

## **Lockton Re Capital Markets**

Securities products and services are offered in the United States through Lockton Re Capital Markets, LLC ("LRCM, LLC"), a broker-dealer registered with the U.S. Securities and Exchange Commission and member of each of the [Financial Industry Regulatory Authority, Inc.](#) ("FINRA") and the [Securities Investor Protection Corporation](#) ("SIPC"). Main Office: 261 Fifth Avenue, 10<sup>th</sup> Floor, New York, NY 10016. Phone 332-262-4833. LRCM, LLC is also registered as an introducing broker with the U.S. Commodity Futures Trading Commission and is a member of the [National Futures Association](#).

Securities products and services are offered in the European Economic Area by Lockton Re Capital Markets Limited ("LRCM Ltd") which is authorized and regulated by the Central Bank of Ireland, Company Registration Number 756328. Registered Office: Floor 3, 18 Lower Leeson Street, Dublin 02, D01 HE97, Ireland.

## **Lockton Re Capital Markets, LLC**

### Privacy Notice

Lockton Re Capital Markets, LLC ("LRCM, LLC") respects your right to privacy and recognizes our responsibility for protecting the privacy and security of the personal information we receive from you. We have always been committed to securing the confidentiality and integrity of your personal information. We are proud of our privacy practices and want our current and prospective customers to understand what information we collect and how we use it. This notice refers to LRCM, LLC and its affiliates and we refer to such companies collectively herein using the terms "we", and "our".

#### Why We Collect Your Information

We gather information about you so that we can (i) know who you are and thereby prevent unauthorized access to your information, (ii) design and improve the services we offer and

(iii) comply with the laws and regulations that govern us.

#### What Information We Collect

We may collect the following types of 'nonpublic personal information' about you:

Information about your identity, such as your name, address and social security number;

Information about your transactions;

Information about your personal financial profile, such as your risk tolerance levels, goals and objectives, assets, liabilities, savings and investments.

#### *What Sources We Obtain Your Information From*

We collect nonpublic personal information about our clients such as you from the following sources:

Information we receive from you on contracts or other forms; such as risk tolerance questionnaires and/or investment policy statements.

Information about your transactions with our affiliates, or others.

If you visit our website, information we collect via a web server, is often referred to as a cookie. Cookies indicate where a site visitor has been online and what has been viewed.

#### *What Information We Disclose*

We do not disclose any nonpublic personal information about our customers or former customers to anyone, except to affiliates, as permitted or required by law, or for regulatory compliance. Moreover, we will not release information about our customers or former customers unless one of the following conditions is met:

We receive your prior written consent.

We believe the recipient to be you or your authorized representative.

We are required by law to release information to the recipient.

#### *Confidentiality and Security*

We maintain physical, electronic and procedural safeguards to guard your personal information. We also restrict access to your personal and financial data to our authorized associates who have a need for these records. We require all nonaffiliated organizations and vendors to keep client data confidential and use appropriate security measures to protect it. They must also be contractually obligated to keep the information provided confidential and used as requested. Furthermore, we will continue to adhere to the privacy policies and practices described in this notice even after your account is closed or becomes inactive.

#### *Changes to Our Privacy Notice*

We will continue to conduct our business in a manner that conforms to our pledge to you, your expectations and all applicable laws; however, our policy about obtaining and disclosing information may change from time to time. We will provide you with notice of any material change to this policy before we implement the change.

#### *To Contact Us*

If you have questions regarding our privacy policy, please contact us at 332-262-4833.

## Business Continuity Plan Disclosure

Lockton Re Capital Markets, LLC ("LRCM, LLC") has developed a Business Continuity Plan outlining how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions are unpredictable, we must be flexible in responding to actual events as they occur. To that end, we are providing you with this information on our business continuity plan.

*Contacting Us* – If after a significant business disruption, you cannot contact us as you usually do by phone at (332) 262-4833 or by email at [LRCMOperations@lockton.com](mailto:LRCMOperations@lockton.com), you should call our alternate number at (816) 960-9000.

*Our Business Continuity Plan* – We plan to quickly recover and resume business operations after a significant business disruption and we will respond by safeguarding our employees and property, making a financial and operational assessment, protecting the Firm's books and records, and enabling our clients to transact business. In short, our business continuity plan is designed to allow our Firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data back-up and recovery; all mission critical systems; financial and operational assessments; alternative communications with clients, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank, and counter-party impact; regulatory reporting; and assuring our clients prompt access to their information if we are unable to continue to conduct our business.

*Varying Disruptions* – Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business within four hours. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area and recover and resume business within one business day. In either situation, we plan to continue business, and notify you through our client emergency number (816) 960-9000 on how to reach us. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our client's timely interface with the respective companies and entities that have provided investment products to you, through us.

*Response to a Pandemic* – To the extent that a Company office is in an area where a Pandemic has been declared, if travel restrictions have not been imposed, the Designated Principal shall consider temporarily moving key personnel to an alternative location or implement the Firm's Remote Working procedures.

*Remote Working Policy* – LRCM, LLC allows registered representatives to work remotely in the event of an SBD. As a result, additional policies and procedures tailored to such circumstances have been implemented to assist registered representatives and other personnel in continuing business during an SBD and ensuring compliance with updating circumstances, rules, and regulations

*For more information* – If you have questions about our business continuity plan, you may contact us at (332) 262-4833.

*This plan is subject to modification. Clients may alternatively obtain updated summaries by requesting a written copy by mail.*

Revised: June 2025

## **Lockton Re Capital Markets Limited**

### MIFID II Disclosures

#### Client Classification:

In accordance with Directive 2014/65/EU (as amended, "MiFID II"), LRCM Ltd. is required to notify clients of their categorization as a professional client or an eligible counterparty. LRCM Ltd's authorization as a MIFID Investment Firm by the Central Bank of Ireland, does not permit it to provide services to retail clients. The objective of this classification is to a) deliver to you the appropriate service, according to your needs and objectives and b) provide you with the relevant information according to your knowledge and experience of financial markets.

#### Appropriateness Assessment:

Given LRCM Ltd. does not provide services to retail clients (non-professional clients) it is not required to conduct an appropriateness assessment as it can assume its clients possess the knowledge and experience to make their own investment decisions.

#### Best Execution:

LRCM Ltd. is required to all take all sufficient steps to obtain the best possible result for clients when executing orders (or receiving and transmitting orders) on their behalf. This takes into account factors such as price, speed, likelihood of execution and settlement, size, nature or any other consideration relevant to the execution of the order (execution factors). In order to meet these regulatory obligations, LRCM Ltd. has implemented a best execution policy. The policy is

reviewed and updated at least annually and whenever there is a material change within LRCM Ltd., or the wider market, that impacts our order handling and execution arrangements.

#### Product Governance:

MIFID II product governance, professional investors and ECPs target market – Solely for the purposes of the manufacturer's product approval process, the target market assessment in respect of the Securities has led to the conclusion that: (i) the target market for the Securities is eligible counterparties and professional clients as defined in MIFID II and (ii) all channels for distribution to eligible counterparties and professional clients are appropriate. Any person subsequently offering, selling or recommending the Securities (a "Distributor") should take into consideration the manufacturer's target market assessment; however, a distributor subject to MiFID II is responsible for undertaking its own target market assessment in respect of the Securities (by either adopting or refining the manufacturer's target market assessment) and determining appropriate distribution channels, subject to the distributor's suitability and appropriateness obligations under MiFID II, as applicable.

#### Conflicts of Interest:

LRCM Ltd. maintains and operates effective organization and administrative arrangements with a view to taking all reasonable steps designed to prevent conflicts of interest from adversely affecting the interests of its clients. LRCM Ltd. maintains a Conflicts of Interest Policy in accordance with requirements of MIFID II. Any actual or potential conflicts of interests identified will be managed in accordance with the Conflicts of Interest Policy. The policy clarifies that disclosure of conflicts of interest to clients is a measure of last resort to be used by LRCM Ltd. to address its regulatory obligations. This only applies where the organizational and administrative arrangements established to prevent or manage its conflicts of interest are not sufficient to ensure, with reasonable confidence, that the risks of damage to the interests of clients will be prevented. The description shall explain the general nature and sources of conflicts of interest in sufficient detail to enable clients to take an informed decision with respect to the investment or ancillary service in the context of which the conflicts of interest arise.