ABN·AMRO Clearing

Customer Disclosure Document

Securities

SIPC Information

ABN AMRO Clearing USA LLC ("AAC-USA" or "Firm") is a member of the Securities Investor Protection Corporation ("SIPC"). SIPC currently protects the securities and cash in your account up to a maximum of $500,000, no more than $250,000 of which may be in cash. You may obtain information about SIPC, including a SIPC brochure entitled "How SIPC Protects You," by contacting SIPC directly at www.sipc.org or (202) 371-8300.

(FINRA Rule 2266)

FINRA BrokerCheck

FINRA's BrokerCheck database is designed to help investors learn about the professional background, business practices and conduct of securities firms and their brokers. In connection with this database, FINRA has established a toll-free hotline at (800) 289-9999 and a web site that may be accessed at www.finra.org.

(FINRA Rule 2267)

Voice Recording Disclosure

In accordance with applicable laws and regulations, AAC-USA may record certain telephone conversations with you. By communicating with AAC-USA, you consent to the voice recording of conversations with personnel of AAC-USA and its affiliates. Such recordings may be made with or without the use of spoken warning, tone or similar notification.

Business Continuity and Contingency Planning

Securities industry regulations require that brokerage firms inform their clients of their plans to address the possibility of a business disruption that potentially results from power outages, natural disasters, or other events ("Disruptive Event").

AAC-USA has both a Business Continuity Plan and a Disaster Recovery Plan that are designed to mitigate the potential risk of a business disruption and provide a continuation of client services.

Preventive measures that AAC-USA takes to be able to continue to operate its business, notwithstanding a Disruptive Event, include:

- Operating data centers in two distinct locations. In the event one data center is damaged in a Disruptive Event, the Firm will move its processing to the other data center.

- In the event of a disruption at the main AAC-USA office, employees will work from their designated home locations. AAC-USA employees work from home on a consistent basis and are able accomplish their work responsibilities from these locations. FINRA registered employees have each disclosed their home address as a workplace environment. The dispersal of employee work locations offers enhanced BCP risk protections such as a greater physical distribution of employees and the utilization of multiple different internet providers to connect with AAC-USA, client, and regulator systems.

AAC-USA's Business Continuity Plan also describes department-level actions AAC-USA will take to continue to operate its business notwithstanding a Disruptive Event. Specifically, the Business Continuity Plan outlines each department's critical processes and applications as well as recovery and continuity procedures for each critical process and application.

Various aspects of the Business Continuity and Disaster Recovery plans are tested no less frequently than annually. Further, the Business Continuity and Disaster Recovery plans are reviewed annually and updated as necessary.

While no contingency plan can eliminate all risk of service interruption or temporarily impeded account access, AAC-USA continually assesses and updates its plans to mitigate all reasonable risk. With respect to a given Disruptive Event, AAC-USA does not guarantee: (i) that its Business Continuity Plan or Disaster Recovery Plan will be implemented correctly; or (ii) such plans, if implemented, will be sufficient or appropriate to avoid, deter, mitigate, or otherwise negate the Disruptive Event.

In the case of a Disruptive Event, AAC-USA intends for its main phone numbers, (312) 604-8000 through 8799, to continue to be operational.

(FINRA Rule 4370)

Day-Trading Risk Disclosure Statement

You should consider the following points before engaging in a day-trading strategy. For purposes of this notice, a "day-trading strategy" means an overall trading strategy characterized by the regular transmission by a customer of intra-day orders to effect both purchase and sale transactions in the same security or securities.

1. **Day trading can be extremely risky.** Day trading generally is not appropriate for someone of limited resources and limited investment or trading experience and low risk tolerance. You should be prepared to lose all of the funds that you use for day trading. In particular, you should not fund day-trading activities with retirement savings, student loans, second mortgages, emergency funds, funds set aside for purposes such as education or home ownership, or funds required to meet your living expenses. Further, certain evidence indicates that an investment of less than $50,000 will significantly impair the ability of a day trader to make a profit. Of course, an investment of $50,000 or more will in no way guarantee success.

2. **Be cautious of claims of large profits from day trading.** You should be wary of advertisements or other statements that emphasize the potential for large profits in day trading. Day trading can also lead to large and immediate financial losses.

3. **Day trading requires knowledge of securities markets.** Day trading requires in-depth knowledge of the securities markets and trading techniques and strategies. In attempting to profit through day trading, you must compete with professional, licensed traders employed by securities firms. You should have appropriate experience before engaging in day trading.

4. **Day trading requires knowledge of a firm's operations.** You should be familiar with a securities firm's business practices, including the operation of the firm's order execution systems and procedures. Under certain market conditions, you may find it difficult or impossible to liquidate a position quickly at a reasonable price. This can occur, for example, when the market for a stock suddenly drops, or if trading is halted due to recent news events or unusual trading activity. The more volatile a stock is, the greater the likelihood that problems may be encountered in executing a transaction. In addition to normal market risks, you may experience losses due to system failures.

5. **Day trading will generate substantial commissions, even if the per trade cost is low.** Day trading involves aggressive trading, and generally you will pay commissions on each trade. The total daily commissions that you pay on your trades will add to your losses or significantly reduce your earnings. For instance, assuming that a trade costs $16 and an average of 29 transactions are conducted per day, an investor would need to generate an annual profit of $111,360 just to cover trading fees.

6. **Day trading on margin or short selling may result in losses beyond your initial investment.** When you day trade with funds borrowed from a firm or someone else, you can lose more than the funds you originally placed at risk. A decline in the value of the securities that are purchased may require you to provide additional funds to the lender to avoid the forced sale of those securities or other securities in your account. Short selling as part of your day-trading strategy also may lead to extraordinary losses, because you may have to purchase a stock at a very high price in order to cover a short position.

7. **Potential Registration Requirements.** Persons providing investment advice for others or managing securities accounts for others may need to register as either an "Investment Adviser" under the Investment Advisers Act of 1940 or as a "Broker" or "Dealer" under the Securities Exchange Act of 1934. Such activities may also trigger state registration requirements.

(FINRA Rule 2270)

Extended Hours Trading Risk Disclosure

The increased risks of extended-hours trading are explained below. To the extent that you request AAC-USA to clear your extended hours trades, you agree and acknowledge that: (i) you have carefully considered the risks of extended hours trading, (ii) you are willing to assume and accepts such risks, (iii) such risks are within your risk tolerance, and (iv) extended-hours trading is appropriate for you.

"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.

1. **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.

2. **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 be only 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.

3. **Risk of Changing Prices.** The prices of securities traded in extended-hours trading may not reflect the prices either at the end of regular market hours, or upon the opening of the next morning. As a result, you may receive an inferior price in extended hours trading than you would during regular trading hours.

4. **Risk of Unlinked Markets.** Depending on the extended-hours trading system or the time of day, the prices displayed on a particular extended-hours system may not reflect the prices in other concurrently operating extended-hours trading systems dealing in the same securities. Accordingly, you may receive an inferior price in one extended hours trading system than you would in another extended hours trading system.

5. **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.

6. **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.

7. **Risk of Trading During Hours in which Financial Market Infrastructure Companies are Closed.** In extended hours trading, there are certain hours in which important financial market infrastructure companies are closed for business. Examples of these market infrastructure companies include the relevant clearing agency as well as other markets, banks, Fedwire Funds Service, and certain other providers of settlement services. Likewise, trading during hours in which the relevant clearing agency as well as other providers of settlement services are closed may lead to an increased passage of time between execution and final settlement of the resulting transaction.

8. **Risk of Lack of Calculation or Dissemination of Underlying Index Value or Intraday Indicative Value ("IIV").** For certain Derivative Securities Products, an updated underlying index value or IIV may not be calculated or publicly disseminated in extended trading hours. Consequently, an investor may not be able to calculate implied values for certain Derivative Securities Products in those sessions, which may cause such investor to be at a disadvantage when compared to market professionals.

9. **Additional Risks Related to Extended Hours Trading.** Participation in extended hours trading may present risks in addition to the risks discussed above, including the following:

   i. **Risk of Trading During Hours in Which Primary Listing Markets May Not Be Open.** During extended hours trading, the primary listing exchanges for securities may not be open, and, thus, trading in listed securities may not be occurring on the primary exchanges during extended hours. The primary listing exchanges also may not be available to perform their regulatory surveillance and other regulatory obligations with regard to their listed securities during extended trading hours.

   ii. **Risk of Trading During Hours in Which There May Be Limited or Different Regulatory Protections.** The regulatory protections available during extended trading hours may be more limited or different than those available during regular trading hours. For example, certain mechanisms that address volatility in individual symbols and the equities market may not be available during extended trading hours.

   iii. **Risk of Trading Because of Limited Trading Alternatives.** There may be a limed number of exchanges trading certain securities during extended trading hours, With more limited trading alternatives during extended trading hours, you may experience losses if your orders cannot be executed normally due to systems failures or other issues on the available exchange(s).

   iv. **Risk Related to Continuous Trading.** With the implementation of extended hours trading, near-continuous trading would take place. With more limited breaks in trading, there may be a greater risk related to system maintenance and testing, as well as the pausing and resumption of trading.

   v. **Risk of Trading Because Extended Trading Hours are Novel.** Trading on an exchange during extended trading hours is novel and may present additional unforeseen risks in addition to those discussed above.

(FINRA Rule 2265)

Margin Disclosure Statement

This statement concerns the risks associated with trading securities in a margin account. Before trading stocks in a margin account, you should carefully review the margin agreement provided at account opening. Contact your firm regarding any questions or concerns you may have with your margin accounts.

When you purchase securities, you may pay for the securities in full or you may borrow part of the purchase price from your brokerage firm. If you choose to borrow funds from your firm, you will open a margin account with the firm. The securities purchased are the firm's collateral for the loan to you. If the securities in your account decline in value, so does the value of the collateral supporting your loan. As a result, the firm can take action, such as issue a margin call and/or sell securities or other assets in any of your accounts, in order to maintain the required equity in the account.

It is important that you fully understand the risks involved in trading securities on margin. These risks include the following:

1. **You can lose more funds than you deposit in the margin account.** A decline in the value of securities that are purchased on margin may require you to provide additional funds to the firm that has made the loan to avoid the forced sale of those securities or other securities or assets in your account(s).

2. **The firm can force the sale of securities or other assets in your account(s).** If the equity in your account falls below the maintenance margin requirements, or the firm's higher "house" requirements, the firm can sell the securities or other assets in any of your accounts held at the firm to cover the margin deficiency. You also will be responsible for any short fall in the account after such a sale.

3. **The firm can sell your securities or other assets without contacting you.** Some investors mistakenly believe that a firm must contact them for a margin call to be valid, and that the firm cannot liquidate securities or other assets in their accounts to meet the call unless the firm has contacted them first. This is not the case. Most firms will attempt to notify their customers of margin calls, but they are not required to do so. However, even if a firm has contacted a customer and provided a specific date by which the customer can meet a margin call, the firm can still take necessary steps to protect its financial interests, including immediately selling the securities without notice to the customer.

4. **You are not entitled to choose which securities or other assets in your account(s) are liquidated or sold to meet a margin call.** Because the securities are collateral for the margin loan, the firm has the right to decide which security to sell in order to protect its interests.

5. **The firm can increase its "house" maintenance margin requirements at any time and is not required to provide you advance written notice.** These changes in firm policy often take effect immediately and may result in the issuance of a maintenance margin call. Your failure to satisfy the call may cause the member to liquidate or sell securities in your account(s).

6. **You are not entitled to an extension of time on a margin call.** While an extension of time to meet margin requirements may be available to customers under certain conditions, a customer does not have a right to the extension.

(FINRA Rule 2264)