Bloomberg Tradebook

Bloomberg Tradebook LLC Compliance Notices/ Business Continuity Statement December 2024

1. Account Protection

Bloomberg Tradebook LLC (the "**Firm**") is 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 St. N.W., Suite 1000 Washington, D.C. 20006-1620

Tele: (202) 371-8300 Fax: (202) 223-1679 Email <u>asksipc@sipc.org</u> Website: <u>www.sipc.org</u>

2. Investor Protection/Education

The Firm is 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/

The Firm is also registered with the Securities Exchange Commission and the Municipal Securities Rulemaking Board ("MSRB"). The MSRB provides investor educational resources including an investor brochure that describes the protections that may be

provided by the MSRB rules and how to file a complaint with an appropriate regulatory authority. These resources can be accessed on the MSRB website at http://msrb.org/.

3. New Client Procedures

The USA Patriot Act which was adopted to prevent money laundering and terrorist financing requires all U.S. financial institutions 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 our 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. The Firm plans to quickly recover and resume business operations after a BC/DR 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, employees, and regulators; (5) alternate physical location of personnel; (6) critical business constituent, bank, and counter-party impact; (7) regulatory reporting; and (8) assuring our clients prompt access to their funds and securities if we engage in a business where we hold such funds and securities. Please note that the Firm does not currently engage in any business where it holds customer funds or securities.

While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, your orders and, if applicable, requests

for funds and securities could be delayed during this period.

The Firm's network and technology infrastructure that supports its 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 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 <u>TBUSCmpl@bloomberg.net</u> 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

Customer complaints may be directed to the following:

Bloomberg Tradebook LLC 731 Lexington Ave. New York, NY 10022 Attn: Compliance Department Tbuscmpl@bloomberg.net (646) 324 – 3179

6. Disclosures to Canadian Permitted Clients under National Instrument 31-103

As a client of the Firm residing in a jurisdiction of Canada, you are advised that we operate under an exemption from the dealer registration requirements in your jurisdiction and, as such, we are not relying upon any registration as a dealer in your jurisdiction when operating under that exemption. In addition, we wish to notify you of the following:

- (a) our head office is located at 731 Lexington Avenue, New York, NY 10022, USA; and
- (b) you may face difficulty in enforcing legal rights you may have against us because of the above and because we are resident outside of Canada and all or substantially all of our assets are situated outside of Canada.

We have appointed Agents for Service in Canada as indicated in the table below:

Jurisdiction	Agent For Service
British Columbia	152928 Canada Inc. c/o Stikeman Elliott LLP Suite 1700, 666 Burrard Street Vancouver, British Columbia V6C 2X8
Alberta	152928 Canada Inc. c/o Stikeman Elliott LLP 4200 Bankers Hall West 888 - 3rd Street S.W. Calgary, Alberta T2P 5C5
Ontario	152928 Canada Inc. c/o Stikeman Elliott LLP 5300 Commerce Court West 199 Bay Street Toronto, Ontario M5L 1B9
Quebec	152928 Canada Inc. c/o Stikeman Elliott LLP 1155 René-Lévesque Blvd. West, 41st Floor Montréal, Québec H3B 3V2
Manitoba	Thompson Dorfman Sweatman LLP 1700-242 Hargrave Street Winnipeg, Manitoba R2C 0V1
New Brunswick	Stewart McKelvey Suite 1000, Brunswick House, 44 Chipman Hill Saint John, New Brunswick E2L 2A9
Nunavut	Field LLP P.O. Box 1734 House 2436 Iqaluit, NU X0A 0H0
Nova Scotia	Stewart McKelvey Queen's Marque, 600-1741 Lower Water Street Halifax, Nova Scotia B3J 0J2
NWT	Field LLP Suite 601, 4920 52 nd Street Yellowknife, Northwest Territories X1A 3T1
PEI	Stewart McKelvey 65 Grafton Street, P.O. Box 2140 Charlottetown, Prince Edward Island C1A 8B9
Saskatchewan	MLT Aikins LLP 1500 - 1874 Scarth Street, Regina, Saskatchewan S4P 4E9
Yukon	Macdonald & Company Suite 200, Financial Plaza 204 Lambert Street Whitehorse, Yukon Y1A 1Z4

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 certain registered representatives of the Firm are dually registered with the Firm's affiliate, Bloomberg Tradebook Canada Company.

8. Extended Hours Trading Risk Disclosure

Pursuant to FINRA Rule 2265, please review the following disclosure regarding the general risks of engaging in extended hours trading¹:

- Risk of Lower Liquidity: there may be lower liquidity in extended hours trading as compared to regular market hours and as a result, your order may only be partially executed by your liquidity provider, or not at all.
- Risk of Higher Volatility: there may be greater volatility in extended hours trading
 and as a result, your order may only be partially executed by your liquidity provider,
 or not at all, or you may receive an inferior price than you would during regular
 market hours.
- 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.
- Risk of Unlinked Markets: 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 and as a result you may receive an inferior price in one extended hours trading system than you would in another trading system.
- Risk of News Announcements: normally, issuers make news announcements that may affect the price of their securities after regular market hours. These announcements may occur during extended hours trading, and if combined with lower liquidity and higher volatility, may cause an exaggerated and unsustainable effect on the price of a security.
- Risk of Wider Spreads: lower liquidity and higher volatility in extended hours trading may result in wider than normal spreads for a particular security.
- 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.

¹ "Extended hours trading" means trading outside of "regular trading hours". "Regular trading hours" generally means the time between 9:30 a.m. and 4:00 p.m. Eastern Standard Time. 500878064