Material Conflict of Interest Disclosure

Version 2 · Effective October 14, 2026

The purpose of this document is to provide you with information about material conflicts of interest that may arise between you and Lumina Markets, Inc. ("**Lumina Markets**" or the "Firm") in connection with it performing services for you with respect to event contracts listed on ForecastEx, LLC. Per CFTC Regulation §1.71(e) and NFA Compliance Rule 2-4, Lumina Markets is required to disclose to customers any material incentives and any material conflicts of interest regarding a customer's decision as to trade execution and/or clearing of a derivatives transaction.

I. Affiliated Ownership Structure — FCM and Exchange

The most significant conflict of interest arising from Lumina Markets' business relates to the common ownership among Lumina Markets, its clearing futures commission merchant ("**FCM**"), and the exchange on which all trades are executed.

Lumina Markets introduces all customer orders exclusively to **Interactive Brokers LLC** ("**IBKR**"), which serves as the sole clearing FCM for all customer accounts. All customer trades are executed exclusively on **ForecastEx, LLC** ("**ForecastEx**"), which is a wholly owned subsidiary of Interactive Brokers Group, Inc. Lumina Markets does not evaluate or offer access to alternative clearing firms or execution venues, and customers cannot direct their orders to a different FCM or exchange through Lumina Markets.

Thomas Peterffy is the Chairman and majority shareholder of Lumina Markets, holding approximately 80% of Lumina Markets through Conyers Investments LLC. Mr. Peterffy also holds 74.2% of the voting interest in Interactive Brokers Group, Inc. through IBG Holdings LLC, and serves as Chairman of Interactive Brokers Group, Inc.

As a result of this ownership structure:

- The same individual who controls Lumina Markets (your introducing broker) also controls the FCM that clears your trades and the exchange on which your trades are executed.

- Lumina Markets does not independently evaluate alternative FCMs or execution venues on customers' behalf.

Earl Nemser serves as an outside director of Lumina Markets and simultaneously serves as Vice Chairman of Interactive Brokers Group, Inc. As a result, a member of Lumina Markets' Board of Directors has a material relationship with the Firm's exclusive FCM and the parent of its exclusive exchange.

In addition, the cash collateral backing customer positions is held at ForecastEx and earns interest, a portion of which is credited to customers as an incentive coupon. Effective August 17, 2026, ForecastEx withholds an administrative clearing fee of 50 basis points (0.50% per year), deducted from the interest rate on that collateral before the coupon is paid. Because ForecastEx is under common control with Lumina Markets, this means the affiliated group earns revenue from interest

on customer funds. Lumina Markets receives no part of this fee. See the Firm's Fee Disclosure for further detail.

II. Revenue Model — Financial Incentive to Generate Trading Volume

Lumina Markets' revenue consists of exchange rebates paid by ForecastEx, equal to 25% of the $0.01 per contract ForecastEx transaction fee on customer transactions, and of a commission equal to 0.35% of the trade value (the contract price multiplied by the number of contracts) that Lumina Markets charges on each customer transaction, a portion of which IBKR retains. Lumina Markets receives both through IBKR.

This creates a material incentive for Lumina Markets to encourage customer trading activity, as Lumina Markets' revenue is directly and exclusively tied to the number and value of transactions on ForecastEx. Customers should be aware that this incentive structure may influence the manner in which Lumina Markets presents, describes, or promotes trading on its platform, notwithstanding the Firm's obligation not to direct customer trading decisions.

III. General Conflicts of Interest

In addition to the affiliated ownership conflicts described above, Lumina Markets has identified the following general circumstances which constitute or may give rise to a conflict of interest:

- Lumina Markets may facilitate transactions in which one customer's order is matched against the order of another customer on ForecastEx.

- Lumina Markets may receive or pay inducements to or from third parties due to the referral of new customers, including any future referral or incentive programs.

IV. Procedures for the Identification, Monitoring, Mitigation and Disclosure of Conflicts of Interest

Lumina Markets maintains written procedures reasonably designed to identify, monitor, mitigate, and disclose material conflicts of interest, consistent with its obligations under CFTC Regulation 1.71 and applicable NFA rules. The Chief Compliance Officer ("**CCO**") is responsible for administering these procedures.

A. Responsibility and Governance. The CCO owns the conflicts-of-interest program, maintains these procedures, and reviews them at least annually and upon any trigger event (defined below). The CCO reports the Firm's identified material conflicts and how they are being managed to senior management, and to the Board of Directors at least annually. Any director, officer, or employee who has a personal or business interest that conflicts, or may conflict, with the Firm's obligations to customers — including the relationships described in Section I — shall disclose that interest to the CCO. Persons with a material relationship to IBKR or Interactive Brokers Group ("**IBG**") (including any director serving in roles at both Lumina Markets and IBG) shall not act as the Firm's sole approver of the terms of any arrangement between Lumina Markets and IBKR or ForecastEx, and any such related-party arrangement shall be reviewed for consistency with the Firm's obligations to customers and documented.

B. Conflict Identification and Inventory. The CCO maintains a written Conflicts of Interest Inventory that lists each identified material conflict (including the affiliated-ownership conflict in Section I, the revenue/volume-incentive conflict in Section II, and the general conflicts in Section III), its source, the customers or activities affected, and the monitoring and mitigation controls applied to it. The Inventory is reviewed and updated at least annually and upon any "trigger event," including: a new business line, product, or execution venue; a new or amended compensation, rebate, or referral arrangement; a change in the Firm's ownership or affiliations; a relevant regulatory development; or a customer complaint indicating a possible conflict. Any employee who becomes aware of a new or potential conflict must report it promptly to the CCO.

C. Ongoing Monitoring. The CCO (or designee) conducts the following monitoring:

- *Promotional material and communications.* Compliance reviews and approves promotional material and Associated Person communications before use to confirm they do not recommend or steer specific trades, imply that Lumina Markets directs customer trading, or encourage excessive trading or suggest the likelihood of profit — addressing both the affiliation and volume-incentive conflicts. (Ongoing.)

- *Self-directed model.* Compliance reviews Firm activity no less than quarterly to confirm that no employee has exercised discretion over a customer account, made trade recommendations, or directed customer trades.

- *Revenue and compensation.* The CCO periodically reviews the ForecastEx rebate and commission arrangements and Associated Person compensation to confirm that compensation is not structured to incentivize steering of individual customers and that the incentive is accurately disclosed.

- *Complaints.* Customer complaints are screened for any allegation of steering, undisclosed conflict, or improper encouragement to trade; such complaints are escalated to the CCO and logged.

- *Execution and routing.* Compliance confirms that customer orders are routed to ForecastEx for execution on its market and cleared through IBKR consistent with the Firm's disclosures, and that Lumina Markets does not act as principal or counterparty to, or internally cross, customer orders.

D. Mitigation Measures. The Firm mitigates the conflicts identified in this Appendix as follows:

- *Affiliated ownership (Section I):* full written disclosure of the common-ownership structure at account opening and on the Firm's website; a strictly self-directed model under which Lumina Markets exercises no discretion and makes no recommendations, so that all trading decisions are made by the customer; clear disclosure that the Firm does not evaluate alternative FCMs or execution venues; and the governance safeguards in paragraph A.

- *Revenue/volume incentive (Section II):* disclosure of the rebate- and commission-based incentive; the prohibition on communications that encourage overtrading or imply profit; supervisory review of all marketing; and compensation that is not tied to steering individual customer activity.

- *Order matching / acting for multiple customers (Section III):* execution of all orders on ForecastEx's market rather than through internal crossing, and a prohibition on the Firm taking proprietary positions adverse to customers.

- *Referral inducements (Section III):* any referral or incentive program is reviewed and approved by Compliance in advance, disclosed to affected customers, documented, and assessed for consistency with NFA Bylaw 1101 and NFA Compliance Rule 2-29.

E. Disclosure Procedures. Material conflicts are disclosed to customers at account opening, with the customer's acknowledgment captured and retained, and the disclosure is maintained and kept current on the Firm's website at luminamarkets.com/legal/conflicts. The CCO reviews this disclosure at least annually and upon any material change to confirm it remains accurate and complete, and retains records of each version and of customer acknowledgments.

F. Escalation and Remediation. Newly identified conflicts are assessed by the CCO, who determines the appropriate disclosure and mitigation. Material matters are escalated to senior management and, where appropriate, the Board. Remediation is tracked to completion and documented.

G. Training. Associated Persons and applicable employees receive training on the Firm's conflicts-of-interest policy and these procedures at onboarding and at least annually.

H. Recordkeeping. The Conflicts of Interest Inventory, monitoring reviews, approvals, disclosures and customer acknowledgments, escalations, reports to senior management and the Board, and training records are retained for at least five (5) years, consistent with the Firm's recordkeeping policies.

I. Periodic Review and Approval. The CCO reviews the adequacy and effectiveness of these procedures at least annually, updates them as needed, and obtains the written approval of an appropriate principal for material changes.

This disclosure does not purport to identify every possible conflict of interest. Additional conflicts may arise as the Firm's business evolves. If you have questions about any potential conflict, please contact Compliance at compliance@luminamarkets.com.