

**LOOP CAPITAL MARKETS LLC
2024 CUSTOMER DISCLOSURES**

Effective February 1, 2024 our new address is:

**425 South Financial Place, Suite 2700
Chicago, IL 60605**

Loop Capital Markets LLC (“Loop Capital” or the “Firm”) and affiliated companies are committed to maintaining the trust and confidence of our clients and customers. Loop Capital is registered as a broker-dealer with the U.S. Securities and Exchange Commission and a member of FINRA and the MSRB. The Firm is also registered as an introducing broker with the Commodities Futures Trading Commission (“CFTC”) and member of the National Futures Association (“NFA”). The following is provided for information purposes.

NEW ACCOUNT PROCEDURES

USA PATRIOT Act of 2001 is designed to detect, deter and punish terrorists in the United States and abroad and impose anti-money laundering (“AML”) requirements on brokerage firms and financial institutions. Under the Act’s provisions, all brokerage firms are required to have comprehensive AML Programs. As part of our AML Program, we may ask you to provide various identification documents or other information prior to effecting any transactions for you.

Important Information You Need To Know About Opening An Account. 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. What this means for you: When you open an account, we will ask for your name, address, tax identification number, and other information that will allow us to identify you. The Firm may also ask for other identifying documents.

A corporation, partnership, trust or other legal entity may need to provide information such as its principal place of business, local/office address, taxpayer identification number, certified articles of incorporation, government-issued business licenses/ partnership agreement, or a trust agreement and resolutions that name the persons authorized to give us instructions regarding the accounts. Additional information such as net worth, annual income, occupation, employment information, investment experiences and objectives and risk tolerances, may also be required.

Under certain circumstances, we may become obligated to disclose this information pursuant to applicable laws, rules or regulations, but the information will otherwise be held in confidence in accordance with our privacy policy.

Rules under the Bank Secrecy Act aid the government in the fight against crimes to evade financial measures designed to combat terrorism and other national security threats. Each time an account is opened for a covered Legal Entity, we are

required to ask you for identifying information (name, address, date of birth, social security number, as well as identification documents for each individual that has beneficial ownership (25% or more) and one individual that has significant managerial control of the Legal Entity.

If you are opening an account on behalf of a Legal Entity, you will be required to provide appropriate documentation and to certify that this information is true and correct to the best of your knowledge.

PRIVACY POLICY

We want you to understand how we protect your privacy when we collect and use personal information in the course of doing business, as well as the measures we take to safeguard your information. Keeping customer information secure and private is a priority at Loop Capital.

Loop Capital has established the following guidelines to comply with the Gramm Leach Bliley Act (“Act”). Our policy regarding customer privacy and the use of non-public personal information applies to both current and former customers, and is designed to comply with the privacy provisions in Title V of the Act, as well as applicable federal privacy regulations.

Please take a moment to review this Privacy Policy and contact us with any questions you may have. Thank you for the trust you have placed in us. We look forward to continuing to serve your needs.

Collecting Non-Public Personal Information

While providing services to you, we may collect non-public personal information from sources including, but limited to, the following:

- Account Applications and other standard forms (i.e. name, address, tax identification number, asset types and amounts of investments, transactions and income);
- Information we receive as a result of the transactions that you undertake with us or an affiliate; and

LOOP CAPITAL MARKETS LLC 2024 CUSTOMER DISCLOSURES

- Information about your transactions we receive from our clearing firm(s) and/or any consumer reporting agency.

Protecting the Confidentiality and Security of Non-Public Personal Information

At Loop Capital, we restrict access to any personal and/or account information to those employees who require the information to deliver the products and services you request. Accordingly, we maintain physical, electronic and procedural safeguards to protect non-public customer information.

Disclosing Non-Public Personal Information to Non-affiliated Third Parties

It is Loop Capital's policy not to sell, share or disclose information or records regarding current or former customers with non-affiliated third-party marketing companies or anyone, except as permitted or required by law. Loop Capital may disclose non-public personal information as necessary to process transactions on your behalf, to conduct our operations, to follow your instructions as authorized, to protect the security of our financial records and to comply with requests during regulatory reviews and examinations.

Disclosing Non-Public Personal Information to Loop Capital Affiliates

Loop Capital is permitted by law to share with our affiliated companies, information about your transactions or experiences with you, such as account information or investment history.

Loop Capital reserves the right to change this policy at any time and you will be notified if changes occur. If you have any questions regarding our Privacy Policy, please contact Loop Capital's Compliance Department at compliance@loopcapital.com.

This Privacy Policy applies to customers or former customers of Loop Capital Markets LLC and its affiliated companies, including Loop Capital, LLC, and Loop Capital Financial Consulting Services, LLC.

BUSINESS CONTINUITY PLAN

The Firm has developed a Business Continuity Plan ("BCP") on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions are unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our BCP.

Contacting Us

If after a SBD you cannot contact us as you usually do, you should contact the Firm at 312 913-4900 or 212 619-2250. If you cannot access us through either of these means, you should contact our clearing Firm, Pershing LLC at (201) 413-3635 for recorded instructions. www.pershing.com/disclosures.

Our Business Continuity Plan

We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the Firm's books and records, and allowing our customers to transact business. In short, our BCP is designed to permit the Firm to resume operations as quickly as possible, give the scope and severity of the SBD.

Our BCP addresses: data recovery and backup; mission-critical systems; financial and operational assessments; alternative communication with customers, employees and regulators; alternative physical locations of employees; critical supplier, contractor, back and counter-party impact; regulatory reporting; and assuring our customers prompt access to the funds and securities if we are unable to continue business.

Our clearing firm, Pershing LLC, backs up our important customer records in a geographically separate area. While every emergency situation poses unique problems based on external factors, such as time of day, and severity of the disruption, we have been advised by our clearing firm that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payment within 4 hours or less. Your orders and requests for funds could be delayed during this period.

If you have questions about our BCP, you can contact Loop Capital's Compliance Department via e-mail at compliance@loopcapital.com.

CYBERSECURITY

Loop Capital has implemented a cybersecurity program designed to protect client and Firm sensitive information and systems from cyber threats and attacks. Loop Capital's cybersecurity program is based upon the framework developed by the National Institute of Standards and Technology ("NIST") and FINRA's Report on Cybersecurity practices.

Governance

Loop Capital has appointed co-Information Security Officers (the "co-ISOs") who are responsible for overseeing the Firm's Cybersecurity Program. On an annual basis, the Co-ISOs conduct a risk assessment designed to address, among other

LOOP CAPITAL MARKETS LLC 2024 CUSTOMER DISCLOSURES

items: (1) types and location of sensitive information including Personal Identifiable Information ("PII"); (2) physical and network access controls; (3) mission-critical vendors; (4) cybersecurity incidents and responses; and (5) cybersecurity training and awareness. The co-ISOs meet at least quarterly to identify and address any cybersecurity concerns or incidents which arose during the prior quarter and to review that appropriate controls are in place.

Network Security

Loop Capital has implemented protocol to limit access to the Firm's computer network. Access to the Firm's network is password protected and associated persons only have access to those network drives necessary to perform their job functions. The entire network is protected by firewalls and electronic communication filters designed to protect the network from cyber intrusion.

Vendor Management

At vendor on-boarding, the Firm determines if a vendor will have access to client and/or Firm sensitive information or provides mission-critical systems to the firm's business operations. For identified vendors, at on-boarding and annually thereafter the Firm conducts a review to evaluate the systems and protections each vendor has implemented to protect the Firm's sensitive information and its systems. If the vendor's programs are insufficient, the Firm will take remedial steps, including if necessary, terminating the vendor agreement.

Incident Tracking and Response

The Firm maintains a list of cybersecurity incidents and responses taken as appropriate. Such responses will, if appropriate, include reporting such incidents to state and/or federal regulators as required by laws or regulations.

Insurance

The Firm maintains cyber liability insurance designed to cover first-party losses, including cyber incident response, business interruption, digital data recovery and network extortion. The insurance program also includes coverage for third-party claims involving cyber, privacy and network security liability and electronic social and printed media liability.

Cybersecurity and Training

On an annual basis the Firm provides training to its employees and associated persons with regard to cyber security matters, including the protection of client and Firm sensitive information. In addition, periodically throughout the year, the Firm provides tips and guidance to associated

persons designed to raise awareness of cybersecurity threats and steps that may be taken to reduce risk.

SIPC

Loop Capital is a member of the Securities Investor Protection Corporation ("SIPC"). SIPC provides account protection to each customer account for up to \$500,000, including \$250,000 in cash. Visit www.sipc.org for more information about SIPC coverage. Please note that SIPC protection on funds you deposit for trading futures and options on futures contracts on either U.S. or foreign markets are not protected by SIPC.

FINRA AND NFA PUBLIC DISCLOSURE INFORMATION

The Board of Governors of the Financial Industry Regulatory Authority ("FINRA") has adopted a public disclosure policy that provides certain types of disciplinary information on FINRA Member Firms and their Associated Persons which is available through the FINRA BrokerCheck website (www.finra.org) or by telephone (1-800-289-9999). The BrokerCheck Program gives you access to information that may help you determine whether to conduct business with a FINRA Member Firm or its Associated Persons and for other uses consistent with the FINRA Broker Check Program. A brochure describing the BrokerCheck Program is available to you upon request by contacting FINRA.

Loop Capital's NFA Background Affiliation Status Information Center (BASIC) Report BASIC contains FCM-related regulatory and non-regulatory actions contributed by NFA, the CFTC and the U.S. futures exchanges. Loop Capital's link can be accessed at [BASIC | NFA \(futures.org\)](http://BASIC|NFA(futures.org)).

MSRB CUSTOMER DISCLOSURES

Customers interested in more information may obtain a copy of the MSRB's Investor Brochure by accessing the MSRB's Website at www.msrb.org. The brochure describes the protections that may be provided by the MSRB rules and how to file a complaint with an appropriate regulatory authority.

CFTC/NFA COMPLAINTS

A customer that wishes to file a complaint about the Firm or one of its employees with the CFTC can contact the CFTC's Division of Enforcement either electronically or by phone. Complaints can be filed at [Tips And Complaints \(cftc.gov\)](http://Tips And Complaints (cftc.gov)) or by calling the Division of Enforcement toll-free at 1-866-FON-CFTC (1 866-366-2382). A customer may file a

LOOP CAPITAL MARKETS LLC 2024 CUSTOMER DISCLOSURES

complaint about the Firm or one of its employees with the NFA electronically at [File a Complaint \(futures.org\)](https://www.futures.org) or by calling NFA directly at 1-800-621-3570.

CUSTOMER COMPLAINTS

All complaints should be made in writing to the Compliance Department, Attn.: Chief Compliance Officer, 111 West Jackson Blvd, Ste. 1901, Chicago, IL 60604 or by electronic mail to compliance@loopcapital.com. Please describe the complaint in detail.

PROSPECTUS AND OFFERING DOCUMENTS

A copy of the prospectus, official statement (including notices and circulars), term sheets, pricing supplements, financial reports and/or other offering information may be found at the MSRB's EMMA, as related to municipal securities offerings, and the SEC's EDGAR, as related to other securities offerings. For transactions in newly issued Federal Home Loan Bank (FHLB), Federal National Mortgage Association (FNMA), Federal Farm Credit Bank (FFCB) and Federal Home Loan Mortgage Corporation (FHLMC) securities, you may readily access this information by visiting their respective websites as detailed below. We will also provide copies of the relevant offering statements upon request.

SEC: <http://www.sec.gov/edgar.shtml>

MSRB: <http://emma.msrb.org/Search/Search.aspx>

FHLB: <http://www.fhlp-of.com>

FFCB: <http://www.farmcredit-ffcb.com>

GNMA: <http://www.ginniemae.gov>

FNMA: <http://www.fanniemae.com/markets/debt/> (debt securities)

FNMA: <http://www.fanniemae.com/mbs/> (mortgage backed)

FHLMC: <http://www.freddiemac.com/debt/> (debt securities)

FHLMC: <http://www.freddiemac.com/mbs/> (mortgage backed)

Pursuant to Rules 172 and 173 promulgated by the Securities and Exchange Commission ("SEC") under the Securities Act of 1933, as amended, we may be exempt from the requirement to deliver a hard copy of the final prospectus to purchasers in certain registered public offerings of securities

("access equals delivery exemption"). These SEC rules permit underwriters and dealers to fulfill their prospectus delivery requirements through an "access equals delivery" system whereby the customer will be deemed to have received delivery of the final prospectus by virtue of notification of its availability on the SEC's EDGAR website, when an issue is made pursuant to a registration statement or prospectus.

Prospectuses and offering documentation are prepared and filed with the SEC by the respective issuer. Accordingly, we make no warranty or representation that the information contained therein is accurate or complete. Please note that prospectuses may only be valid during the required delivery period and may not reflect current information regarding the securities offered or the issuer.

A copy of the offering documentation and subscription agreement for unregistered private securities offerings may be obtained by contacting the respective issuer or our company. This information does not constitute an offer to sell or a solicitation of an offer to buy securities, nor shall there be any sale of securities, in any state or jurisdiction in which such an offer, solicitation or sale would be unlawful.

EQUITY TRADING DISCLOSURES

Proprietary Trading--Loop Capital does not generally engage in proprietary equity trading. In the event of customer facilitation trading while in possession of your order, the Firm has information barriers in place that prevent the flow of information between units. These business lines will not interact with or have access to information about your order.

FINRA Rule 5320 & Handling of Client Orders--FINRA Rule 5320 generally prohibits a broker-dealer that accepts and holds a client order in an equity security from trading for its own account at a price that would satisfy the client order, unless the broker-dealer immediately executes the client's order at the same price or better than it traded for its own account. If you do not consent to the handling of your orders in this manner, please notify your Loop Capital sales or trading representative.

Not Held Orders--With limited exception, all orders transmitted to Loop Capital are handled on a "not held" basis, which provides the Firm discretion in the handling and execution of your orders to seek best execution. If you do not consent to the handling of your orders as not held, please notify your Loop Capital sales or trading representative.

Payment for Order Flow--Loop Capital does not receive payments in return for directing client order flow to any specific broker-dealer or market center. Loop Capital does

**LOOP CAPITAL MARKETS LLC
2024 CUSTOMER DISCLOSURES**

not accept compensation for routing orders to any broker or market maker nor does Loop Capital distribute payment for order flow to any such market venue; thus, there is no bias related to best execution for its clients. Loop Capital acknowledges that it may receive standard fee credits for placing liquidity orders with exchanges, but it is not direct payment for flow, immaterial in amount and has no impact on Loop Capital's best execution obligations to its clients.

Important Risks Associated with Market Orders--Market orders execute at any available price in the market. Although Loop Capital strives to obtain the best possible execution price, there are instances in which a market order may execute at an undesirable price. Limit orders allow our institutional clients to execute at or better than a specified limit price. Please notify your Loop Capital sales or trading representative to specify instructions on order handling.

REG NMS Rule 606--Disclosure required pursuant to Reg NMS Rule 606(a) are available under "Disclosures" on our website, www.loopcapital.com. Additional disclosures required pursuant to Reg NMS Rule 606(b) are available upon request to your Loop Capital sales or trading representative or by emailing compliance@loopcapital.com

REG BI DISCLOSURE

Reg BI is applicable to the Firm's occasional retail customers for whom we are acting as broker in connection to the offering and sale of private placements. The REG BI CRS Form is available upon request by contacting compliance@loopcapital.com or by visiting www.loopcapital.com

FINANCIAL STATEMENT

Loop Capital's financial statements are available upon request to accounting@loopcapital.com.