

May 2024

Related Registrants Disclosure

Virtu Canada Corp. (“VCC”) is a member of the Canadian Investment Regulatory Organization (“CIRO”, formerly IIROC) and the Canadian Investor Protection Fund (“CIPF”) and a registrant under the *Securities Act (Ontario)*. VCC offers trading and execution products to its institutional clients (as defined in Section 1201 of the Investment Dealer and Partially Consolidated Rules (the “Rules”) and referred to as “Clients” for the remainder of this disclosure).

The following describes VCC’s relation to other Canadian registrants and reporting issuers.

VIRTU FINANCIAL, INC.

VCC is an indirect subsidiary of Virtu Financial, Inc. (“VFI”), a publicly traded Delaware corporation listed on NASDAQ (Ticker Symbol: VIRT). The firm is headquartered in New York with offices in North America, Europe and the Asia Pacific regions. For more information on VFI, please see www.virtu.com. Virtu Financial, Inc. operates in Canada through its wholly-owned investment dealer subsidiaries. Several VFI affiliates operate and own interests in non-Canadian trading venues and may effect Client transactions on these platforms.

VIRTU FINANCIAL CANADA, ULC

Virtu Financial Canada, ULC (“VFC”) is a subsidiary of VFI, and a member of CIRO and CIPF. VFC is nonoperational as of the date of this disclosure.

The following individuals are registered with both VFC and VCC:

Ms. Cindy Lee is an executive of VFC, and a director of VCC.

Mr. Justin Miller is an executive of VFC, and a director of VCC.

Mr. Justin Algor is an executive and director of VFC, and the Chief Executive Officer of VCC.

Ms. Lee, Mr. Miller and Mr. Algor are expected to be aware of and abide by the policies of VFC and VCC, as applicable, concerning conflicts of interest and confidentiality of information, and all other applicable legal and regulatory requirements, and to apply them to information they may receive in one role or the other to minimize any possible conflict of interest.

VIRTU AMERICAS LLC

Virtu Americas LLC (“VAL”) is a broker-dealer that is registered with the U.S. Securities and Exchange Commission (“SEC”) and Financial Industry Regulatory Authority (“FINRA”). VAL is an indirect subsidiary of VFI. VAL makes markets, operates alternative trading systems, and provides brokerage services in the United States. In connection with its activities in Canada, VAL is exempt from dealer registration under the

Securities Act (Ontario) as it is relying on the international dealer exemption contained in Part 8.18 of National Instrument 31-103 *Registration Requirements and Exemption*. VAL is registered under the international dealer exemption in each of the following provinces: Alberta, British Columbia, New Brunswick, Ontario, Québec and Saskatchewan.



INVESTX FINANCIAL (CANADA) LTD.

VFI, the ultimate parent of VCC, has a strategic investment in InvestX Capital Ltd. (“InvestX”). InvestX operates a Canadian subsidiary, InvestX Financial (Canada) Ltd., which is registered as an exempt market dealer in each of Alberta, British Columbia, New Brunswick, Ontario and Québec.

STATEMENT OF POLICIES AND UNDERTAKING RESPECTING RELATED AND CONNECTED ISSUERS

VFI may offer to purchase or sell, as agent, securities of the Related Issuer noted below and has interest in such securities.

Virtu Financial, Inc. (NASDAQ: VIRT)

The securities laws of the Province of Ontario require securities dealers and advisers, when they trade in or advise with respect to their own securities or securities of certain other issuers to which they, or certain other parties related to them, are related or connected, to do so only in accordance with particular disclosure and other rules. These rules require dealers and advisers, prior to trading with or advising their customers or clients, to inform them of the relevant relationships and connections with the issuer of the securities. Clients should refer to the applicable provisions of these securities laws for the particulars of these rules and their rights or consult with a legal adviser.

CIBC WORLD MARKETS INC.

Virtu Canada Corp. is an Introducing Broker and CIBC World Markets Inc. (“**CIBC WM**”) is a Carrying Broker. Services are provided to you under a written Introducing/Carrying Broker Agreement between Virtu Canada Corp. (“**Virtu**”) and CIBC WM.

Responsibilities of Virtu:

Virtu shall serve and supervise your securities account in accordance with its policies and applicable laws and regulations. Virtu is solely responsible for the acceptance and the execution of securities orders. Virtu is responsible for ensuring appropriate supervision is performed for all trading activity in client accounts. Virtu shall prepare and deliver trade confirmations.

Virtu is solely responsible for supervising the activities of the individual or individuals who service your account and for resolving any complaints regarding the handling of your account. In all of the above matters relating to the servicing of your account, CIBC WM has no involvement and assumes no responsibility.

Neither Virtu nor CIBC shall owe you a suitability obligation for any transaction as you are either exempt from the suitability requirement under IDPC rules or have previously waived the suitability protections at account opening.

Responsibilities of CIBC WM:

In general, CIBC WM is only responsible for those services provided at the request or direction of Virtu as described in the Introducing/Carrying Broker Agreement.

With respect to any transactions clients may enter into, CIBC WM will be responsible for trade settlement, custody of cash and securities, the preparation of account statements and the financing of client account positions as directed by Virtu.

CIBC WM reserves the right to refuse to accept a particular account or order at its sole discretion for the sole protection of CIBC WM.

CIBC WM will receive and deliver cash and securities for your account and will record such receipts and deliveries according to information provided either by Virtu or directly, in writing, by you.