

Direct Electronic Access Due - Diligence Questionnaire

for

DEA clients

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Members of LME, ICE Futures Europe, ICE Futures U.S., LBMA, Eurex, COMEX & LCH.Clearnet

Authorised and Regulated by the Financial Conduct Authority

ELECTRONIC TRADING QUESTIONNAIRE (“ETQ”)

Please complete this ETQ if you are trading on regulated markets (LME, ICE Futures Europe and US, CME divisions and so on) using Sucden Financial Limited’s (“SFL”) STAR platform, via PATS or CQG or your own platform.

Full legal name of client:		
1. Market data access		
Please confirm what market data you currently take from Sucden Financial Limited by entering a numerical value in the appropriate column(s) table below based on the number of devices used (e.g. screens, platforms), not the number of users. This is because one user may view data on more than one device or screen, e.g. if a client has two users who both view data on STAR and OWN PLATFORM for ICE Futures US, then the Internal Device Use count is 4.		
Exchange	Standard Device Use	Non-Display Use (e.g. Algorithm, automated spreading)
ICE Futures US		
ICE Futures Europe – Commodities		
ICE Futures Europe – Financials		
CME		
CME Europe		
CBOT		
NYMEX		
COMEX		
LME		
Euronext Commodities Derivatives		
Eurex		
Others (please specify)		
TOTAL		

2. Operational set-up	
Please state the name of the trading platform you plan to use e.g. CQG, TT, STAR	
Will you use proprietary or third party trading software to access the trading platform?	Yes <input type="checkbox"/> No <input type="checkbox"/> If "No", please go to section 3. If "Yes", please answer the following questions:
	Please state the name of the proprietary or third party trading software:
	Please describe the pre-trade controls provided by such software:
	Please tick the box that applies to security features enabled by such software: Alpha-numeric passwords with not less than 8 digits Yes <input type="checkbox"/> No <input type="checkbox"/> Encryption Yes <input type="checkbox"/> No <input type="checkbox"/> Firewalls on internal servers Yes <input type="checkbox"/> No <input type="checkbox"/> Intrusion detection devices Yes <input type="checkbox"/> No <input type="checkbox"/> Servers placed in locked room Yes <input type="checkbox"/> No <input type="checkbox"/>
	Do you intend to trade on CME markets? Yes <input type="checkbox"/> No <input type="checkbox"/> If "Yes", please confirm that your order will identify whether it has been placed manually or automatically by populating the manual/automated trading indicator (FIX Tag 1028) correctly. (CME Globex requirement codified in CME rulebook 536.B.) Yes <input type="checkbox"/> No <input type="checkbox"/>
3. Authorisation status	
Please state your regulatory status:	Authorised <input type="checkbox"/> Exempt <input type="checkbox"/> N/A <input type="checkbox"/>
	If authorised, please provide the name of the regulator:
4. Governance	
Has your company had any disciplinary actions brought by EU regulators or by trading venues, which: <ul style="list-style-type: none"> • Relate to the relevant trading activity; and • Were brought within the preceding five-year period. 	Yes <input type="checkbox"/> No <input type="checkbox"/>
	If "Yes", please provide details:

5. Expected trading pattern & behaviour			
Will your trading strategy involve manual trading, automated trading or both?	Manual <input type="checkbox"/>	Automated <input type="checkbox"/>	Both <input type="checkbox"/>
How would you describe your trading strategy? (Please tick the box that applies) <i>±Only positions held by or on behalf of non-financial entities which are objectively measurable as reducing risks directly relating to commercial activity meet this hedging definition</i>	±Hedging <input type="checkbox"/>	Speculative <input type="checkbox"/>	Both <input type="checkbox"/>
Types of strategies you intend to use (e.g., Arbitrage, averaging, offset, price fixing):			
Expected order & trading volume (please state if this is per day/month/year):			
6. Internal Controls			
Do you have pre & post trade risk controls that you apply or will apply to your trading strategy for the use of SFL's DEA services?	Yes <input type="checkbox"/> No <input type="checkbox"/>		
	If 'Yes' please provide details of your pre & post trade risk controls:		
	If 'No', please advise how you intend to manage your pre & post trade risk controls?		
Do you have formal written electronic trading procedures? (SFL will strictly use this document to meet its obligations under MIFID II Article 22 of RTS 6.)	Yes <input type="checkbox"/> (please provide a copy of this document with this ETQ)		
	No <input type="checkbox"/> If you are unable to provide a copy of your electronic trading procedures, please state your reason and describe your electronic trading procedures:		

	<p>If 'No', please describe your electronic trading procedures:</p>
<p>Do you provide training to your employees on: (i) these procedures & controls; (ii) the laws and rules applicable to the markets upon which you trade; and (iii) EU Market Abuse Regulation?</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>
	<p>If "Yes", please state how often you provide training to your employees:</p>
	<p>If "No", please state when you will provide training to your employees:</p>
<p>Do you have a real-time monitoring system that you apply or will apply to your trading strategy for the use of SFL's DEA services to ensure that your trades:</p> <ul style="list-style-type: none"> • do not breach applicable risk limits? • are not abusive? • are not erroneous? 	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>
	<p>If 'Yes', please provide details of your real-time monitoring:</p>
	<p>If 'No', please state how your trades:</p> <ul style="list-style-type: none"> • do not breach applicable risk limits? • are not abusive? • are not erroneous?
<p>Please state the contact details of the employee responsible for conducting the monitoring activities described above:</p>	<p>Name:</p> <p>Position:</p> <p>Telephone number:</p> <p>Email address:</p>

7. Clients Providing DEA service to their clients through Sub-Delegation

Do you provide your direct electronic access (“DEA”) to your own clients? (“Sub-Delegation”)

Yes No

If No, go to section 8

If Yes, please answer the following questions:

Do you comply with the requirements set out in Article 22 (Due diligence assessment of prospective DEA clients) (3) of regulatory technical standard (“RTS”) 6?

Yes No

Do you carry out an annual due-diligence assessment (as per Article 23 (Periodic review of DEA clients) of RTS 6)?

Yes No

Are you using a due-diligence framework which covers substantively the same topics as this questionnaire?

Yes No

8. Declaration and undertaking

By completing and signing this form, I/we confirm that:

- a. all the information provided in this questionnaire and any associated documentation is complete, true and correct;
- b. I am/we are authorised by the client named above to confirm the information contained within this form;
- c. the number of declared accesses listed in this form is correct;
- d. in the event of any changes to this information in this form, the client undertakes to inform Sucden Financial Limited immediately;
- e. market data is not being redistributed to and/or accessed by any third party individual/company outside of the client/company named above; and
- f. I understand that the information given in this form constitutes a representation that forms part of the Agreement in place between the client and Sucden Financial Limited. Accordingly, Sucden Financial Limited shall be entitled to exercise any of the remedies contained within the Terms of Business in place with the client in the event that any information has deliberately been given incorrectly.

Authorised signatory name:

Title:

Signature:

Date:

DEA CLIENT DUE DILIGENCE ASSESSMENT

MIFID II requires investment firms like SFL that provide direct electronic access ('DEA') to a trading venue to have in place effective systems and controls which ensure a proper assessment and review of the suitability of clients using the service, that clients using the service are prevented from exceeding appropriate pre-set trading and credit thresholds, that trading by clients using the service is properly monitored and that appropriate risk controls prevent trading that may create risks to the investment firm itself or that could create or contribute to a disorderly market or could be contrary to Regulation (EU) No 596/2014 or the rules of the trading venue.

As a DEA service provider, SFL is required to carry out a due diligence assessment of its prospective DEA clients to ensure that they meet the requirements set out in MIFID II and the rules of the trading venue to which it offers access.

We may ask for further information in relation to any of the answers you have provided above.

We may conduct a periodic risk based assessment of the adequacy of your systems and controls on an annual basis or at such other frequency as we determine necessary and we may require further information from you at the time of such assessment.

An electronic version of this questionnaire is available on our website at <https://www.sucdenfinancial.com/en/about/client-documentation-disclosures>