



GX2 Spread Markets, LLC

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GX2 Spread Markets 2023 Annual Disclosures

Dear Valued Customer,

GX2 Spread Markets, LLC (“GX2”) is taking this opportunity to make certain disclosures to you and remind you of certain SEC, FINRA and SRO regulations and policies of GX2.

Business Continuity Plan

GX2 has developed a Business Continuity Plan (BCP) that includes the ability to recover from situations including, but not limited to floods, power outages, global pandemics and any facilities failures that may cause business interruptions. Key features of the GX2 BCP include annual review of the following;

- 1) Identification of all mission critical systems (and system back-up and recovery for such systems),
- 2) Review of financial and operation risks,
- 3) systems and telecommunication accessibility, and
- 4) alternate communications between GX2, its clients, employees and regulators and critical business constituents.

Although no contingency plan can eliminate all risk of service interruption, GX2 continually assesses and updates its BCP to mitigate all reasonable risks. While the specific details of our BCP are proprietary and contain information which is confidential, GX2’s policy is to respond to a significant business disruption by safeguarding employee lives and firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting GX2’s books and records, and allowing GX2 clients to continue to transact business. As we continue to test our plans and as conditions in our firm and the industry change, we will revise the plan accordingly and as considered necessary.

Anti-Money Laundering Notice

The USA PATRIOT Act is designed to detect, deter and punish terrorists in the United States and abroad and imposes anti-money laundering (“AML”) requirements in brokerage firms and financial institutions. Under the Act’s provisions, all financial institutions are required to have comprehensive AML programs. In order to meet these requirements relating to AML, terrorism, organized crime activities and Know Your Customer rules (“KYC”), GX2 requires that all clients furnish certain identifying information that will assist in identifying each entity

that opens an account or establishes a relationship with GX2. As an industry participant, you may already be subject to, or familiar with, the regulations and obligations regarding KYC, AML and Customer Identification Programs (“CIP”).

To help the government fight the funding of terrorism and money laundering activities, federal law requires all financial institutions to obtain, verify, and record information that identifies each person or entity that opens an account.

When you establish an account with GX2, we will request information and documents that will allow us to identify your firm and your authorized representatives or traders. A corporation, partnership, trust or other legal entity may need to provide other information, such as its principal place of business, local office, employer identification number, certified articles of incorporation, financial information, government-issued business license, a partnership agreement or a trust agreement.

FINRA Broker Check

Pursuant to FINRA Rule 2267, GX2 reminds you of the availability of information from the Financial Industry Regulatory Authority, Inc. (FINRA). Specifically, the Public Disclosure Program from FINRA’s Broker Check database provides convenient access to information about securities firms and their associated personnel. The information available in the Broker Check database may be requested by calling FINRA’s Broker Check Hotline Number (800) 289-999 or by visiting the FINRA website at www.FINRA.org.

SIPC Disclosure

GX2 is a member of the Securities Investor Protection Corporation (“SIPC”). For more details on SIPC, or to request a SIPC brochure, visit www.sipc.org or call 1-202-371-8300.

Cybersecurity and Data Protection Policy

The Firm employs a cybersecurity and client data protection policy that meets industry standards; please contact the Firm if you would like to receive a copy of the policy.

Privacy Policy

The Firm employs a data protection and privacy policy to protect confidential information collected; the policy describes the information that may be collected, the reasons why we may use and share such data, how long we keep it and safeguards employed to protect the data. Please contact the Firm if you would like to receive a copy of the policy.