

KCG Whistleblower Policy

Nothing in any code, agreement, manual or in any other policies, procedures or agreements of KCG shall prohibit or restrict any current or former KCG employee or their counsel from providing information in connection with: (a) any disclosure of information required by law or legal process; (b) reporting possible violations of federal or state law or regulation to any governmental agency, commission or entity, including but not limited to, the Department of Justice, the Commodities Futures Trading Commission, the Securities and Exchange Commission, the Department of Labor, the Congress, any state Attorney General, self-regulatory organization and any agency Inspector General (collectively “Government Agencies”) (c) filing a charge or complaint with Government Agencies; (d) making disclosures that are protected under the whistleblower provisions of federal or state law or regulation (collectively the “Whistleblower Statutes”); or (e) from initiating communications directly with, responding to any inquiry from, volunteering information to, testifying or otherwise participating in or assisting in any inquiry, investigation or proceeding brought by Government Agencies in connection with (a) through (d). Any current or former KCG employee is not required to advise or seek permission from KCG before engaging in any activity set forth in (a) through (e). Further, KCG does not in any manner limit any current or former KCG employee’s right to receive an award from Government Agencies for information provided to Government Agencies or pursuant to the Whistleblower Statutes.