

Participant Disclosure Form

Participant(s): Cboe BZX Exchange, Inc. (“BZX”)

- Is the Participant's firm for profit or not-for-profit?

For Profit

- If the Participant's firm is for profit, is it publicly or privately owned?

Publicly owned

- If privately owned, list any owner with an interest of 5% or more of the Participant, where to the Participant's knowledge, such owner, or any affiliate controlling, controlled by, or under common control with the owner, subscribes, directly or through a third-party vendor, to SIP and/or exchange Proprietary Market Data products.

Not applicable

- Does the Participant firm offer real-time proprietary equity market data that is filed with the SEC ("Proprietary Market Data")?

Yes

- If yes, list each product, describe its content, and provide a link to where fees for each product are disclosed.

Cboe BZX Exchange, Inc. (“BZX” or the “Exchange”) offers a variety of equity market data products as follows:

- Depth-of-book data provides real time displayed orders and/or execution information based on equity orders entered into the Exchange’s system. Depth-of-book is offered on a full depth-of-book basis, or for certain price levels. The specific products offered on the Exchange are as follows: TCP Depth, Multicast Depth, Book Viewer, and Summary Depth.
- Top-of-book data provides displayed top-of-book quotations and execution information based on equity orders entered into the Exchange’s system.
- Last sale data provides execution information based on equity orders entered into the Exchange’s system.
- Auction data provides buying and selling interest information for auctions on the Exchange, as well as total size of all buy and sell orders matched via Cboe Market Close. The specific products offered are as follows: Bats Auction Feed and IPO Auction Viewer.

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- ETF Implied Liquidity data provides liquidity information for both a given ETF and its underlying component securities.
- Cboe Premium Exchange Tools is a web-based tool designed to give a subscribing user the ability to track certain latency statistics of the user's logical order entry ports and execution information.
- Short volume data provides a summary of certain equity trading activity on the Exchange including trade date, total volume, sell short volume, and sell short exempt volume, by symbol.
- Short interest data provides a summary of consolidated market short interest positions in all BZX-listed securities as reported by FINRA. Designed to facilitate the distribution of short sale data, the report includes information including cycle settlement date, symbol, name, number of shares net short current cycle, and number of shares net short previous cycle.
- Missed Liquidity Report contains historical data and provides time details for executions of orders and quotations that rest on the BYX Book where the Member receiving the report attempted to execute against that resting order within an Exchange-determined amount of time after receipt of the first attempt to execute against the resting order or quote and within an Exchange-determined amount of time before receipt of the first attempt to execute against the resting order or quote. This report is intended to assist Members in determining by how much time an order missed an execution.
- Cancels Report contains historical data and provides liquidity response time details for orders and quotes that rest on the BYX Book where the Member receiving the report attempted to cancel that resting order or quote or any other resting order or quote within an Exchange-determined amount of time after receipt of the order or quote that executed against the resting order or quote and within an Exchange-determined amount of time before receipt of the order or quote that executed against the resting order or quote. The Cancel Report is intended to assist Members in determining by how much time an order missed being canceled instead of executing.

BZX, Cboe BYX Exchange, Inc. ("BYX"), Cboe EDGX Exchange, Inc. ("EDGX"), and Cboe EDGA Exchange, Inc. ("EDGA", and collectively referred to as the "Cboe Equities Exchanges") also offer the Cboe Equities One Feed, which provides a unified view of the market from all four of the Cboe Equities Exchanges. Specifically, it provides displayed orders and execution information across the Cboe Equities Exchanges.

Additional information regarding the data products offered on the Exchange is available in BZX 11.22 and in the relevant Exchange Fee Schedule, each as provided below.

- [https://markets.cboe.com/us/equities/membership/fee\\_schedule/bzx/](https://markets.cboe.com/us/equities/membership/fee_schedule/bzx/)
- [https://cdn.batstrading.com/resources/regulation/rule\\_book/BATS\\_Exchange\\_Rulebook.pdf](https://cdn.batstrading.com/resources/regulation/rule_book/BATS_Exchange_Rulebook.pdf)

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- Provide the names of the representative and any alternative representatives designated by the Participant who are authorized under the Plans to vote on behalf of the Participant. Also provide a narrative description of the representatives' roles within the Participant organization, including the title of each individual as well as any direct responsibilities related to the development, dissemination, sales, or marketing of the Participant's Proprietary Market Data, and the nature of those responsibilities sufficient for the public to identify the nature of any potential conflict of interest that could be perceived by a reasonable objective observer as having an effect on the Plan. If the representative works in or with the Participant's Proprietary Market Data business, describe the representative's roles and describe how that business and the representative's Plan responsibilities impacts his or her compensation. In addition, describe how a representative's responsibilities with the Proprietary Market Data business may present a conflict of interest with his or her responsibilities to the Plan.
  - Robert Books, Director, Equities. Responsible for product design and strategy for U.S. equities exchanges. Has no direct responsibilities related to the development, dissemination, sales, or marketing of the Participant's Proprietary Market Data. Has no compensation that is directly tied to the Proprietary Market Data business or other relevant conflicts.
  - Matthew Iwamaye, Vice President, Associate General Counsel at Cboe Global Markets, Inc. (“Cboe”). Responsible for supporting Cboe’s North American equities markets in a legal capacity. Has no direct responsibilities related to the development, dissemination, sales, or marketing of the Participant’s Proprietary Market Data. Has no compensation that is directly tied to the Proprietary Market Data business or other relevant conflicts.
- Does the Participant, its representative, or its alternative representative, or any affiliate have additional relationships or material economic interests that could be perceived by a reasonable objective observer to present a potential conflict of interest with their responsibilities to the Plan?

As discussed, the Participant firm offers real-time proprietary equity market data that is filed with the SEC. The Participant, its appointed representative, and alternative representative(s) have no additional relationships or material economic interests that the Participant believes would be perceived by a reasonable objective observer to present a potential conflict of interest with their responsibilities to the Plan.

- If so, provide a detailed narrative discussion of all material facts necessary to identify the potential conflicts of interest and the effects they may have on the Plan.

Not applicable