

## Americas Listed Equity Options Disclosures

	<p><b>Effective as of May 31, 2021</b>– Citigroup Global Markets Inc. (“CGMI” and together with its affiliates, “Citi”, the “Firm”, “we” or “us”) is a global financial services firm that operates as a broker, dealer and market maker in equities. CGMI offers North American (NAM) execution services in equities securities and other financial instruments in the United States, and through its affiliates in Latin America (LATAM), Asia-Pacific (APAC) and Europe, the Middle East and Africa (EMEA). Citi is dedicated to adhering to applicable laws and regulations in our dealings with our clients in those markets. This document is intended to clarify aspects of the trading relationship between Citi and our clients (each, the “Client” or “you”) in the markets for trading of options listed on SEC regulated exchanges in the United States (“Options”) markets. This document does not address Citi order handling and other details that relate to over the counter options that are not exchange listed, nor does it address options on futures contracts or most commodities. Please see our Americas Cash Equities Disclosures for important information related to equities (<a href="https://www.citibank.com/icg/about/assets/docs/cash-equities-disclosures-americas.pdf">https://www.citibank.com/icg/about/assets/docs/cash-equities-disclosures-americas.pdf</a>).</p> <p>The information being described relates to Citi trading option securities as of May 31, 2021 and is subject to change without notice and prior to the circulation of any update. It is always recommended that you contact your Citi sales representative or <a href="mailto:optionee@citi.com">optionee@citi.com</a> for additional information.</p> <p>The disclosures set forth in this document apply to the institutional business of Citi and to its clients that fall within the regulatory definition of “Institution”; these disclosures may not be complete and we recommend seeking clarifications you may require from your Citi representative. These disclosures are intended for institutional clients and are not intended for individuals or other retail investors. These disclosures are subject to (and, to the extent of any conflict, shall be governed by): (i) any written agreement with you; and (ii) any applicable law or regulation (including, but not limited to, any applicable requirements regarding best execution or conflicts of interest). Laws and regulations in various jurisdictions may provide rights or obligations other than those discussed in this document. To the extent of any conflict between these disclosures and any other disclosures (including published policies) we have previously provided to you, the terms of these disclosures shall govern.</p> <p>You should review this document in connection with other applicable Citi agreements, terms of business and disclosures in order to fully understand your relationship with us in the context of a particular transaction. The Firm may execute an order received from you as principal or agent (e.g., executed by Citi on an exchange or otherwise pursuant to the rules of an exchange as agent for its Clients), or partly as principal and partly as agent. In the case of transactions executed on an agency basis, the Firm will be acting solely as agent for the purpose of execution and not otherwise as an agent, fiduciary, financial advisor or in any similar capacity on your behalf, and the disclosures set out in this document will also apply to the extent relevant.</p> <p>Any statements we make to a Client should not be construed as recommendations or advice or that Citi has acted as the Client’s advisor. In addition, when we transact with our Clients, we rely upon the apparent authority of the employees, representatives, advisers and agents who</p>
--	--

	<p>communicate with us on their behalf, and we assume no obligation to independently verify that authority, unless on a case-by-case basis there may be circumstances whereby confirmation is needed to ensure authority has not been breached.</p>
<p><b>(1) Order Handling / Routing</b></p>	<p>This disclosure is part of Citi’s ongoing efforts to provide transparency to its institutional clients about its U.S. listed equity Options order handling, orders handled by Citi’s Router (“Citi Order Routing Engine” or “CORE”), including most low-touch electronic orders, and certain agency orders handled by Citi’s high-touch desk. Citi’s objective in handling client orders is to deliver the best execution reasonably available under the circumstances. Order handling and routing performance are analyzed and reviewed by Citi on a regular basis. Citi executes client orders by accessing exchange liquidity. For additional disclosures concerning Options order handling and routing, please see our SEC Rule 606 Disclosure (<a href="https://www.citi.com/icg/about/assets/docs/SEC-Rule-606-Disclosure.pdf">https://www.citi.com/icg/about/assets/docs/SEC-Rule-606-Disclosure.pdf</a>).</p> <p><b>Citi’s single leg order routing:</b>  CORE provides access to the single-leg Options markets on every U.S. listed Options exchange. For both marketable and non-marketable client orders, CORE is designed to capture a snapshot of the protected quotes on U.S. listed Options exchanges, to construct a view of available liquidity. Citi uses Options Price Reporting Authority (OPRA) feeds in order to obtain the protected quotes for a given security on each exchange. Subject to certain changes in orders or markets, the view of marketability and availability of liquidity will be re-evaluated for the life of the order. Subject to CORE’s view of available liquidity and client instructions, for marketable orders, CORE determines which sources of liquidity to access based upon anticipated execution price. If more than one source of liquidity exists at a given price level, additional factors that CORE uses when determining which source(s) of liquidity to select include, but may not be limited to, some or all of the following: client instructions; available liquidity and/or expectation of liquidity; exchange rebates and fees; exchange volume incentive programs including tiers; client configurations set by Citi. Subject to CORE’s view of available liquidity, client instructions, and client configurations, if there is not sufficient liquidity to execute the entirety of the client order at the best available price level, CORE may, continue to work the unfilled quantity at the prevailing market until executed, cancelled, or the price reaches the client limit price, subject to CORE’s market order and limit order behaviours. Subject to CORE’s view of available liquidity and client instructions, factors that CORE uses when determining where to route non-marketable orders include, but may not be limited to, some or all of the following: client instructions; exchange market structure and liquidity; historical fill rate analysis; rebates and fees; exchange volume incentive programs including tiers and; client configurations set by Citi. If a NBB or NBO at an Option Exchange is unavailable to the CORE router, an order can be handled via the SEC’s approved Intermarket Options Linkage Plan whereby another Option Exchange has the ability to execute buy and/or sell orders at the exchange where the better price quote is available.</p> <p><b>Citi’s complex order routing:</b>  A complex order is an order involving the simultaneous purchase and/or sale of two or more different instruments, or “legs”, in a client-defined ratio. The complex order is comprised of either (i) two or more Options, or (ii) one or more Options plus an underlier. This order is sent to the exchange as a net bid or offer, at the leg ratio defined by the client upon order entry. If filled, all legs are executed at the client-defined ratio and at a net price. Consequently, it is possible that executions in the individual legs will be printed by the exchange</p>

outside of their respective national best bid or offer. Subject to exchange rules, a complex order can execute against resting orders in the complex order book, execute in an auction, or execute each leg on an exchange's single-leg order book. Unlike single leg orders, complex orders are not protected across multiple exchanges. As a result, complex orders will not be routed by the executing exchange if a better price is displayed at an away exchange, and may execute at a price that is inferior to the price displayed at an away exchange's complex order book or the Synthetic National Best Bid or Offer ("SNBBO") which is comprised of the best bid or offer for each instrument comprising the complex product from its single-leg and/or cash order book. To determine its view of marketability for an order, the CORE router will construct the relevant spread NBBO by capturing a snapshot from OPRA for each of the legs. Subject to certain changes in orders or markets, the view of marketability and availability of liquidity will be re-evaluated for the life of the order. Subject to the CORE router's view of available liquidity and client instructions, for orders that are deemed marketable as compared to the SNBBO, it will send the entire initial or unfilled quantity of the order to one or multiple exchanges' complex order book(s). The order will be re-evaluated and may be re-routed based on observed fills for the order. Subject to the router's view of available liquidity and client instructions, for orders that are deemed non-marketable as compared to the SNBBO, it will send the entire initial or unfilled quantity of the order to one or multiple exchanges' complex order book(s). Non-marketable orders will rest on the exchange, but may be periodically re-evaluated for further routing. Citi's CORE routing provides access to the complex markets on the following exchanges: NYSE American Options, NYSE Arca Options, Cboe EDGX Options Exchange, Cboe, Nasdaq ISE, MIAX Options, Nasdaq PHLX and MIAX Emerald. Complex orders are routed based on factors that include, but may not be limited to, some or all of the following:; client instructions; anticipated and observed fill rates; size of the order; exchange rebates and fees; exchange volume incentive programs including tiers; client configurations.

**Opening/Reopening:** There is no consolidated opening/reopening price for options series due to the fact that each options exchange runs their own opening process contingent on the underlier opening on the primary listing market. As a result, price instability in the options market can occur during the opening/reopening process. CORE evaluates orders it receives while the market is not in a continuous trading state against predetermined reference prices to assess viability of orders. CORE routes preopen orders to venues deemed by Citi to protect the customer order and provide the most reasonable safeguards for price discovery and liquidity seeking. After the opening Citi may reroute some of its resting orders to additional venues. Cancelled, Amended, and Rejected Orders Subject to regulations and internal practices concerning market access, Citi may amend or cancel any accepted orders at its sole discretion. In addition, Citi may reject orders that exceed certain Citi-set execution limits. Citi may read the exchange reject messages and may determine to reject the order back to a client based on the information contained in these messages.

**Order Types:** Citi accepts the following order types, which may be amended or cancelled as outlined below. For information on additional order types, please contact your Citi representative.

**Market Orders:** To mitigate the risk of adverse market impact, among other reasons, Citi may place limit prices on market orders when accessing the market, including in circumstances when the order is directed to a particular

	<p>destination. Therefore, it is possible that a market order may not be completely filled, Citi uses price bands for executions of market orders and may stop executing a market order if the option prices deviates to far from the first execution.</p> <p><b>Limit Orders:</b> To mitigate the risk of adverse market impact, among other reasons, Citi may change limit prices on limit orders when accessing the market, including in circumstances when the order is directed to a particular destination. Limit order priced to aggressively may be rejected. Therefore, it is possible that a marketable limit order may not be completely filled.</p> <p><b>Good-til-Cancelled (GTC) Orders:</b> A GTC order will remain an open order until executed, cancelled by the client that placed the order or cancelled by CORE, whichever comes first. CORE will automatically cancel any open GTC orders one year after its receipt. Clients who wish to keep their orders open must cancel/replace or re-enter the order prior to the 1 year expiration date. In addition, the firm will cancel any good-til-date (GTD) orders one year after its receipt.</p> <p><b>Algorithmic Orders:</b> Citi offers clients a suite of algorithms which are designed to aid in price discovery and scheduling of orders. These algorithms leverage CORE for accessing on-exchange liquidity. Agency orders for clients choosing to interact with Citi’s high-touch desks may use Citi’s suite of Algorithmic Orders.</p> <p><b>Open Client Order Information:</b> Access to open client order information is limited to account coverage, personnel handling client orders, and their supervisors, as well as certain legal, compliance, risk management, senior management and other support personnel in the performance of their responsibilities. Other clients, traders and sales traders do not have access to this information. Depending on respective personnel responsibilities, there are different levels of permissioned access pursuant to our internal policies.</p> <p><b>Historical Client Order Information:</b> Subject to internal governance, Citi analyses historical client Options order flow for a variety of reasons, including reviewing COREs performance, optimizing routing and algorithm practices, and determining economics of routing decisions for Citi and its clients. Based on this analysis, while adhering to Citi’s objective to deliver the best execution reasonably available under the circumstances, client configurations set by Citi may be updated for flow handled by CORE.</p> <p><b>Cboe GTH:</b> Citi provides access upon client request to the Cboe Global Trading Hours session, known as GTH. Orders designated for this session are not eligible for routing until 7:30-9:15 am ET.</p> <p>For additional disclosures about this trading session, please see Cboe GTH disclosures (below) or contact your Citi representative.</p>
<b>(2) Best Execution</b>	<p><u>How does Citi provide Option Best Execution?</u></p> <p>CGMI has a Best Execution listed option governance framework in place overseeing its routing business to:</p> <ul style="list-style-type: none"> <li>(i) Consistently seek to deliver best execution and operate in the best interests of our clients.</li> <li>(ii) Comply with all relevant regulatory requirements; and</li> </ul>

	<p>(iii) Continuously look at ways to further improve our routing capabilities.</p> <p>CGMI maintains a quarterly Listed Option Best Execution Committee that reviews the electronic order handling practices of Citi for compliance with the principles of Best Execution and recommend policies, procedures, and order handling practices relating thereto to qualified principals of the Firm responsible for the pertinent business activities. The Committee consist of supervisors from the relevant businesses responsible for handling electronic listed option customer orders. ICRM Compliance and legal may serve as advisory members of the Committee.</p> <p>The metrics reviewed may include marketable orders, non-marketable orders, complex orders, percentage of order routed for price improvement, Effective to Quote (E/Q), At-or-Better, percent improved, and speed of execution among others. The Committee also reviews metrics regarding order-by-order exception analysis that is conducted on a daily basis throughout the month. All Option routing changes and priority level changes made during the review period are reviewed by the Committee.</p> <p>Upon request by a client, CGMI can provide a client with an SEC Rule 606 report that shows standardized disclosure of our institutional order handling and routing. For additional disclosures concerning order handling and routing, please see our SEC Rule 606 Disclosure (<a href="https://www.citi.com/icg/about/assets/docs/SEC-Rule-606-Disclosure.pdf">https://www.citi.com/icg/about/assets/docs/SEC-Rule-606-Disclosure.pdf</a>).</p>
<p><b>(3) Payment for Order Flow</b></p>	<p>CGMI may execute customer orders on a principal or agency basis and receives compensation for such executions.</p> <p>CGMI, in its efforts to seek best execution, routes customer orders to national securities exchanges and venues. Certain venues, from time to time, may offer cash credits or rebates for orders that provide liquidity to their books and charge explicit fees for orders that extract liquidity from their books. Certain other venues, from time to time, may be inverted, meaning such venues offer cash credits or rebates for orders that extract liquidity from their books and charge explicit fees for orders that provide liquidity to their books.</p> <p>CGMI routes orders to the US Listed Option Exchanges and may be eligible for these benefits under an Exchanges rules. CGMI's order routing decisions are based on a number of factors, including but not limited to, price, liquidity, venue reliability, cost of execution, and the likelihood of execution.</p> <p>Citi has strategic ownership stakes in the Boston Options Exchange ("BOX") and The Members Exchange, which are SEC-registered securities exchanges, and in eBX LLC (Level ATS), which is an external U.S. equity trading venue/source of liquidity. Citi also has Board seats on BOX and eBX (Level). In addition, Citi owns shares of the Chicago Mercantile Exchange as part of its membership requirements.</p> <p>Because CGMI holds an ownership interest in BOX, CGMI stands to share in any profits that BOX derives from the execution of CGMI's customer orders on BOX.</p>
<p><b>(4) Options Disclosure Document</b></p>	<p>Pursuant to SEC Rule 9b-1 and various exchange rules, CGMI is required to provide all clients who trade Options and/or who receive Options-related sales material a current copy of the Characteristics and Risks of Standardized</p>

	<p>Options (the "ODD") including supplements, issued by the Options Clearing Corporation. A copy of the ODD can be found here:  <a href="https://www.theocc.com/getmedia/a151a9ae-d784-4a15-bdeb-23a029f50b70/riskstoc.pdf">https://www.theocc.com/getmedia/a151a9ae-d784-4a15-bdeb-23a029f50b70/riskstoc.pdf</a></p>
<p><b>(5) Global Trading Hours ("GTH") Risk Disclosure</b></p>	<p>CGMI through CORE may provide Pre-Market and Post-Market trading sessions to its clients. Pre-certification is required to participate in such extended trading sessions; clients wishing to participate in the GTH session should contact their Citi Representative for more information. In addition, clients should be aware of the differences and risks that may exist during the GTH session. CGMI provides the following risk disclosures to those who submit listed option orders to be executed in the pre-market or post-market sessions:</p> <ul style="list-style-type: none"> <li>• <b>Risk of Lower Liquidity.</b> Liquidity refers to the ability of market participants to buy and sell securities. Generally, the more orders and quotes that are available in a market, the greater the liquidity. Liquidity is important because with greater liquidity it is easier for investors to buy or sell securities, and as a result, investors are more likely to pay or receive a competitive price for securities purchased or sold. There may be lower liquidity during GTH as compared to Regular Trading Hours ("RTH"), including fewer Market-Makers quoting during GTH. As a result, your order may only be partially executed, or not at all.</li> <li>• <b>Risk of Changing Prices.</b> The prices of securities traded during GTH may not reflect the prices either at the end of RTH, or upon the opening of RTH the next business day. As a result, you may receive an inferior price during GTH as compared to RTH.</li> <li>• <b>Risk of News Announcements.</b> Normally, issuers make news announcements that may affect the price of their securities after RTH. Similarly, important financial information is frequently announced outside of RTH. These announcements may occur during GTH, and if combined with lower liquidity and higher volatility, may cause an exaggerated and unsustainable effect on the price of a security.</li> <li>• <b>Risk of Wider Spreads.</b> The spread refers to the difference between the price for which you can buy a security and the price for which you can sell it. Lower liquidity and higher volatility during GTH may result in wider than normal spreads for a particular security.</li> <li>• <b>Risk of Lack of Calculation or Dissemination of Underlying Index Value or Intraday Indicative Value ("IIV") and Lack of Regular Trading in Securities Underlying Indexes.</b> For certain products, an updated underlying index or portfolio value or IIV will not be calculated or publicly disseminated during GTH. Since the underlying index or portfolio value and IIV are not calculated or widely disseminated during GTH, an investor who is unable to calculate implied values for certain products during GTH may be at a disadvantage to market professionals. Additionally, securities underlying the indexes or portfolios will not be regularly trading as they are during RTH or may not be trading at all. This may cause prices during GTH to not reflect the prices of those securities when they open for trading.</li> </ul>

	<ul style="list-style-type: none"> <li>• <b>Risk of Higher Volatility.</b> Volatility refers to the changes in price that securities undergo when trading. Generally, the higher the volatility of a security, the greater its price swings. There may be greater volatility during Global Trading Hours as compared to Regular Trading Hours. As a result, your order may only be partially executed, or not at all, or you or you may receive an inferior price during Global Trading Hours as compared to Regular Trading Hours.</li> </ul>
<p><b>(6) Solicited Order Mechanisms</b></p>	<p>CGMI is required to notify customers pursuant to U.S. Options exchange rules of our intent to use the solicited order mechanisms that it has available for members to cross customer Options orders.</p> <p><u>Cboe Exchange, Inc. – Automated Improvement Mechanism (“AIM”) AON Solicitation Mechanism</u>  When handling an order of 500 contracts or more on your behalf, CGMI may solicit other parties to execute against your order and may thereafter execute your order using the Cboe Exchange, Inc.’s AON AIM Solicitation Mechanism. This functionality provides a single-priced execution, unless the order results in price improvement for the entire quantity, in which case multiple prices may result. For further details on the operation of this mechanism, please refer to Cboe Exchange, Inc. Rule 6.74B, which is available at <a href="https://markets.cboe.com/us/Options/regulation/">https://markets.cboe.com/us/Options/regulation/</a></p> <p><u>Nasdaq U.S. Options Exchanges – Solicitation Order Mechanisms</u>  When handling an order of 500 contracts or more on your behalf, CGMI may solicit other parties to execute against your order and may thereafter execute your order using the Nasdaq ISE (ISE), Nasdaq GEMX (GEMX) and Nasdaq MRX (MRX) Exchange’s Solicited Order Mechanisms. This functionality provides a single-price execution only, so that your entire order may receive a better price after being exposed to the Exchange’s participants, but will not receive partial price improvement. For further details on the operation of this Mechanism, please refer to Nasdaq ISE (ISE), Nasdaq GEMX (GEMX) and Nasdaq MRX (MRX) Rules 716(e), all which are available at <a href="http://www.ise.com/options/regulatory-and-fees/rules-and-rule-changes/">http://www.ise.com/options/regulatory-and-fees/rules-and-rule-changes/</a></p>
<p><b>(7) Position Limits</b></p>	<p>U.S. Options exchanges and regulators have established limits on the maximum number of equity and index exchange listed puts and calls covering the same underlying security that may be held or written by a single investor or group of investors acting in concert or under common control (regardless of whether the Options are purchased or written on the same or different exchanges or are held or written in one or more accounts or through one or more brokers). Under exchange and FINRA rules, customers are required to agree not to violate these limits. CGMI is required to monitor and report a customer’s positions to the Options exchanges and may be required to liquidate positions in excess of these limits. Failure by CGMI to adhere to these regulations may result in the imposition of fines and other sanctions by the Options exchanges. The position limit applicable to a particular Option class is determined by the Options exchanges based on the number of shares outstanding and trading volume of the security underlying the Option. Positions are calculated on both the long and short side of the market. To calculate a long position, aggregate calls purchased (long calls) with puts written (short puts), on the same underlying. To calculate a short position, aggregate calls written (short calls) with puts purchased (long puts) on the same underlying. Expiring Options are included in your end of day position.</p>

	<p>Please note that position limits in an Option class may be adjusted temporarily as a result of certain corporate actions such as a stock split. The exchanges' position limit rules also permit positions in excess of the applicable limit if the customer is engaging in certain qualified hedging strategies. Additionally, under certain limited circumstances, the Options exchanges may also grant special position limit exemptions. Customers should determine the current position limits from their brokers before engaging in any Options transactions.</p> <p>The Options Clearing Corporation ("OCC") may periodically make adjustments to existing listed Options contracts as a result of corporate actions or other events. Information on adjustments is generally available from the OCC. Clients should contact their CGMI representative if they have questions regarding Options adjustments.</p>
<b>(8) Exercise Limits</b>	<p>The U.S. Options exchanges and regulators have imposed exercise limits on the maximum number of equity and index listed Options covering the same underlying security that can be exercised within any five (5) consecutive business day period by a single investor or group of investors acting in concert or under common control (regardless of whether the Options are purchased or written on the same or different exchanges or are held or written in one or more accounts or through one or more brokers). The exercise limit is the same as the position limit for the underlying security. If a client has an open Option position that is above the established position limit, but implements a qualified hedge strategy, they are permitted to exercise the amount of Options that they are fully hedged for within any five (5) consecutive business day period.</p>
<b>(9) U.S. Listed Single Stock Options Exercise Procedures</b>	<p>The following sets forth the current procedures that apply to a client's expiring U.S.-listed single stock Options positions. To ensure that a client's expiring Options positions are handled appropriately, the client is responsible for communicating its intended exercise activity to its CGMI representative in accordance with the procedures outlined below.</p> <p>a) <u>To Exercise:</u>  Unless a client notifies its CGMI sales representative otherwise, the Options Clearing Corporation will automatically exercise all Options in such client's account that are at least US\$0.01 in-the-money at the time of expiration. Absent contrary instructions from the client, no positions that are in-the-money by less than US\$0.01 (or that are out-of-the-money) will be exercised.</p> <p>b) <u>To Prevent Exercise of an Option that is At Least US\$0.01 In-the-Money:</u>  In order to prevent a position that is in-the-money by at least US\$0.01 from being exercised automatically, a client must provide contrary exercise instructions to its CGMI sales representative with directions not to exercise the Option no later than 5:30 p.m. Eastern Time on the U.S. business day established by the options Exchanges (with respect to monthly exercises on the Friday before their expiration and for all other Options on the day of their expiration).</p> <p>c) <u>Special Notice for Options Purchased on the Day Immediately Preceding Their Expiration Date:</u>  Expiring Options positions in a client's account purchased on the day immediately preceding their expiration may need special attention. Please remember to communicate these positions to your CGMI sales representative. Please be reminded that the client will need to have cash or cash equivalents or margin available to fund any exercises.</p>

	<p>d) <u>Special Notice for Options Expiring on Underlying Securities that are Subject to a Trading Halt:</u>  Pursuant to OCC policy, in the event that trading in an underlying security has halted on or before the Monday before expiration and trading has not resumed before expiration, a client must provide CGMI with exercise instructions for any Option positions that it desires to exercise, regardless of whether the underlying security is at least US\$0.01 in-the-money. CGMI is required to submit such notices to the OCC; therefore, if CGMI does not receive exercise instructions from the client, none of such client’s long Options positions will be exercised.</p> <p>e) <u>Special Notice Regarding Early Exercise Cut-off Times:</u>  Periodically, the Options exchanges may establish early cut-off times for providing contrary exercise instructions. If the exchanges establish such earlier cut-off time, clients are responsible for providing any contrary exercise instructions to CGMI by the earlier time established by the exchanges.</p> <p>A CGMI representative may from time to time provide a client with information regarding its expiring Options positions, and although CGMI may provide a client with this information, CGMI has no obligation to do so and will have no liability to such client for failure to provide this information or for any inaccuracies in the information.</p>
<b>(10) Account Origin Codes</b>	Option exchange rules require all option orders to be marked with the appropriate account origin code, such as Customer, Broker-Dealer, Professional Customer, or Firm. Therefore, you must ensure your option orders are marked with the correct account origin code when routing option orders electronically or telephonically to the Firm, please notify your CGMI sales representative of any applicable changes.
<b>(11) Professional Customer Origin Code</b>	A professional customer is defined as any non-broker dealer customer who enters a daily average greater than 390 orders during any calendar month over the preceding calendar quarter. All professional customer orders must be marked with the professional customer designation. Professional customer orders may lose priority and incur higher execution fees at the US Listed Option exchanges. If you meet this category you must contact your sales representative at Citi to arrange for testing and certification of the new origin code.
<b>(12) Opening or Closing Transaction</b>	Option exchange rules require all option orders to be marked with either opening (buy/sell to open) or closing (buy/sell to close) indicator. Therefore, you must ensure your option orders are marked appropriately when routing option orders electronically or telephonically to the Firm.
<b>(13) Actionable Identifier</b>	Option Clearing Corporation (“OCC”) has amended Rule 401 to require that an “Actionable Identifier” be included on all customer and firm listed option trades submitted to the OCC for processing. (other than market maker trades). The OCC believes that having an Actionable Identifier on customer and firm trades will allow Clearing Members to more timely identify trades transmitted as part of a CMTA arrangement as well as trades transmitted through the “give-up” process at the exchanges. Client’s preferred Actionable Identifiers should be communicated to your Citi Representative if your firm clears at a firm other than CGMI.