MINT

Regulatory Disclosures Statement - 2020

In accordance with various regulatory requirements, Mint Brokers ("MINT") is providing the following regulatory disclosures to its customers. Mint Brokers is a wholly owned subsidiary of BGC Partners, L.P.

New Account Opening – Verifying Your Identity

To assist the governments fight against the funding of terrorism and to prevent money laundering activities, federal laws and regulations require financial institutions to obtain and verify information that identifies each client who opens an account.

When opening an account, MINT is required to obtain your name, address, tax information and other information and documentation that will be utilized to verify your identification. For accounts other than natural persons (e.g.: a corporation, partnership or trust) MINT will request identifying documents evidencing the existence of the entity, such as articles of incorporation, a government-issued business license, a partnership agreement or a trust agreement. MINT may also request to see a valid government issued form of identification evidencing nationality or residence and bearing a photograph such as a driver's license, passport or other identifying documents for the Control persons or beneficiaries of the account.

As required by federal law, if MINT is unable to verify your identity, MINT will not be able to open an account or establish a relationship with you. MINT reserves the right to request additional information or documentation at any time at its sole discretion. Material changes in account information should be forwarded in writing to MINT's Compliance Department at the above address.

Order Flow & Directing of Order

MINT does **not** receive payment or remuneration of any kind for directing order flow on any transaction.

Commission Sharing

The Firm from time to time may enter into an arrangement with broker-dealers and/or affiliates; whereby the entities may share in commissions charged on transactions.

FINRA BrokerCheck

FINRA BrokerCheck is a free tool that assists investors by providing background and regulatory information on current and former FINRA member firms and registered representatives. This information can be obtained at **www.finra.org** or by calling the FINRA BrokerCheck Hotline toll-free line at 1-800-289-9999. A copy of an investor brochure that includes information describing FINRA BrokerCheck can be obtained by calling the FINRA BrokerCheck Hotline number or accessing the FINRA website.

Information on Securities Investor Protection Corp. ("SIPC")

Information on SIPC and the SIPC Brochure is available at either **www.sipc.org**, or by contacting SIPC at (202) 371-8300, or by sending an email request to **asksipc@sipc.org.**

Voice Recording Disclosure

In accordance with applicable laws and regulations, MINT may record certain telephone conversations with outside parties. By communicating with MINT, you consent to the voice recording of conversations with personnel of MINT and its affiliates.

Extended Hours Trading Risk Disclosure Statement

In accordance with FINRA Rule 2265, no member shall permit a customer to engage in extended hours trading in the premarket session or the post-market session without disclosing to customers the risks specific to extended hours trading. "Extended hours trading" means trading outside of "regular trading hours," which generally means the time between 9:30 a.m. and 4:00 p.m. Eastern Standard Time. Customers should consider the following points before engaging in extended hours trading.

- **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.

FINRA Rule 5320 Disclosure

FINRA Rule 5320 generally provides that a member firm that accepts and holds an order in an equity security from its own customer or a customer of another broker-dealer without immediately executing the order is prohibited from trading that security on the same side of the market for its own account at a price that would satisfy the customer order, unless it immediately thereafter executes the customer order up to the size and at the same or better price at which it traded for its own account.

Large Orders and Institutional Accounts

FINRA Rule 5320 continues to permit firms to negotiate terms and conditions on the acceptance of certain large-sized orders (***orders of 10,000 shares or more and greater than $100,000 in value***) and orders from institutional accounts that would permit firms to trade ahead of or along with such orders, provided that firms give clear and comprehensive written disclosure to such customer at account opening and annually thereafter that discloses that the firm may trade proprietarily at prices that would satisfy the customer order, and provides the customer with a meaningful opportunity to opt in to the Rule 5320 protections with respect to all or any portion of its order.

In lieu of providing the written disclosure to customers, FINRA Rule 5320 permits firms to provide clear and comprehensive oral disclosure to, and obtain oral consent from, a customer on an order-by-order basis, which the firm will document.

Institutional accounts and persons placing orders for 10,000 shares or more not otherwise subject to the protections afforded by Rule 5320 may "**opt in**" to the Rule 5320 protections by providing written notice with respect to **all** orders for your account, to your sales representative or to:

Mint Brokers
199 Water Street, 19th Floor
New York, NY 10038
Attention: Chief Compliance Officer

If a customer does **not** opt in to the Rule 5320 protections with respect to all or any portion of its order(s), the firm may reasonably conclude that the customer has consented to the firm trading a security on the same side of the market for its own account at a price that would satisfy the customer's order. Even when a customer has opted in to the FINRA Rule 5320 protections, a firm may still obtain consent on an order-by-order basis to trade ahead of or along with an order from that customer.

No-Knowledge Exception

FINRA Rule 5320 provides an exception for a firm's proprietary trading in NMS stocks where the proprietary trading unit does ***not*** have knowledge of the customer order where the firm has implemented internal controls, such as appropriate information barriers that prevent one trading unit from obtaining knowledge of customer orders held by a separate trading unit. In such case, the other trading units trading in a proprietary capacity may continue to trade at prices that would satisfy the customer orders held by the separate trading unit.

“Not Held” Orders

When you place a “*Not Held*” order with the Firm and leave the price and time of execution to our discretion, the Firm may trade in the security for our own account prior to completion of your order.

Pre-Market & Post-Market Orders

Our Firm does not ordinarily accept orders for execution outside of normal market hours (before 9:30 am or after 4:00 pm). Unless otherwise agreed, all orders received prior to 9:30 will be executed through the primary market opening mechanism. Should our Firm accept an order for execution outside of normal market hours, the business practices discussed above will apply to the handling of such orders.

Privacy Policy Notice

MINT’s privacy policy is available at **www.bgcpartners.com.**

Business Continuity Plan

MINT’s Business Continuity information is available at **www.bgcpartners.com**.

“Held” Or “Not Held” Orders

When an order is placed with MINT for execution in the equity market, you may specify that MINT handle your order on either a “held” or “not held” basis. A “held” order means that MINT does not have discretion over the time and price in which your order is executed. If you instruct MINT to handle your order on a “held” basis, or you provide a marketable limit order, the trader must execute that order at the prevailing market price at the time the order was eligible for execution. Further, if you submit a “held” limit order, any execution has to occur at the limit price or better, if available. By contrast, a “not held” order means you are giving MINT discretion over the time and price in which your order is executed. “Not Held” orders give MINT traders the flexibility to work your order so as to obtain the best execution terms that are reasonably available within market conditions.

Net Basis Orders

At the time you place an order with MINT, you may request to trade on a “net” basis. A “net” transaction is a principal transaction in which MINT may perform either of the following actions:

- After having received an order to buy an equity security, MINT then purchases that equity security at one price from another broker-dealer (or another customer) and then sells it to you at a different price; or,
- After having received an order to sell an equity security, MINT then sells that equity security at one price to another broker-dealer (or another customer) and then buys it from you at a different price.

In either case, MINT does not charge you a commission. Instead, MINT will collect the price difference between its principal transaction to buy (or sell) the security and its subsequent sale (or purchase) of the same security to (or from) you as compensation for executing your transaction.

In general, "net trades" must comply with the Order Protection Rule of FINRA Regulation NMS. The net price, which is reported to the Consolidated Tape, is the price of the trade for all purposes under the Order Protection Rule; such as determining whether a trade-through occurred and routing the necessary orders to execute against protected quotations to comply with the ISO exception.

Introducing Broker and Future Commission Merchant Disclosure

In accordance with CFTC Rule 1.55(b), please see the Disclaimers and Legal Information section at www.bgcpartners.com for the full Risk Disclosure Statement.

In accordance with CFTC Rule 1.55(k), please see the Disclaimers and Legal Information section at www.bgcpartners.com for BGC Financial, L.P.'s Firm Specific Disclosure Statement.

Virtual Currencies - Disclosure

There are risks associated with transacting in Virtual Currencies ("VCs"). VCs are not legal tender in the United States and many question whether they have intrinsic value. The price of VCs is based on the perceived value of the VCs and subject to changes in sentiment, which makes these products highly volatile. VCs can be traded through privately negotiated transactions and through numerous VC exchanges and intermediaries around the world. The lack of a centralized pricing source poses a variety of valuation challenges. The cybersecurity risks of VCs and related "wallets" or spot exchanges include hacking vulnerabilities and a risk that publicly distributed ledgers may not be immutable. A cybersecurity event could result in a substantial, immediate and irreversible loss for market participants that trade VCs. Unlike banks and brokerage accounts, VC exchanges and custodians that hold VCs do not always identify the owner. As a result, the opaque underlying or spot market poses asset verification challenges for market participants, regulators and auditors and gives rise to an increased risk of manipulation and fraud, including the potential for Ponzi schemes, bucket shops, and pump and dump schemes. VC exchanges, as well as other intermediaries, custodians, and vendors used to facilitate VC transactions, are relatively new and largely unregulated in both the United States and many foreign jurisdictions. It should also be known that VCs face an uncertain regulatory landscape globally and one or more jurisdictions may, in the future, adopt laws, regulations, and/or directives that may impact the price of VCs and their acceptance by users, merchants, and service providers.

Mint Brokers is a member of the NFA and is subject to NFA's regulatory oversight and examinations. However, you should be aware that the NFA does not have regulatory oversight authority over underlying or spot virtual currency products or transactions or virtual currency exchanges, custodians or markets.

For more information regarding the aforementioned risks and lack of regulatory oversight associated with virtual currencies, please see the following links:

https://www.nfa.futures.org/investors/investor-advisory.html
https://www.cftc.gov/sites/default/files/idc/groups/public/@customerprotection/documents/file/customeradvisory_urvct121517.pdf
https://www.nfa.futures.org/rulebook/rules.aspx?Section=9&RuleID=9073

NFA Background Affiliation Status Information Center (BASIC)

When opening an account and on an annual basis, the Firm is required to provide customers written notice of the NFA's BASIC system. As such, please see the following link: www.nfa.futures.org/basic

Questions

Should you have any questions or require any additional information regarding this statement, please contact the Compliance Department at **(646) 346-7000**.