

# JX

## Client Disclosures

This document contains important client disclosures regarding Jane Street Capital, LLC (“JSC”), a broker-dealer registered with the SEC and FINRA, and “JX”, an electronic system operated by JSC. Please review this document in its entirety and advise your client services representative if you have any questions.

JX is not an “alternative trading system” as defined in SEC rules; it is designed solely to facilitate the potential execution of incoming client orders against JSC proprietary liquidity.

The JX system enables JSC to trade against only those client orders that JSC believes are desirable to trade against. JX benefits clients by facilitating interaction with JSC’s proprietary liquidity and offering the potential to execute transactions with price improvement from the National Best Bid or Offer (“NBBO”) and other desirable fill characteristics.

### **JX Execution Mechanics**

JX facilitates execution of directed immediate-or-cancel orders received from JSC clients\* (“Client IOC Orders”) against JSC’s proprietary trading and market making units. The JX execution logic (the “Execution Logic”) determines whether each incoming Client IOC Order should execute against JSC and the price at which any execution should occur. If the Execution Logic determines that a full or partial fill should occur, then JSC will execute the trade. If the Execution Logic determines that there should be no fill or only a partial fill, the Client IOC Order, or the unexecuted portion, will be immediately cancelled and returned. Client IOC Orders do not rest inside the JX system and do not interact with any other client order flow.

JX determines the NBBO using a combination of direct data feeds, which are utilized for major market centers, and the SIP. Additional information is available upon request. In the event JX loses connectivity to one or more direct data feeds, JX will determine the NBBO using the SIP feeds as needed.

### **JX Execution Logic**

The Execution Logic is not based on “price-time priority” or any other neutral mechanism. Instead, it is intended to facilitate execution of client orders that are predicted to be desirable for JSC and avoid execution of client orders that are predicted to be undesirable for JSC, especially those indicative of aggressive or opportunistic trading strategies.

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An affiliate of JSC, Jane Street Execution Services, LLC (“JSES”) engages in the business of (i) facilitating negotiated trades between its clients and JSC and (ii) working not-held agency orders for clients. JSES may seek to execute portions of clients’ orders against JSC proprietary liquidity by utilizing the JX system. The JSES employees responsible for these activities are jointly supervised by, regularly interact with, and are physically located near the JSC employees responsible for operating the JX system.

JSC employees program the Execution Logic in a client-specific manner that is based in large part on information gathered from historical analyses these employees perform on each client's order flow. The purpose of the historical analyses is to enable the Execution Logic to predict whether JSC would profit if a given client's future order were executed in light of all information available at that time. The Execution Logic also may offer certain clients' orders price improvement or other beneficial fill characteristics to achieve execution targets that the client has negotiated with JSC. Therefore, based solely on the identity of two clients submitting identical orders to JX, (i) one client's order may be canceled and returned while the other is executed and (ii) one client's order may be filled without price improvement while the other order is filled with price improvement.

## **JX Client Information**

Jane Street is a proprietary trading firm, and as explained below, the operations of JX are integrated in many ways with other operations of Jane Street.

JX client order flow information, including live client order flow or related information, is available to the staff responsible for maintaining the Execution Logic. Those personnel analyze client order flow and program the Execution Logic on a day-to-day basis but do not simultaneously work on any other trading strategies for Jane Street. They do, however, regularly interact with personnel involved in proprietary trading, including by coordinating with JSC traders about the manner in which liquidity is submitted to JX. This coordination includes making suggestions to proprietary traders about the size, width, timing or other attributes of liquidity that is submitted to JX. JX personnel also will produce reports for JSC proprietary traders that contain aggregated and anonymous historic unexecuted client order information, primarily for the purpose of encouraging higher fill rates.

JX and Jane Street's proprietary trading operations share many common support functions. Therefore JX client order flow information, including live client order flow or related information, is accessible by a significant number of Jane Street personnel involved in such functions, including developers, technical and trade support personnel. These personnel do not execute proprietary trading orders for Jane Street, and Jane Street policies prohibit their sharing unexecuted order information with proprietary traders. Many of these support personnel do, however, directly support JSC proprietary traders, are physically located near JSC proprietary traders, or report to managers who are also responsible for proprietary trading personnel. Certain senior business supervisors, risk managers and personnel involved in compliance, legal and operations functions also have access to client order flow information. Furthermore, individuals who work for JSC may be aware that Client has established a JX client relationship with JSC.

All Jane Street employees are subject to policies and procedures that are intended (i) to prevent JSC proprietary traders from knowing the identity of the client that submitted any particular order and (ii) to prevent JSC proprietary traders and trading systems other than JX from having access to unexecuted client orders.

Jane Street management may nonetheless authorize specific uses of client information in circumstances they deem necessary and appropriate. For example, it may be necessary to inform JSC risk managers or trading supervisors about unsettled JX counterparty trading exposure in the event of extraordinary counterparty risk events.

## **Other Disclosures and Information**

### **Extended Hours Trading Risks**

Clients should consider the following points before submitting orders to JX during extended trading hours. "Extended trading hours" means the period outside of "regular trading hours," which are between 9:30 a.m. and 4:00 p.m. Eastern Standard Time.

During extended trading hours, markets are typically less liquid and more volatile than during regular trading hours, and the spread between the prevailing best bid and prevailing best offer on lit market venues is typically wider. Therefore, while any JX execution would still occur at or within the prevailing best bid and best offer available on lit markets, executions during extended trading hours are likely to occur at inferior prices as compared to executions during regular trading hours. Additionally, JX may be less likely to execute all or any portion of your order during extended trading hours.

Further, the prices of securities traded in extended hours trading may not reflect the prices either at the end of regular trading hours, or upon the opening the next morning. Issuers typically make news announcements that may affect the price of their securities after regular trading hours, and important financial information is frequently announced outside of regular trading hours. In extended hours trading, these announcements may occur during trading, and if combined with lower liquidity and higher volatility, may cause an exaggerated and unsustainable effect on the price of a security which would be reflected in the price of any JX execution.

### **Erroneous Transactions**

If the SEC, FINRA, an SRO or any other regulatory body determines that an executed transaction is "clearly erroneous" or should otherwise be cancelled, JSC will be required to cancel the transaction and will not be able to honor the executed price or other terms. Additionally, JSC reserves the right to adjust, cancel, correct or take any other appropriate action when it reasonably deems a transaction executed within JX to be erroneous in nature, even if such transaction would not be subject to modification or cancellation pursuant to the various clearly erroneous rules referenced above.

### **Limitation or Denial of Access**

JSC reserves the right to limit, deny or discontinue access to JX at any time and for any reason without providing prior notice to clients.

## Client Complaints

Any client who wishes to lodge a complaint related to the activities of JSC or any of its current or former personnel may do so in any of the following manners:

- By mailing the complaint to JSC's offices at 250 Vesey Street, 6<sup>th</sup> Floor, New York, NY 10281. Attention: Compliance
- By phoning JSC's offices at 646-759-6000 and asking to speak with Compliance; or
- By sending an email to [jx-complaints@janestreet.com](mailto:jx-complaints@janestreet.com).

## SIPC Notice - FINRA Rule 2266

JSC is a member of the Securities Investor Protection Corporation ("SIPC"). You may obtain information about SIPC and a copy of the SIPC brochure by contacting SIPC at:

Securities Investor Protection Corporation  
805 15th St. NW, Suite 800  
Washington, DC 20005-2215  
Tel: (202) 371-8300  
Fax: (202) 371-6728  
Email: [asksipc@sipc.org](mailto:asksipc@sipc.org)  
SIPC's website is [www.sipc.org](http://www.sipc.org)

## FINRA Rule 2267 Disclosure

FINRA BrokerCheck, formally known as the FINRA's Public Disclosure Program, allows investors to learn about the professional background, business practices and conduct of FINRA member firms and their associated persons. The telephone number of the FINRA BrokerCheck is 800-289-9999, the website address <http://www.FINRA.org>. An investor brochure that includes information describing FINRA BrokerCheck is also available upon request.