

IBG Trading, Inc.'s
Anti-Money Laundering Policy Disclosure Statement

The USA PATRIOT Act, enacted in 2001, is designed to detect, deter, and punish terrorists in the United States and abroad. The USA PATRIOT Act imposes new anti-money laundering requirements on financial institutions. All financial institutions are required to have comprehensive anti-money laundering programs. To help you understand these efforts, we want to provide you with some information about money laundering and our steps to implement the USA PATRIOT Act.

What is money laundering?

Money laundering is the process of disguising illegally obtained money so that the funds appear to come from legitimate sources or activities. Money laundering occurs in connection with a wide variety of crimes, including illegal arms sales, drug trafficking, robbery, fraud, racketeering, and terrorism.

How big is the problem and why is it important?

The use of the U.S. financial system by criminals to facilitate terrorism or other crimes could well taint our financial markets. According to the U.S. State Department, one recent estimate puts the amount of worldwide money laundering activity at \$1 trillion a year.

Our Commitment

We are committed to complying fully with all applicable laws and regulations relating to combating money laundering and any activity which facilitates the funding of terrorist or other criminal enterprises.

Our Client Identification Procedures (CIP) for New Accounts

Government rules adopted to prevent money laundering and terrorist financing require all U.S. financial institutions to obtain, record and verify information that identifies each individual or entity that opens an account.

When you invest or open an account through IBG Trading, Inc., we will ask you for your name and address and an identification number. For U.S. individuals, this means a taxpayer identification number such as your social security number. For U.S. entities, it means your employer identification number. For non-U.S. individuals, you must supply a passport or other government-issued photo identification document. For non-U.S. entities, it means a taxpayer identification number and other identifying documentation.

In addition, you may be required to provide identification documents as necessary to enable us to verify your identity. We may also screen your name against various databases to verify your identity. All information and documentation will be treated in a manner so as to protect your privacy.

We are responsible uncovering or reporting any activity that might constitute, indicate or raise suspicions of money laundering. To this end, we provide continuing education and training of all such persons. All officers and employees of IBG Trading, Inc. are required to notify our compliance department if they have any knowledge, suspicions or information regarding potential money laundering activities. In any such event, our Chief Compliance Officer will document the reported activity, investigate fully, and, if warranted, report such activity to the senior management of the company.

IBG Trading, Inc. is required to comply with all trade and economic sanctions imposed by OFAC against targeted foreign countries and shall cooperate fully with government agencies, self-regulatory organizations and law enforcement officials. As provided by the Act, IBG Trading, Inc. may supply information about former, current or prospective clients to such bodies.