- The FINRA BrokerCheck website: <https://brokercheck.finra.org/>

3. New Client Procedures

The USA Patriot Act and the Proceeds of Crime (Money Laundering) and Terrorist Financing Act (Canada), which were adopted to prevent money laundering and terrorist financing, require all U.S. financial institutions and Canadian registered securities dealers, respectively, to obtain, record and verify information that identifies each new individual or entity. When you onboard with the Firm, we will ask you for your name, address, and an identification number (for U.S. firms, this means an employer identification number).

In addition, you may be required to provide identification documents as necessary to enable the Firm to verify your identity. We may also screen your name against various databases to verify your identity. All information and documentation will be treated in a manner so as to protect your privacy.

We are required to verify the identity of our clients. In certain circumstances, we may not be able to onboard you or permit you to conduct any transactions with your brokers or other liquidity providers over the relevant systems until we have obtained and verified the necessary identification information.

4. Business Continuity

The Firm's Business Continuity/Disaster Recovery Plan ("**BC/DR Plan**") details the procedures to be implemented in response to a physical, technological, pandemic, or other form of event that materially and adversely affects the Firm including an internal or external significant business disruption (a "**BC/DR Event**"). The BC/DR Plan sets out the procedures that the Firm will use to manage and recover essential communications and technology infrastructure, as well as personnel and operational assets, following a BC/DR Event. The BC/DR Plan facilitates a company-wide state of readiness and requires prompt responses from relevant personnel after a BC/DR Event has occurred. Firm plans to quickly recover and resume business operations after a BC/DR Event and respond by safeguarding its personnel and property, making a financial and operational assessment, protecting the Firm's books and records, and allowing its clients to transact business.

Among other items, the Firm's BC/DR Plan addresses the following if the Firm is unable to continue its business: (1) data back-up and recovery; (2) mission critical systems; (3) financial and operational assessments; (4) alternative communications with clients, personnel, and regulators; (5) alternate physical location of personnel; (6) critical business constituent, bank and counter-party impact; (7) regulatory reporting;

and (8) assuring its clients prompt access to their funds and securities if it were to engage in a business where it holds such funds and securities. Please note that the Firm does not currently engage in any business where it holds such funds and securities.

The Firm's network and technology infrastructure that supports mission critical systems used to provide the Firm's services exist in multiple data centers. The Firm's business operations are conducted from multiple office locations and the Firm has access to backup office space during a BC/DR Event. In addition, the Firm and its service provider, Bloomberg L.P., support secure remote access (e.g., work-from-home capabilities) for relevant personnel.

The Firm will use all available means of communication to notify its clients. If the BC/DR Event is so severe that it prevents the Firm from remaining in business, it will assure its clients' prompt access to their funds and securities if it engages in such business where the Firm holds such funds and securities.

Contacting Us – In the event of a BC/DR Event or for more information, contact the Firm at tbc_cmpl@bloomberg.net or by calling +1(212) 617-7070 (US) or +1 (212) 318-2000 (alternative number). These plans are subject to modification and any required updates will be posted to the Firm's website (<https://www.bloomberg.com/professional/solution/tradebook/>).

5. Customer Complaints - Rule 17a-3(a)(18)((ii) of the Securities Exchange Act of 1934 and Rule 3216(5)(1) and 3700 of the Investment Dealer and Partially Consolidated Rules

Customer complaints may be directed to the following:

Bloomberg Tradebook Canada Company Brookfield Place –
TD Canada Trust Tower
161 Bay Street
Suite 4300
Toronto, Ontario
M5J 2S1 Canada
Attn: Compliance Department
Tbc_cmpl@bloomberg.net
416 203-5701

6. Disclosures in Connection with Access to Negotiation Systems

In connection with a client's access and use of certain negotiation systems operated by the Firm's affiliates including Bloomberg Tradebook LLC (the "**Negotiation Systems**"), which constitute part of the Services (as defined in the Bloomberg Tradebook Canada Access Agreement), client acknowledges the following:

1. The Negotiation Systems are not "foreign organized regulated markets"¹ as

¹ "Foreign organized regulated market" is defined in UMIR Rule 1.1 to mean a market outside of Canada:
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- defined in the Canadian Investment Regulatory Organization (“**CIRO**”) Universal Market Integrity Rules (“**UMIR**”).
2. If client is a CIRO Dealer Member or transacts on the Negotiation Systems through an affiliate that is a CIRO Dealer Member, it or such affiliate must comply with the requirements of UMIR Rule 6.4 – Trades to be on a Marketplace, including the requirement in UMIR Rule 6.4(1) that all trades must be executed on a marketplace unless otherwise exempted under UMIR Rule 6.4(2).
 3. Client, each of its Authorized Traders and its counterparties must be in compliance in all material respects with applicable Canadian securities laws, including without limitation, any applicable prospectus and dealer registration requirements or applicable exemptions from such requirements for all Instruments negotiated or transacted through the Negotiation Systems.

7. Disclosure for Clients Located in the State of Utah under Section R164-4-1(D)(4)(b)(iii) of Utah Administrative Code

Please be advised that registered representatives of the Firm may be dually registered with the Firm’s affiliate, Bloomberg Tradebook LLC.

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- a. that is an exchange, quotation or trade reporting system, alternative trading system or similar facility recognized by or registered with a securities regulatory authority that is an ordinary member of the International Organization of Securities Commissions;
 - b. on which the entry of orders and the execution or reporting of trades is monitored for compliance with regulatory requirements at the time of entry and execution or reporting by a self-regulatory organization recognized by the securities regulatory authority or by the market if the market has been empowered by the securities regulatory authority to monitor the entry of orders and the execution or reporting of trades on that market for compliance with regulatory requirements; and
 - c. that displays and provides timely information to information vendors, information processors or persons providing similar functions respecting the dissemination of data to market participants for that market of at least the price, volume and security identifier of each trade at the time of execution or reporting of the trade on that market,

but, for greater certainty, does not include a facility of a market to which trades executed over-the-counter are reported unless:

- d. the trade is required to be reported and is reported to the market forthwith following execution;
- e. at the time of the report, the trade is monitored for compliance with securities regulatory requirements; and
- f. at the time of the report, timely information respecting the trade is provided to information vendors, information processors or persons providing similar functions respecting the dissemination of data to market participants for that market.