



September 2023

## 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 Corporation 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.

### FIDELITY CLEARING CANADA ULC

VCC is an introducing broker and Fidelity Clearing Canada ULC ("FCC") is its carrying broker. FCC is a member of CIRO and CIPF.

### 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](http://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 non-operational 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 a director 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.



### **AEQUITAS INNOVATIONS INC.**

VCC previously held a minority ownership interest in Aequitas Innovations Inc. (“Aequitas”), a private company which owns and operates Aequitas NEO Exchange and its trading books. In June 2022, Virtu sold our minority interest in Aequitas to Cboe Global Markets, Inc. (the “Aequitas Sale”). Pursuant to the terms of the Aequitas Sale, Virtu may receive additional contingent consideration based on the performance of Aequitas through December 31, 2023.

### **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.