



USA PATRIOT ACT

To help the government fight the funding of terrorism and money laundering activities, Federal law requires all financial institutions to obtain, verify and record information that identifies each person or entity that opens an account with TJM.

What this means to you is when you open an account with us, you will be asked for your name, address, tax ID #, beneficial ownership and other information which identifies you.

There are two categories of beneficial owners for legal entities:

- Direct or Indirect owners with a 25% or more equity interest in the legal entity.
- Any individual with significant responsibility to control, manage or direct the legal entity customer (e.g., a Chief Executive Officer, Vice President, Treasurer, etc.)

We are required to notify you that TJM Investments, LLC, TJM Institutional Services, LLC, and/or TJM Europe LLP may not be used to provide access to our financial institutions by any party prohibited by the U.S. Sanctions list, which can be found at: <https://sanctionssearch.ofac.treas.gov/>.

Additionally, Section 311 of the USA PATRIOT Act prohibits TJM from opening or maintaining a correspondent account for, or on behalf of the following entities that have been specifically designated by the Financial Crimes Enforcement Network ("FinCEN") as primary money laundering concern and any existing correspondent accounts maintained by or on behalf of these entities must be terminated immediately.

If we become aware that any of these entities are indirectly using the correspondent account you maintain with our financial institution, we will be required to take appropriate steps to prevent such access including terminating your relationship with TJM. The entities are as follows:

- Burma
- Democratic People's Republic of Korea
- Islamic Republic of Iran
- ABLV Bank, AS
- Bank of Dandong
- Commercial Bank of Syria (Syrian Lebanese Commercial Bank)
- FBME Bank Ltd.
- Halawi Exchange Co.
- Kassem Rmeiti and Co. for Exchange

PHONE LINES

As is industry standard practice, TJM records its phone lines for quality control purposes. If you choose to communicate with TJM via telephone, you are consenting to the recording of those conversations.

TJM may be required to turn these recordings over to certain regulatory and/or governmental bodies in response to regulatory inquiries or subpoenas.

RATES

The rates for TJM's execution fees are generally documented in an Execution Agreement as an addendum or in an email to the Customer. Rates are subject to change on an individual transaction basis. Rates may vary based on products traded, customer, volume, or other factors within TJM's sole discretion. Those negotiated changes may occasionally be the subject of verbal agreements between TJM and Customer. All verbally negotiated rate changes must be made on a recorded line to be deemed effective. Notwithstanding the foregoing, the clearing rates, execution rates, and fees shown on the Customer's trade recaps, daily statements, invoices and other billing information shall govern. It is imperative that Customers review trade recaps, daily statements, invoices and other billing information and notify their TJM Broker and/or TJM promptly of any discrepancies. If you wish to receive trade recaps via email daily, please contact your TJM Broker to do so.

NOT HELD ORDERS ENTERED WITH FLOOR BROKERS:

This Customer Disclosure Document will confirm our understanding of the manner in which you want us to handle orders. Absent specific instructions to the contrary, we understand that when you place an order with us, you are directing that we handle your order on a "not held" basis, which means you are giving us discretion to exercise our brokerage judgment as to time and price, and we will work that order accordingly.

A "not held" order is an order marked "not held", "take time" or which bears any qualifying notation giving discretion as to the time and/or price at which the order is to be executed.

"Held" orders do not permit us to exercise discretion in handling your order. Depending on whether your order is a market order or a limit order, "held" orders obligate us to execute your market order immediately at the then prevailing market price; or to execute your limit order at your limit price (or better), which may not necessarily be the best price that can ultimately be obtained.

An order entrusted to our Floor Broker will be considered a Not Held Order, unless otherwise specified as "Held" by you as the Customer prior to the entry of each order on a recorded line, via email or where the order is an option order received by the Cboe Exchange electronically and subsequently routed to a Floor Broker or PAR Official pursuant to your instructions.

This may under certain circumstances also result in your order not being executed at all.

BEST EXECUTION POLICY

It is a fundamental principle of our business that we will take reasonable steps to obtain, when executing orders, the best possible result for our clients considering:

1. Price
2. Costs
3. Speed
4. Likelihood of execution and settlement
5. Size
6. Nature or any other consideration relevant to the execution of the order

We will also consider when executing orders and when choosing venues, the explicit external cost of a transaction which includes:

1. Commissions passed on by intermediaries
2. Fees
3. Taxes
4. Exchange fees
5. Clearing and settlement cost

When providing brokerage services to Customers in relation to financial instruments, we will take sufficient steps to achieve the best overall trading result. This means that we will aim to provide best execution subject to and considering the nature of your order, the prices available in the market, the nature of the market in question and a reasonable assessment of the sometimes overlapping and conflicting execution factors. This may conclude in some cases that price may be less important than size in illiquid situations. We will as a matter, of course, check and monitor the fairness of prices proposed as well as gather the market data used in the process of estimation of prices.

SEC RULE 606 DISCLOSURE OF ORDER ROUTING INFORMATION

The U.S. Securities and Exchange Commission's (SEC) client disclosure rule, SEC Rule 606, requires a broker-dealer that routes orders on behalf of customers to prepare quarterly reports that disclose the identity of the venues to which it routed orders for execution and to provide retail customers in particular with certain enhanced disclosures regarding a broker-dealer's order routing practices. Broker-dealers are required to disclose, on customer's request, where they routed a customer's individual orders for execution.

We shall, on request of a Customer, disclose to you for:

- Orders in NMS stocks that are submitted on a held basis;
- Orders in NMS stocks that are submitted on a not held basis where TJM is not required to provide the customer a report under subsection (3) of Reg NMS Rule 606; and
- Orders in NMS securities that are option contracts

In November 2018, the SEC adopted amendments to Rule 606 of Regulation NMS to require broker-dealers to provide enhanced disclosure of information regarding the handling of their customers' orders. Specifically, the SEC adopted new Rule 606(b)(3) to require a broker-dealer, upon request of a customer that places not held orders, to provide specific disclosures, for the prior six months, regarding routing and execution of such orders. These new disclosure requirements are subject to two de minimis exceptions – one pursuant to new Rule 606(b)(4) that applies based on the broker-dealer's NMS stock order flow and another pursuant to new Rule 606(b)(5) that applies based on the customer's NMS stock order flow.

TJM has the obligation, and makes every effort, to execute its Customers' orders at the most favorable terms possible under the facts and circumstances surrounding each Customer order. In addition, TJM will seek to provide price improvement on its Customers' orders whenever such opportunities are reasonably available.

Singularly listed options directed to the Floor of an Exchange are treated as Directed Orders for purposes of this report. Written copies of the Firm's order routing reports are available free of charge upon request. Please direct written report requests to 606requests@tjmbrokerage.com.

TJM prepares two separate reports with respect to its Rule 606 reporting. One report is generated for its TJM Investments business (MPID: TJMI). This report includes options data. A second report is generated for its NYSE Floor Brokerage business also known as MND Partners (MPID: MNDX). To review TJM's Order Routing Information, compiled by quarter, please go to the following site <http://www.tjmbrokerage.com/disclosures> and choose "TJM 606 Report" [MPID: TJMI] and/or "MND 606 Report" [MPID: MNDX].

Supporting Documentation will be made available upon request.

SEC RULE 607 PAYMENT FOR ORDER FLOW DISCLOSURE

TJM does not receive payment for order flow to direct securities orders to a particular venue, absent specific instructions from the Customer regarding where to route an order. TJM will use its brokerage judgment to include price, the opportunity for price improvement, available liquidity, and the speed of execution to determine where to route a particular order.

While TJM does not receive payment for order flow, certain market centers provide rebates or other payments for providing liquidity and charge fees for taking liquidity. Therefore, for any given order or any given time period, TJM may be either charged fees or receive rebates from a particular execution venue for orders executed there.

MARKET ADVISORY

Customer is hereby advised that when Executing Broker handles an order of 500 contracts or more on Customer's behalf, Executing Broker may solicit other parties to execute against Customer's order and may thereafter execute Customer's order using the Chicago Board Options Exchange's AON AIM Solicitation Mechanism. This system provides a single-priced execution, unless the order results in price improvement for the entire quantity, in which case multiple prices may result. For further details on the operation of this mechanism, please refer to Chicago Board Options Exchange (CBOE) Rule 6.74B, which is available at: https://cdn.cboe.com/resources/regulation/rule_book/C1_Exchange_Rule_Book.pdf

When Executing Broker handles an AON agency FLEX option order of 500 contracts or more, Executing Broker may solicit other parties to execute against Customer's order and may therefore execute Customer's order using the Chicago Board Option Exchange's SAM Auction mechanism. This system provides a single-priced execution, unless the order results in price improvement for the entire quantity, in which case multiple prices may result. For further details on the operation of this mechanism, please refer to Chicago Board Options Exchange (CBOE) Rule 24B.5B, which is available at: https://cdn.cboe.com/resources/regulation/rule_book/C1_Exchange_Rule_Book.pdf

Executing Broker may also solicit other parties to execute against Customer's order and may thereafter execute Customer's order using the International Securities Exchange's Solicited Order Mechanism. This system provides a single-price execution only, so that Customer's 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 International Securities Exchange (ISE) Rule 716, which is available at www.ise.com under "Membership, Rules & Fees – Regulatory – ISE Rules. These systems provide a single-price execution only, so that Customer's entire order may receive a better price after being exposed to the Exchange's participants but will not receive partial price improvement.

COMPLAINTS

If you have a complaint regarding the services we provided, please direct it to:
TJM Investments, LLC
Attention: Compliance Department
318 W. Adams Street, Suite 900
Chicago, IL 60606

DODD-FRANK EXTERNAL BUSINESS CONDUCT

The Dodd-Frank Act imposed external business conduct standards on swap dealers. While we are not registered as a swap dealer, it is necessary for us to fulfill a portion of these standards in FX prime brokerage transactions (other than spot) that we intermediate on your behalf. In particular, the rule requires the delivery to you, prior to execution, of pre-trade mid-market price information and, if requested by you, a scenario analysis for the specific trade.

CONFLICTS OF INTEREST POLICY

DISCLOSURE OF FX INTERMEDIARY MATERIAL INCENTIVES, CONFLICTS OF INTEREST AND OTHER MATTERS

The purpose of this Disclosure of FX Intermediary Material Incentives, Conflicts of Interest and Other Matters ("Standard Conflicts Disclosure") is to provide you with information about material conflicts of interest that may arise between you and us when we act as your agent pursuant to that certain Derivatives/FX Prime Brokerage FX Intermediary Business Conduct Agency Agreement (the "Agency Agreement"). Unless otherwise specified, capitalized terms used herein are defined in the Agency Agreement and the Annex thereto.

Our agency role is in connection with providing FX intermediation services for you pursuant to our separate contractual relationship with you. These FX intermediation services include the negotiation and agreement to the material terms and conditions of a Covered Transaction with one or more Executing Dealers based on our market knowledge and access to liquidity through market expertise and relationships with Executing Dealers, other liquidity providers, Trading Facilities (as defined below) and non-registered electronic trading platforms.

In our agency role, conflicts of interests can arise in particular when we have an economic or other incentive to act, or persuade you to act, in a way that favors us or our affiliates. Conflicts of interests can arise in the fees and costs we charge you, the use of our services as opposed to another market participant or trading facility, the decisions we make regarding the execution of your orders, the decisions we make regarding multiple and aggregated orders, our role as an agent to another market participant, the market information we provide or do not provide to you, our ownership or other interests in non-registered electronic trading platforms, and our research (if applicable) and other services we provide in the market. We have provided greater detail on conflicts of interest below.

In addition, we may from time to time provide you with additional disclosure to supplement the information provided herein. This Standard Conflicts Disclosure should be read in conjunction with any such additional disclosures.

In this Standard Conflicts Disclosure and any supplemental disclosure statement that expressly refers to this Standard Conflicts Disclosure, any reference to us includes our affiliates, and we refer to any transaction that we may intermediate for you as a Covered Transaction.

This Standard Conflicts Disclosure is limited to those Covered Transactions for which we are your agent pursuant to the Agency Agreement.

MATERIAL INCENTIVES AND CONFLICTS OF INTEREST

Fees and Costs:

We generally intermediate Covered Transactions to earn a profit. Our profits may derive from explicit fees and commissions, or may be implicit in the difference between payments and deliveries made to or by us (or our Prime Broker) under Covered Transactions and our costs (or gains) in offsetting the resulting exposures. It is possible that we may earn a substantial return from

offsetting positions related to a Covered Transaction while the value of the Covered Transaction to you declines or fails to increase by a commensurate amount. Before you enter into a Covered Transaction, you should review and understand all commissions, fees and other charges for which you will be liable, including all amounts payable or due to us. These charges will affect your net profit (if any) or increase your loss.

We will incur a variety of costs and expenses in connection with intermediating Covered Transactions on your behalf. These may include, without limitation, fees, commissions and other charges that we may become obligated to pay to third parties from time to time in connection with Covered Transactions, including brokerage fees, referral fees, and execution, clearing and/or reporting fees associated with our compliance with applicable law. Unless otherwise agreed, you will not be obligated to reimburse us for these fees, commissions or other charges, but as with any of our other costs and expenses, you should assume they are reflected in the price or other economics of your Covered Transactions. In this regard, we generally do not disclose our costs and expenses except as required by applicable law.

Use of an FX Intermediary's Services:

Under applicable law, including regulations of the Commodity Futures Trading Commission (CFTC), not all Covered Transactions are required to be executed on an exchange or swap execution facility (each, a "Trading Facility"), even if a Trading Facility lists the Covered Transactions for trading. In such circumstances, it may be financially advantageous for us to intermediate a Covered Transaction on your behalf bilaterally in the over-the-counter market (including on a non-registered electronic trading platform) pursuant to a Covered PB Arrangement with one or more Executing Dealers rather than on a Trading Facility. We may thus have an incentive to persuade you to execute your Covered Transaction bilaterally in the over-the-counter market pursuant to a Covered PB Arrangement. Additionally, we may have an incentive to persuade you to intermediate a Covered Transaction with us, instead of directly with an Executing Dealer or your Prime Broker, either bilaterally between you and such Executing Dealer or your Prime Broker or on a non-registered electronic trading platform provided by the Executing Dealer or your Prime Broker (often referred to as a single-dealer platform).

Decisions Regarding Order Execution:

As your agent for the execution of Covered Transactions, subject to applicable law, we may have discretion to decide where and how to direct your orders, to solicit (or not solicit) persons to trade opposite those orders, or to enter into Covered Transactions opposite those orders for the account of other counterparties. We may derive financial and other benefits (such as the right to receive payment for order flow or other fees) from such decisions.

When we provide intermediation services to you, we may direct orders to affiliated or unaffiliated Swap Dealers, Executing Dealers, market-makers, other executing firms, Trading Facilities, non-registered electronic trading platforms, individual brokers or brokerage groups for execution. We may also choose one Executing Dealer instead of another Executing Dealer, or choose an Executing Dealer instead of a non-registered electronic trading platform (if available), or seek pricing for a Covered Transaction from only one Executing Dealer or selected Executing Dealers, or seek price improvements or not seek price improvements with one or more Executing Dealers. Unless otherwise agreed, any price improvements we obtain may accrue solely to our benefit. We may derive financial and other benefits (such as the right to receive payment for order flow or other fees) from such decisions.

Multiple Orders and Order Aggregation:

When we provide intermediation services to you, we may concurrently handle multiple orders for other counterparties who may receive pricing and terms that are different from the pricing and terms we provide to you. In addition, we may aggregate the trades from multiple Executing Dealers and allocate such trades to you and other counterparties. Our intermediation services may result in different fee structures or fees for the same or a similar transaction than the fee structure or fees charged to you. We may derive financial and other benefits (such as the right to receive payment for order flow, reporting or other fees) from such order handling and decisions related to order handling. In addition, differences in fees or fee structures among the counterparties for whom we provide intermediation services or otherwise handle orders may create potential conflicts of interest with regard to our order handling decisions.

Agent to Other Counterparties:

When we provide intermediation services to you, we may act as agent to other counterparties in Covered Transactions that have trading, investment, or hedging objectives that are similar to yours. This may create potential conflicts where there is limited availability or limited liquidity for those Covered Transactions. We may also act as agent to other counterparties in Covered Transactions that have trading, investment, or hedging objectives adverse to yours. We are under no duty to inform you of the nature or identity of these other counterparties or their respective Covered Transactions.

Further, where we act as agent to other counterparties, we may solicit a counterparty or Executing Dealer to trade opposite your order or enter into transactions for its own account or the account of other counterparties or Executing Dealers that may, at times, be adverse to your interests in a Covered Transaction. In such circumstances, that counterparty or Executing Dealer may make payments and/or pay a commission or fee to us in connection with that transaction. The results of your Covered Transactions may differ significantly from the results achieved by us for other counterparties.

Covered Transactions by multiple counterparties may have the effect of diluting or otherwise negatively affecting the values, prices or levels of Covered Transactions, or your trading, investment or hedging strategies or results. The results of your Covered Transactions may differ significantly from the results achieved by other counterparties.

Market Information:

Acting as an FX intermediary may give us broad access to the current status of certain markets, investments and products. As a result, we may be in possession of information, which, if known to you, might cause you to seek to dispose of, retain or increase interests in one or more Covered Transactions. Unless otherwise agreed, we will be under no duty to make any such information available to you, except to the extent that disclosure may be required under applicable law.

Ownership and Other Interests in Electronic Trading Platforms:

You also should be aware that we may own stock in, or have some other form of ownership interest in, one or more U.S. or foreign electronic trading platforms where your Covered Transactions may be executed. As a result, we may receive financial or other benefits related to our ownership interest when Covered Transactions are executed on a given electronic trading platform, and we would, in such circumstances, have an incentive to persuade you to have Covered Transactions executed on that electronic trading platform rather than bilaterally in the over-the-counter market. In addition, our employees and officers may also serve on the board of directors or on one or more committees of an electronic trading platform.

Research and Other Market Roles:

We may act as, among other things, an investor, research provider, placement agent, underwriter, distributor, remarketing agent, structurer, securitizer, lender, investment manager, investment adviser, commodity trading advisor, municipal advisor, market maker, trader, prime broker or clearing broker. In those and other capacities, we may take or hold positions in, or advise other counterparties concerning, or publish research or express a view with respect to, a Covered Transaction or a related financial instrument that may be the subject of advice from us to you. Any such positions and other advice may not be consistent with, or may be contrary to, your interests or to positions which are the subject of advice previously provided by us to you, and unless otherwise disclosed in writing, we are not necessarily acting in your best interest and are not assessing the suitability for you of any Covered Transaction or related financial instrument. Acting in one or more of the capacities noted above may give us access to information relating to markets, investments and products. As a result, we may be in possession of information which, if known to you, might cause you to seek to dispose of, retain or increase your position in one or more Covered Transactions or other financial instruments. We will be under no duty to make any such information available to you, except to the extent we have agreed in writing or as may be required under applicable law.

Material Economic Terms and Price of Covered Transaction:

Pursuant to the Agency Agreement, we have agreed to receive from the Executing Dealer certain Rule 23.431 Disclosure related to Covered Transactions, and to provide certain Rule 23.431 Disclosure to you via an Approved Method (as defined in the Agency Agreement) prior to an agreement to the material economic terms of a Covered Transaction. Rule 23.431 Disclosure includes the price and other material economic terms of the

Covered Transaction (including notional amount and termination date) and the mid-market mark of the Covered Transaction (such mid-market mark shall not include amounts for profit, credit reserve, hedging, funding, liquidity, or any other costs or adjustments). Such Rule 23.431 Disclosure will be provided to you via an Approved Method prior to an agreement to the material economic terms of a Covered Transaction. Certain Rule 23.431 Disclosures related to Covered Transactions disclosed by the Executing Dealer to us may be material to your decision to enter into a Covered Transaction and to your evaluation of the effectiveness and the price of the Covered Transaction obtained by the FX Intermediary for you. Accordingly, it is important for you to review carefully the terms of the Agency Agreement, including particularly the terms governing the manner and timing of transmittal of Executing Dealer disclosure to you and your use of the Rule 23.431 Disclosure provided by us to you.

INTERNATIONAL INVESTMENTS

While investing in any security requires careful consideration, international investing raises some special issues and risks. These include:

Access to different information: In some jurisdictions, the information provided by foreign companies is different than information provided by U.S. companies. The nature, amount and frequency of disclosures required under foreign law may also be different from that required of U.S. companies. In addition, foreign companies' financial statements may be prepared using a different set of accounting standards than companies use in the United States. Information foreign companies publish may not be in English.

Moreover, the financial statements of publicly listed companies in the United States, whether based in the United States or abroad, must be audited by an independent public accounting firm subject to oversight by the Public Company Accounting Oversight Board (PCAOB). The financial statements of a foreign company that is not publicly listed in the United States may or may not be subject to analogous auditing and auditor oversight arrangements.

Costs of international investments: International investing can be more expensive than investing in U.S. companies. In some countries there may be unexpected taxes, such as withholding taxes on dividends. In addition, transaction costs such as fees, broker's commissions and taxes may be higher than in U.S. markets. Investors also should be aware of the potential risks and effects of currency conversion costs on an investment. U.S.-registered mutual funds and ETFs that invest abroad may have higher fees and expenses than funds and ETFs that invest in U.S. securities, in part because of the extra expense of trading in foreign markets.

Changes in currency exchange rates and currency controls: A foreign investment also has foreign currency exchange risks. When the exchange rate between the foreign currency and the U.S. dollar changes, it can increase or reduce an investment return in a foreign security. In fact, it is possible that a foreign investment may increase in value in its home market but, because of changing exchange rates, the value of that investment in U.S. dollars is actually lower. In addition to exchange rates, investors should be aware that some countries may impose foreign currency controls that restrict or delay investors or the company invested in from moving currency out of a country. These controls could affect the value and liquidity of an investment.

Changes in market value: All securities markets can experience dramatic changes in market value. One way to attempt to reduce the impact of these price changes is to be prepared to hold investments through adverse times and sharp downturns in domestic or foreign markets, which may be long lasting.

Political, economic and social events: Depending on the country or region, it can be more difficult for individual investors to obtain information about and comprehensively analyze all the political, economic and social factors that influence a particular foreign market. These factors may provide diversification from a domestically-focused portfolio, but they may also contribute to the risk of international investing.

Different levels of liquidity: Some foreign markets may have lower trading volumes for securities or fewer listed companies than U.S. markets. Some foreign markets are open for shorter periods than U.S. markets. In addition,

some countries may restrict the amount or type of securities that foreign investors may purchase. Where these factors exist, a market may have less liquidity, which may make it more difficult to find a buyer when investors want to sell their securities.

Legal remedies: Where investors purchase a security can affect whether they have, and where they can pursue, legal remedies against the foreign company or any other foreign-based entities involved in a transaction. Investors should be mindful of this when either buying or selling securities on foreign securities exchanges or otherwise outside the United States or entering into securities transactions with parties located outside the United States. In these situations, investors may not have the ability to seek certain legal remedies in U.S. courts as private plaintiffs. Moreover, even if investors sue successfully in a U.S. court, they may not be able to collect on a U.S. judgment against a foreign company, entity or person. Investors may have to rely on legal remedies that are available in the home country, if any.

TJM may use foreign brokers to assist in the execution of orders in products listed on a foreign market.

Different market operations: Foreign markets may operate differently from the major U.S. trading markets. For example, there may be different time periods for clearance and settlement of securities transactions. Some foreign markets may not report securities trades within the same period as U.S. markets. Rules providing for the safekeeping of shares held by foreign custodian banks or depositories may differ from those in the United States. If a foreign custodian has credit problems or fails, shares purchased in a foreign market may have different levels of protection than provided under the laws of the United States.

International Trading including direct investments in foreign markets involve various investment risks, including foreign exchange risk (the possibility that foreign currency will fluctuate in value against the U.S. dollar), increased volatility as compared to the U.S. markets, political, economic and social events that may influence foreign markets or affect the prices of foreign securities, lack of liquidity (foreign markets may have lower trading volumes and fewer listed companies, shorter trading hours and restrictions on the types of securities that foreign investors may buy and sell) and less access to information about foreign companies. Emerging markets, in particular, can be subject to greater social, economic, regulatory, and political uncertainties and can be extremely volatile.

International Trading also may be subject to various credit, settlement, operational, financial and legal risks. These risks may include but are not limited to:

Physical Markets: Certain markets may have less regulated or less liquid securities markets. In addition, some countries still rely on physical markets that require delivery of properly endorsed share certificates to effect trades. As a result, the settlement process can be lengthy (and erratic in some markets) and carries an increased risk of failure.

Misidentification of Securities: Foreign companies may have multiple classes of securities, including "foreign" and "local" shares. Inadequate understanding of a foreign company's capital structure or imprecision in placing orders with Foreign Executing Brokers can result in a purchase of the wrong securities.

Non-DVP Transactions: Local trading and settlement customs frequently require non-DVP ("delivery versus payment") transactions. Unlike DVP transactions, which involve a simultaneous exchange of securities and payment, non-DVP transactions can increase counterparty risk because the purchaser pays before securities are delivered or the seller delivers securities before payment is made.

Trading Days and Hours: Differences in trading days and hours can also create operational issues and complicate clearance and settlement. Foreign securities orders may not be sent to the local market except during market hours in such country. All orders entered during such non-market hours (with the exception of a limited number of Foreign Securities also traded in the United States as specified below) may be held until the local market is open.

Foreign Securities traded in the United States or traded in foreign markets using U.S. symbology: You should understand that a limited number of foreign securities may be available through US market makers when the local markets are closed and the US markets are open. Additionally, these same securities

may be traded directly in foreign markets through local brokers when local markets are open. Quotes for these securities may not accurately reflect the most current bids or offers for the particular security. The transaction price in U.S. Dollars reported to you for foreign securities trades executed in the US includes both the currency exchange rate and the local broker's commission, if any. A breakdown of the actual fees included in any foreign security transaction price is available upon request.

Unless indicated otherwise, all online trading hours are reflected in US Eastern Standard Time.

Cross-Border Settlement: Cross-border settlement involves the interaction of different settlement systems and differing (and potentially inconsistent) laws in each of the affected countries.

Trading Restrictions and Market Operations: Foreign markets often operate differently from U.S. markets. For example, there may be different periods for clearance and settlement of securities transactions and investments in foreign securities may be subject to local market trading restrictions and fees. Certain markets may impose restrictions regarding re-patriation of monies or limit certain investment activities. You should understand that TJM is not responsible for notifying you of each country's specific requirements. You should conduct appropriate due diligence to understand specific limitations in each country.

Tax Treatment: You should also understand that there may be negative tax consequences as a result of trading in certain countries. You should consult a tax advisor for further information.

Dividend and Reorganization Payments: Dividend and Reorganization payments are paid upon receipt of funds from local market custodians, which may or may not coincide with the actual announced payment date. Customers subject to USD payments as a result of a Foreign Exchange or a Dividend or Reorganization transaction, should refer to the Foreign Currency Exchange Risk Disclosure Statement section of this supplement.

Margin Privileges: Extension of margin credit in foreign securities may result in greater risk than US Securities. You should understand that foreign securities may be eligible for margin privileges to the extent your brokerage account has been established and approved for margin.

Limited Recourse under Local Law: A US investor may not be able to sue a foreign issuer or a Foreign Executing Broker or to enforce a judgment in US courts. The only available remedy may be the legal remedies that are available under foreign law, and those remedies may be limited.

Because of these risks, the possibility of incurring substantial losses exists, so before engaging in International Trading, you must carefully consider whether it is appropriate for you to do so.

FOREIGN CURRENCY EXCHANGE RISK DISCLOSURE STATEMENT

While this brief statement cannot disclose all risks associated with trading in foreign currency, when considering whether to trade or authorize someone else to trade foreign currency for you, you should be aware of the following:

The risk of loss in trading foreign currency can be substantial: You should therefore carefully consider whether such trading is suitable for you in light of your financial condition, risk tolerance and understanding of foreign markets.

Cash Held in Foreign Currency: To the extent that you hold all or a portion of your cash assets in a currency other than your local currency, you may suffer currency losses from unfavorable exchange rate movements that reduce the value of your cash assets as measured against your local currency.

These potential losses could leave you without sufficient cash to pay planned expenses or other liabilities.

Impossible to liquidate: Under certain market conditions, you may find it difficult or impossible to liquidate a position. This can occur, for example, when a currency is deregulated or fixed trading bands are widened. Certain currencies may not be available to transact through TJM. Exchange practices including currency controls may change from time to time without notice to you. As a result, it is important that you understand the practices in the foreign markets in which you trade.

Currency trading is speculative and volatile: Currency prices are highly volatile. Price movements for currencies are influenced by, among other things: changing supply-demand relationships, trade, fiscal, monetary, exchange control programs and policies of governments; United States and foreign political and economic events and policies; changes in national and international interest rates and inflation; currency devaluation; and sentiment of the market place. None of these factors can be controlled by you or any individual advisor and no assurance can be given that you will not incur losses from such events.

Currency trading presents unique risks: TJM may refuse to quote prices for certain currencies or quote wide spreads for currencies that are experiencing high levels of volatility.

Broker compensation: TJM may impose a commission or mark-up to the price it receives from the interbank market which may result in a higher price to you. More favorable exchange rates may be available through third parties not affiliated with TJM. Furthermore, larger transactions for foreign currency may receive more favorable rates than smaller transactions.

Foreign Currency Balances: You should also understand that credit balances in foreign currency may or may not earn interest.

HANDLING OF BLOCK ORDERS UNDER FINRA'S FRONT RUNNING RULE

The following is being provided pursuant to FINRA Rule 5270 regarding Front Running of Block Transactions. We are required to provide Customers with the following information concerning the placing of block trading orders and how those block orders are handled.

TJM may trade principally or as agent at prices that would satisfy your block trading order when those trades are unrelated to your block order. When the trades are not unrelated, we may trade principally or as agent ahead of, or alongside, your block order for the purpose of fulfilling, or facilitating the execution of, your order. For these orders you may instruct us that you do not wish us to trade ahead of, or alongside, your order.

A copy of Rule 5270 can be obtained at <https://www.finra.org/>. Please contact your TJM Broker if you require more information regarding how your block orders are handled.

AVERAGE PRICE CONFIRMATIONS

TJM may execute your order in multiple transactions or aggregate your order with other customer orders and execute them as a block or in multiple smaller transactions. In these instances, our policy is to provide Customers with an "average price confirmation" which summarizes the aggregate amount of securities purchased or sold and the average price of the executions. We are happy to provide additional information on average price transactions to you upon request.

SEC RULE 13H-1 LARGE TRADER IDENTIFICATION NUMBER

SEC Rule 13h-1 requires entities deemed large traders as prescribed by the rule, to submit a filing with the SEC to obtain a Large Trader Identification Number (LTID) and promptly disclose its LTID to registered broker-dealers effecting transactions on its behalf.

If you are a Large Trader, TJM requests that you provide us with your LTID via email to LTIDs@tjmbrokerage.com. A large trader is defined as any person or entity who exercises directly or indirectly investment discretion over transactions in listed equity and options securities which in aggregate, equal or exceed 2 million shares or \$20 million dollars during any calendar day or 20 million shares or \$200 million during any calendar month. TJM reminds Customers that it is the Customer's responsibility to register with the SEC if Customer qualifies as a large trader and to provide that id (LTID) to TJM. See <https://www.sec.gov/divisions/marketreg/large-trader-faqs.htm> for answers to Frequently Asked Questions concerning Large Trader Reporting.

CLIENT REPRESENTATION

In placing orders with TJM, you are agreeing not to engage in an activity that circumvents laws, rules or regulations including those established by the SEC, CFTC, FINRA, NFA, or U.S. Securities and/or Commodities Exchanges (e.g. CBOE, CME, ISE/Gemini, NYSE, NYSE American, NYSE Arca, NYSE AMEX). Examples of prohibited conduct that is in contravention of U.S. regulations include, for example, but are not limited to, frontrunning, splitting up orders, bunching, layering or cancelling orders or entering orders, in any manner that gives such orders an unfair participation rights, priority, tape revenue, rebates

or serves to manipulate the market.

You agree not to place orders that violate any rules governing the minimum or maximum size order limits established by TJM, the SEC, CFTC or the Exchanges where TJM operates its trade execution business.

TJM requires that you furnish complete and accurate order information at all times, including but not limited to, proper account origin code, long or short on sell orders, clearing firm, delta or other contingencies, CMTA, Qualified Contingency Cross (QCC) or Qualified Cross Transaction (QCT) eligibility or any restriction on the account by its clearing member or by regulation.

Customer is responsible for making an affirmative determination that a security can be borrowed prior to placing a short sale order with TJM. TJM shall in its sole discretion have the right to refuse to execute any short sale order if it does not receive a confirmation from Customer that this procedure has been followed.

Additionally, any Exchange registered as Market Maker must advise Executing Broker when entering an options order if the order is restricted in any option class due to a Trading Appointment or any other Exchange restriction on the Market Maker at time of order entry. Executing Broker reserves the right to refuse any request to perform a post-trade allocation (change in clearing firm, price, account designation, CMTA, etc.) with respect to a previously executed order, on a case by case basis.

Each options market has its own order origin codes, but at a minimum, all have codes to indicate that an order is being executed for a customer, a firm or a market maker. These order origin codes are important because, among other things, they affect the accuracy of the Exchange's audit trail, may impact priority of order execution, and ensure that trades were reported to the Exchange and to OCC with accurate trade details.

It is the Customer's responsibility to accurately represent origin code and open/close information to TJM when entering each options order with our Broker. Orders should be designated as Broker-Dealer, Non-Broker-Dealer Customer, Firm Proprietary, Market Maker, Away Market Maker, Stock Specialist, Wholly owned Non-Member BD subsidiary of a CBOE Member, or Professional Customer (more than 390 orders in listed options per day on average during a calendar month for their own beneficial account(s) or voluntarily have your orders categorized as Broker-Dealer orders for order handling, execution and cancel fee calculation purposes.)

OPTIONS DISCLOSURE DOCUMENT

Options are not suitable for all investors. Prior to buying or selling an option, investors must read a copy of the Characteristics & Risks of Standardized Options, also known as the options risks of exchange traded options. Periodic updates to this disclosure document will be posted here: <https://www.theocc.com/getmedia/a151a9ae-d784-4a15-bdeb-23a029f50b70/riskstoc.pdf>

STATEMENT FOR UNCOVERED OPTION WRITERS

There are special risks associated with uncovered option writing which expose the investor to potentially significant loss. Therefore, this type of strategy may not be suitable for all customers approved for options transactions.

1. The potential loss of uncovered call writing is unlimited. The writer of an uncovered call is in an extremely risky position, and may incur large losses if the value of the underlying instrument increases above the exercise price.

2. As with writing uncovered calls, the risk of writing uncovered put options is substantial. The writer of an uncovered put option bears a risk of loss if the value of the underlying instrument declines below the exercise price. Such loss could be substantial if there is a significant decline in the value of the underlying instrument.

3. Uncovered option writing is thus suitable only for the knowledgeable investor who understands the risks, has the financial capacity and willingness to incur potentially *substantial* losses, and has sufficient liquid assets to meet applicable margin requirements. In this regard, if the value of the underlying instrument moves against an uncovered writer's options position, the investor's broker may request significant additional margin payments. If an investor does not make such margin payments, the broker

may liquidate stock or options positions in the investor's account, with little or no prior notice in accordance with the investor's margin agreement.

4. For combination writing, where the investor writes both a put and a call on the same underlying instrument, the potential risk is unlimited.

5. If a secondary market in options were to become unavailable, investors could not engage in closing transactions, and an option writer would remain obligated until expiration or assignment.

6. The writer of an American-style option is subject to being assigned an exercise at any time after he has written the option until the option expires. By contrast, the writer of a European-style option is subject to exercise assignment only during the exercise period.

NOTE: It is expected that you will read the booklet entitled: CHARACTERISTICS AND RISKS OF STANDARDIZED OPTIONS available from your Broker. In particular your attention is directed to the chapter entitled Risks of Buying and Writing Options. This statement is not intended to enumerate all of the risks entailed in writing uncovered options.

TIED HEDGE ORDERS ON BEHALF OF CUSTOMERS

When handling an options order of 500 contracts or more on your behalf, TJM may buy or sell a hedging stock, securities future or futures position following receipt of the options order but prior to announcing the options order to the trading crowd. The options order may thereafter be executed using the Chicago Board Options Exchange's tied hedge procedures. These procedures permit the options order and hedging position to be presented for execution as a net priced package subject to certain requirements.

PENNY STOCKS / MICROCAP STOCKS

Penny Stocks Can Be Very Risky. Penny stocks or microcap stocks are low-priced shares of small companies. Penny stocks may trade infrequently—which means that it may be difficult to sell penny stock shares once you have them. Because it may also be difficult to find quotations for penny stocks, they may be impossible to accurately price. Investors in penny stock should be prepared for the possibility that they may lose their whole investment.

While penny stocks generally trade over-the-counter, they may also trade on U.S. securities exchanges, facilities of U.S. exchanges, or foreign exchanges. You should learn about the market in which the penny stock trades to determine how much demand there is for this stock and how difficult it will be to sell. Be especially careful if your Broker is offering to sell you newly issued penny stock that has no established trading market.

The securities you are considering have not been approved or disapproved by the SEC. Moreover, the SEC has not passed upon the fairness or the merits of this transaction nor upon the accuracy or adequacy of the information contained in any prospectus or any other information provided by an issuer or a broker or dealer.

Information You Should Get

In addition to this statement, your broker is required to give you a statement of your financial situation and investment goals explaining why his or her firm has determined that penny stocks are a suitable investment for you. In addition, your Broker is required to obtain your agreement to the proposed penny stock transaction.

Before you buy penny stock, Federal law requires your salesperson to tell you the "offer" and the "bid" on the stock, and the "compensation" the salesperson and the firm receive for the trade. The firm also must send a confirmation of these prices to you after the trade. You will need this price information to determine what profit or loss, if any, you will have when you sell your stock.

The offer price is the wholesale price at which the dealer is willing to sell stock to other dealers. The bid price is the wholesale price at which the dealer is willing to buy the stock from other dealers. In its trade with you, the dealer may add a retail charge to these wholesale prices as compensation (called a "mark-up" or "mark-down").

The difference between the bid and the offer price is the dealer's "spread." A spread that is large compared with the purchase price can make a resale of a stock very costly. To be profitable when you sell, the bid price of your

stock must rise above the amount of this spread and the compensation charged by both your selling and purchasing dealers. *Remember that if the dealer has no bid price, you may not be able to sell the stock after you buy it, and may lose your whole investment.*

After you buy penny stock, your carrying brokerage firm must send you a monthly account statement that gives an estimate of the value of each penny stock in your account, if there is enough information to make an estimate. If the firm has not bought or sold any penny stocks for your account for six months, it can provide these statements every three months. Additional information about low-priced securities—including penny stocks or microcap stocks — is available on the SEC's web site at: <https://www.sec.gov/about/reports-publications/investorpubsmicrocapstock>

In addition, your Broker will send you a copy of this information upon request. The SEC encourages you to learn all you can before making an investment in penny stocks or microcap stocks.

FIXED INCOME DISCLOSURE DOCUMENT

Investments in fixed income securities involve a variety of risks, including credit risk, inflation risk, interest rate risk, liquidity risk and call risk, among others.

Bonds issued by the U.S. government have significantly less risk of default than those issued by corporations and municipalities. However, the overall return on government bonds tends to be less than other types of fixed income securities. Investments in debt securities rated below investment grade (commonly referred to as "junk bonds") may be subject to greater levels of credit and liquidity risk than investments in investment grade securities. Sovereign debt instruments are subject to the risk that a governmental entity may delay or refuse to pay interest or repay principal on its sovereign debt.

Investors who own fixed income securities should be aware of the relationship between interest rates and the price of those securities. As a general rule, the price of a bond moves inversely to changes in interest rates.

Diversification does not ensure a profit or protect against a loss. There are risks associated with fixed income investing, even though many investors consider bonds to be "risk free" investment vehicles.

Investors should pay careful attention to the types of fixed income securities which comprise their portfolios and remember that, as with all investments, there is the risk of loss of capital. The value of fixed income securities fluctuates and investors may receive more or less than their original investments if sold prior to maturity. Bonds are subject to price change and availability.

FUTURES RISK DISCLOSURE DOCUMENT

FUTURES AND OPTIONS ARE NOT SUITABLE FOR ALL INVESTORS. Please ensure that you have read and understand the current futures and options risk disclosure document before entering into any futures or options transaction. The futures and options risk disclosure document can be obtained here: <http://www.tjmbrokerage.com/disclosures/>

PRIVACY PLEDGE/DISCLOSURE STATEMENT TO CONSUMERS

We are required by the SEC and the NFA to provide customers with our Privacy Policy annually.

TJM does not sell customer information or customer lists to outside marketers.

Information We Collect:

The information we collect is limited to that which enables us to comply with laws and regulations.

We collect information from the following sources:

- Information we may receive from you on applications or other forms, such as your assets, income, and other debt.
- Information we may obtain about your transactions and experiences with our affiliates, others, or us such as your account balance, payment history, parties to transactions.
- Information we may receive from a consumer report, such as information regarding your creditworthiness or credit history.

- Information we may receive through our online services, such as information relating to web site navigation and customer contact.
- Information we have obtained at your request, such as aggregated information from multiple financial service providers.

Sharing within TJM Group of Companies:

In the course of our business, we may share some or all of the information described above within the TJM group of companies.

Some of the benefits to you may include:

- Prevention of unauthorized transactions or fraud.
- Account upgrades with additional benefits.
- Offers for products and services specifically suited to your individual situation. For example, if you have an equity/option account with our broker-dealer, we may be able to offer you an alternative hedging strategy through our futures affiliate, or accounting and back office services.
- Increased convenience, making it faster and easier for you to do business with us. For example, some or all of the application information you provide to obtain an account from one of our affiliates can be used to complete an application for brokerage services through our brokerage affiliate, without the need to provide the same information twice.
- Enhanced customer service and responsiveness.

The law allows us to share identifying information and information about our transactions and experiences with you, such as your account balances and payment history. You may direct us not to share other information that is assembled or used to determine your eligibility for a product or service, such as that shown on consumer credit reports and asset and income information from applications.

If you prefer that we not share this other information within the TJM group of companies, you may choose to opt out (or ask us not to share). To opt out simply notify us by calling (312) 432-5100. Your opt-out request will become effective as soon as reasonably practicable after we receive it.

We will mail or email the TJM Privacy Pledge annually via the Customer Disclosure Document to the address to which we send your invoice or account information. If there are multiple locations of a product or account, we will treat an opt-out request by the owners who signed the form(s) or document(s), as applying to that owner only, unless that person requests on behalf of other owners that their information not be disclosed.

You only need to notify us once if you choose to limit the information shared among our family of companies. If you have notified us in the past, there is no need to do so again. We will continue to honor your request, subject to modifications by you and other exceptions described in the TJM Privacy Pledge.

Sharing With Affiliates:

In order to conduct company business, and to offer products or services that may complement your relationship with us, we may share some or all of the information we collect, as described above, with companies that perform services for us or on our behalf, such as computer vendors we hire to enhance our systems, provide account statements or to provide support for one or more of our products and services.

These companies act on our behalf, and are contractually obligated to keep the information we provide them confidential and to use the information only for the purposes authorized.

Sharing in Other Situations:

We may share some or all of the information we collect, as described above, as otherwise authorized or required under applicable law. This includes, for example, disclosures to process and service your requested or authorized transactions; disclosures in connection with subpoenas or other legal processes; disclosures as part of fraud investigations; disclosures in connection with audits and examinations; and disclosures pursuant to your authorization or consent.

Protecting Information about You:

We restrict access to information about you to only those employees who

need to know that information as part of their job responsibilities. We also educate our employees about the importance of confidentiality and customer privacy through standard operating procedures, special training programs, and our Code of Conduct. Customer information is either in access-only private drive or secure in locked file cabinets with keys only given to those authorized. We take appropriate disciplinary measures to enforce employee privacy responsibilities.

TJM also maintains physical, electronic, and procedural safeguards to guard your information. We will continue to test and update our technology to improve the protection of your information. All electronic information we have on Customer information is on a secure private drive that only those authorized can view. We do not store confidential Customer information on CDs, flash drives, floppy disks, laptops, PDAs or other devices that any outside or unrestricted personnel can retrieve or access.

When information needs to be removed it is done in a secure environment. Customer information and consumer report information is destroyed by shredding if paper copy or by complete deletion if electronic. Our Customers do not withdraw or deposit money from any of our locations.

Protecting Information about Former Customers:

Our Privacy Pledge regarding the collection, use, and disclosure of information about former Customers is the same as our pledge to current Customers.

Maintaining Accurate Information:

We Want to Maintain Accurate Customer Information. We have established procedures to keep your information current and complete. These procedures include responding to requests to correct inaccurate information in a timely manner. If you believe our customer records contain incorrect information about you, call, or write to us at the telephone number or address listed on your account statement, or other documentation.

Questions about the TJM Privacy Pledge:

If you have questions about the TJM Privacy Pledge or about the privacy of your information, please call us at (312) 432-5100 between 8:00 a.m. and 4:00 (CT) Monday through Friday.

Keeping Up to Date with TJM Privacy Pledge:

The TJM Privacy Pledge is subject to change. You can always review the current TJM Privacy Pledge at any of our offices to obtain a copy. We will notify you annually about the TJM Privacy Pledge as long as you maintain an ongoing relationship with us.

Miscellaneous Information:

The TJM Privacy Pledge applies to individuals who obtain or have obtained from us a financial product or service. The laws of some states may impose separate or additional requirements before particular types of information about customers in those states can be disclosed.

The TJM Family of Companies:

The following is a list of the TJM's affiliates to which the TJM Privacy Pledge applies:

- TJM Holdings, LLC
- TJM Investments, LLC
- TJM Institutional Services, LLC
- TJM Europe LLP

GENERAL DATA PROTECTION REGULATION (GDPR) (EU)

On May 25, 2018, companies will have to comply with new rules on data protection, the General Data Protection Regulation ("GDPR"). In preparation for the upcoming regulation, we have updated our Privacy Notice, which is available here: <http://www.tjmbrokerage.com/disclosures/>

The updated Privacy Notice addresses:

- What personal data we collect and why;
- Our legal grounds for processing your personal data; and
- Your rights under the data privacy rules and how to exercise them

You may contact TJM about your data by sending an email to datasec@tjmbrokerage.com. The legal basis on which we maintain your

personal data is via 'legitimate interest'. We believe that you have an interest in receiving communication from the Firm and therefore, we will continue to keep you abreast of any interesting market commentary or other specific developments related to our Firm.

As a U.S. Broker-Dealer, FINRA and NFA member, TJM has a regulatory obligation to maintain certain information in order to comply with the rules and regulations of certain regulatory bodies and U.S. law.

Should you disagree with our assessment and wish to get in touch with us to discuss this, please email TJM at datasec@tjmbrokerage.com.

BUSINESS CONTINUITY AND CONTINGENCY PLANNING

Pursuant to FINRA and NFA rules, TJM has created a Business Continuity and Contingency Plan (BCP) to address and guide our response and recovery from a Significant Business Disruption (SBD). Copies of this Summary Disclosure Statement shall be provided to clients at the time they open their accounts. The BCP is subject to modification, and an updated summary will be distributed to our clients when modified. Alternatively, clients may obtain a summary of the BCP via mail, by requesting a copy.

TJM's policy is to respond to a SBD by safeguarding employees' lives and Firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of the Firm's books and records, and allowing our customers to transact business. In the event that we determine we are unable to continue our business, we will assure customers prompt access to their funds and securities. In the event of an SBD, our staff will operate remotely from their homes.

Significant Business Disruptions (SBDs):

Our plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only our Firm's ability to communicate and do business, such as a fire in our building. External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a city flood, or a wide-scale, regional disruption. Our response to an external SBD relies more heavily on other organizations and systems.

Customers' Access to Funds and Securities:

TJM does not maintain custody of customers' funds or securities, which are maintained by the clearing members. Customers will need to contact the clearing member with customer orders or instructions.

Alternate Communications Between the Customers and the Member:

We communicate with our Customers using the telephone, e-mail, fax, U.S. mail, and in person visits at our Firm or at the other's location. In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party.

Please call us if you have any questions.

John Burke COO: (312) 432-5110
Colleen Risinger CFO: (312) 432-5102
Denise Skweres CFO: (312) 432-5108

FINRA

FINRA Rule 2267 requires that members firms provide customers with the FINRA BrokerCheck Hotline Number (800) 289-9999, and FINRA web site: <https://www.finra.org/> and notify each customer that a brochure describing BrokerCheck is available from FINRA by contacting FINRA.

NFA

NFA rules require that members provide customers with the NFA's Background Affiliation Status Information Center (BASIC) web site: <https://www.nfa.futures.org/BasicNet/>

SIPC

TJM Investments, LLC is a member of the Securities Investor Protections Corporation (SIPC). You may obtain information about SIPC, including the SIPC brochure by contacting SIPC at <https://www.sipc.org/> or (202) 371-8300.