



SRT Securities, LLC - Annual Disclosures 2024

This letter contains important information for clients of SRT Securities, LLC (“SRT”). SRT is a registered broker-dealer with the Securities and Exchange Commission as well as several self-regulatory organizations including FINRA. As a client of the Firm, we would like to advise you of several important disclosures, some of which are required by our regulatory agencies. Please note that the information is being provided for informational purposes and is meant to cover different aspects of the Firm’s business. Please contact the Firm’s compliance department at compliance@srtsecurities.com regarding questions or issues concerning this notice.

Securities Investor Protection Corporation (“SIPC”)

SRT is a member of the Securities Investor Protection Corporation (“SIPC”). Clients may obtain information about SIPC, including a brochure entitled *How SIPC Protects You* by contacting SIPC at:

Securities Investor Protection Corporation: 805 15th Street NW, Suite 800
Washington D.C. 20005
Tel: (202) 371-8300
Fax: (202) 371-6728
Email: asksipc@sipc.org

This information can also be obtained through the SIPC website at www.sipc.org.

Business Continuity Plan

Pursuant to FINRA Rule 4370, SRT maintains and periodically updates a Business Continuity Plan to address the Firm’s actions in the event of a significant business disruption. The plan serves to address various types of potential disruptions to ensure that the Firm can react in an appropriate and timely manner. SRT’s policy is to respond to all business disruptions by focusing on safeguarding employees’ lives, customer assets and firm property; making timely and prudent financial and operational assessments, quickly resuming essential business operations as soon as practicable; protecting the firm’s books & records and allowing the firm’s clients to continue to transact business. SRT’s business is limited to providing agency execution service. Accordingly, the Firm’s BCP is focused on addressing potential risks that could prevent the Firm from providing execution services and to implement an action plan to re-establish such services. SRT’s cloud network protocol provides for accessing critical continuity information from multiple locations in the event of any disruption to the Firm’s sites. Such access allows duplicative storage & versatile networking facilities which may be accessed by any location to continue its operations, with minimal disruption, if SRT’s principal places of business are unavailable due to either a firm-only, city-wide, or business-district disruption. SRT also maintains operations on three national securities exchanges across the country, either of which is able to handle the overflow in the event of a significant business disruption.



Investor Education & Protection

As a client of SRT and pursuant to FINRA Rule 2267, we are making you aware of the availability of information through FINRA's Broker Check program regarding both SRT and its associated persons. Please be advised that FINRA offers an investor brochure describing the Public Broker Check program. The investor brochure may be obtained via the FINRA website at <http://brokercheck.finra.org/> or through the FINRA Broker Check program Hotline Number at (800) 289-9999.

USA Patriot Act/Anti-Money Laundering Procedures

SRT is committed to abiding by the U.S. government's regulatory and statutory requirements regarding Anti-Money Laundering protections. The USA PATRIOT Act (Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism) was enacted to strengthen the United States government's ability to combat terrorist financing and money laundering. An essential component of the USA PATRIOT Act requires financial institutions to obtain, verify, and record information that identifies each person or entity with a relationship at a financial institution. SRT, prior to inception of a relationship and periodically during the tenure of that relationship, will ask for your firm's legal name, street address (either principal place of business, a local office or other physical location), authorized traders and other information or documents that we consider necessary to verify your identity. Examples of additional information include, but are not limited to, articles of incorporation, a government-issued business license, a partnership agreement and/or a trust instrument. We may also verify your identity through other means, including personal information regarding control persons. SRT may ask you to give it access to various public or private databases in order to verify the information you have provided.

Order Routing & Handling: Information and Practices

SRT seeks to execute its client orders at the most favorable terms reasonably available under prevailing market conditions. SEC rule 606 requires a broker-dealer that routes orders on behalf of customers to prepare quarterly reports ("606 Reports") that disclose the identity of the venues to which it routed orders for execution. The SEC allows for a broker-dealer to be exempt from preparing the 606 Reports if such broker-dealer has a de minimis number of customer orders for a particular period. SRT posts any required 606 Reports quarterly to its website. Please be aware that SRT will disclose to you upon request the identity of the venue to which your orders were routed for execution in the six months prior to your request, whether the orders were directed or non-directed and the time of the execution, if any, that resulted from such orders. Unless a SRT client specifically requests that its order be routed to a particular market center, SRT may select an execution venue(s) based on the size of the order, the trading characteristics of each security, speed of execution, likelihood of price improvement, availability of efficient automated transaction processing, guaranteed automatic execution level, and other qualitative factors.

Pursuant to SEC Rule 607, broker-dealers must disclose the nature of the broker-dealer's relationship with those market centers reported, including the existence of any internalization or payment for order flow arrangements or profit-sharing relationship as it related to the type of



securities for that section. Order routing decisions are not based on the availability of payment for order flow. SRT may receive payment for order flow from a broker or dealer, national securities exchange, registered securities association, or exchange member to which it routes customers' orders for execution, which payment may take the form of credits against fees, cash payments or reciprocal business.

Solicitation of Orders

When handling an order of 500 contracts or more on your behalf, SRT may solicit other parties to execute against your order and may thereafter execute your order using the Chicago Board Options Exchange All-or-None AIM Solicitation Mechanism. The option order may thereafter be executed using the Cboe tied hedge procedures, permitting the option order and the hedging position to be presented for execution as a net priced package (subject to certain requirements.) For further details on the operation of these mechanisms, please refer to either: Chicago Board Options Exchange Rule 5.39, 5.86, which is available at www.cboe.org/Legal,

Held or Not Held Orders

This will confirm our understanding of the manner in which you want us to handle orders you may place. Absent specific instructions to the contrary, we understand that when you place an order with us, you are directing that we handle your order on a “not held” basis, which means you are giving us discretion to exercise our brokerage judgment to seek to obtain the best execution for your order. “Held” orders do not permit us to exercise discretion in handling your order. Depending on whether your order is a market order or limit order, “held” orders obligate us to execute your market order immediately at the then-prevailing market price or your limit order at your limit price (or better), which may not necessarily be the best price that can ultimately be obtained. “Not held” orders give us the flexibility and discretion to act in your best interest by working your order to seek to obtain the best execution possible. SRT believes that by exercising appropriate judgment and discretion with respect to your order, it can achieve the best execution possible under the circumstances. Therefore, unless you give us specific instructions to treat such order differently at the time you place the order, we will treat the order as “not held” and will work that order accordingly. In addition, where an order is executed in more than one transaction, our policy is for the confirmation of such transactions to indicate an average price instead of the price of each partial execution. Should you not agree with our treatment of your orders a “not held” or our practice of providing average price confirmations please contact your registered representative and instruct us accordingly.

Long/Short Exempt

When placing any order to sell securities short (“SS”) or short exempt (“SSX”) for your account, you are responsible for designating the order as such, and you hereby authorize SRT to mark the order as “SS” or “SSX” as appropriate. You agree to provide SRT with information concerning any securities borrowing arrangements made by you and/or your Prime Broker in connection with any short sales. If you have designated a given Prime Broker as a locate source we will document and rely on that source in our order records unless we receive instructions from you to the contrary. All other sell orders will be for securities owned (“long” as defined in REG SHO Rule 200 (c))



and, by placing the order as “long”, you affirm that the securities to be sold are owned by the respective Customer and will be delivered on or before the settlement date for such trade.

Telephone Conversations

SRT at its sole and complete discretion, may record, on tape or otherwise, any telephone conversation between SRT and its clients, their respective agents and employees.

Options Disclosure Document

As a client of SRT, we are submitting to you for your information and review the link to the Options Disclosure Document (“ODD”). The ODD can be found at <http://www.theocc.com/about/publications/character-risks.jsp>. Copies available upon request at compliance@srtsecurities.com or (212) 841-4500.

Privacy Policy

As a FINRA and SEC registered Broker / Dealer providing financial services, we want you to know that, as a customer of ours, we believe that protecting your privacy is extremely important and we want to be sure that we maintain your confidence and trust. We collect nonpublic information from you on the account application and related account documentation as well as from trade records. We may share this information about you with our clearing agent(s) in order to deliver or receive the securities you have transacted with us. We do not otherwise disclose any nonpublic personal information about our customers or former customers to anyone, except as required by law. This may include sharing your information with non-affiliated companies that perform support services for your account or process your transactions with us. We may disclose information to regulatory authorities and law enforcement officials who have jurisdiction over us or if we are required to do so by applicable law and to provide information to protect against fraud. We restrict access to nonpublic information about you to those employees who need to know that information in order to provide products or services to you as you have instructed us. We maintain physical, electronic, and procedural safeguards that comply with industry standards to guard your nonpublic personal information. If you decide to close your account(s) or become an inactive customer, we will adhere to the privacy policies and practices as described in this notice.

Margin Disclosure Statement

As applicable to those introduced accounts that maintain margin accounts. The risks of trading securities on margin include: losing more funds than you deposit in the margin account; clearing firm can force the sale of securities or other assets in the account(s); clearing firm can sell your securities or other assets without contacting you; not being entitled to choose which securities are liquidated to meet a margin call; clearing firm can increase its house maintenance margin requirements at any time and is not required to provide advanced notice of such change; and not being entitled to an extension of time on a margin call.

Supervision & Complaints

Every SRT Registered Representative is supervised by a Registered Principal who is responsible for the final review and approval of all transactions, sales and marketing materials/activities and



administrative support at SRT. Should you wish to discuss any of the activities handled for you with his/her supervisor, please feel free to ask your Registered Representative for the name and phone number of their supervisor. Should you have a complaint, please call or write the following: Stephen Tobias, 2562 Muir Circle, Wellington, FL 33414 917-282-4757 or compliance@srtsecurities.com.

Professional Customers

Most U.S. option exchanges have implemented rules which serve to distinguish orders originating from a group of public customers deemed to be "Professional" (i.e., persons or entities having access to information and/or technology which enables them to trade in a manner as a broker dealer) as opposed to retail. In accordance with these rules, any customer account which is not a broker dealer and which places more than 390 listed option orders (whether executed or not) on a daily average across all option exchanges in a given month for its own beneficial account(s) will be classified as Professional Orders submitted on behalf of Professional customers to these option exchanges will be treated the same as broker dealers for purposes of execution priority. Brokers are required to conduct a review on a calendar quarter basis to identify those customers who have exceeded the 390 order threshold for any month in that quarter and who are to be designated as Professional for the next calendar quarter. Note that for purposes of this rule, spread orders are considered a single order, rather than each leg of the spread as an individual order.