In accordance with U.S. anti-money laundering laws, the following policies shall apply to all foreign accounts.

Identifying documentation will be required in order to establish all international accounts, including international futures accounts. This requirement will necessitate a copy of a picture ID (verified by a governmental agency or authority, i.e., valid passport, driver's license, etc.) in addition to the standard account opening documentation. An account will not be opened or will not be permitted to remain open if all information on the new account application forms are not provided. The account will not be opened/will be closed immediately if all required documentation is not provided. The customer will not be permitted to decline providing financial or other personal information requested in connection with account opening documentation. In the event the customer fails to provide such information, the account may not be opened.

Any incoming funds will not be accepted unless all necessary paperwork has been received and processed.

All incoming funds in connection with international accounts (including check or wires drawn on a foreign bank accounts OR checks or wires for foreign accounts) will be required to go through BMO Harris Bank.

All incoming funds in connection with international accounts will be required to be in U.S. currency.

No third-party transfers will be effected for international accounts.

Planner Securities and Apex Clearing will not accept cashiers' checks, money orders, bank drafts, credit card checks, travelers checks or electronic checks for international accounts.

Apex approval will be required for all outgoing funds for international accounts.

Incoming funds into international accounts will be required to be held at least 30 days before being dispersed.

International accounts will be run against the OFAC database on a quarterly basis. Accounts found to match with this database will be frozen/closed immediately.