

Customer Identification Program Notice

Important Information You Need to Know About Opening a New Account

To help the government fight the funding of terrorism and money laundering activities, federal law requires financial institutions to obtain, verify and record information that identifies each person or entity who opens an account. This notice is designed to answer some questions about Clear Street LLC s (Clear Street” or, the Firm”) Customer Identification Program.

What types of information will I need to provide?

When you open an account, Clear Street is required to collect information from you which includes but is not limited to: full legal name; date of birth; residential address; and government issued identification number, such as a driver s license or U.S. passport; non-U.S. passport number and country of issuance; alien identification card number; or other government-issued identification showing nationality, residence and a photograph of you.

You will also need to provide other identifying documents and additional information, such as your net worth, annual income, occupation, employment information, investment experience and objectives and risk tolerance so that Clear Street can comply with U.S. Department of the Treasury, U.S. Securities and Exchange Commission (SEC”), and rules of the Financial Industry Regulatory Authority, Inc. (“FINRA”).

A corporation, partnership, trust or other legal entity is required to provide other information, such as its principal place of business, local office, employer identification number, certified articles of incorporation, government-issued business license, authorized traders, a partnership agreement or a trust agreement. Certain legal entities will also be required to provide information and identifying documents for its beneficial owners and control person(s), as well as a list of personnel authorized to act on its behalf.

What happens if I don’t provide the information requested or my identity can’t be verified?

Clear Street may not be able to open an account or carry out transactions for you. If Clear Street has already opened an account for you, we may have to close it. You will be responsible for any losses or damages (including, but not limited to, lost opportunities) that may result if your account is restricted or closed.

Prohibited Accounts - Section 311 Notice

Pursuant to U.S. regulations issued under Section 311 of the USA PATRIOT Act, 31 CFR 103.193, Clear Street is prohibited from establishing, maintaining, administering or managing correspondent accounts for, or on behalf of: Bank of Dandong; Burma; Commercial Bank of Syria (Includes Syrian Lebanese Commercial Bank); Democratic People's Republic of Korea; FBME Bank Ltd.; Halawi Exchange Co.; Islamic Republic of Iran; and Kassem Rmeiti & Co. For Exchange; or other foreign jurisdictions, institutions, classes of transactions or types of accounts which are identified as a "primary money laundering concern" under the USA PATRIOT Act.

Regulations also require us to notify you that you may not provide any of the aforementioned entities or their subsidiaries with access to the account(s) that you hold with us. If we become aware that one of these entities or any of their subsidiaries is indirectly using the account that you hold with us, we will be required to take appropriate steps to prevent such access including, where necessary, terminating your account(s). Updated Section 311 Special Measures can be found [here](#).

Prohibited Accounts – US Department of the Treasury OFAC

The Office of Foreign Assets Control (OFAC) maintains lists of individuals, entities and targeted countries; Specially Designated Nationals and Blocked Persons List (SDN), Foreign Sanctions Evaders (FSE) List and the Sectoral Sanctions Identifications (SSI) List which U.S. persons and entities are generally prohibited from doing business with. Clear Street may not establish, maintain, administer or manage an account for, or on behalf of individuals or entities identified on OFAC Lists. More information concerning OFAC lists are available [here](#).