
Jefferies GmbH

Client Notification Regarding Short Selling Restrictions

November 2025

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Version 1.2.1

Supersedes all previous Notices regarding this subject matter

Jefferies GmbH

Authorised and regulated by Bundesanstalt für Finanzdienstleistungsaufsicht

Jefferies

The relevant and/or competent regulatory authorities in many jurisdictions around the world have issued a series of prohibition and/or disclosure requirements relating to short selling (the “**Requirements**”).

Jefferies GmbH (also referred to as “**Jefferies**”) is required to comply with all the Requirements, and therefore, Jefferies is not permitted to carry out, facilitate, or arrange any trade that breaches the Requirements.

The terms of this Notification shall be deemed to cover the short selling of all relevant securities, financial or otherwise, in any relevant jurisdiction for which Requirements have been announced and regarding which a client of Jefferies might reasonably be expected to have an obligation to be informed before making a sell order.

In light of these Requirements, and in the event that we, or any of our affiliates, should enter into any transaction with you which is subject to any of the Requirements, we shall do so on each occasion with the strict understanding that you will be deemed to have represented to us, or, as appropriate, our affiliate, that your transaction’s effect and purpose will not result in a breach of such Requirements.

Similarly, if you enter an order in relation to any securities that are subject to any of the Requirements on or through any electronic trading system, application or service provided by Jefferies, or any of our affiliates, you shall be deemed to have represented to us, or, as appropriate, our affiliate, that such order:

1. will not result in a breach of the Requirements; and
2. will not result in Jefferies, or, as appropriate, our affiliate, being required by the Requirements to make a disclosure.

Jefferies GmbH accepts no responsibility for your failure to comply with any of the Requirements applicable to you. ⁱ

ⁱ Jefferies GmbH (registration number HRB 108812) is authorised and regulated by Bundesanstalt für Finanzdienstleistungsaufsicht (“BaFin”). Registered in Germany with registered office at Bockenheimer Landstrasse 24, 60323 Frankfurt am Main, Deutschland.