



Tradition Securities and Derivatives LLC

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Anti-Money Laundering Policy Statement

Tradition Securities and Derivatives LLC (“TSD”), is a U.S. Securities and Exchange Commission (“SEC”) registered broker-dealer, headquartered in the United States of America and is a member of the Financial Industry Regulatory Authority (“FINRA”) and various principal exchanges. TSD is also a U.S. Commodity Futures Trading Commission (“CFTC”) registered introducing broker and a member of the National Futures Association (“NFA”). The Firm has developed an effective anti-money laundering (“AML”) and Bank Secrecy Act (“BSA”) program. The Firm’s AML policies and procedures are subject to an independent audit during each calendar year and the Firm has been found to be, in general compliance with the rule.

TSD has established policies and procedures reasonably designed to be in compliance with all anti-money laundering and anti-terrorism laws and regulations. Our efforts include the development of Know Your Customer Standards, AML training for all associates of the firm, compliance with the Office of Foreign Assets Control regulations and other economic sanctions programs, as well as the reporting of suspicious activity.

As a part of this program as required by Section 326 of the USA Patriot Act, we have developed a “customer identification program” (“CIP”) which includes enhanced due diligence procedures for customers deemed to be “high risk” and politically exposed persons. All new accounts are checked against lists of known violators provided by OFAC as well as notices of seizure (“NOS”) maintained by DEA, FBI, USPS and the Secret Service. In addition accounts are subject to a constant review.

As required by Section 352 of the USA Patriot Act and rules promulgated by our various regulatory bodies, the Senior Management has designated an ALM/BSA Compliance Officer. The AML/BSA Compliance Officer is responsible, among other duties, for ensuring continuing education for firm personnel.

TSD will conduct business in conformity with the highest ethical standards and will adhere to all applicable laws and regulations.

Sincerely,

/s/ Eric M. Earnhardt
Regional Chief Compliance Officer
AML/BSA Compliance Officer

*32 Old Slip 28th Floor, New York, New York 10005
Member NFA FINRA MSRB SIPC NASDAQ and Other Principal Exchanges*