



TRADING SYSTEM DISCLOSURES

INTRODUCTION

HRT Financial LP (“HRTF”) is a broker-dealer registered under Section 15 of the Securities and Exchange Act of 1934 and a member of the Financial Industry Regulatory Authority (“FINRA”) engaged in market making and proprietary trading activities. HRTF operates a single dealer platform (the “Platform”) whereby counterparties who execute an Electronic Access and Trading Agreement and connect to the Platform (each, a “Counterparty”) can transmit orders in NMS Stocks (as defined in Regulation NMS under the Securities Exchange Act of 1934) for potential execution.

The Platform does not operate as an Alternative Trading System as defined by the Securities and Exchange Commission (“SEC”). Counterparties using the Platform must be registered as a broker-dealer with the SEC.

This document is intended to provide Counterparties with certain disclosures relating to the operation of the Platform.

OPERATIONAL MATTERS

Counterparties may access HRTF’s unique and proprietary liquidity through the Platform. The Platform only supports the receipt of market or limit immediate-or-cancel orders from Counterparties and all orders are treated as “not held” orders. The Platform will not accept day orders and will not facilitate a resting limit order book. All orders are either filled, in full or partially, by HRTF or cancelled back to the Counterparty.

Where a Counterparty’s order is executed, such execution will occur at or within the “national best bid or offer” (the “NBBO”) using pricing information from direct feeds, where available. Where direct feeds are not available or where the Platform loses access to one or more direct feeds, the Platform will use the Securities Information Processor (“SIP”). At any point in time, the Platform is determining the NBBO using direct feeds or the SIP for a particular market, but not both.

The Platform may stream non-binding indications of potential trading interest (each such indication, an “IOI”) to a Counterparty. IOIs may be customized to each connected counterparty. IOIs are merely an indication of interest; they are not quotes and may change following transmission to a Counterparty.

COUNTERPARTY DATA

Certain historical order flow information will be made available to associated persons of HRTF who are responsible for the Platform’s provision of liquidity or who maintain and test the Platform and/or other systems that may affect the operation of the Platform. Order and execution data may be analyzed for the purposes of administering, maintaining or managing the Platform or customizing the characteristics of fills provided to a particular Counterparty. This data may contain historical unexecuted Counterparty order information.



Real-time unexecuted order information will not be used by HRTF proprietary strategies or strategies providing liquidity to the Platform. Real-time Counterparty-attributed executed order information will be available only to those HRTF proprietary strategies providing liquidity to Counterparty through the Platform and for certain risk-management and compliance-related purposes.

Certain associated persons of HRTF will have access to both historical and real-time Counterparty order information. HRTF's policies and procedures provide that such access will be limited to those associated persons whose job function requires access to such information. Currently, this includes business supervisors, support, risk management, compliance, trading operations and other similar personnel.