



IBG LLC

Brokerage System

System and Organization Controls (SOC) 3[®] Report

For the period of December 1, 2024 to November 30, 2025



An Independent Service Auditor Report issued by
Forvis Mazars, LLP

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Section I: Report of Independent Service Auditors

To: Management of IBG LLC

Scope

We have examined IBG LLC's (IBG) accompanying assertion titled *Assertion of IBG LLC's Management* (assertion) that the controls within IBG's Brokerage System (system) were effective throughout the period December 1, 2024 to November 30, 2025, to provide reasonable assurance that IBG's service commitments and system requirements were achieved based on the trust services criteria relevant to security, availability, processing integrity, and confidentiality (applicable trust services criteria) set forth in TSP section 100, *2017 Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy*, in AICPA *Trust Services Criteria*.

Service Organization's Responsibilities

IBG is responsible for its service commitments and system requirements and for designing, implementing, and operating effective controls within the system to provide reasonable assurance that IBG's service commitments and system requirements were achieved. IBG has also provided the accompanying assertion about the effectiveness of the controls within the system. When preparing its assertion, IBG is responsible for selecting, and identifying in its assertion, the applicable trust service criteria and for having a reasonable basis for its assertion by performing an assessment of the effectiveness of the controls within the system.

Service Auditor's Responsibilities

Our responsibility is to express an opinion, based on our examination, on whether management's assertion that controls within the system were effective throughout the period to provide reasonable assurance that the service organization's service commitments and system requirements were achieved based on the applicable trust services criteria. Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. Those standards require that we plan and perform our examination to obtain reasonable assurance about whether management's assertion is fairly stated, in all material respects. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

Our examination included:

- Obtaining an understanding of the system and the service organization's service commitments and system requirements;
- Assessing the risks that controls were not effective to achieve IBG's service commitments and system requirements based on the applicable trust services criteria; and
- Performing procedures to obtain evidence about whether controls within the system were effective to achieve IBG's service commitments and system requirements based on the applicable trust services criteria.

Our examination also included performing such other procedures as we considered necessary in the circumstances.

We are required to be independent and to meet our other ethical responsibilities in accordance with relevant ethical requirements relating to the engagement.

Inherent Limitations

There are inherent limitations in the effectiveness of any system of internal control, including the possibility of human error and the circumvention of controls.

Because of their nature, controls may not always operate effectively to provide reasonable assurance that the service organization's service commitments and system requirements were achieved based on the applicable trust services criteria. Also, the projection to the future of any conclusions about the effectiveness of controls is subject to the risk that controls may become inadequate because of changes in conditions or that the degree of compliance with the policies or procedures may deteriorate.

Opinion

In our opinion, management's assertion that the controls within IBG's Brokerage System were effective throughout the period December 1, 2024 to November 30, 2025, to provide reasonable assurance that IBG's service commitments and system requirements were achieved based on the applicable trust services criteria is fairly stated, in all material respects.

Forvis Mazars, LLP

Forvis Mazars, LLP

New York, NY
February 27, 2026



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Section II: Assertion of IBG LLC's Management

We are responsible for designing, implementing, operating, and maintaining effective controls within IBG LLC's (IBG) Brokerage System (system) throughout the period December 1, 2024 to November 30, 2025, to provide reasonable assurance that IBG's service commitments and system requirements relevant to security, availability, processing integrity, and confidentiality were achieved. Our description of the boundaries of the system is presented in Section III, *IBG LLC's Description of the Boundaries and Principal Service Commitments and System Requirements of its System* and identifies the aspects of the system covered by our assertion.

We have performed an evaluation of the effectiveness of the controls within the system throughout the period December 1, 2024 to November 30, 2025, to provide reasonable assurance that IBG's service commitments and system requirements were achieved based on the trust services criteria relevant to security, availability, processing integrity, and confidentiality (applicable trust services criteria) set forth in TSP section 100, *2017 Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy*, in AICPA *Trust Services Criteria*. IBG's objectives for the system in applying the applicable trust services criteria are embodied in its service commitments and system requirements relevant to the applicable trust services criteria. The principal service commitments and system requirements related to the applicable trust services criteria are presented in Section III, *IBG LLC's Description of the Boundaries and Principal Service Commitments and System Requirements of its System*.

There are inherent limitations in any system of internal control, including the possibility of human error and the circumvention of controls. Because of these inherent limitations, a service organization may achieve reasonable, but not absolute, assurance that its service commitments and system requirements are achieved.

We assert that the controls within the system were effective throughout the period December 1, 2024 to November 30, 2025, to provide reasonable assurance that IBG's service commitments and system requirements were achieved based on the applicable trust services criteria.

Section III: IBG LLC's Description of the Boundaries and Principal Service Commitments and System Requirements of its System

A. Company Profile

IBG LLC ("IBG" or the "Company") is a subsidiary of Interactive Brokers Group, Inc. ("IBG, Inc."). IBG is an automated global electronic broker specializing in executing and clearing trades in stocks, options, futures, foreign exchange instruments, bonds, mutual funds, Exchange-Traded Funds (ETFs), precious metals, and forecast contracts on more than 170 markets around the world and offering custody, prime brokerage, securities, and margin lending services to customers. In addition, the Company's customers can use its trading platform to trade certain cryptocurrencies through third-party cryptocurrency service providers that execute, clear, and custody the cryptocurrencies.

For the purpose of the report, IBG refers to the following entities: Interactive Brokers LLC; IBKR Securities Services LLC; Interactive Brokers Canada, Inc.; Interactive Brokers (U.K.) Limited; Interactive Brokers Ireland Limited; IBKR Financial Services AG; Interactive Brokers (India) Private Limited; Interactive Brokers Hong Kong Limited; Interactive Brokers Securities Japan, Inc.; Interactive Brokers Singapore Private Limited; and Interactive Brokers Australia Pty Limited.

B. Overview of Services Provided

IBG's primary business is electronic brokerage.

As a direct market access broker, IBG serves the customers of both traditional brokers and prime brokers. IBG provides customers with advanced order management, trade execution, and portfolio management platforms. Customers can simultaneously access many financial markets worldwide and trade across multiple asset classes (stocks, options, futures, foreign exchange, bonds, and mutual funds) denominated in multiple currencies, on one screen, from a single account based in any major currency. Large financial advisor and broker-dealer customers may "white brand" the trading interface (i.e., make the trading interface available to their customers without referencing IBG's name) or can select from among modular functionalities, such as order routing, trade reporting, or clearing on specific products or exchanges in which they may not have up-to-date technology, to offer their customers a comprehensive, global range of services and products.

IBG performs the following services for its customers:

- Trade Clearing and Settlement
- Reconciliation and Control (custody and safekeeping of securities)
- Pricing and Valuation of Customer Positions
- Corporate Actions – Dividends and Reorganization Processing and Reconciliation
- Wire Transfer, Check Processing, and ACH
- Customer Reporting

Customers initiate transactions electronically through a variety of processes. Transactions are processed directly into a specific order entry system either electronically through direct customer input or, to a much lesser extent, by fully registered branch office personnel if necessary.

The security transactions referenced above are processed directly into IBG's trade processing, clearing, and settlement systems. IBG's Corporate Actions department processes dividends and reorganizations (i.e., tender offers and stock splits).

IBG's Clearing and Control department also confirms that positions with custodians and internal ledgers are reconciled. Customer reporting, including electronic confirmation and statement reporting services, is also provided. Securities pricing is facilitated by the Operations Group which confirms pricing data obtained from independent pricing vendors which is updated across IBG's internal firm and external customer reporting systems.

C. Principal Service Commitments and System Requirements

IBG designs its processes and procedures related to its Brokerage System to meet its objectives for its Brokerage System services. Those objectives are based on the service commitments that IBG makes to user entities; the laws and regulations that govern the provision of Brokerage System services; and the financial, operational, and compliance requirements that IBG has established for the services.

The Brokerage System services of IBG are the relevant regulatory and industry information and data security requirements in which IBG operates. Security, availability, processing integrity, and confidentiality commitments to user entities are documented and communicated within service level agreements and other customer agreements, as well as within the description of the service offering provided online.

Security, availability, processing integrity, and confidentiality commitments are standardized and include, but are not limited to, the following:

- Security, availability, processing integrity, and confidentiality principles within the fundamental designs of the brokerage system which are designed to permit system users to access the information they need based on their role in the system while restricting them from accessing information not needed for their role;
- Use of encryption technologies to protect customer data;
- Restricting access to the system through the use of strong passwords and unique user IDs;
- Continuous monitoring of system performance and processing capacity;
- Secure and timely backup and retention of customer data;
- The complete, accurate, and timely processing of customer-initiated transactions within the system;
- A system architecture and operating model designed to limit the impact of a localized disaster or disruption; and
- The development and periodic testing of a business continuity plan.

IBG establishes operational requirements that support the achievement of security, availability, processing integrity, and confidentiality commitments, relevant laws and regulations, and other system requirements. Such requirements are communicated within IBG's system policies and procedures, system design documentation, and contracts with customers. Information security policies and procedures define an organization-wide approach to how systems and data are protected, including policies around how the service is designed and developed, how the system is operated, how the internal business systems and networks are managed, and how employees are hired and trained.

Principal system requirements include the following:

- Access to logical assets is limited to appropriate users and is managed consistent with the assessed risk of unauthorized access to authorized activities;
- Management identifies, assesses, and manages the cybersecurity risk to organizational operations;
- Policies and procedures are maintained and used to manage protection of information systems and assets;
- Changes to the system are tested (if applicable) and approved to help ensure that they function as intended and do not adversely impact the security, availability, processing integrity, or confidentiality of the system;
- Recovery processes and procedures are executed and maintained to help ensure the restoration of systems or assets;
- The information system and assets are monitored to identify cybersecurity events;
- Policies and procedures to support the complete accurate, and timely processing of customer-initiated requests, and
- Management monitors third-party providers to detect failures of those service providers to meet service agreements that could threaten the achievement of the service organization's objectives.

D. Components of the System Used to Provide the Services

IBG has established a system that supports the Brokerage System. The system is defined as the infrastructure, software, procedures, and data which are designed, implemented, and operated by people to achieve one or more of the organization's specific business objectives in accordance with management's-specified requirements.

1. Infrastructure and Software

IBG receives customer order requests from various sources and applications, trade confirmation information from various clearing corporations and depositories, and reference information relating to corporate announcements and pricing from external vendors. There are numerous systems involved in the processing of brokerage-related transactions.

2. People

IBG is comprised of separate functional groups designed to facilitate effective operational capability and to help ensure segregation of duties between functions. Each area is under the direct responsibility of a senior manager and consists of the following functional groups: Clearing, Risk Management, Customer Reporting, Clearing Operations, Cashiering, Customer Service, Treasury, and Technology. Roles and responsibilities are further defined within written job descriptions, are communicated during the hiring process, and are available upon request.

3. Policies and Procedures

The Company has implemented formal written Information Security Policies and Standards (part of a set of Information and Communications Technology governance documents), a Computer Security Incident Response Plan, and a Data Classification Standard which collectively address the security, availability, confidentiality, and processing integrity of the system and cover the escalation process for security breaches and other incidents. These policies are reviewed and approved by management on an annual basis and are posted on the Company's Intranet.

IBG has implemented a sanctions policy for personnel who violate the Company's code of business conduct and ethics.

4. Data

Data Governance

Several policies, standards, and procedures, including the Data Classification Standard, Data Governance Policy, and Data Security Policy, are reviewed, updated, and approved on an annual basis by management. These policies, standards, and procedures outline the ownership, communication, destruction, maintenance, storage, back-up, distribution, identification, and classification of confidential information, as well as the identification of related processes, systems, and third parties involved in the handling of such information.

Formal data retention and destruction standards have been developed to provide guidelines for the retention of data for required periods of time, and the Company disposes of data in accordance with its established retention and destruction standards.

Data Categories

IBG processes and maintains various categories of data within its in-scope systems and services to support brokerage and trading operations. The following summarizes the categories of data handled:

Customer Account Information

- Includes non-public customer Personally Identifiable Information (PII) such as names, addresses, contact details, account identifiers, and user activity related information provided or assigned during account opening and maintenance.

Financial and Transaction Data

- Includes information pertinent to customers' brokerage transactions, credit risk, deposits/withdrawal transactions, asset transfers, fees/commissions, interest charges, client asset ledgers, settlement and custody, and relevant transaction history.

Market and Reference Data

- Includes pricing, financial securities specifications, corporate action details, and other market and referential data obtained from third parties such as exchanges, vendors, and depositories.

Regulatory and Compliance Data

- Includes information that supports trade reporting, regulatory reporting, surveillance, and monitoring as required for compliance with applicable laws and firm policies.

E. Subservice Organizations

The Company uses the following subservice organization:

Subservice Organization	Service(s) Provided
Equinix, Inc.	The Company uses Equinix for its third-party hosting of servers and equipment, including the restriction of physical access to the defined system including, but not limited to, facilities, backup media, and other system components such as firewalls, routers, and servers.

Our description of the boundaries of the system and the principal service commitments and system requirements related to the applicable trust services criteria do not include the services provided by the subservice organizations.

Our conclusion regarding effectiveness of controls within the system to achieve IBG’s service commitments and system requirements based on the applicable trust services criteria assumes that the complementary subservice organization controls assumed in the design of IBG’s Brokerage System operated effectively throughout the period December 1, 2024 to November 30, 2025.

F. User Entity Controls

Our description of the boundaries of the system and the principal service commitments and system requirements related to the applicable trust services criteria does not include complementary user entity controls.

Our conclusion regarding the effectiveness of controls within the system to achieve IBG’s service commitments and system requirements based on the applicable trust services criteria assumes that complementary user entity controls assumed in the design of the IBG’s controls operated effectively throughout the period December 1, 2024 to November 30, 2025.