BrokerCheck Report

OPTIVER EXECUTION SERVICES LLC

CRD# 316308

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When communicating online or investing with any professional, make sure you know who you're dealing with. Imposters might link to sites like BrokerCheck from phishing or similar scam websites, or through social media, trying to steal your personal information or your money.

Please contact FINRA with any concerns.

About BrokerCheck®

BrokerCheck offers information on all current, and many former, registered securities brokers, and all current and former registered securities firms. FINRA strongly encourages investors to use BrokerCheck to check the background of securities brokers and brokerage firms before deciding to conduct, or continue to conduct, business with them.

- **What is included in a BrokerCheck report?**
- BrokerCheck reports for individual brokers include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards. BrokerCheck reports for brokerage firms include information on a firm's profile, history, and operations, as well as many of the same disclosure events mentioned above.
- Please note that the information contained in a BrokerCheck report may include pending actions or allegations that may be contested, unresolved or unproven. In the end, these actions or allegations may be resolved in favor of the broker or brokerage firm, or concluded through a negotiated settlement with no admission or finding of wrongdoing.
- **Where did this information come from?**
- The information contained in BrokerCheck comes from FINRA's Central Registration Depository, or CRD® and is a combination of:
    - information FINRA and/or the Securities and Exchange Commission (SEC) require brokers and brokerage firms to submit as part of the registration and licensing process, and
    - information that regulators report regarding disciplinary actions or allegations against firms or brokers.
- **How current is this information?**
- Generally, active brokerage firms and brokers are required to update their professional and disciplinary information in CRD within 30 days. Under most circumstances, information reported by brokerage firms, brokers and regulators is available in BrokerCheck the next business day.
- **What if I want to check the background of an investment adviser firm or investment adviser representative?**
- To check the background of an investment adviser firm or representative, you can search for the firm or individual in BrokerCheck. If your search is successful, click on the link provided to view the available licensing and registration information in the SEC's Investment Adviser Public Disclosure (IAPD) website at https://www.adviserinfo.sec.gov. In the alternative, you may search the IAPD website directly or contact your state securities regulator at http://www.finra.org/Investors/ToolsCalculators/BrokerCheck/P455414.
- **Are there other resources I can use to check the background of investment professionals?**
- FINRA recommends that you learn as much as possible about an investment professional before deciding to work with them. Your state securities regulator can help you research brokers and investment adviser representatives doing business in your state.
-

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For additional information about the contents of this report, please refer to the User Guidance or www.finra.org/brokercheck. It provides a glossary of terms and a list of frequently asked questions, as well as additional resources. For more information about FINRA, visit www.finra.org.

OPTIVER EXECUTION SERVICES LLC

CRD# 316308

SEC# 8-70932

Main Office Location

130 E RANDOLPH STREET
SUITE 800
CHICAGO, IL 60601
Regulated by FINRA Chicago Office

Mailing Address

130 E RANDOLPH STREET
SUITE 800
CHICAGO, IL 60601

Business Telephone Number

312-821-9500

Report Summary for this Firm

This report summary provides an overview of the brokerage firm. Additional information for this firm can be found in the detailed report.

Firm Profile

This firm is classified as a limited liability company.

This firm was formed in Illinois on 07/29/2021.

Its fiscal year ends in December.

Firm History

Information relating to the brokerage firm's history such as other business names and successions (e.g., mergers, acquisitions) can be found in the detailed report.

Firm Operations

This firm is registered with:

- the SEC
- 1 Self-Regulatory Organization
- 15 U.S. states and territories

Is this brokerage firm currently suspended with any regulator? **No**

This firm conducts 3 types of businesses.

This firm is affiliated with financial or investment institutions.

This firm does not have referral or financial arrangements with other brokers or dealers.

Disclosure Events

Brokerage firms are required to disclose certain criminal matters, regulatory actions, civil judicial proceedings and financial matters in which the firm or one of its control affiliates has been involved.

Are there events disclosed about this firm? **No**

The number of disclosures from non-registered control affiliates is 3

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Firm Profile

This firm is classified as a limited liability company.

This firm was formed in Illinois on 07/29/2021.

Its fiscal year ends in December.

Firm Names and Locations

This section provides the brokerage firm's full legal name, "Doing Business As" name, business and mailing addresses, telephone number, and any alternate name by which the firm conducts business and where such name is used.

OPTIVER EXECUTION SERVICES LLC

Doing business as OPTIVER EXECUTION SERVICES LLC

CRD# 316308

SEC# 8-70932

Main Office Location

130 E RANDOLPH STREET
SUITE 800
CHICAGO, IL 60601

Regulated by FINRA Chicago Office

Mailing Address

130 E RANDOLPH STREET
SUITE 800
CHICAGO, IL 60601

Business Telephone Number

312-821-9500

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Firm Profile

This section provides information relating to all direct owners and executive officers of the brokerage firm.

Direct Owners and Executive Officers

Legal Name & CRD# (if any):	OPTIVER VENTURES PARTNERSHIP US LP
Is this a domestic or foreign entity or an individual?	Domestic Entity
Position	PARENT COMPANY
Position Start Date	12/2022
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	DEATON, MICHAEL WILLIAM 2964800
Is this a domestic or foreign entity or an individual?	Individual
Position	CHIEF FINANCIAL OFFICER / CHIEF COMPLIANCE OFFICER / FINOP / MANAGER
Position Start Date	07/2021
Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	LEES, JUSTIN TERENCE 6077317
Is this a domestic or foreign entity or an individual?	Individual
Position	HEAD OF SALES TRADING
Position Start Date	01/2023

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Firm Profile

Direct Owners and Executive Officers (continued)

Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

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Firm Profile

This section provides information relating to any indirect owners of the brokerage firm.

Indirect Owners

Legal Name & CRD# (if any):	OPTIVER AMERICAS LLC
Is this a domestic or foreign entity or an individual?	Domestic Entity
Company through which indirect ownership is established	OPTIVER US HOLDING LLC
Relationship to Direct Owner	PARENT OF OPTIVER US HOLDING LLC
Relationship Established	01/2017
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	OPTIVER HOLDING BV
Is this a domestic or foreign entity or an individual?	Foreign Entity
Company through which indirect ownership is established	OPTIVER AMERICAS LLC
Relationship to Direct Owner	PARENT COMPANY OF OPTIVER AMERICAS LLC
Relationship Established	01/2017
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	OPTIVER PARTNERSHIP US LP
Is this a domestic or foreign entity or an individual?	Domestic Entity

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Firm Profile

Indirect Owners (continued)

Company through which indirect ownership is established	OPTIVER VENTURES PARTNERSHIP US LP
Relationship to Direct Owner	LIMITED PARTNER OF OPTIVER VENTURES PARTNERSHIP US LP
Relationship Established	07/2021
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	OPTIVER US HOLDING LLC
Is this a domestic or foreign entity or an individual?	Domestic Entity
Company through which indirect ownership is established	OPTIVER PARTNERSHIP US LP
Relationship to Direct Owner	LIMITED PARTNER OF OPTIVER PARTNERSHIP US LP
Relationship Established	11/2020
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	OPTIVER GT US, LLC
Is this a domestic or foreign entity or an individual?	Domestic Entity
Company through which indirect ownership is established	OPTIVER PARTNERSHIP US LP
Relationship to Direct Owner	LIMITED PARTNER OF OPTIVER PARTNERSHIP US LP
Relationship Established	01/2016

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Firm Profile

Indirect Owners (continued)

Percentage of Ownership	Other General Partners
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	OPTIVER INVESTMENT US LLC
Is this a domestic or foreign entity or an individual?	Domestic Entity
Company through which indirect ownership is established	OPTIVER PARTNERSHIP US LP
Relationship to Direct Owner	LIMITED PARTNER OF OPTIVER PARTNERSHIP US LP
Relationship Established	09/2020
Percentage of Ownership	Other General Partners
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	OPTIVER INVESTMENTS UK LIMITED
Is this a domestic or foreign entity or an individual?	Foreign Entity
Company through which indirect ownership is established	OPTIVER PARTNERSHIP US LP
Relationship to Direct Owner	GENERAL PARTNER OF OPTIVER PARTNERSHIP US LP
Relationship Established	11/2020
Percentage of Ownership	Other General Partners
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting	No

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Firm Profile

Indirect Owners (continued)

company?

Legal Name & CRD# (if any):	OPTIVER VENTURES US LLC
Is this a domestic or foreign entity or an individual?	Domestic Entity
Company through which indirect ownership is established	OPTIVER VENTURES PARTNERSHIP US LP
Relationship to Direct Owner	GENERAL PARTNER OF OPTIVER VENTURES PARTNERSHIP US LP
Relationship Established	11/2022
Percentage of Ownership	Other General Partners
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

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Firm History

This section provides information relating to any successions (e.g., mergers, acquisitions) involving the firm.

No information reported.

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Firm Operations

Registrations

This section provides information about the regulators (Securities and Exchange Commission (SEC), self-regulatory organizations (SROs), and U.S. states and territories) with which the brokerage firm is currently registered and licensed, the date the license became effective, and certain information about the firm's SEC registration.

This firm is currently registered with the SEC, 1 SRO and 15 U.S. states and territories.

Federal Regulator	Status	Date Effective
SEC	Approved	03/01/2023

SEC Registration Questions

This firm is registered with the SEC as:

A broker-dealer: Yes

A broker-dealer and government securities broker or dealer: No

A government securities broker or dealer only: No

This firm has ceased activity as a government securities broker or dealer: No

Self-Regulatory Organization	Status	Date Effective
FINRA	Approved	03/01/2023

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Firm Operations

Registrations (continued)

U.S. States & Territories	Status	Date Effective
Alabama	Approved	06/30/2023
California	Approved	03/03/2023
Connecticut	Approved	03/03/2023
Florida	Approved	03/21/2023
Illinois	Approved	03/02/2023
Massachusetts	Approved	07/28/2025
Montana	Approved	06/28/2023
New Jersey	Approved	05/01/2023
New York	Approved	03/14/2023
Pennsylvania	Approved	03/03/2023
Puerto Rico	Approved	03/14/2023
Rhode Island	Approved	06/16/2023
Texas	Approved	03/14/2023
Virginia	Approved	03/29/2023
Washington	Approved	06/20/2023

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Firm Operations

Types of Business

This section provides the types of business, including non-securities business, the brokerage firm is engaged in or expects to be engaged in.

This firm currently conducts 3 types of businesses.

Types of Business

Put and call broker or dealer or option writer
Non-exchange member arranging for transactions in listed securities by exchange member
Other - CHAPERONE FOREIGN BROKER-DEALERS PURSUANT TO SEA RULE 15A-6 IN THE EXECUTION OF SECURITIES TRANSACTIONS - 15A-6(A)(3).

Other Types of Business

This firm does not effect transactions in commodities, commodity futures, or commodity options.
This firm does not engage in other non-securities business.

Non-Securities Business Description:

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Firm Operations

Clearing Arrangements

This firm does not hold or maintain funds or securities or provide clearing services for other broker-dealer(s).

Introducing Arrangements

This firm does not refer or introduce customers to other brokers and dealers.

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Firm Operations

Industry Arrangements

This firm does have books or records maintained by a third party.

Name: STARCOMPLIANCE OPERATING LLC

Business Address: 9200 CORPORATE BLVD.
SUITE 440
ROCKVILLE, MD 20850

Effective Date: 01/31/2023

Description: STARCOMPLIANCE RECEIVES, STORES, AND ARCHIVES CERTAIN BOOKS AND RECORDS RELATING TO PERSONAL ACCOUNT DEALING, INSIDER TRADING, AND GIFTS AND ENTERTAINMENT.

Name: GLOBAL RELAY

Business Address: 121 W WACKER
33RD FLOOR
CHICAGO, IL 60601

Effective Date: 05/04/2022

Description: GLOBAL RELAY IS AN OUTSOURCED ELECTRONIC STORAGE MEDIA SERVICE USED TO ARCHIVE THE FIRM'S ELECTRONIC COMMUNICATIONS RECORDS.

Name: AMAZON WEB SERVICES

Business Address: 40 TERRY AVENUE N.
SEATTLE, WA 98109

Effective Date: 05/04/2022

Description: AMAZON WEB SERVICES IS AN OUTSOURCED CLOUD DATA STORAGE PROVIDER THAT MAINTAINS CERTAIN BOOKS AND RECORDS OF THE FIRM.

This firm does have accounts, funds, or securities maintained by a third party.

Name: ABN AMRO CLEARING USA LLC

CRD #: 14020

Business Address: 175 W. JACKSON BLVD.
SUITE 400
CHICAGO, IL 60604

Effective Date: 05/04/2022

Description: ABN AMRO CLEARING USA LLC HOLDS FUNDS AND SECURITIES AND

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Firm Operations

Industry Arrangements (continued)

CLEARS OPTIONS TRANSACTIONS OF THE FIRM.

This firm does not have customer accounts, funds, or securities maintained by a third party.

Control Persons/Financing

This firm does not have individuals who control its management or policies through agreement.

This firm does not have individuals who wholly or partly finance the firm's business.

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Firm Operations

Organization Affiliates

This section provides information on control relationships the firm has with other firms in the securities, investment advisory, or banking business.

This firm is, directly or indirectly:

- **in control of**
- **controlled by**
- **or under common control with**

the following partnerships, corporations, or other organizations engaged in the securities or investment advisory business.

OPTIVER ATLAS LLC is under common control with the firm.

Business Address:	130 E. RANDOLPH STREET SUITE 800 CHICAGO, IL 60601
Effective Date:	06/16/2026
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	UNDER COMMON CONTROL UNDER ULTIMATE PARENT COMPANY, OPTIVER HOLDING B.V.

OPTIVER TRADING EUROPE BV is under common control with the firm.

Business Address:	STRAWINSKYLAAN 3095 AMSTERDAM, NETHERLANDS 1077 ZX
Effective Date:	10/30/2025
Foreign Entity:	Yes
Country:	NETHERLANDS
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	UNDER COMMON CONTROL UNDER ULTIMATE PARENT COMPANY OPTIVER HOLDING B.V.

AXIOM TRADING LIMITED is under common control with the firm.

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Firm Operations

Organization Affiliates (continued)

Business Address: 190 ELGIN AVENUE
GEORGE TOWN, CAYMAN ISLANDS KY1-9008

Effective Date: 05/07/2026

Foreign Entity: Yes

Country: CAYMAN ISLANDS

Securities Activities: Yes

Investment Advisory Activities: No

Description: UNDER COMMON CONTROL UNDER ULTIMATE PARENT COMPANY OPTIVER HOLDING B.V.

OPTIVER VOF is under common control with the firm.

Business Address: STRAWINKSYLAAN 3095 II
AMSTERDAM, NETHERLANDS 1077 ZX

Effective Date: 07/29/2021

Foreign Entity: Yes

Country: NETHERLANDS

Securities Activities: Yes

Investment Advisory Activities: No

Description: ULTIMATE PARENT COMPANY, OPTIVER HOLDING BV CONTROLS BOTH OPTIVER VOF AND OPTIVER US

OPTIVER UK TRADING LIMITED is under common control with the firm.

Business Address: 20 OLD BAILEY
LONDON, UNITED KINGDOM EC4M 7AN

Effective Date: 07/29/2021

Foreign Entity: Yes

Country: UNITED KINGDOM

Securities Activities: Yes

Investment Advisory Activities: No

Description: UNDER COMMON CONTROL UNDER ULTIMATE PARENT COMPANY OPTIVER

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Firm Operations

Organization Affiliates (continued)

HOLDING B.V.

OPTIVER TAIWAN FUTURES CO. LTD is under common control with the firm.

Business Address:	12/F., NO. 19, SEC 1, HANGZHOU RD. ZHONGZHENG DISTRICT TAIPEI CITY, TAIWAN (R.O.C.) 10053
Effective Date:	07/29/2021
Foreign Entity:	Yes
Country:	TAIWAN
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	UNDER COMMON CONTROL UNDER ULTIMATE PARENT COMPANY OPTIVER HOLDING B.V.

OPTIVER TRADING HONG KONG LIMITED is under common control with the firm.

Business Address:	25/F, 33 DES, DES VOEUX ROAD CENTRAL, HONG KONG
Effective Date:	07/29/2021
Foreign Entity:	Yes
Country:	HONG KONG
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	UNDER COMMON CONTROL UNDER ULTIMATE PARENT COMPANY OPTIVER HOLDING B.V.

OPTIVER AUSTRALIA PTY LTD is under common control with the firm.

Business Address:	9 HUNTER STREET SYDNEY, AUSTRALIA 2000
Effective Date:	07/29/2021
Foreign Entity:	Yes
Country:	AUSTRALIA
Securities Activities:	Yes

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Firm Operations

Organization Affiliates (continued)

Investment Advisory Activities:	No
Description:	UNDER COMMON CONTROL UNDER ULTIMATE PARENT COMPANY OPTIVER HOLDING B.V.

OPTIVER US LLC is under common control with the firm.

CRD #:	128030
Business Address:	130 E. RANDOLPH STREET SUITE 800 CHICAGO, IL 60601
Effective Date:	07/29/2021
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	UNDER COMMON CONTROL UNDER ULTIMATE PARENT COMPANY OPTIVER HOLDING B.V.

This firm is not directly or indirectly, controlled by the following:

- **bank holding company**
- **national bank**
- **state member bank of the Federal Reserve System**
- **state non-member bank**
- **savings bank or association**
- **credit union**
- **or foreign bank**

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Disclosure Events for Non-Registered Control Affiliates

All firms registered to sell securities or provide investment advice are required to disclose regulatory actions, criminal or civil judicial proceedings, and certain financial matters in which the firm or one of its control affiliates has been involved. For your convenience, below is a matrix of the number and status of disclosure events involving this brokerage firm or one of its control affiliates. Further information regarding these events can be found in the subsequent pages of this report.

	Pending	Final	On Appeal
Regulatory Event	0	3	0

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Disclosure Event Details

Regulatory - Final

Disclosure 1 of 3

Reporting Source:	Firm
Affiliate:	OPTIVER AUSTRALIA PTY LIMITED
Current Status:	Final
Allegations:	PURSUANT TO AN OFFER OF SETTLEMENT IN WHICH OPTIVER AUSTRALIA PTY LIMITED NEITHER ADMITTED NOR DENIED THE FINDINGS, THE CHICAGO MERCANTILE EXCHANGE DETERMINED THAT, DURING THE PERIOD FROM OCTOBER 2, 2023 THROUGH NOVEMBER 2, 2023, OPTIVER AUSTRALIA PTY LIMITED ENGAGED IN THE CREATION AND EXECUTION OF CERTAIN USER DEFINED SPREAD TRANSACTIONS RELATED TO E-MINI S&P 500 OPTIONS AND DECEMBER 2023 E-MINI S&P 500 FUTURES CONTRACTS ON THE CME GLOBEX ELECTRONIC TRADING PLATFORM IN A MANNER THAT RESULTED IN ADVANTAGEOUS OVER-ALLOCATIONS OR UNDER-ALLOCATIONS OF ASSOCIATED FUTURES CONTRACTS. THE CHICAGO MERCANTILE EXCHANGE CONCLUDED THAT SUCH CONDUCT CONSTITUTED A VIOLATION OF CME RULE 575.D.
Initiated By:	CHICAGO MERCANTILE EXCHANGE
Date Initiated:	01/23/2025
Docket/Case Number:	CME 23-1722-BC
Principal Product Type:	Futures - Financial
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	DISGORGEMENT
Resolution:	Decision & Order of Offer of Settlement
Resolution Date:	01/14/2026
Sanctions Ordered:	Monetary/Fine $60,000.00 Disgorgement/Restitution
Other Sanctions Ordered:	DISGORGEMENT: $80,853.43
Sanction Details:	CHICAGO MERCANTILE EXCHANGE ORDERED OPTIVER AUSTRALIA PTY LIMITED TO PAY A $60,000 FINE AND TO DISGORGE PROFITS IN THE

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AMOUNT OF $80,853.43

Disclosure 2 of 3

Reporting Source:	Firm
Affiliate:	OPTIVER VOF
Current Status:	Final
Allegations:	THE COMMISSIONE NAZIONALE PER LE SOCIETÀ E LA BORSA ("CONSOB") IMPOSED AN ADMINISTRATIVE SANCTION AGAINST OPTIVER VOF FOR VIOLATION OF ARTS. 5, 9 AND 12 OF EU REGULATION NO. 236/2012 ("SSR") IN RELATION TO DISCLOSURE OF NET SHORT POSITIONS AND UNCOVERED SHORT SELLING, RESPECTIVELY. OPTIVER CONSIDERS THAT IT ALWAYS ACTED LAWFULLY AND IN GOOD FAITH WITHIN THE PROVISION OF THE SSR AND THE RELEVANT MARKET MAKING EXEMPTION UNDER ART. 17 OF THE SSR WHICH EXEMPTED OPTIVER FROM COMPLYING WITH ART. 5, 9 AND 12 OF THE SSR. OPTIVER DISPUTED IN WRITING IN VARIOUS OCCASIONS THE CHARACTERISATIONS MADE BY CONSOB OF ITS TRADING ACTIVITIES AS NOT MARKET MAKING, HOWEVER CONSOB DID NOT ACCEPT OPTIVER'S ARGUMENTATIONS.
Initiated By:	COMMISSIONE NAZIONALE PER LE SOCIETÀ E LA BORSA (CONSOB), ITALY
Date Initiated:	05/09/2024
Docket/Case Number:	23420
Principal Product Type:	Equity Listed (Common & Preferred Stock)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	DISGORGEMENT
Resolution:	Order
Resolution Date:	02/06/2025
Sanctions Ordered:	Monetary/Fine $720,738.00 Disgorgement/Restitution
Other Sanctions Ordered:	
Sanction Details:	OPTIVER VOF INSTRUCTED PAYMENT IN FULL TO BE PAID ON 17.04.2025. THERE WERE NO PORTIONS WAIVED. PURSUANT TO ARTICLE 195 OF THE ITALIAN CONSOLIDATED LAW ON FINANCE, THE DECISION IS OPEN FOR

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APPEAL WITHIN 60 DAYS OF NOTIFICATION. OPTIVER VOF HAS ELECTED TO NOT APPEAL.

Disclosure 3 of 3

Reporting Source:	Firm
Affiliate:	OPTIVER VOF
Current Status:	Final
Allegations:	THE COMMISSIONE NAZIONALE PER LE SOCIETÀ E LA BORSA ("CONSOB") IMPOSED AN ADMINISTRATIVE SANCTION AGAINST OPTIVER VOF FOR VIOLATION OFARTS. 5, 6, AND 9 AS WELL AS ART. 12 OF EU REGULATION NO. 236/201 ("SSR") IN RELATION TO DISCLOSURE OF NET SHORT POSITIONS AND UNCOVEREDSHORT SELLING, RESPECTIVELY. OPTIVER CONSIDERS THAT IT ALWAYS ACTED LAWFULLY AND IN GOOD FAITH WITHIN THE PROVISION OF THE SSR AND THERELEVANT MARKET MAKING EXEMPTION UNDER ART. 17 OF THE SSR WHICH EXEMPTED OPTIVER FROM COMPLYING WITH ART. 5, 6, 9 AND 12 OF THE SSR.OPTIVER DISPUTED IN WRITING IN VARIOUS OCCASIONS THE CHARACTERISATIONS MADE BY CONSOB OF ITS TRADING ACTIVITIES AS NOT MARKET MAKING,HOWEVER CONSOB DID NOT ACCEPT OPTIVER'S ARGUMENTATIONS.
Initiated By:	COMMISSIONE NAZIONALE PER LE SOCIETA E LA BORSA (CONSOB), ITALY
Date Initiated:	08/02/2023
Docket/Case Number:	158108/2023
Principal Product Type:	Equity Listed (Common & Preferred Stock)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Disgorgement
Other Sanction(s)/Relief Sought:	
Resolution:	Order
Resolution Date:	05/30/2024
Sanctions Ordered:	Monetary/Fine $5,663,867.18 Disgorgement/Restitution
Other Sanctions Ordered:	
Sanction Details:	OPTIVER VOF INSTRUCTED PAYMENT IN FULL ON THE 24.7.2024. THERE

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WERE NO PORTIONS WAIVED. PURSUANT TO ARTICLE 195 OF THE ITALIANCONSOLIDATED LAW ON FINANCE, THE DECISION IS OPEN FOR APPEAL WITHIN 60 DAYS OF NOTIFICATION. OPTIVER VOF HAS ELECTED TO NOT APPEAL.

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End of Report

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