



Please make sure to submit all final responses via the online version of the RCA.

**Trading and/or Execution and/or Clearing**

This section is intended to help us better understand the risks and mitigating controls associated with your Trading, Execution, and/or Clearing business. Please respond to this section if your firm reported revenue in fiscal year 2014 in any of the following areas:

- “Gains or Losses on Derivative Trading Desks”, “Net Gains or Losses on Principal Trades”, Capital Gains (Losses) on Firm Investments and/or “Interest/Rebate/Dividend Income”, “Execution Services” and/or the “Clearing Services” sections of the Supplemental Statement of Income (line items 13906 or 13950 or 13952 or 11069 or 11096 or 11097 respectively), or;
- If these represent material aspects of your overall business

This section has also been categorized into 15 brief subsections.

Which products does your firm trade?

*Select all that apply.*

|                  | <i>Principal</i>         | <i>Agency</i>            |
|------------------|--------------------------|--------------------------|
| Equities         | <input type="checkbox"/> | <input type="checkbox"/> |
| Futures          | <input type="checkbox"/> | <input type="checkbox"/> |
| Foreign Exchange | <input type="checkbox"/> | <input type="checkbox"/> |
| Fixed Income     | <input type="checkbox"/> | <input type="checkbox"/> |
| Options          | <input type="checkbox"/> | <input type="checkbox"/> |
| Other            | <input type="checkbox"/> | <input type="checkbox"/> |

Optional comments/additional products?

|  |
|--|
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|  |
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**Subsection 1: Monitoring of trading positions, P&L, credit risk**

Does an individual/department independent of the trading desk monitor position limits?

*Select one per row.*

|   | Yes                   | No                    | N/A                   |
|---|-----------------------|-----------------------|-----------------------|
| Equities  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Options   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Other (Fixed Income, Foreign Exchange, Futures, etc.) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Optional comments:

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Describe what happens when formal limits are breached.

|  |
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|  |
|  |

Does an individual/department independent of the trading desk monitor the daily profit-and-loss (P&L) fluctuations at the desk level?

*Select one per row.*

|          | Yes                   | No                    | N/A                   |
|----------|-----------------------|-----------------------|-----------------------|
| Equities | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Options  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Other    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Does your firm have explicit credit limits established with respect to the total exposure across all product classes to an individual counterparty?

*Select one.*

|                       |     |
|-----------------------|-----|
| <input type="radio"/> | Yes |
| <input type="radio"/> | No  |
| <input type="radio"/> | N/A |

|                    |
|--------------------|
| Optional comments: |
|                    |
|                    |

Does your firm have explicit credit limits established with respect to the total exposure on a desk level?

|                       |     |
|-----------------------|-----|
| <i>Select one.</i>    |     |
| <input type="radio"/> | Yes |
| <input type="radio"/> | No  |
| <input type="radio"/> | N/A |

|                    |
|--------------------|
| Optional comments: |
|                    |
|                    |

Does your firm have explicit limits established with the total market exposure at an individual trader level?

|                       |     |
|-----------------------|-----|
| <i>Select one.</i>    |     |
| <input type="radio"/> | Yes |
| <input type="radio"/> | No  |
| <input type="radio"/> | N/A |

|                    |
|--------------------|
| Optional comments: |
|                    |
|                    |

Does your firm make margin loans to clients?

|                       |     |
|-----------------------|-----|
| <i>Select one.</i>    |     |
| <input type="radio"/> | Yes |
| <input type="radio"/> | No  |

If No, skip the next three (3) questions.

|   |     |  |
|---|-----|--|
| Does your firm receive or produce information about the risk of margin loans made to clients? |     |  |
| <i>Select one.</i>  |     |  |
| <input type="radio"/>   | Yes |  |
| <input type="radio"/>   | No  |  |

If Yes, answer the next question.

|   |   |
|---|---|
| Does your firm receive or produce information about the risk of the margin loans made to clients? |   |
| <i>Select all that apply.</i>   |   |
| <input type="checkbox"/>  | Information is received from clearing firm(s) |
| <input type="checkbox"/>  | We generate our own reports                   |
| <input type="checkbox"/>  | Other:<br><input type="text"/>                |

|   |                                |
|---|--------------------------------|
| How often does your firm review and react to margin loan credit limit violations? |                                |
| <i>Select one.</i>  |                                |
| <input type="radio"/>   | Never or almost never          |
| <input type="radio"/>   | Occasionally                   |
| <input type="radio"/>   | Daily                          |
| <input type="radio"/>   | Other:<br><input type="text"/> |

|  |  |
|--|--|
| Does your firm have an internal risk model validation group? |  |
| <i>Select all that apply.</i>                                |  |
| <input type="checkbox"/>                                     | Yes  |
| <input type="checkbox"/>                                     | No, we use external entities                               |
| <input type="checkbox"/>                                     | Yes, but we complement their work with external validation |
| <input type="checkbox"/>                                     | No   |

**Subsection 2: Monitoring of Trading Practices and Outside Trading Accounts**

How does the firm monitor for trading ahead/supervision of customer orders?

*Select all that apply.*

|                          |   |
|--------------------------|---|
| <input type="checkbox"/> | System Controls   |
| <input type="checkbox"/> | Policies and Procedures   |
| <input type="checkbox"/> | Account Monitoring  |
| <input type="checkbox"/> | Email/IM Monitoring   |
| <input type="checkbox"/> | Exception Report Reviews  |
| <input type="checkbox"/> | Not monitored   |
| <input type="checkbox"/> | Other - Please specify:<br><input style="width: 600px; height: 15px;" type="text"/> |
| <input type="checkbox"/> | N/A   |

What supervisory controls does the firm employ to monitor for manipulative trading activity including but not limited to front-running, wash sales, layering, marking the close, etc.?

*Select all that apply.*

|                          |   |
|--------------------------|---|
| <input type="checkbox"/> | System Controls                                 |
| <input type="checkbox"/> | Policies and Procedures                         |
| <input type="checkbox"/> | Account Monitoring                              |
| <input type="checkbox"/> | Email/IM Monitoring                             |
| <input type="checkbox"/> | Exception Report Reviews                        |
| <input type="checkbox"/> | Not monitored                                   |
| <input type="checkbox"/> | Other - Please specify:<br><input type="text"/> |
| <input type="checkbox"/> | N/A   |

How does the firm supervise for customer accounts trading on non-public information?

*Select all that apply.*

|                          |   |
|--------------------------|---|
| <input type="checkbox"/> | Physical Barriers                               |
| <input type="checkbox"/> | Electronic Barriers                             |
| <input type="checkbox"/> | Policies and Procedures                         |
| <input type="checkbox"/> | Account Monitoring                              |
| <input type="checkbox"/> | Email/IM Monitoring                             |
| <input type="checkbox"/> | Exception Report Reviews                        |
| <input type="checkbox"/> | No Controls                                     |
| <input type="checkbox"/> | Other - Please specify:<br><input type="text"/> |
| <input type="checkbox"/> | N/A   |

Does the firm permit trading in Outside Brokerage Accounts for its staff?

*Select one.*

|                       |     |  |
|-----------------------|-----|--|
| <input type="radio"/> | Yes |  |
| <input type="radio"/> | No  |  |

Optional comments:

|                      |
|----------------------|
| <input type="text"/> |
| <input type="text"/> |

If Yes, answer the next question.

How does the firm supervise trading in Outside Brokerage Accounts for trading in restricted securities, material non-public information, and manipulation?

*Select all that apply.*

|                          |                                |
|--------------------------|--------------------------------|
| <input type="checkbox"/> | Policies and Procedures        |
| <input type="checkbox"/> | Account Monitoring             |
| <input type="checkbox"/> | Email/IM Monitoring            |
| <input type="checkbox"/> | Exception Report Reviews       |
| <input type="checkbox"/> | Not monitored                  |
| <input type="checkbox"/> | Other:<br><input type="text"/> |
| <input type="checkbox"/> | N/A                            |

**Subsection 3: Aggregation Units**

Along which of the following dimensions does your firm have the ability to aggregate daily current exposure (select all that apply)?

*Select at least 1 choice.*

|                          |   |
|--------------------------|---|
| <input type="checkbox"/> | Counterparty  |
| <input type="checkbox"/> | Desk  |
| <input type="checkbox"/> | Position  |
| <input type="checkbox"/> | Trader  |
| <input type="checkbox"/> | Other (please specify):<br><input type="text"/>                         |
| <input type="checkbox"/> | The firm does not have the ability to aggregate daily current exposures |

Does your firm maintain multiple desks that trade equities?

*Select one per row.*

|           | Yes                   | No                    | N/A                   |
|-----------|-----------------------|-----------------------|-----------------------|
| Agency    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Principal | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Optional comments:

|                      |
|----------------------|
| <input type="text"/> |
| <input type="text"/> |

Does your firm maintain multiple desks that trade options?

*Select one per row.*

|           | Yes                   | No                    | N/A                   |
|-----------|-----------------------|-----------------------|-----------------------|
| Agency    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Principal | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Optional comments:

|  |
|--|
|  |
|  |

Does your firm use aggregation units?

*Select one.*

|                       |     |  |
|-----------------------|-----|--|
| <input type="radio"/> | Yes |  |
| <input type="radio"/> | No  |  |
| <input type="radio"/> | N/A |  |

If Yes, answer the remainder of the questions in this section.

Optional comments:

|  |
|--|
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Do any of the aggregation units include multiple trading desks?

*Select one.*

|                       |     |  |
|-----------------------|-----|--|
| <input type="radio"/> | Yes |  |
| <input type="radio"/> | No  |  |
| <input type="radio"/> | N/A |  |

Optional comments:

|  |
|--|
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|  |



Do any of the aggregation units trade on a principal basis?

*Select one per row.*

|          | Yes                   | No                    | N/A                   |
|----------|-----------------------|-----------------------|-----------------------|
| Equities | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Options  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Other    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Optional comments:

|  |
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Does your firm maintain aggregation units that trade strictly on a proprietary basis?

*Select one.*

|                       |     |
|-----------------------|-----|
| <input type="radio"/> | Yes |
| <input type="radio"/> | No  |
| <input type="radio"/> | N/A |

Optional comments:

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Through which of the following communication channels does your firm allow internal communication (select all that apply)?

*Select all that apply.*

|                          |   |  |
|--------------------------|---|--|
| <input type="checkbox"/> | Email   |  |
| <input type="checkbox"/> | Chat room   |  |
| <input type="checkbox"/> | Text Message (SMS, iMessage, etc.)  |  |
| <input type="checkbox"/> | Instant Message   |  |
| <input type="checkbox"/> | Telephonic  |  |
| <input type="checkbox"/> | Other (please specify):<br><table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="height: 15px;"></td> </tr> </table> |  |
|                          |   |  |
| <input type="checkbox"/> | None of the above   |  |

How does the firm supervise against information sharing between Aggregation units or desks?

*Select all that apply.*

|                          |   |
|--------------------------|---|
| <input type="checkbox"/> | Physical Barriers                               |
| <input type="checkbox"/> | Electronic Barriers                             |
| <input type="checkbox"/> | Policies and Procedures                         |
| <input type="checkbox"/> | Physical Monitoring                             |
| <input type="checkbox"/> | Email/IM Monitoring                             |
| <input type="checkbox"/> | Exception Report Reviews                        |
| <input type="checkbox"/> | Other - Please specify:<br><input type="text"/> |
| <input type="checkbox"/> | N/A   |

**Subsection 4: Market Access Questions**

Does your firm provide market access services?

*Select one.*

|                       |     |  |
|-----------------------|-----|--|
| <input type="radio"/> | Yes |  |
| <input type="radio"/> | No  |  |

If Yes, answer the next question. If No, proceed to Subsection 5.

Does your firm provide market access to your clients or other broker-dealers?

*Select one per row.*

|          | Yes                   | No                    | N/A                   |
|----------|-----------------------|-----------------------|-----------------------|
| Equities | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Options  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Other    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Does your firm receive market access from other parties or broker-dealers?

*Select one per row.*

|          | Yes                   | No                    | N/A                   |
|----------|-----------------------|-----------------------|-----------------------|
| Equities | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Options  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Other    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

How does the firm monitor for manipulative activity in customer accounts that have been provided market access?

*Select all that apply.*

|                          |   |
|--------------------------|---|
| <input type="checkbox"/> | System Controls                                 |
| <input type="checkbox"/> | Policies and Procedures                         |
| <input type="checkbox"/> | Account Monitoring                              |
| <input type="checkbox"/> | Email/IM Monitoring                             |
| <input type="checkbox"/> | Exception Report Reviews                        |
| <input type="checkbox"/> | No Monitoring                                   |
| <input type="checkbox"/> | Other - Please specify:<br><input type="text"/> |
| <input type="checkbox"/> | N/A   |

Does the firm review erroneous activity in customer accounts that have been provided market access?

*Select one.*

|                       |     |
|-----------------------|-----|
| <input type="radio"/> | Yes |
| <input type="radio"/> | No  |

**Subsection 5: Order Routing and Marking**

Does the firm's order marking take into account the following?:

*Select all that apply.*

|                          |                               |
|--------------------------|-------------------------------|
| <input type="checkbox"/> | Executed Buy Orders           |
| <input type="checkbox"/> | Executed Sell Orders          |
| <input type="checkbox"/> | Open (unexecuted) Buy Orders  |
| <input type="checkbox"/> | Open (unexecuted) Sell Orders |
| <input type="checkbox"/> | Canceled Orders               |
| <input type="checkbox"/> | None of the above             |

Does the firm receive rebates from Exchanges for routing orders there?

*Select one.*

|                       |     |
|-----------------------|-----|
| <input type="radio"/> | Yes |
| <input type="radio"/> | No  |
| <input type="radio"/> | N/A |

If Yes, answer the next question.

What tools does the firm employ to regularly and rigorously assess the quality of executions received for its routed customer orders?

*Select one.*

|                       |   |
|-----------------------|---|
| <input type="radio"/> | Best Execution Committee                        |
| <input type="radio"/> | Execution Reports                               |
| <input type="radio"/> | Vendor Provided Reports                         |
| <input type="radio"/> | Exception Reports                               |
| <input type="radio"/> | None  |
| <input type="radio"/> | Other - Please Specify:<br><input type="text"/> |
| <input type="radio"/> | N/A   |

**Subsection 6: Indications of Interest (IOI) Communications**

Does your firm communicate or advertise proprietary or customer trading interest in the form of "indications of interest" to the marketplace?

*Select one.*

|                       |     |  |
|-----------------------|-----|--|
| <input type="radio"/> | Yes |  |
| <input type="radio"/> | No  |  |
| <input type="radio"/> | N/A |  |

If Yes, answer the next question.

Which of the following methods of communication does your firm use to communicate "indications of interest" (select all that apply)?

*Select all that apply.*

|                          |   |
|--------------------------|---|
| <input type="checkbox"/> | Email   |
| <input type="checkbox"/> | Text message (SMS, iMessage, etc.)              |
| <input type="checkbox"/> | Instant messaging                               |
| <input type="checkbox"/> | Telephonic                                      |
| <input type="checkbox"/> | Electronic connection/(FIX)                     |
| <input type="checkbox"/> | Outside vendor service                          |
| <input type="checkbox"/> | Other (please specify):<br><input type="text"/> |

**Subsection 7: Options Order Solicitation**

|  |     |
|--|-----|
| Does your firm solicit customer option orders? |     |
| <i>Select one.</i>                             |     |
| <input type="radio"/>                          | Yes |
| <input type="radio"/>                          | No  |
| <input type="radio"/>                          | N/A |

|   |     |
|---|-----|
| Does your firm receive solicitations for option orders? |     |
| <i>Select one.</i>                                      |     |
| <input type="radio"/>                                   | Yes |
| <input type="radio"/>                                   | No  |
| <input type="radio"/>                                   | N/A |

|  |     |
|--|-----|
| Does your firm facilitate customer option orders from a proprietary account? |     |
| <i>Select one.</i>   |     |
| <input type="radio"/>  | Yes |
| <input type="radio"/>  | No  |
| <input type="radio"/>  | N/A |

| <b>Subsection 8: Held Orders, Manual Orders, "Net" Orders</b> |                       |                       |                       |
|---|-----------------------|-----------------------|-----------------------|
| Does your firm accept held customer orders?                   |                       |                       |                       |
| <i>Select one per row.</i>                                    |                       |                       |                       |
|   | Yes                   | No                    | N/A                   |
| Equities  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Options   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Other   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

|                    |
|--------------------|
| Optional comments: |
| <br><br>           |



Financial Industry Regulatory Authority

What approximate percentage of your firm's equity orders are handled as held customer orders?

*Select one.*

|                       |         |
|-----------------------|---------|
| <input type="radio"/> | 0-25%   |
| <input type="radio"/> | 25-50%  |
| <input type="radio"/> | 50-75%  |
| <input type="radio"/> | 75-100% |
| <input type="radio"/> | N/A     |

Optional comments:

|          |
|----------|
| <br><br> |
|----------|

Does your firm handle manual option orders?

*Select one.*

|                       |     |
|-----------------------|-----|
| <input type="radio"/> | Yes |
| <input type="radio"/> | No  |
| <input type="radio"/> | N/A |

Optional comments:

|          |
|----------|
| <br><br> |
|----------|

Does your firm accept orders on a "net" basis that incorporates a markup, markdown, commission equivalent or other change in the limit order price?

*Select one.*

|                       |     |
|-----------------------|-----|
| <input type="radio"/> | Yes |
| <input type="radio"/> | No  |
| <input type="radio"/> | N/A |

Optional comments:

|          |
|----------|
| <br><br> |
|----------|

**Subsection 9: Algorithmic Trading**

|  |     |  |
|--|-----|--|
| Does the firm or any of its desks/traders employ automated trading strategies? |     |  |
| <i>Select one.</i>   |     |  |
| <input type="radio"/>  | Yes |  |
| <input type="radio"/>  | No  |  |

If No, proceed to Subsection 10 – Alternative Trading System (ATS).

|  |
|--|
| Describe the types of automated trading strategies the firm employs. |
| <br><br>   |

|  |
|--|
| How many employees does the firm employ for the automated trading unit/business? |
| <br>   |

|  |
|--|
| Does the firm service any customers, broker-dealers, or affiliates that employ automated trading strategies? |
| <i>Select one.</i>   |
| <input type="radio"/> Yes  |
| <input type="radio"/> No   |

|                    |
|--------------------|
| Optional comments: |
| <br><br>           |

|   |                       |                       |                       |
|---|-----------------------|-----------------------|-----------------------|
| Are automated trading algorithms material to your business in any of the following areas (select all that apply)? |                       |                       |                       |
| <i>Select one per row.</i>  |                       |                       |                       |
|   | Yes                   | No                    | N/A                   |
| Equities  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Options   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Other   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Does your firm make its proprietary algorithms available to its customers and/or other broker-dealers?

Select one.

|                       |     |
|-----------------------|-----|
| <input type="radio"/> | Yes |
| <input type="radio"/> | No  |
| <input type="radio"/> | N/A |

If Yes, answer the next question.

Describe the types of proprietary algorithms made available to customers and/or other broker-dealers.

|  |
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|  |
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Are the algorithms that underpin your firm's automated trading strategies clearly documented at a trading strategy level?

Select one.

|                       |   |
|-----------------------|---|
| <input type="radio"/> | Yes   |
| <input type="radio"/> | No  |
| <input type="radio"/> | Other - Please specify:<br><input style="width: 600px;" type="text"/> |

Have your firm's trading algorithms been tested under various stress scenarios?

Select one per row.

|          | Yes                   | No                    | N/A                   |
|----------|-----------------------|-----------------------|-----------------------|
| Equities | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Options  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Other    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Describe the testing process for algorithms prior to deployment.

|  |
|--|
|  |
|--|



Are the development, testing, deployment, and modification of new and existing technologies conducted by the same individual?

*Select one.*

|                       |     |
|-----------------------|-----|
| <input type="radio"/> | Yes |
| <input type="radio"/> | No  |
| <input type="radio"/> | N/A |

Optional comments:

|  |
|--|
|  |
|  |

How does the firm test and validate its trading technology initiatives, including but not limited to new algorithms, vendors, software, hardware, and other trading tools prior to rolling them into production?

*Select all that apply.*

|                          |  |
|--------------------------|--|
| <input type="checkbox"/> | User Acceptance Testing (UAT)              |
| <input type="checkbox"/> | Offline Testing                            |
| <input type="checkbox"/> | Testing under non-normal market conditions |
| <input type="checkbox"/> | Exception Reports                          |
| <input type="checkbox"/> | Other - Please specify:                    |
|                          | <input style="width: 100%;" type="text"/>  |

How often does the firm conduct testing of its algorithms in production to ensure they are functioning as intended?

*Select one.*

|                       |   |
|-----------------------|---|
| <input type="radio"/> | Weekly                                    |
| <input type="radio"/> | Monthly                                   |
| <input type="radio"/> | Quarterly                                 |
| <input type="radio"/> | Annually                                  |
| <input type="radio"/> | Other - Please specify:                   |
|                       | <input style="width: 100%;" type="text"/> |

How does the firm supervise for abusive/manipulative trading by users of its algorithms?

*Select all that apply.*

|                          |   |
|--------------------------|---|
| <input type="checkbox"/> | System Controls                                 |
| <input type="checkbox"/> | Policies and Procedures                         |
| <input type="checkbox"/> | Account Monitoring                              |
| <input type="checkbox"/> | Email/IM Monitoring                             |
| <input type="checkbox"/> | Exception Report Reviews                        |
| <input type="checkbox"/> | Other - Please specify:<br><input type="text"/> |

Which users of this technology do the supervisory reviews cover?

*Select all that apply.*

|                          |   |
|--------------------------|---|
| <input type="checkbox"/> | Traders   |
| <input type="checkbox"/> | Customers                                       |
| <input type="checkbox"/> | Employees                                       |
| <input type="checkbox"/> | Ownership                                       |
| <input type="checkbox"/> | Affiliates                                      |
| <input type="checkbox"/> | Other - Please specify:<br><input type="text"/> |

**Subsection 10: Alternative Trading System (ATS)**

Does your firm operate an Alternative Trading System?

*Select one.*

|                       |     |  |
|-----------------------|-----|--|
| <input type="radio"/> | Yes |  |
| <input type="radio"/> | No  |  |

If Yes, answer the next three (3) questions.

Please provide a breakdown of ATS subscribers:

|                   |                      |
|-------------------|----------------------|
| Retail %:         | <input type="text"/> |
| Institutional %:  | <input type="text"/> |
| Broker Dealers %: | <input type="text"/> |
| Affiliates %:     | <input type="text"/> |
| <b>Total:</b>     | <b>100</b>           |

|   |                      |
|---|----------------------|
| Please provide a breakdown of automated trading strategy order flow within the ATS: |                      |
| Internal traders %:   | <input type="text"/> |
| External traders/firms/individuals %:   | <input type="text"/> |
| <b>Total:</b>   | <b>100</b>           |

|  |                       |                       |                       |
|--|-----------------------|-----------------------|-----------------------|
| Does your firm trade principally within your alternative trading system/dark pool? |                       |                       |                       |
| <i>Select one per row.</i>   |                       |                       |                       |
|  | Yes                   | No                    | N/A                   |
| Equities   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Options  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Other  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

**Subsection 11: Exemptions from publishing order execution statistics**

|  |     |
|--|-----|
| Does your firm claim the Small Market Center exemption from having to publish order execution statistics pursuant to SEC Rule 605? |     |
| <i>Select one.</i>   |     |
| <input type="radio"/>  | Yes |
| <input type="radio"/>  | No  |
| <input type="radio"/>  | N/A |

|   |
|---|
| Optional comments:                                      |
| <input style="width: 100%; height: 40px;" type="text"/> |
| <input style="width: 100%; height: 40px;" type="text"/> |

|  |     |
|--|-----|
| Does your firm claim an exemption from having to publish order execution statistics pursuant to SEC Rule 605 based on being a market center only for "inactively traded securities"? |     |
| <i>Select one.</i>   |     |
| <input type="radio"/>  | Yes |
| <input type="radio"/>  | No  |
| <input type="radio"/>  | N/A |

|   |
|---|
| Optional comments:                                      |
| <input style="width: 100%; height: 40px;" type="text"/> |
| <input style="width: 100%; height: 40px;" type="text"/> |

Has your firm begun publishing order execution information for a newly established trading desk(s) or business(es) within the last 12 months?

*Select one.*

|                       |     |  |
|-----------------------|-----|--|
| <input type="radio"/> | Yes |  |
| <input type="radio"/> | No  |  |
| <input type="radio"/> | N/A |  |

If Yes, answer the next question.

Please describe the newly established trading desk(s) and/or business line(s) (ATS, market-making, riskless principal trading, etc.).

|  |
|--|
|  |
|  |
|  |

**Subsection 12: Payment for order flow**

Does your firm maintain agreements to pay other broker-dealer entities for order flow (with either cash or non-cash compensation)?

*Select one per row.*

|          | Yes                   | No                    | N/A                   |
|----------|-----------------------|-----------------------|-----------------------|
| Equities | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Options  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Other    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Does your firm maintain reciprocal order flow arrangements (in which the firm sends orders to another member in exchange for order flow from the other member)?

*Select one per row.*

|          | Yes                   | No                    | N/A                   |
|----------|-----------------------|-----------------------|-----------------------|
| Equities | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Options  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Other    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Does your firm maintain agreements to send its orders to other broker-dealers for which the firm receives payment for order flow (with either cash or non-cash compensation)?

*Select one per row.*

|          | Yes                   | No                    | N/A                   |
|----------|-----------------------|-----------------------|-----------------------|
| Equities | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Options  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Other    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Does your firm receive payment from other broker-dealers for being a liquidity provider?

*Select one.*

|                       |     |
|-----------------------|-----|
| <input type="radio"/> | Yes |
| <input type="radio"/> | No  |
| <input type="radio"/> | N/A |

Does your firm maintain agreements to pay other broker-dealer entities to provide liquidity?

*Select one.*

|                       |     |
|-----------------------|-----|
| <input type="radio"/> | Yes |
| <input type="radio"/> | No  |
| <input type="radio"/> | N/A |

Optional comments:

|  |
|--|
|  |
|  |

### Subsection 13: Clearing Services

Does your firm have a clearing business?

*Select one per row.*

|          | Yes                   | No                    |
|----------|-----------------------|-----------------------|
| Equities | <input type="radio"/> | <input type="radio"/> |
| Options  | <input type="radio"/> | <input type="radio"/> |
| Other    | <input type="radio"/> | <input type="radio"/> |

If Yes to any of the choices above, answer the remaining questions in this section.  
If No to all choices above, then proceed to Subsection 14.

Optional comments:

|  |
|--|
|  |
|--|

In which of the following clearing-related activities does your firm engage (select all that apply)?

*Select at least 1 choice.*

|                          |                                    |
|--------------------------|------------------------------------|
| <input type="checkbox"/> | Collateral transformation services |
| <input type="checkbox"/> | Correspondent clearing services    |
| <input type="checkbox"/> | Securities lending                 |
| <input type="checkbox"/> | Other (please specify):            |
| <input type="checkbox"/> | N/A                                |

What process does your firm have to approve material margin loans (> 1% of Total Regulatory Capital)?

*Select all that apply.*

|                          |  |
|--------------------------|--|
| <input type="checkbox"/> | Decentralized (e.g.: Approved by registered representatives, branch office managers, margin clerk) |
| <input type="checkbox"/> | Centralized (i.e. Approved at the supervisory level (e.g.: Head of Margin, Financial Principal)    |
| <input type="checkbox"/> | Approved by top firm officials (e.g.: CFO, CRO, Committee of Officers)                             |
| <input type="checkbox"/> | None   |
| <input type="checkbox"/> | Other - Please specify:  |
|                          | <input style="width: 100%;" type="text"/>  |

How often does your firm review minimum "house" requirements?

*Select all that apply.*

|                          |  |
|--------------------------|--|
| <input type="checkbox"/> | We do not set house requirements                 |
| <input type="checkbox"/> | The requirements were set once                   |
| <input type="checkbox"/> | The requirements are reviewed as needed          |
| <input type="checkbox"/> | The requirements are reviewed on a regular basis |
| <input type="checkbox"/> | N/A  |

With respect to wholesale lending (e.g. derivative transactions, prime brokerage) does your firm have a process in place to set counterparty credit limits?

*Select all that apply.*

|                          |   |
|--------------------------|---|
| <input type="checkbox"/> | No  |
| <input type="checkbox"/> | Yes – by each counterparty                      |
| <input type="checkbox"/> | Yes – by each loan                              |
| <input type="checkbox"/> | Other - Please specify:<br><input type="text"/> |
| <input type="checkbox"/> | N/A   |

How often does your firm stress test margin lending collateral?

*Select all that apply.*

|                          |                       |
|--------------------------|-----------------------|
| <input type="checkbox"/> | Never or almost never |
| <input type="checkbox"/> | Monthly               |
| <input type="checkbox"/> | Daily                 |
| <input type="checkbox"/> | Intra-day             |
| <input type="checkbox"/> | N/A                   |

What process does your firm have to approve new material counterparties?

*Select all that apply.*

|                          |   |
|--------------------------|---|
| <input type="checkbox"/> | None  |
| <input type="checkbox"/> | Credit checks                                   |
| <input type="checkbox"/> | Financial statement review                      |
| <input type="checkbox"/> | News event review                               |
| <input type="checkbox"/> | Other - Please specify:<br><input type="text"/> |
| <input type="checkbox"/> | N/A   |

How often does your firm review the creditworthiness of existing counterparties?

*Select all that apply.*

|                          |                            |
|--------------------------|----------------------------|
| <input type="checkbox"/> | Never                      |
| <input type="checkbox"/> | Annually                   |
| <input type="checkbox"/> | Monthly or more frequently |
| <input type="checkbox"/> | N/A                        |

Optional comments:

|  |
|--|
|  |
|  |

**Subsection 14: Execution Services**

Does your firm have an execution business?

*Select one per row.*

|          | Yes                   | No                    |
|----------|-----------------------|-----------------------|
| Equities | <input type="radio"/> | <input type="radio"/> |
| Options  | <input type="radio"/> | <input type="radio"/> |
| Other    | <input type="radio"/> | <input type="radio"/> |

Optional comments:

|  |
|--|
|  |
|  |

In which of the following execution-related activities does your firm engage (select all that apply)?

*Select all that apply.*

|   | Equities                 | Options                  | Other                    | N/A                      |
|---|--------------------------|--------------------------|--------------------------|--------------------------|
| Alternative trading system/dark pool                            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Electronic communications network (ECN) / Electronic executions | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Exchange market maker   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Exchange non-floor broker                                       | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Execution on an agency basis                                    | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Execution on a principal basis                                  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Execution on a proprietary basis                                | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Floor broker  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Intermediary for foreign brokers                                | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Market access   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| OTC/OTCBB market maker  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Sponsored access  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |



Please describe any selections in the "Other" category.

|  |
|--|
|  |
|  |

Does your firm provide Execution Consulting services for institutional customers?

*Select one.*

|                       |     |
|-----------------------|-----|
| <input type="radio"/> | Yes |
| <input type="radio"/> | No  |

**Subsection 15: Other Questions**

Does your firm provide or perform any of the following roles?

*Select all that apply.*

|                          |   |
|--------------------------|---|
| <input type="checkbox"/> | Act as an Authorized Participant for ETFs?                    |
| <input type="checkbox"/> | Act as a Market maker for exchange-traded products like ETFs? |

Answer the following question if your firm trades fixed income products.

How do you price fixed income products?

*Select all that apply.*

|                          |                                      |  |
|--------------------------|--------------------------------------|--|
| <input type="checkbox"/> | Internal system                      |  |
| <input type="checkbox"/> | We use one third party service       |  |
| <input type="checkbox"/> | We use multiple third party services |  |
| <input type="checkbox"/> | N/A                                  |  |

If response to above question is internal system or N/A, skip the next question.

Please indicate name or names of third party service used to price fixed income products.

|  |
|--|
|  |
|  |