

STATEMENT OF CORRECTIVE ACTION BY INTERACTIVE BROKERS LLC

This Corrective Action Statement is submitted by Interactive Brokers LLC (“IBKR” or the “Firm”). It does not constitute factual or legal findings by MIAX Emerald, LLC (“MIAX Emerald” or the “Exchange”), nor does it reflect the views of MIAX Emerald or MIAX Emerald staff.

IBKR submits this Statement of Corrective Action in connection with the foregoing Letter of Consent (“LOC”). As set forth in detail below, IBKR acted promptly to address the issues set forth in the LOC and invested substantial resources in investigating and remediating the items identified in this matter, including but not limited to via significant enhancements to the Firm’s policies and procedures and preparation of a complex lookback analysis.

IB’s Response to the Conduct at Issue: Once IBKR became aware of the inadvertent exclusion of complex orders from order counting for purposes of Professional customer designations, IBKR promptly investigated and, through its own thorough investigation, identified the similar inadvertent exclusion of certain cancel-replace orders. IBKR self-reported both items to the Financial Industry Regulatory Authority (“FINRA”) on June 1, 2022 and completed its remediation with respect to complex orders within days of the June 2022 self-report, and with respect to the cancel/replace orders by early August 2022.

Updated Policies and Procedures: The Firm has made significant changes to its code development and release processes since the coding for purposes of determining Professional customer designations was originally released in 2009 to, among other things, catch issues like those described in the LOC before newly developed code is released.