MEMORANDUM

TO: The Nasdaq Phlx LLC Options Floor
FROM: The Nasdaq Phlx LLC
DATE: January 24, 2019
RE: Cellular Phone Use on the Nasdaq Phlx LLC Options Trading Floor

This memorandum is intended to remind all Nasdaq Phlx LLC (“Phlx” or the “Exchange”) members and member organizations of the rules governing the use of communication devices on the Phlx Options Floor. Options 8, Section 38 of the Phlx rulebook requires each member or member organization using a communication device on the Options Floor to register the device with the Exchange. Section 38 also requires each member and member organization using a communication system to register the device by category of user (e.g., Specialist, Floor Market Maker, Floor Broker, or Clerk). If there is a change in the category of any user, the member or member organization must immediately inform the Exchange in writing on the same day as when the change occurs. At the time of registration, members and member organization representatives must sign a statement that they are aware of and understand the rules and procedures governing the use of telephones on the Options Floor. Please consult Options 8, Section 38 for additional details on what the rule requires.

The communication devices governed by Section 38 includes cellular telephones (“cell phones”). The Exchange understands that floor members use cell phones while on the Options Floor. The Exchange does not seek to limit a member’s lawful use of a cell phone in any way. The Exchange does, however, have an obligation to enforce its rules and the rules of the United States Securities and Exchange Commission. Therefore, any cell phone used by a member on the Options Floor, whether it is issued by the member’s employer or it is the member’s personal cell phone, must be registered with the Exchange as outlined in Options 8, Section 38. Members that do not wish to register their cell phone have the right to refrain from bringing them onto the Options Floor. The failure to comply with this rule may subject the member and its member organization to disciplinary proceedings by the Exchange.

Any questions regarding Phlx rules may be directed to Angela Dunn.