

Please complete the following information. Note this form is ONLY to be completed by US broker-dealers, domestic Investment Advisers, or other US institutions. If not your case, please speak with your account representative. Please note a broker-dealer does not fit the definition of customer according to FINRA guidance. Indicate below the type of trading account :

- DVP/RVP
 Cash
 Margin
 Options
 Treasuries, MBS, ABS, Agencies
 Electronic Statement Delivery Only
 Statement Suppression - DVP only / FINRA Rule 2340(b)

I. ACCOUNT INFORMATION (please enter full legal name)

Account Name Please indicate if firm contact is a satellite located offshore but information provided below belongs to the US affiliate.

Legal Address MPID#

Telephone E-mail Firm SEC # LTID#

II. AUTHORIZED TRADERS OR ADVISERS

A LIST IS BEING PROVIDED INSTEAD

Full Legal Name <input type="text"/>	CRD or IARD # <input type="text"/>
Full Legal Name <input type="text"/>	CRD or IARD # <input type="text"/>
Full Legal Name <input type="text"/>	CRD or IARD # <input type="text"/>

III. FINRA RULE 5320 DISCLOSURE (Market Maker Disclosure)

FINRA Rule 5320 generally provides that a broker/dealer that accepts and holds an order in an equity security from its own customer or customer of another broker-dealer 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 the firm immediately thereafter executes the customer's order up to the size and at the same or better price at which it traded for its own account. This disclosure outlines INTL's practices relating to FINRA Rule 5320. Please note that consistent with the existing regulatory guidance, not-held orders are outside the scope of FINRA Rule 5320. With respect to orders for institutional accounts, or for orders of 10,000 shares or more that are greater than \$100,000 in value, INTL is permitted to trade a security on the same side of the market for its own account at a price that would satisfy such customer order, provided that INTL has provided clear and comprehensive written disclosure to such customer at account opening and annually thereafter that:

- discloses that it may trade for its own account 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 the customer's order.

FINRA Rule 5320 does not require order-by-order consent. Institutional clients may grant INTL consent permitting INTL to trade for its own account while handling their orders. Pursuant to FINRA Rule 5320 as described above, you may choose to withhold your consent and disallow INTL from trading alongside your orders. If you choose to withhold your consent, you must notify INTL in writing. Bear in mind that even if you have notified us in writing that you disallow INTL from trading for its own account alongside your order, INTL may still obtain your consent on an order-by-order basis.

Notification should be made to: INTL FCStone Financial Inc. Attn: Chief Compliance Officer 329 Park Ave. North, Ste. 350 Winter Park, FL 32789

Please note that one of our Market Makers may be handling your order. FINRA Rule 5320 permits these market makers to execute trades alongside your order on a principal basis at prices that would satisfy your orders without restriction.

IV. AUTHORIZED SIGNATURES - Please note this form contains a pre-dispute arbitration clause. See Important Information section.

Authorized Signature <input type="text"/>	Authorized Signature <input type="text"/>
Title/Name <input type="text"/> Date <input type="text"/>	Title/Name <input type="text"/> Date <input type="text"/>

INTERNAL USE ONLY | ACCOUNT APPROVAL

Registration/License requirements reviewed by GSP
 Broadcort
 Pershing
 JPM

Broker/Trader/Agent <input type="text"/>	Name <input type="text"/>	Date <input type="text"/>
Supervisory Principal (GSP) <input type="text"/>	Name <input type="text"/>	Date <input type="text"/>

AML ESCALATION (if applicable)

Compliance Completeness Review:

AMLCO
 CO
 Complete file
 Not complete

Institutional Suitability and Affirmative Indication of Exercise of Independent Judgement

In connection with any recommended transaction or investment strategy by a registered broker-dealer, the undersigned acknowledges on behalf of the Institution named below that:

- I. It is an Institutional Account as defined in FINRA Rule 4512(c) [also defined under MSRB Rule D-15(a) - an equivalent definition];
- II. It is capable of evaluating investment risks independently, both in general and with regard to all transactions and investment strategies involving a security or securities; and will exercise independent judgment in evaluating the recommendations of any broker-dealer or its associated persons, the quality of execution, transaction price for non-recommended and non discretionary transactions, and has timely access to material information that is publicly available. Contrary to these, it has to notified the broker-dealer in writing;
- III. It will immediately notify INTL FCStone Financial Inc. if anything in this Attestation ceases to be true;
- IV. He/she is authorized to sign on behalf of the Institutional Account named below.

By signing this Attestation the undersigned affirms that the above statements are accurate but does not waive any rights afforded under U.S. federal or state securities laws, including without limitation, any rights under Section 10(b) of the Securities Exchange Act of 1934, as amended, and the rules and regulations promulgated thereunder.

FINRA Rule 4512(c) Institutional Account Definition and the full text of FINRA Rule 2111 may be found here: [http://www.finra.org/Industry/Regulation/FINRA Rules](http://www.finra.org/Industry/Regulation/FINRA%20Rules). MSRB Rule D-15 is available at <http://msrb.org/Rules-and-Interpretations/MSRB-Rules/Definitional/Rule-D-15.aspx>

PLEASE NOTE: This Attestation shall apply with respect to all recommended transactions and investment strategies involving securities that are entered into by the "Institutional Account" named in this Attestation, whether for the account of such Institutional Account or for the account of any beneficial owner that has delegated decision making authority to such Institutional Account. THE STANDARD TEMPLATE OF THIS LETTER CAN ALSO BE ACCEPTED.

Your signature below is limited to affirmative action of exercise of independent judgement.

Authorized Signature		Name			
		Title		Date	

PRE-DISPUTE ARBITRATION AGREEMENT DISCLOSURES

THE ARBITRATION AGREEMENT HERE STIPULATES THAT ANY CONTROVERSY BETWEEN YOU AND INTL FCSTONE FINANCIAL INC. SHALL BE SUBMITTED TO ARBITRATION BEFORE FINRA.
 (1) ALL PARTIES TO THIS AGREEMENT ARE GIVING UP THE RIGHT TO SUE EACH OTHER IN COURT, INCLUDING THE RIGHT TO TRIAL BY JURY, EXCEPT AS PROVIDED BY THE RULES OF THE ARBITRATION FORUM IN WHICH A CLAIM IS FILED. (2) ARBITRATION AWARDS ARE GENERALLY FINAL AND BINDING; A PARTY'S ABILITY TO HAVE A COURT REVERSE OR MODIFY AN ARBITRATION AWARD IS VERY LIMITED. (3) THE ABILITY OF THE PARTIES TO OBTAIN DOCUMENTS, WITNESS STATEMENTS, AND OTHER DISCOVERY IS GENERALLY MORE LIMITED THAN IN COURT PROCEEDINGS. (4) ARBITRATORS DO NOT HAVE TO EXPLAIN THE REASON FOR THEIR AWARD, UNLESS, IN AN ELIGIBLE CASE, A JOINT REQUEST FOR AN EXPLAINED DECISION HAS BEEN SUBMITTED BY ALL PARTIES TO THE PANEL AT LEAST 20 DAYS PRIOR TO THE FIRST SCHEDULED HEARING DATE. (5) THE PANEL OF ARBITRATORS WILL TYPICALLY INCLUDE A MINORITY OF ARBITRATORS WHO WERE OR ARE AFFILIATED WITH THE SECURITIES INDUSTRY. (6) THE RULES OF SOME ARBITRATION FORUMS MAY IMPOSE TIME LIMITS FOR BRINGING A CLAIM IN ARBITRATION. IN SOME CASES, A CLAIM THAT IS INELIGIBLE FOR ARBITRATION MAY BE BROUGHT IN COURT. (7) THE RULES OF THE ARBITRATION FORUM IN WHICH THE CLAIM IS FILED, ANY AMENDMENTS TO IT, SHALL BE INCORPORATED INTO THIS AGREEMENT.

NO PERSON SHALL BRING A PUTATIVE OR CERTIFIED CLASS ACTION TO ARBITRATION, NOR SEEK TO ENFORCE ANY PREDISPUTE ARBITRATION AGREEMENT AGAINST ANY PERSON WHO HAS INITIATED IN COURT A PUTATIVE CLASS ACTION; OR WHO IS A MEMBER OF A PUTATIVE CLASS WHO HAS NOT OPTED OUT OF THE CLASS WITH RESPECT TO ANY CLAIMS ENCOMPASSED BY THE PUTATIVE CLASS ACTION UNTIL: (1) THE CLASS CERTIFICATION IS DENIED; (2) THE CLASS IS DECERTIFIED; OR (3) THE CUSTOMER IS EXCLUDED FROM THE CLASS BY THE COURT. SUCH FORBEARANCE TO ENFORCE AN AGREEMENT TO ARBITRATE SHALL NOT CONSTITUTE A WAIVER OF ANY RIGHTS UNDER THIS AGREEMENT EXCEPT TO THE EXTENT STATED. THE LAWS OF THE STATE OF NY GOVERN.

FINRA Rule 2340 - Account Statements

- (a) General**
 Except as otherwise provided by paragraph (b), each general securities member shall, with a frequency of not less than once every calendar quarter, send a statement of account ("account statement") containing a description of any securities positions, money balances, or account activity to each customer whose account had a security position, money balance, or account activity during the period since the last such statement was sent to the customer. In addition, each general securities member shall include in the account statement a statement that advises the customer to report promptly any inaccuracy or discrepancy in that person's account to his or her brokerage firm. (In cases where the customer's account is serviced by both an introducing and clearing firm, each general securities member must include in the advisory a reference that such reports be made to both firms.) Such statement also shall advise the customer that any oral communications should be re-confirmed in writing to further protect the customer's rights, including rights under the Securities Investor Protection Act (SIPA).
- (b) Delivery Versus Payment/Receive Versus Payment (DVP/RVP) Accounts**
 Quarterly account statements need not be sent to a customer pursuant to paragraph (a) of this Rule if:
 (1) the customer's account is carried solely for the purpose of execution on a DVP/RVP basis;
 (2) all transactions effected for the account are done on a DVP/RVP basis in conformity with [Rule 11860](#);
 (3) the account does not show security or money positions at the end of the quarter (provided, however that positions of a temporary nature, such as those arising from fails to receive or deliver, errors, questioned trades, dividend or bond interest entries and other similar transactions, shall not be deemed security or money positions for the purpose of this paragraph (b));
 (4) the customer consents to the suspension of such statements in writing. The member must maintain such consents in a manner consistent with [Rule 3110](#) and SEC Rule 17a-4;
 (5) the member undertakes to provide any particular statement or statements to the customer promptly upon request; and
 (6) the member undertakes to promptly reinstate the delivery of such statements to the customer upon request.

Nothing in this Rule shall be seen to qualify or condition the obligations of a member under SEC Rule 15c3-2 concerning quarterly notices of free credit balances on statements.
IMPORTANT DEFINITIONS - MPID: Market Participant Identifier used to report trades. This is a 4 character alpha code. The Clearing Firms will be reporting INSITE data by MPID. It is necessary to have an active MPID. **LTID:** Large Trading Identifier, used for reporting of NMS securities. It is a requirement to collect this number if applicable to dealer.

IMPORTANT INFORMATION

COMMON RISKS ASSOCIATED WITH TRADING IN EXTENDED SESSIONS (pre-market & after hours are those outside the 9:30 am - 4:00pm ET). This disclosure is provided to customers who will engage in trading outside normal market hours. Such trading involves certain risks explained below:

- **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 market 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 market hours. As a result, your order may only be partially executed, or not at all, or you may receive an inferior price in extended hours trading than you would during regular market 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 market hours, or upon the opening the next morning. As a result, you may receive an inferior price in extended hours trading than you would during regular market 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 market hours. Similarly, important financial information is frequently announced outside of regular market 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.
- **Risk of Partial Executions.** Orders placed during extended trading hours may be entered through a participating ECN or exchange, which may be linked to other ECNs or exchanges. As you cannot add qualifiers to an order, such as AON or FOK, a round lot order may be filled in part by an odd lot or mixed lot order, leaving stock left over to buy or to sell. There is a risk that the remaining may not be filled during the extended-hours session. An odd lot may not be represented in the displayed quote. This would occur in instances in which an order has an execution leaving an odd lot. There are no execution guaranties for an odd lot or the odd lot portion of a mixed lot portion of an order.
- **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. Since the underlying index value and IIV are not calculated or widely disseminated during the Opening and Late Trading Sessions, an investor who is unable to calculate implied values for certain Derivative Securities Products in those sessions may be at a disadvantage to market professionals.

(1) "QIB" - QUALIFIED INSTITUTIONAL BUYER

As defined in Rule 144A(a)(1) [17 CFR 230.144A(a)(1)] and includes specified institutions that, in the aggregate, own and invest on a discretionary basis at least \$100 million in securities of issuers that are not affiliated with such institutions. Banks and other specified financial institutions must also have a net worth of at least \$25 million. A registered broker-dealer qualifies as a QIB if it, in the aggregate, owns and invests on a discretionary basis at least \$10 million in securities of issuers that are not affiliated with the Dealer.

(2) The USA PATRIOT Act

"Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism" - please follow this link for the statutes and regulations: www.fincen.gov/statutes_regs/patriot/

OPTIONS DISCLOSURES - Please refer to INTL FCStone Financial Disclosure section for the detail explanation of the Options Random Allocation Assignment and the Risk Disclosure for Uncovered Options: <https://www.intlfcstone.com/Main-Channels/Securities/Capabilities/Securities/Disclosures/>

PRIVACY NOTICE REGARDING CLIENT PRIVACY

In connection with providing investment products and services, we obtain non-public personal information about you, including:

- Information on account applications, such as your address, Tax Identification Number, financial goals, investable assets and income;
- Information about your transactions with us, our affiliates, or others

INTL FCStone Financial Inc. and its affiliates do not sell customer lists and will not sell your name to telemarketers.

We will not disclose information regarding you or your account with us, except under the following circumstances:

- To our parent company, INTL FCStone Inc., or its subsidiaries, to the extent permitted by law;
- To entities that perform services for us or function on our behalf, including financial service providers, such as a clearing broker-dealer.
- To third parties who perform services on our behalf;
- To your attorney, trustee or anyone else who represents you in a fiduciary capacity;
- To our attorneys, accountants or auditors; and
- To government entities or other third parties in response to subpoenas or other legal process as required by law or to comply with regulatory inquiries.

• We may disclose non-public personal information in connection with the transfer of your account to another financial institution at your request or of your advisor.

Information may be used by the INTL FCStone Inc. companies that perform support services, such as data processors, technical systems consultants and programmers, such as:

- To protect your accounts from unauthorized access or identity theft;
- To process your requests such as securities purchases and sales;
- To establish or maintain an account with an unaffiliated third party, such as a clearing broker-dealer providing services to you and/or INTL FCStone Securities Inc.;
- To comply with Federal, State, and Self-Regulatory Organization requirements; and

We restrict access to non-public information about you to those individuals who need to know that information to provide products or services to you and perform their respective duties. We maintain physical, electronic and procedural security measures to safeguard confidential client information.

If substantial changes are made in the way that we use or disseminate confidential information, we will notify you of those changes. If you decide to close your account(s) the Privacy Policy will continue to apply to you. Please direct complaints and/or questions regarding this policy to: Compliance -329 Park Avenue North, Winter Park, FL 32789.

CUSTOMER IDENTIFICATION PROGRAM & COMPLAINTS

In an effort 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/institution that opens an account. Therefore, INTL FCStone Financial Inc. (the "Firm") has implemented a process to verify client information in accordance with the identification and verification rules of the PATRIOT Act.

In accordance with the Securities and Exchange Commission Books and Records rules, Broker/Dealers are required to notify their clients where to file a customer complaint. Pursuant to this requirement please refer any complaints that you may have relating to your INTL FCStone Financial Inc. account to:

INTL FCStone Financial Inc., Attn: Compliance Department, 329 Park Avenue North, Winter Park, FL 32789, +1 (407) 741-5325.

IMPORTANT INFORMATION

NET TRADING

INTL is a market maker in a number of NASDAQ, OTCBB and Pink Sheet securities; as such we have the capability to execute orders on a “net” basis. A “net” transaction is defined as a principal transaction in which a market maker, after having received an order to buy (sell) an equity security, purchases (sells) the equity security at one price (to/ from another broker-dealer or another customer) and then sells to (buys from) the customer at a different price. Unless instructed otherwise at the time the order has been placed, INTL may treat your order as a “net” transaction. Trades will be confirmed on a net basis with the following understanding: The price per share or other unit of trading will reflect a net price which includes the addition of any mark-up for purchase transactions or the deduction of any mark-down for sale transactions, where mark-ups or markdowns apply. If the above is not consistent with your desire for confirming trades on a net basis, please notify your sales representative, at the time you place your order, that you do not want your order to be transacted on a “net” basis.

SECTION 311 OF THE USA PATRIOT ACT

Pursuant to US regulations issued under section 311 of the USA PATRIOT Act, 31 CFR 103.192, we are prohibited from opening or maintaining a correspondent account for, or on behalf of the financial institutions indicated, nor grant access to our institution. The updated list can be seen: http://www.fincen.gov/statutes_regs/patriot/section311.html

SIPC

INTL FCStone Financial Inc. is a member of the Securities Investor Protection Corporation (“SIPC”), which provides protection for accounts up to \$500,000 (including \$250,000 for claims of cash) per client as defined by SIPC rules. As it pertains to SIPC, you can obtain further information, including the SIPC brochure, by contacting SIPC. They can be reached by visiting their website at www.sipc.org or by telephone, email, or regular mail: Securities Investor Protection Corporation (SIPC) Tel: +1 (202) 371-8300 805 15th Street, N.W. Suite 800 Fax: +1 (202) 371-6728 Washington, D.C. 20005-2215 Email: asksipc@sipc.org

BUSINESS CONTINUITY PLAN

Our firm’s policy is to respond to a Significant Business Disruption (SBD) by safeguarding employees’ lives and firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of the firm’s books and records, and allowing our customers to transact business. In the event that we determine we are unable to continue our business, we will assure customers prompt access to their funds and securities. The Firm maintains a business continuity plan which outlines how we plan to respond events that may cause a disruption to our business. Since the timing and impact of disasters and disruptions are unpredictable, we have to be flexible in responding to actual events as they occur. Accordingly, we are providing you with the information below on how we intend to continue our business operations should we experience a disruption. Our business continuity plan disclosure statement can also be found on our website at www.intlfcstone.com.

Significant Business Disruptions (SBDs)

Our plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only our firm’s ability to communicate and do business, such as a fire in our building. External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a city flood, or a wide-scale, regional disruption. Our response to an external SBD relies more heavily on other organizations and systems, especially on capabilities of our clearing firm.

Emergency Contact Persons

In the event that the firm experiences a SBD, senior management will call for the implementation of our BCP. During times of a SBD, our firm’s two emergency contact persons are: Brian Sephton (407) 741-5309 brian.sephton@intlfcstone.com & Mark Paverman (212) 379-5520 mark.paverman@intlfcstone.com

Our clearing firms are:

- (1) Merrill Lynch, Pierce, Fenner & Smith Inc. (Broadcort Division) | 101 Hudson Street | Jersey City, NJ 07302 | (201) 557-4437 | www.broadcort.com
Contact Person: Anthony Maranzano | (201) 557-3852 | anthony.maranzano@ml.com
- (2) Pershing, LLC | One Pershing Plaza | Jersey City, NJ 07399 | (201) 413-4200 | www.pershing.com
Contact Person: Johnathan Good | (321) 249-4950 | jgood@pershing.com

Office Locations:

- Office #1:** 329 Park Avenue North, Suite 350, Winter Park, FL 32789 +1 (407) 741-5300.
- Office #2:** 708 3rd Avenue, NY, NY 10017 +1 (212) 485-3500.
- Office #3:** 1221 Brickell Avenue, 25th Floor, Miami, FL 33131 +1 (305) 377-0074.
- Office #4:** 2600 North Military Trail, Suite 290, Boca Raton, FL 33431 +1 (561) 544-7610.
- Office #5:** 107 St. Francis Street, Suite 990 Mobile, AL 36602 +1 (251) 463-3082.
- Office #6:** 1251 NW Briarcliff Parkway, Suite 80, Kansas City, MO 64116 +1(816) 410-7146.
- Office #7:** 1075 Jordan Creek Parkway, Suite 300, West Des Moines, IA 50266 +1(515) 223-3797.
- Office #8:** 230 South LaSalle, Suite 10-500, Chicago, IL 60604 +1(312) 780-6972.
- Office #9:** 2 Perimeter Park South, Suite 100W, Birmingham, AL 35243 +1(205) 949-3594.

Severity of SBD’s

Our BCP takes into account various levels of disruption. Because office locations serve as a backup to each other and are located in different regions, we are confident that we can continue operations during an SBD to a specific building, business district, city or region. If one of these types of SBD’s were to affect one of our locations, it is our intent that the unaffected location would immediately assume the functions of the affected one; however, some functionality might take up to 4 hours to be restored. Every in-house and supplier provided system is available in both the New York and Winter Park, FL locations. Some of these systems are available in multiple locations in New York, London and Miami. Of course, we are dependent on some systems from outside providers. In the event of an SBD that affects a business district, city or region, an unaffected office might be unable to utilize the services of some of these outside providers until such time as these providers have restored service. Our mission critical providers all have stated plans for restorations of services within 4 hours. It is necessary to recognize that it is possible for an SBD of sufficient magnitude where these providers would be unable to meet their 4 hours goal. Nevertheless, our contingencies should ensure that we return to operations concurrent with the restorations of operations of the major U.S. Equity and Fixed Income Markets from any wide spread SBD. Because of our redundancies and security of our systems, we believe that our exposure to an SBD limited to our firm is minimal. If an event was to occur that rendered all US offices inoperable, we would rely on the support of our clearing firms (Broadcort and Pershing) to help us restore operations, while ensuring that all pending transactions were properly completed.

Communications

Our BCP is subject to modification. A link to any updated summary will be posted on our website when modifications occur. Customers may alternatively obtain updated summaries by writing to: INTL FCStone Financial Inc. 329 Park Avenue North, Suite 350 Winter Park, FL 32789.