

DISCLOSURES and NOTICES**TABLE OF CONTENTS**

ANTI-MONEY LAUNDERING NOTIFICATION	1
INVESTOR EDUCATION AND PROTECTION	1
PRIVACY POLICY	1
SEC RULE 606	2
PAYMENTS FOR ORDER FLOW AND FEE DISCOUNTS	2
EXECUTION QUALITY	2
INDICATIONS OF INTEREST	3
EXTENDED TRADING HOURS	3
SEC RULE 15c3-5 MARKET ACCESS	4
SEC RULE 13h-1 LARGE TRADE REPORTING	4
ACCURATE ORDER INFORMATION	4
INFORMATION SHARING	4
NASDAQ ISE SOLICITATION ORDERS	4
CBOE SOLICITATION AUCTION MECHANISM	4
MIAX SOLICITATION ORDERS	5
PROFESSIONAL CUSTOMER	5
ERRONEOUS TRANSACTIONS	5
BUSINESS CONTINUITY PLAN OVERVIEW	5
SIPC DISCLOSURE	6
OPTIONS DISCLOSURE DOCUMENT	6
REGULATION BEST INTEREST	6
CLIENT COMPLAINTS	6



OVERVIEW

Optimal Market Technologies, LLC ("Optimal") is a registered broker-dealer with the Securities and Exchange Commission ("SEC"), several securities exchanges, and the Financial Industry Regulatory Authority ("FINRA"). Optimal (which is, at times, referred to herein using phrases such as "we", "our" or similar phrases) is providing this document as means of providing Optimal clients ("client" or "you" or similar phrases) with important disclosures and notices pursuant to certain industry obligations, guidance and good practices. **Receipt of this Disclosures and Notices document or posting it on Optimal's website serves as your acknowledgement and informed consent to the information contained herein. Please note that; 1) not every disclosure or notice will be applicable to every client depending upon the services utilized by each client, and 2) regardless of the services utilized by each client, the disclosures and notices contained herein should not be construed as a recommendation to buy or sell a security or to provide investment advice. All clients must read all risk disclosure statements relevant to the type of activity they intend to conduct prior to any activity taking place.**

ANTI-MONEY LAUNDERING NOTIFICATION

To help the government fight the funding of terrorism and money laundering activities, Federal law requires financial institutions to obtain, verify, and record information that identifies each person who handles transactions on behalf of others.

Upon applying for the services of Optimal, Optimal is required to collect (at a minimum) information such as the following from you:

- Your Name
- Date of Birth
- Address
- Identification number, such as:
- U.S. Citizen: taxpayer identification number (social security number or employer identification number)
- Non- U.S. Citizen: taxpayer identification number, passport number, and country of issuance, alien identification card number, or government-issued identification showing nationality, residence, and a photograph of you.

You may also be asked to show your driver's license, corporate documentation or other identifying documents. A corporation, partnership, trust or other legal entity may need to provide information such as principal place of business, local office, employer identification number, certified articles of incorporation, government-issued business license, a partnership agreement or a trust agreement.

INVESTOR EDUCATION AND PROTECTION

Pursuant to FINRA Rule 2267, please note that the toll-free number for the Public Disclosure Program of FINRA (which provides certain information about the disciplinary history of FINRA members and their associated persons) is 1-800-289-9999, the FINRA website is www.finra.org and an investor brochure that includes information describing the Public Disclosure Program is available upon request from FINRA.

PRIVACY POLICY

We consider the information our clients provide and entrust to us on a daily and ongoing basis to be of the utmost importance. In order to provide brokerage and execution services to you and to maintain compliance with securities regulations, we collect certain personal, non-public information which is obtained from the following sources:

- From you on applications or other forms; and
- Information about your transactions through us.

Optimal uses the personal, non-public information that we collect to service you, which includes using the information you provide through the Optimal system(s). This information is necessary to, among other things, open accounts, route your orders and settle your transactions. In doing so, we share your applicable information with our service providers. That said, Optimal restricts access of your personal, non-public information to its



employees who need to know that information to provide products and/or services to you. Optimal maintains physical, electronic, and procedural safeguards to guard your personal, non-public information.

When you provide personal, non-public information to us about someone else (such as your executives, directors, employees, or other persons with whom you have business dealings), you must ensure that you are entitled to disclose that personal, non-public information to us and that Optimal and its service providers will utilize such personal, non-public information to provide services to you.

You may find Optimal's complete Privacy Policy here: <https://optimal1stg.wpenginepowered.com/wp-content/uploads/2026/01/Optimal-Privacy-Policy-v2.0-01-28-26.pdf>

SEC RULE 606

SEC Rule 606 requires broker dealers that route certain orders in listed option securities to make publicly available quarterly reports that identify the venues to which such orders are routed for execution. Optimal's Rule 606 reports are available at optimalmarkettech.com.

You may contact Optimal for the identity of the venue to where your orders were routed for execution in the (6) six months prior to your request, whether the orders were 'directed' or 'non-directed', and the time of the transaction, if any, that resulted from such orders by sending an email to the Optimal Team at operations@optimalmarkettech.com.

PAYMENTS FOR ORDER FLOW AND FEE DISCOUNTS

Optimal has chosen to participate within the available payment for order flow programs offered by various exchanges pursuant to the marketing fee programs that have been adopted by such exchanges and approved by the Securities and Exchange Commission. Participation in these programs allows Optimal to receive and make payments in varying amounts, and potentially be eligible for fee discounts from the exchanges and also from other broker dealers that Optimal routes your orders to. Absent any direction or preference from you on your order, Optimal will route to exchanges or other broker-dealers with payment for order flow programs taking into consideration several factors, including the size and complexity of your order, liquidity of the market, available price improvement, and potential price impact.

EXECUTION QUALITY

When you send a 'directed' order to us, we will follow your 'directed' instructions and route your 'directed' order to the destination of your choice. When you send a 'non-directed' order to us, we will route your order based upon our best execution obligations and price improvement experience in routing to national securities exchanges, alternative trading systems and other broker-dealers.

In addition, unless instructed by you that your order is 'held', all orders received and accepted by us without a 'held' instruction are considered 'not held'. A 'held' order means that you have determined the time and price(s) that you would like your order routed for execution, which may not necessarily be the best price that can be obtained. Absent a 'held' instruction from you, we will use our discretion on a 'not held' (aka best-efforts) basis regarding order time and price to seek best execution and/or price improvement. When exercising such discretion, we will take all reasonable steps to obtain the best possible execution for your order taking into consideration all other order terms and conditions while also taking into consideration a variety of factors, including but not limited to, the size of your order, liquidity of the relevant markets, opportunities for price improvement, speed of execution, the trading characteristics of the security involved, and the cost of the transaction.

Order size is a key factor when determining how to achieve best execution for 'non-directed' and/or 'not held' orders. For example, because there is typically a correlation between the size of an order and its impact on the execution price of a security, orders of large size, and/or less liquid securities, may not be filled at the quotes displayed by market data services (which typically apply only to orders of a limited size). When we believe that the price of a security may be impacted due to the order size of an accepted 'non-directed' and/or 'not-held' order, we will likely choose to route a marketable limit order for a brief period of time and for size less than your 'non-directed' and/or 'not held' order in an effort to not exert undue pressure on the price of the security. When we do



this, it is our goal to minimize market impact to achieve the best possible execution price as fast as possible, however, your order execution information may be delayed and such orders may experience slippage in execution price.

Additionally, when accepting 'non-directed' and/or 'not held' orders, we may use available exchange-provided functionality, including various order types, exchange auction mechanisms, attributed orders, and preferenced orders, in addition to soliciting requests for quotes from one or more affiliated or unaffiliated market makers in an effort to achieve best execution and, when available, price improvement relative to the published markets. In certain instances, we will solicit market makers or other liquidity providers, including, but not limited to, options floor brokers, to provide liquidity for 'non-directed' and/or 'not held' orders. Further, we may choose to 'leg' into complex 'non-directed' and/or 'not held' orders by sending two (or more) separate orders in an attempt to achieve best execution and/or price improvement.

INDICATIONS OF INTEREST

We use our systems to advertise indications of interest ("IOIs") to certain counterparties/responders. These counterparties/responders include other broker-dealers, such as market makers, and other liquidity providers. IOIs are expressions of trading interest that contain one or more of the following elements: security name, side of the market, size, and/or price. As part of our relationship with these counterparties/responders, we are attempting to provide you with; 1) liquidity (size) improvement; 2) faster executions; and 3) price improvement. Given the fact that we are a broker-dealer routing options orders on an agency basis ONLY, all IOI messages disseminated to counterparties/responders are considered "natural" (order in hand) and if executed, are on a U.S. options exchange. Only 'non-directed,' marketable orders are expressed when advertising an IOI.

EXTENDED TRADING HOURS

Although Optimal does not provide execution services to retail accounts, Optimal would like to remind its clients of the risks associated with extended hours trading:

You should consider the following points before engaging in extended hours trading. "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.

- Risk of Lower Liquidity. Liquidity refers to the ability of market participants to buy and sell securities. Generally, the more orders that are available in a market, the greater the liquidity. Liquidity is important because with greater liquidity it is easier for investors to buy or sell securities, and as a result, investors are more likely to pay or receive a competitive price for securities purchased or sold. There may be lower liquidity in extended hours trading as compared to regular trading hours. As a result, your order may only be partially executed, or not at all.
- Risk of Higher Volatility. Volatility refers to the changes in price that securities undergo when trading. Generally, the higher the volatility of a security, the greater its price swings. There may be greater volatility in extended hours trading than in regular trading hours. As a result, your order may only be partially executed, or not at all, or you may receive an inferior price when engaging in extended hours trading than you would during regular trading 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 trading hours, or upon the opening the next morning. As a result, you may receive an inferior price when engaging in extended hours trading than you would during regular trading hours.
- Risk of Unlinked Markets. Depending on the extended hours trading system or the time of day, the prices displayed on a particular extended hours trading system may not reflect the prices in other concurrently operating extended hours trading systems dealing in the same securities. Accordingly, you may receive an inferior price in one extended hours trading system than you would in another extended hours trading system.
- Risk of News Announcements. Normally, issuers make news announcements that may affect the price of their securities after regular trading hours. Similarly, important financial information is frequently announced outside of regular trading hours. In extended hours trading, these announcements may occur during 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.** The spread refers to the difference in price between what you can buy a security for and what you can sell it for. Lower liquidity and higher volatility in extended hours trading may result in wider than normal spreads for a particular security.

SEC RULE 15c3-5 MARKET ACCESS

SEC Rule 15c3-5 requires broker-dealers with access to exchanges or Alternative Trading Systems (“ATs”) to establish, document, and maintain a system of risk management controls and supervisory procedures reasonably designed to limit the financial exposure of the broker-dealer. Optimal has implemented client specific pre-trade risk parameters that will reject orders when Optimal’s risk parameters are exceeded. To request an intra-day risk parameter change(s) or inquiries regarding Optimal’s 15c3-5 risk parameters, please contact Optimal Support by email at operations@optimalmarkettech.com.

SEC RULE 13h-1 LARGE TRADE REPORTING

SEC Rule 13h-1, also known as Large Trader Reporting, requires a person or entity that meets the definition of a Large Trader to: 1) identify itself to the SEC via filing a Form 13H, 2) obtain a Large Trader ID (“LTID”) from the SEC, and 3) provide their LTID to all executing and clearing registered broker-dealers through which they transact in NMS securities and identify each account to which it applies. A Large Trader is defined as a person or entity whose trades in NMS equity securities and/or listed options for their own account or any account which they exercise discretion that equals or exceeds either 2 million shares or \$20 million during any calendar day, or 20 million shares or \$200 million during any calendar month.

It is the client’s responsibility to register with the SEC if it qualifies as a large trader and to provide their LTID to Optimal. LTIDs must be submitted upon account onboarding. LTID information registered and obtained after account onboarding may be sent to operations@optimalmarkettech.com. Should you have any questions, see <https://www.sec.gov/rules-regulations/staff-guidance/trading-markets-frequently-asked-questions/responses-frequently-0>.

ACCURATE ORDER INFORMATION

Clients are required to submit accurate, timely, and complete order information on all orders routed to Optimal. Such information includes, but is not limited to, proper account origin code, actionable identifiers, client account number, CMTA information, and Qualified Contingency Cross (“QCC”) eligibility.

INFORMATION SHARING

Optimal will share certain post-trade information with its counterparties/responders for the purposes of analyzing post-trade data to improve best execution for clients. Optimal and these counterparties/responders may derive additional benefits, such as reduced transaction costs. Optimal does not disclose client identifying information to these counterparties/responders in real time, including name, origin code capacity, or settlement firm, however Optimal will share certain information with these counterparties/responders on a post-trade basis. The Compliance Department routinely monitors the access, use, and sharing of post-trade information to ensure that Optimal employees are following internal procedures.

NASDAQ ISE SOLICITATION ORDERS

Pursuant to International Securities Exchange Rule 716, Optimal is required to provide the following disclosure, informing you of our intent to use the Solicited Order mechanism to cross options orders. ISE Rule 716(e) provides that when handling an order of 500 contracts or more on your behalf, Optimal may solicit other parties to execute against your order and may thereafter submit for execution your order using the International Securities Exchange’s Solicited Order Mechanism. This functionality provides a single-price execution only, so that your 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 Rule 716, which is available at <https://listingcenter.nasdaq.com/rulebook/ise/rules#>.

CBOE SOLICITATION AUCTION MECHANISM

Pursuant to Chicago Board Options Exchange Rule 5.39, Optimal is required to provide the following disclosure, informing you of our intent to use the Solicited Auction mechanism to cross options orders. CBOE Rule 5.39 provides that Optimal may electronically submit for execution orders it represents as agent against solicited



orders if: (i) the agency order is for 500 contracts or more (or 5,000 mini option contracts); (ii) the order is designated as all-or-none; and (iii) the minimum price increment for single price submission is determined by CBOE but may not be smaller than one cent. For further details on the operation of this Mechanism, please refer to CBOE Rule 5.39, which is available at https://cdn.cboe.com/resources/regulation/rule_book/C1_Exchange_Rule_Book.pdf.

MIAX SOLICITATION ORDERS

Pursuant to Miami International Securities Exchange, LLC Rule 515A, Optimal is required to provide the following disclosure, informing you of our intent to use the Solicited Auction mechanism to cross options orders. MIAX Rule 515A provides that Optimal may electronically submit for execution orders that it represents as agent against solicited orders if: (i) the agency order is 500 contracts or more (or 5,000 mini option contracts); (ii) the order is designated as all-or-none; and (iii) the minimum price increment for single price submission is determined by MIAX but may not be smaller than one cent. For further details on the operation of this Mechanism, please refer to MIAX Rule 515A, which is available at <https://www.miaxoptions.com/rulebook>.

PROFESSIONAL CUSTOMER

Most U.S. option exchanges have implemented rules which serve to distinguish orders originating from a group of public customers deemed to be "Professional" (i.e., persons or entities having access to information and/or technology which enables them to trade in a manner as a broker-dealer) as opposed to retail. In accordance with these rules, any client account which is not a broker-dealer and which places more than 390 listed option orders (whether executed or not) on a daily average across all option exchanges in a given month for its own beneficial account(s) will be deemed as Professional.

Broker-dealers are required to conduct a review on a calendar quarter basis to identify those persons or entities who have exceeded the 390-order threshold for any month in that quarter and who are to be designated as Professional for the next calendar quarter. Note that for purposes of this rule, spread orders are considered a single order, rather than each leg of the spread as an individual order. See CBOE Regulatory Circular RG16-064 for an explanation of Professional. <https://cdn.cboe.com/resources/regulation/circulars/regulatory/RG16-064.pdf>

ERRONEOUS TRANSACTIONS

In an effort to curb erroneous transactions from taking place, Optimal reserves the right to reject any order received if Optimal believes that the order received is erroneous in nature, such as, but not limited to, orders priced through the market or orders of unusually large size. Conversely, if the SEC, FINRA, an SRO, or any other regulatory body with jurisdiction over Optimal determines that a previously executed transaction was erroneous and must be adjusted or cancelled, Optimal will be required to make such adjustment or cancellation and will not be unable to honor the execution price or any other terms of that transaction. Clients are responsible for promptly identifying and notifying Optimal of any transaction that may be considered an erroneous trade or obvious error. If a transaction contains an obvious error in its execution and meets the applicable numerical thresholds under relevant SRO clearly erroneous rules, a client may request that Optimal submit an obvious error filing on the client's behalf in an effort to seek a cancellation or a price adjustment of the transaction. Any such request must be received promptly and in writing by Optimal to allow Optimal adequate time to complete and submit the required filing. Notwithstanding the foregoing, Optimal retains the sole and absolute discretion to decline to submit an obvious error filing.

BUSINESS CONTINUITY PLAN OVERVIEW

Our business continuity plan was developed to provide reasonable assurance that we can maintain business continuity in the event of a disruption of normal business operations. Our business continuity plan was developed to anticipate various types of potential disruptions to reasonably ensure that we react appropriately and timely should a business disruption occur. Keep in mind that no contingency plan provides total assurance that an interruption will not occur or that as a result of a disruptive event that normal operations will ensue. We will periodically update our business continuity plan in an effort to maintain as comprehensive a plan as possible.

Optimal provides agency execution services. Accordingly, the Optimal business continuity plan focuses on; 1) identifying potential risks that may inhibit our ability to provide execution services, and 2) implementation of processes that are to be followed to reestablish business operations. The plan is designed to address key areas of concern, including, but not limited to the following:

optimalmarkettech.com

1 World Trade Center, Suite 47M New York, NY 10007



- Data back-up and recovery;
- Mission critical systems;
- Financial and operational assessments;
- Alternate means of communication between us and our clients;
- Alternate means of communication between us and our employees;
- Alternate physical locations for employees;
- Critical business constituents, banks and counterparty impact;
- Regulatory reporting; and
- Communications with regulators.

Should there be a serious business disruption, clients are encouraged to contact us at compliance@optimalmarkettech.com or contact us at 646-389-5076 for further information.

SIPC DISCLOSURE

In accordance with FINRA Rule 2266, Optimal is providing notice to you that information pertaining to the Securities Investors Protection Corporation ("SIPC") including an SIPC Brochure, may be obtained by contacting the following or the web at:

Securities Investor Protection Corporation 805 15th Street, N.W. Suite 800
Washington, D.C. 20005-2215
202-371-8300
www.sipc.org

OPTIONS DISCLOSURE DOCUMENT

Options involve risk and are not suitable for all investors. Prior to buying or selling an option, each client must review a copy of the Characteristics and Risks of Standardized Options (ODD). This document is available on the OCC's website at <https://www.theocc.com/company-information/documents-and-archives/options-disclosure-document>. Please contact your Optimal representative for a paper copy of the disclosure document.

Spreads, straddles, and other multiple-leg options strategies can entail substantial transaction costs, including multiple commissions, which may impact any potential return. These are advanced option strategies and often involve greater risk, and more complex risk, than basic options trades.

REGULATION BEST INTEREST

Regulation Best Interest ("Reg BI") establishes a standard of conduct for broker dealers and natural persons who are associated persons of a broker dealer when making a recommendation of any securities transaction or investment strategy involving securities (including account recommendations) to a retail customer. If Reg BI applies, a broker dealer must act in the best interest of a retail customer when making a recommendation and at the time the recommendation is made. Optimal does not recommend securities transactions, investment strategies involving securities (including account type recommendations), or accounts to retail customers, or otherwise provide any service to retail customers, therefore, Reg BI does not apply to Optimal.

CLIENT COMPLAINTS

Pursuant to SEC Rule 17a-3(a)(18)(ii), please be advised that any complaints may be directed to the following:

Optimal Market Technologies, LLC
1 WTC Suite 47M, New York, NY 10007
Attn: Frank Wanzor
Email: compliance@optimalmarkettech.com