Memorandum

TO: Nasdaq PHLX Trading Floor Members and personnel

FROM: Dana Rutherford

DATE: October 1, 2021

RE: COVID-19 Protocol Update

Effective November 15, 2021, Nasdaq PHLX LLC (Phlx) is requiring all Floor Participants (Floor Brokers, Market Makers, Lead Market Makers, Clerks, etc.) to be fully vaccinated, as defined below, in order to access the Trading Floor and surrounding areas. Floor Participants who fail to comply with the vaccination requirement will not be permitted to access the Trading Floor beginning November 15, 2021.

For purposes of this memo, which supplements Nasdaq’s Phlx Floor Participant Manual, fully vaccinated is defined as at least 14 days after receiving either the second dose in a two dose series or a single dose vaccine. Proof of this vaccination must be provided to the Exchange.

Therefore, if it has been >= 14 days since your last dose vaccination, you must provide evidence that you are fully vaccinated to Nasdaq Trading Floor Security. Evidence of vaccination can include a valid COVID-19 vaccination card or picture of such card (or another officially recognized medical record as confirmed by Nasdaq in advance). Nasdaq Security will retain a list of all fully vaccinated individuals so you will not need to provide such evidence on a daily basis thereafter.

No additional documentation is necessary if a Floor Participant has already provided the Exchange with proof of vaccination.

Additionally, effective Monday, October 4, 2021, Phlx is modifying its COVID-19 testing requirements for all Floor Participants. Beginning Monday, and each week thereafter, all vaccinated Floor Participants will be required to have a negative COVID-19 test at least once a week and all unvaccinated Floor Participants will be required to have a negative COVID-19 test every day of the week the Trading Floor is accessed until they are fully vaccinated. Vaccinated individuals are required to test on the first day of the week they access the Trading Floor.
The COVID-19 tests will be performed on location in the morning between 7:30 AM and 10:30 AM. All Floor Participants will be required to take the COVID-19 test prior to entering the Trading Floor. Once tested, you are permitted to enter the Trading Floor and your results will be texted or emailed to you. Any Floor Participant who receives a positive test will be required to leave the Trading Floor immediately. A Floor Participant will be permitted to return to the Trading Floor upon receipt of a negative COVID-19 PCR test or upon completion of the required quarantine. Upon request, Phlx will provide a take-home, mail-in Binx PCR test for any Floor Participant who received a positive result from Phlx’s required COVID-19 testing.

As is the case today, anyone who fails to adhere to the protocols listed within Nasdaq’s Phlx Floor Participant Manual will be denied entrance to the Trading Floor and the premises immediately adjacent to the Trading Floor (collectively, the Premises). Members who misrepresent their vaccination status to the Exchange and/or fail to comply with the safety protocols will be subject to immediate exclusion from the Premises, and may also be subject to disciplinary action.

If you have any questions concerning the above, please contact Dana Rutherford at 215-496-1564.