



TPH Requirements
Playbook for the
Reopening of the Cboe
Options Exchange
Trading Floor

Version 3.2 (October 8, 2021)

This document is subject to modifications based on legal, government, and public health updates.



Introduction

Cboe Options Exchange (“Cboe”) has created this playbook to outline responsibilities of Trading Permit Holder organizations (“TPH Organizations”) including training and expectation setting for your TPHs and clerks (collectively, “TPHs”) related to their return to Cboe’s trading floor, including actions to be taken prior to their return. This playbook supplements the Notice Cboe distributed on May 26, 2020, entitled Standards of Conduct related to the Reopening of the Cboe Options Trading Floor and COVID-19. Enclosed you will find requirements and protocols that cover:

- Mandatory Vaccination and Exemptions
- Social Distancing
- Disinfecting and Deep Cleaning
- Arrival Check-in and Onsite Health Screening
- Isolation
- Contact Tracing
- Self-Monitoring and Quarantine
- Return to the Workplace

Cboe reserves the right to amend this playbook at any time and in its sole discretion.

Mandatory Vaccination and Exemptions

As of October 15, 2021, individuals must be fully vaccinated (as defined by the CDC) in order to access the trading floor. Additionally, unvaccinated individuals are required to obtain the first dose of a two-dose vaccine (or the sole dose of a single dose vaccine) by September 1, 2021. An unvaccinated individual must provide proof of a first dose of a two-dose vaccination (or the sole dose of a single dose vaccine) to her/his respective CCO, who is required to complete and provide a copy of Cboe’s Vaccine Acknowledgement Form (attached) to Cboe’s Senior Director of Market Structure (Tony Carone, acarone@cboe.com) by September 1, 2021.

TPHs who wish to discuss the potential need for reasonable accommodations due to a medical reason or sincerely held religious belief related to Cboe’s COVID-19 policies should contact their TPH Organization. In order for an unvaccinated individual to maintain access to Cboe’s trading floor on or after September 1, 2021, Cboe’s Senior Director of Market Structure must receive an Acknowledgement of Religious or Medical Exemption form (attached) from the TPH’s CCO or their designee. Accommodations will be granted where they do not cause Cboe undue hardship or pose a direct threat to the health and safety of others. Individuals granted an exemption to the full vaccination requirement as an accommodation due to a medical reason or sincerely held religious belief must always wear a N95-equivalent or surgical mask, including when on the trading floor. Unvaccinated individuals will also be required to continue participating in the bi-weekly COVID testing procedure detailed below. (Examples of medical exemptions may be found [here](#) and religious exemptions [here](#)).

Social Distancing Protocols

The Centers for Disease Control and Prevention (“CDC”) advises that [social distancing](#) is a simple, yet very effective mechanism to decrease the risk of potential infection. In practice this means:

- Staying 6 feet away from others as a normal practice
- Eliminating contact with others, such as handshakes or hugs
- Avoiding touching surfaces touched by others, to the extent feasible
- Avoiding anyone who appears to be sick, or who is coughing or sneezing

The CDC also advises that social distancing is universally applicable and includes, but is not limited to, common areas such as the entrance and exits, lunchroom, bathrooms, hallways, escalators and the trading floor. All TPHs are required to abide by this practice, and Cboe’s office includes signage to reinforce and remind others of the importance of social distancing.

Public Transportation

While not required, we highly recommend that people find alternatives to public transportation.

Elevators and Escalators

TPHs will be directed to use the escalators to access the trading floor. The escalators will have step markings to help visually orient you to the required six feet distancing. Access to the elevators will not be permitted, unless TPHs require an accommodation. Cboe's Senior Director of Market Structure should be contacted by the Chief Compliance Officer of a TPH if an accommodation is needed.

Bathrooms

To limit the spread of germs and infectious agents on high touch surfaces, only the bathrooms on the 2nd and 4th floors will remain open. The entrance doors to those bathrooms will be propped open. At the entrance of each bathroom, a sign will be posted to denote maximum occupancy. And, to enforce social distancing, stickers will be located on the floors to denote where individuals should stand as they are waiting to utilize the facilities. The number of stalls/urinals will be limited based on proximity within the bathroom.

Lunchroom Area

The lunch area on the 4th floor will be open; however, tables will be social distanced and there will be only a limited number of chairs at each table. The Auditorium on the north side is also available. If eating onsite, the TPH may bring his/her lunch to work and store it in a cooler which must be kept with them at their location on the floor, alternatively lunch may be ordered and picked up in the lobby.

Lunch Guidelines

- Eating hours for TPHs will be between 7:30 am to 1:30 pm, and maximum capacity in the 4th floor lounge and Auditorium will be monitored and controlled in accordance with State of Illinois and City of Chicago health guidelines to ensure social distancing is maintained
- Vaccinated TPHs may eat in their designated booth areas, but no food is allowed on the trading floor
- Eating anywhere in the building will not be permitted before or after these hours
- The coffee barista station will be closed but there will be an area to refill water bottles
- Chairs will be limited and/or spaced appropriately in the 4th floor lounge. Please do not move chairs either at a table or to another table
- Please review signage for lunchroom etiquette and healthy habits
- Bring a storage bag (e.g., brown paper bag) to store your face mask (if you are not fully vaccinated) while eating
- TPHs that do not adhere to these requirements may be asked to exit the building and will not be allowed back on the trading floor for the remainder of the day

Trading Floor

Significant efforts including expanding of the trading floor and recent construction have been completed. Each TPH is expected to stay in their designated area as well as maintain 6 feet or more of distance away from colleagues as well as the following:

- If you are not fully vaccinated, wear your mask at all times, unless drinking a beverage
- Wash your hands throughout the day and/or use hand sanitizer
- No hugs, high fives or secret handshakes
- No meandering or congregating on the trading floor or other spaces outside of the trading floor



Disinfecting and Deep Cleaning

Cboe will be maintaining a clean work environment through implementation of the following:

- Enhanced daily sanitation practices, including cleaning door handles, restrooms, and high-touch surfaces
- Procured third-party cleaning companies to assist with increased cleaning frequency
- Stocked bathrooms with soap and/or hand sanitizer on a more frequent basis

Types of Cleaning

Spraying, or “deep cleaning”, of areas involves spraying mist onto surfaces or objects which are then wiped down with microfiber rags. General disinfecting occurs throughout the day at increased frequency. Deep cleaning will be performed every evening on the trading floor.

To maintain a healthy and clean environment, everyone is expected to abide by the signage displayed throughout the building and practice [CDC healthy habits guidelines](#).

Arrival Check-in and Onsite Health Screening

Before returning to Cboe’s trading floor, and to prioritize health and safety of all workers, you are required to take precautions and self-monitor for COVID-19 symptoms. You are required to comply with all federal, State of Illinois and City of Chicago guidelines for the reduction and/or prevention of the spread of COVID-19 and use the [online CDC Self-Checker tool](#) should you have concerns about potential exposure or symptoms.

Do not come to Cboe if any of the following occurs:

- You are experiencing symptoms related to COVID-19 and/or have a temperature of 100.4°F or higher
- You have a reasonable belief that you have or may have been exposed to someone with COVID-19
- The Individual has a family or household member who has been exposed to COVID-19 within the past 14 days, and is suspected of having COVID-19 or has received a positive test result
- An unvaccinated TPH has travelled to a City of Chicago-designated ‘color-coded state’ or a TPH and/or household member has travelled to a CDC Level 3 or higher destination or an area of higher risk as provided by the Illinois Department of Public Health (“IDPH”) (www.dph.illinois.gov/covid19/travel). You are required to follow the City of Chicago travel advisory that was effective as of that day.

The TPH CCO, or designee, is to immediately inform Cboe’s Senior Director of Market Structure (Tony Carone, acarone@cboe.com) if any of the above occur. In any of these scenarios, and in addition to CDC guidelines, Cboe will require an individual who suspects COVID exposure, or has a close contact or household member who has tested positive, to also get a COVID test during their quarantine period. Please note that testing is ideally 5 days after exposure unless directed otherwise by a physician.

Facial Covering / Face Masks

All individuals, regardless of vaccination status, are required to wear a facial covering on the trading floor. The covering must be in accordance with [CDC guidelines](#). The CDC has issued [new guidelines on face masks](#) for unvaccinated individuals – covering type, how to wear and care for masks.



- Facial covering means a covering made of cloth, fabric or other soft or permeable material without holes that covers the nose and mouth and surrounding areas of the face while securing under the chin.
- If fully vaccinated, this [gaiter](#), and only this brand and type, is allowed due to it being multi-layered and its snug fit
- The following **do not satisfy Cboe's face covering/face mask requirement:**
 - Bandanas
 - A face mask that has ventilation valves, which allow virus particles to escape
 - Face shields as their effectiveness is unknown and under evaluation
- A face covering/mask must always be worn in the Cboe building, except when eating/drinking
- Face covering/mask reuse is acceptable, but it is important to regularly inspect your face covering/mask for dirt or tears. And, when not in use, store your face covering/mask in a storage bag (e.g., brown paper bag)
- If your mask or covering needs to be replaced, please ask your Chief Compliance Officer
- Individuals should dispose of their face covering/mask or covering in a trash container

Building Access

In order to proceed through the check-in process and gain access to the trading floor before the beginning of the trading day, you will need to plan accordingly and allow for enough time. Check-in will start at 7:00 am. Cboe strongly encourages all TPHs to arrive at Cboe prior to 8:00 am to begin the check-in process so you are able to be on the trading floor prior to the opening of trading. **Regardless of the time you arrive, you will be required to go through the check-in process – no exceptions will be made.**

All trading floor participants will be required to enter the building at the designated north or south entrance:

- **SPX trading crowd** participants will be required to enter through the **north side of the building**
- **All other floor participants** will be required to enter through the **south side of the building**
- Turnstiles will be programmed for your specified entrance and you will not be allowed to enter elsewhere

Upon passing through your designated entrance, there will be a station where you will be provided with hand sanitizer, and a facial covering inspection will be conducted (if necessary). If your facial covering meets the CDC requirements, you will be permitted to enter one of the designated lanes, where you must comply with the social distancing markers for the health screening process which includes a no-touch temperature check (Masimo TIR-1) and medical screening.

Medical Screening Questions:

Per the CDC, people with COVID-19 have had a [wide range of symptoms](#) reported – ranging from mild symptoms to severe illness. Symptoms may appear **2-14 days after exposure to the virus**. People with these symptoms may have COVID-19:

- | | |
|---|---|
| • Cough | • Muscle pain or body aches |
| • Fever or Chills | • Sore throat |
| • Shortness of breath or difficulty breathing | • New loss of taste or smell |
| • Congestion or runny nose | • Fatigue |
| • Headache | • Gastrointestinal symptoms like nausea, vomiting or diarrhea |

Source: CDC. This list does not include all possible symptoms. The CDC will continue to update this list as they learn more about COVID-19.

If approved for entry, you may proceed to your designated spot on the trading floor using the escalators which will be marked to maintain required social distancing. A TPH will be allowed to leave Cboe's building and re-enter that same day. Fully vaccinated individuals will be permitted to move from one side of the floor to another intra-day, provided the TPH CCO has provided adequate notification to and received approval from Tony Carone.



If a TPH individual presents either at/prior to arrival or during the day, with any of the following they will be turned away from Cboe:

- A temperature of 100.4°F or higher
- Answers to screening questions that indicate Covid-19 symptom(s)
- A recently confirmed positive Covid-19 test where return to work protocols have not been satisfied
- Unvaccinated individual has been exposed or exposed to someone who has/or may have a positive COVID-19 diagnosis
- Unvaccinated individual has a family or household member who has been exposed to COVID-19 within the past 14 days, is suspected of having COVID-19, or has received a positive test result
- An unvaccinated TPH has travelled to a City of Chicago-designated 'color-coded state', or an unvaccinated TPH and/or household member has travelled to a CDC Level 3 or higher destination or an area of higher risk as provided by the IDPH (www.dph.illinois.gov/covid19/travel). You are required to follow the City of Chicago travel advisory that was effective as of that date.

In any of the above scenarios, the TPH will be directed to either the Stage 2 room in the north lobby is located outside of the turnstiles (signage will be displayed) or the Stage 2 room in the south lobby is located outside of the turnstiles (signage will be displayed) for additional medical guidance.

The TPH's badge will be deactivated and the TPH Organization and Chief Compliance Officer (CCO) will be informed. An individual will not be permitted to re-enter Cboe until the individual has received negative results of a PCR swab Covid-19 test and the CDC return to work protocols are satisfied.

The TPH CCO, or designee, is required to contact and inform Cboe's Senior Director of Market Structure (acarone@cboe.com) if their employee is denied access or has been directed to leave Cboe's facility and seek medical attention. In any of these scenarios, and in addition to CDC guidelines, Cboe will require an individual who suspects COVID exposure, or has a close contact or household member who has tested positive, to also get a PCR swab test during their quarantine period. Please note that testing is ideally 5 days after exposure unless directed otherwise by a physician.

End of Day Departure

At the end of day, departure is expected to be complete by 4:30 pm through the same entrance used on arrival. Additionally, participants must continue to follow social distancing rules, and face masks for unvaccinated individuals must remain on until after leaving Cboe's building.

Bi-Weekly COVID Testing

- ➔ Fully vaccinated individuals are exempt from onsite testing. However, everyone not fully vaccinated accessing the Trading Floor, even temporarily, will be required to participate in bi-weekly onsite COVID testing as we continue to take every step possible to maintain health and safety for every individual on our trading floor. The onsite testing will be managed by a third party, InHouse Physicians, that has deep expertise in this area. They will provide additional services, beyond testing, to include telemedicine that provides guidance on testing through return to work. There is also a hotline that can be used for any questions for individuals who test positive.

A participant who is not fully vaccinated and present on a test date, but does not test, may be subject to the imposition of fines for violations of the Exchange's trading conduct and decorum policies as set forth in <https://cdn.cboe.com/resources/regulation/circulars/regulatory/RC21-009-Violations-of-Trading-Conduct-and-Decorum-Policies.pdf>.

In preparation for the onsite COVID test, you will receive a link to complete your initial registration. Alternatively, there is a QR code (to the right) that will also take you to the registration site. Additionally, you will need to set up your access to the patient portal after registration, which will allow you to log in and see your test results. Test results are generally available 2 hours after test administration. If you receive a positive test result, you are to immediately inform your CCO or designee. If you are on the floor when you receive a positive test result you need to leave Cboe facilities immediately. *Individuals who receive a positive test result from the onsite COVID test may opt to take a confirmatory PCR test for verification. If a subsequent PCR test yields a negative result, the individual may submit proof of the negative test result to Cboe's Senior Director of Market Structure (Tony Carone, acarone@cboe.com) to gain access to Cboe facilities prior to the completion of the isolation and quarantine protocols set forth below.*



Access to the onsite COVID testing area is as follows:

NORTH (SPX)

Follow signs and arrows to the testing area. Registration is in the hallway outside the testing area, and testing hours are 7:00am-1:00pm only.

Should an individual test positive, the other standard protocols in this playbook will apply.

In the event an individual has been fully vaccinated, the individual may be exempted from participating in the bi-weekly onsite COVID testing once 14 days have passed since the individual's final vaccination, provided:

- The CCO of the individual's TPH firm submits a completed vaccination acknowledgment form (attached) to Cboe's Senior Director of Market Structure; and
- The individual does not exhibit any COVID-19 symptoms.

Even if exempted from the bi-weekly onsite COVID testing, a fully vaccinated individual must still participate in the arrival check-in/onsite health screening procedures, and, if exhibiting symptoms, is subject to the isolation and quarantine protocols set forth below.

Contact Tracing

If a TPH presents with suspected or confirmed case of COVID-19, the following contact tracing protocols are required. Cboe expects the CCO of the TPH firm to follow these contact tracing steps and leverage the **Contact Tracing Questionnaire** in the Appendix. If the TPH would like to assign a primary contact within the firm in lieu of the CCO, please contact Cboe's Senior Director of Market Structure. Please use the following CDC definition of 'close contact' as part of your contact tracing protocol.



Someone who was within 6 feet of an infected person for a cumulative total for 15 minutes or more over a 24-hour period* starting from 2 days before illness onset (or, for asymptomatic patients, 2 days prior to test specimen collection) until the time the person is isolated.

*Individual exposures added together over a 24-hour period (e.g., three 5-minute exposures for a total of 15 minutes). Data are limited, making it difficult to precisely define “close contact”, however 15 cumulative minutes of exposure at a distance of six feet or less can be used as an operational definition for contact investigation. Additional guidance factors can be located on [CDC website under the Appendix and definition of close contact](#).

Investigate: The TPH CCO or assigned primary contact interviews the TPH to identify his/her close contacts at Cboe’s building and on the trading floor and informs Cboe’s Senior Director of Market Structure of the results of the interviews. Please see the Appendix for additional tools to assist in the contact tracing process.

Inform: The TPH CCO or assigned primary contact informs the individual’s close contacts at his/her firm of exposure and provides that information to Cboe’s Senior Director of Market Structure. If a close contact is from another firm, Cboe’s Senior Director of Market Structure will contact the CCO or assigned primary contact of the other firm. All medical information will be kept strictly confidential to abide by privacy laws.

Track and Follow-Up: The TPH CCO or assigned primary contact conducts follow-up interviews with the TPH and his/her close contacts (within their firm) to track symptoms and to indicate when/if the TPH can return to the workplace after satisfying the return to work protocol. If close contacts are from a different firm, the Senior Director of Market Structure will notify the CCO or assigned primary contact of the other firm so they can inform the close contacts to track and follow-up.

The TPH CCO, or designee, is required to contact and inform Cboe’s Senior Director of Market Structure (acarone@cboe.com) if their employee is suspected of COVID-19 exposure, is exhibiting symptoms and/or is denied access or has been directed to leave Cboe’s facility and seek medical attention. In addition to CDC guidelines, Cboe will require an individual who suspects COVID exposure, or has a close contact or household member who has tested positive, to also get a PCR swab test during their quarantine/isolation period. Please note that testing is ideally 5 days after exposure unless directed otherwise by a physician.

Isolation and Quarantine

Local public health authorities determine and establish the quarantine options for their jurisdictions.

Quarantine is used to keep someone *who might have been exposed to COVID-19* away from others. Quarantine helps prevent spread of disease that can occur before a person knows they are sick or if they are infected with the virus without feeling symptoms. People in quarantine should stay home, separate themselves from others and monitor their health.

Isolation keeps someone who is infected with the virus away from others, even in their home.

Quarantine Protocols

<p>Who needs to quarantine?</p>	<p>People who have been in close contact with someone who has COVID-19—excluding people who are fully vaccinated or have had COVID-19 within the past 3 months. People who are fully vaccinated or have tested positive for COVID-19 do not need to quarantine or get tested again for up to 3 months <i>so long as</i> they do not develop symptoms again. People who develop symptoms again within 3 months of their first bout of COVID-19 may need to be tested again if there is no other cause identified for their symptoms.</p> <p>What counts as close contact?</p> <ul style="list-style-type: none"> • You were within 6 feet of someone who has COVID-19 for a total of 15 minutes or more • You provided care at home to someone who is sick with COVID-19 • You had direct physical contact with the person (hugged or kissed them) • You shared eating or drinking utensils • They sneezed, coughed, or somehow got respiratory droplets on you
<p>Steps to take</p>	<p>Stay home and monitor your health</p> <ul style="list-style-type: none"> • Stay home for 14 days after your last contact with a person who has COVID-19. • Watch for fever (100.4°F), cough, shortness of breath, or other symptoms of COVID-19 • If possible, stay away from others, especially people who are at higher risk for getting very sick from COVID-19
<p>Options to reduce or avoid quarantine</p>	<p>The CDC recommends two additional options for how long quarantine should last. Based on availability of testing, unvaccinated people without symptoms can end quarantine:</p> <ul style="list-style-type: none"> • On day 10 without testing and If no symptoms have been reported during daily monitoring • On day 7 after receiving a negative test result; the test may be taken within 48 hours before the time of planned quarantine discontinuation (e.g., in anticipation of testing delays), but quarantine cannot be discontinued earlier than after Day 7 <p>After stopping quarantine, people should:</p> <ul style="list-style-type: none"> • Watch for symptoms until 14 days after exposure • If they have symptoms, immediately self-isolate and contact their TPH CCO or designee • Wear a mask, stay at least 6 feet from others, wash their hands, avoid crowds, and take other steps to prevent the spread of COVID-19. <p>The City of Chicago also provides an option for avoiding quarantine:</p> <ul style="list-style-type: none"> • No more than 72 hours prior to arrival in Chicago, an individual traveling from a state on the Orange list may avoid quarantine by obtaining a negative COVID-19 test result and providing a copy of the negative test results.

	CDC continues to endorse quarantine for 14 days and recognizes that any quarantine shorter than 14 days balances reduced burden against a small possibility of spreading the virus. CDC will continue to evaluate new information and update recommendations as needed.
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Isolation Protocols

Who needs to isolate?	People who have COVID-19 <ul style="list-style-type: none"> • People who have symptoms of COVID-19 and are able to recover at home • People who have no symptoms (are asymptomatic) but have tested positive for infection with SARS-CoV-2
Steps to take	Stay home except to get medical care <ul style="list-style-type: none"> • Monitor your symptoms. If you have an emergency warning sign (including trouble breathing), seek emergency medical care immediately • Stay in a separate room from other household members, if possible • Use a separate bathroom, if possible • Avoid contact with other members of the household and pets • Don't share personal household items, like cups, towels, and utensils • Wear a mask when around other people, if you are able to

Isolation/Quarantine Scenarios

Scenario	TPH Actions	Resolution Actions
Unvaccinated individual travels to Level 3 or higher CDC designated location OR Unvaccinated individual travels outside Illinois to a City of Chicago designated color-coded state OR Individual travels to an area of higher risk as provided by the IDPH	If TPH firm elects to replace individual with a substitute, then TPH firm must : <ul style="list-style-type: none"> • Ensure that substitute meets all requirements for access to Cboe facilities (i.e., fingerprinting is complete, access card received and activated, etc.) 	<u>TPH CCO or designee</u> <ul style="list-style-type: none"> • Confirm TPH vacation/travel dates, reason for travel to orange state and adherence to new color-coded state system inclusive of receipt of negative COVID-19 test result when returning from an orange state. • Comply with advisory recommendations for Level 3 or higher CDC designated locations, subject to guidance from the IDPH and CDPH. <u>Individual</u> <ul style="list-style-type: none"> • Provide days of vacation/ to TPH CCO or designee and adhere to new guidelines by the City of Chicago for the color-coded state system. Individual is to abide by all advisories and, if a test is taken in accordance with orange state guidelines, the individual must carry a copy of a negative test result. • Comply with advisory recommendations for Level 3 or higher CDC designated locations, subject to guidance from the IDPH and CDPH.

Scenario	TPH Actions	Resolution Actions
<p>Confirmed Positive COVID-19 Diagnosis</p>	<p>TPH CCO contacts Cboe’s Senior Director of Market Structure to inform of a positive COVID-19 diagnosis</p> <p>If TPH firm elects to replace individual with a substitute, then TPH firm must:</p> <ul style="list-style-type: none"> • Ensure that substitute meets all requirements for access to Cboe facilities (i.e., fingerprinting is complete, access card received and activated, etc.) 	<p><u>TPH CCO or designee</u> Monitors individual’s adherence to CDC guidelines and manages return to work protocol</p> <p>Email Cboe’s Senior Director of Market Structure with a certification that the COVID-19+ individual can return to work per CDC guidelines</p> <p><u>Individual</u> Adhere to CDC guidelines, keep CCO updated on condition, and comply with return to work protocol</p>
<p>Unvaccinated individual identified as being in close contact (<6 ft) for prolonged periods (>15 minutes) to a COVID-19+ individual</p>	<p>If TPH firm elects to replace individual with a substitute, then TPH firm must:</p> <ul style="list-style-type: none"> • Ensure that substitute meets all requirements for access to Cboe facilities (i.e., fingerprinting is complete, access card received and activated, etc.) <p>All trading floor personnel who are not close contacts should self-monitor for symptoms</p>	<p><u>TPH CCO or designee</u> Monitors individual’s adherence to CDC guidelines and manages return to work protocol</p> <p><u>Individual</u> Adhere to CDC guidelines.</p>
<p>Individual Fails Onsite Health Screening</p>	<p>If TPH firm elects to replace individual with a substitute, then TPH firm must:</p> <ul style="list-style-type: none"> • Ensure that substitute meets all requirements for access to Cboe facilities (i.e., fingerprinting is complete, access card received and activated, etc.) 	<p><u>TPH CCO or designee</u> Monitors individual’s adherence to CDC guidelines and oversees return to work protocol</p> <p>CCO interviews individual for any potential CDC defined close contacts in event individual receives positive COVID-19 diagnosis</p> <p><u>Individual</u> Adhere to CDC guidelines, keep CCO updated on condition, and comply with return to work protocol</p>
<p>Individual Becomes Sick After Check-In</p>	<p>If TPH firm elects to replace individual with a substitute, then TPH firm must:</p> <ul style="list-style-type: none"> • Ensure that substitute meets all requirements for access to Cboe facilities (i.e., fingerprinting is complete, access card received and activated, etc.) • Inform substitute that they can report to floor as soon as individual that has become sick leaves. 	<p><u>TPH CCO or designee</u> Monitors individual’s adherence to CDC guidelines and manages CDC return to work protocol</p> <p><u>Individual</u> Adhere to CDC guidelines, keep CCO updated on condition, and comply with return to work protocol</p>

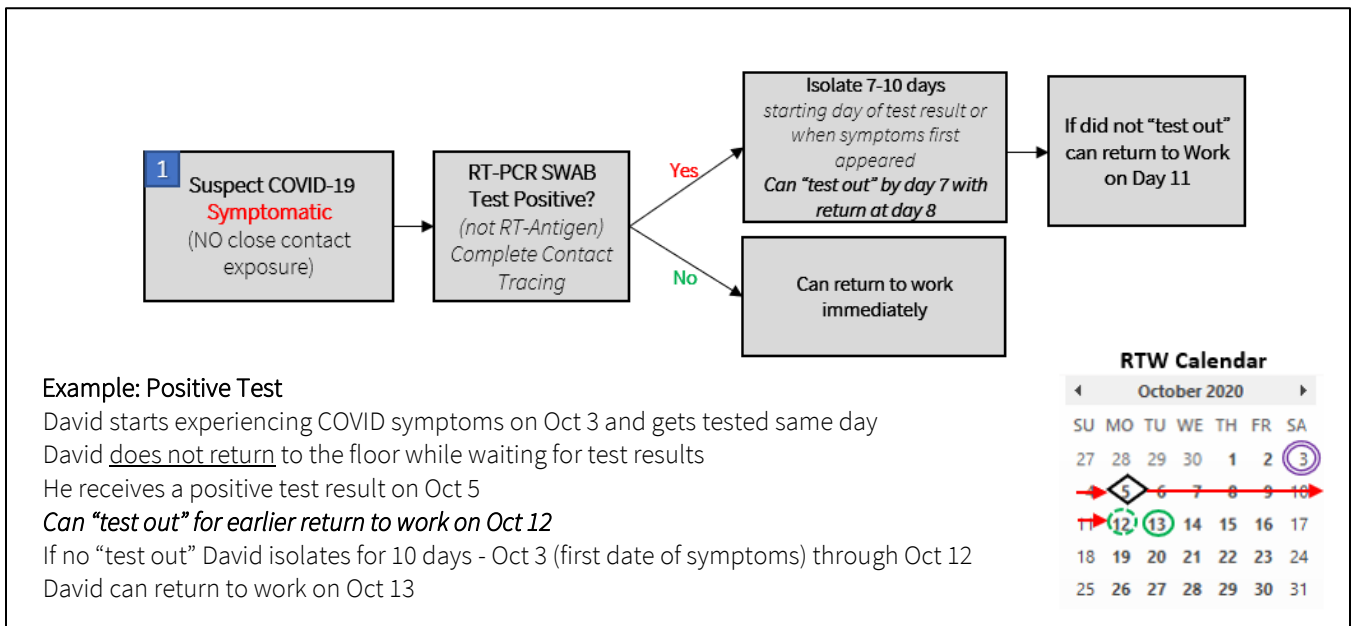
Return to Work - Duration and Precautions

While the CDC has updated certain return to work protocols as outlined below, the CDC also states that local public health authorities – such as the Chicago Department of Public Health – “make the final decisions about how long quarantine should last”. In any of the following isolation scenarios, and in addition to CDC guidelines, Cboe will require an individual who suspects COVID exposure, or has a close contact or household member who has tested positive, to also get a COVID-19 PCR swab test during their quarantine period. Please note that testing is ideally within 5 days of exposure or unless directed otherwise by a physician.

Most people with COVID -19	<ul style="list-style-type: none"> After receiving your positive Rapid Test (RT)-PCR test (“swab test”) isolation and precautions can generally be discontinued 10 days after symptom onset and resolution of fever for at least 24 hours, without the use of fever-reducing medications, and with improvement of other symptoms.
COVID-19 Positive People with Severe Illness	<ul style="list-style-type: none"> Limited number of persons may produce replication-competent virus beyond 10 days that may warrant extending duration of isolation and precautions for up to 20 days after symptom onset; consider consultation with infection control medical experts/personal physician before return to work.
People who never develop symptoms	<ul style="list-style-type: none"> Isolation and other precautions can be discontinued 10 days after the date of their first positive RT-PCR test for SARS-CoV-2 RNA
People who are close contact to someone who is COVID-19 positive	<ul style="list-style-type: none"> After receiving your RT-PCR test, stay home for 14 days after your last contact, or from date of positive test result with a person who has COVID-19 Watch for fever (100.4°F), cough, shortness of breath, or <u>other symptoms</u> of COVID-19 If possible, stay away from others, especially people who are at <u>higher risk</u>

Return to Work Scenarios

○ Symptom Onset
 ○ Symptom Onset/ Testing same day
 ○ Test Date
 ◇ Test Result
 ○ “Test Out” RTW Date
 ○ RTW Date
 → Not On Floor



Return to Work Scenarios

○ Symptom Onset ○ Symptom Onset/ Testing same day ○ Test Date ◇ Test Result ○ "Test Out" RTW Date ○ RTW Date → Not On Floor

Example: Positive Test
 John isn't exhibiting COVID-19 symptoms but wants to take extra precaution and have a test
 John gets tested on Oct 5; because asymptomatic allowed on floor Oct 6
 John receives a positive test result on Oct 7
 John may take a confirmatory PCR test for verification. If negative, he may access to Cboe facilities prior to the completion of the isolation and quarantine protocols
 John isolates for 10 days – Oct 7 (date of test result) through Oct 16
 John can return to work on Oct 19

October 2020						
SU	MO	TU	WE	TH	FR	SA
27	28	29	30	1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	31

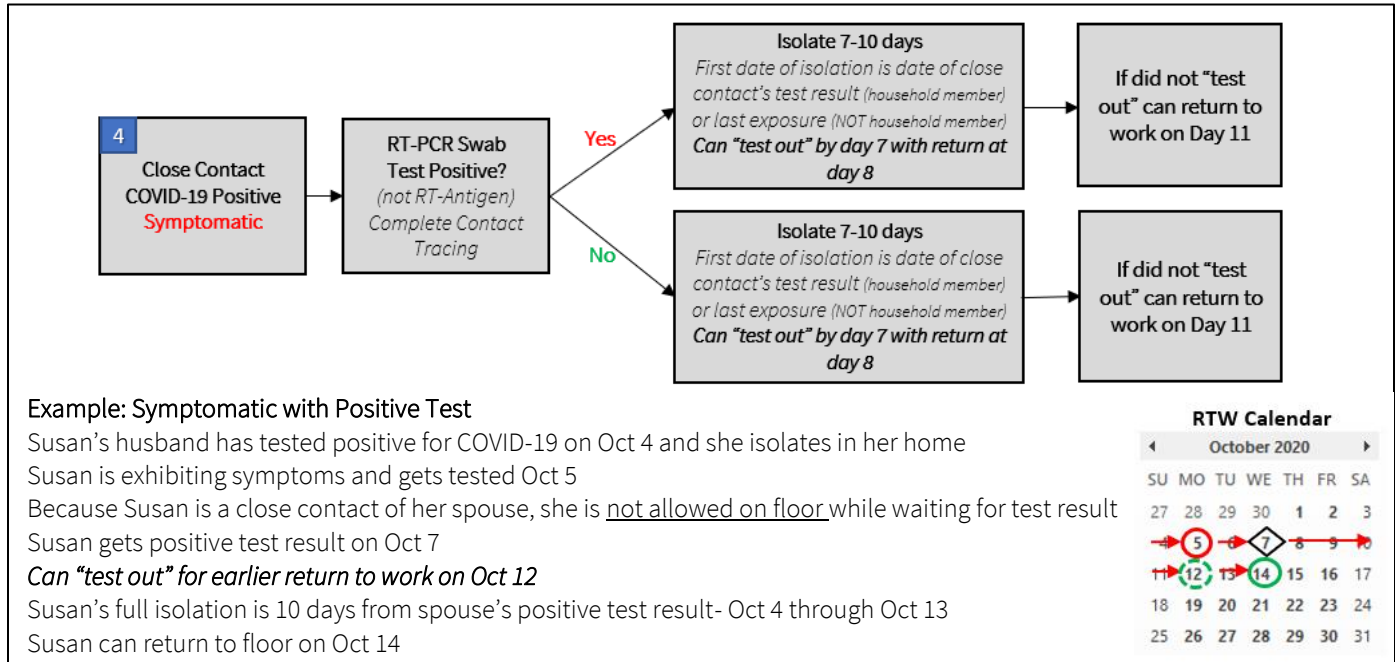
Return to Work Scenarios

○ Symptom Onset ○ Symptom Onset/ Testing same day ○ Test Date ◇ Test Result ○ "Test Out" RTW Date ○ RTW Date → Not On Floor

Example: Asymptomatic with Negative Test
 Doug goes out for dinner on Oct 2 with a friend, Bob, and was within 6 feet for cumulative 15 min
 Bob tests positive for COVID on Oct 5
 Doug gets tested on Oct 6 even though he doesn't have any symptoms; he is not allowed on floor
 Doug receives a negative test result on Oct 8
If fully vaccinated, Doug may return to work on Oct.9.
 If **not** fully vaccinated, Doug needs to isolate for 14 days – Oct 2 (last exposure) through Oct 11
 Doug can return to the floor on Oct 12

October 2020						
SU	MO	TU	WE	TH	FR	SA
27	28	29	30	1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	31

Return to Work Scenarios



If there are any questions with regards to these requirements, please contact your Cboe derivatives coverage representative at NADerivsCoverage@cboe.com

APPENDIX: Frequently Asked Questions

TESTING/ONSITE COVID TEST

Q: Who made the decision to order the COVID tests?

A: The decision was made by Cboe as an additional safety protocol and in the interest of the health and safety of the trading floor community, and not by the City of Chicago or State of Illinois health department

Q: What testing does the CDC recommend?

A: CDC does NOT recommend that employers use [antibody tests](#) to determine which employees can work. Antibody tests check a blood sample for **past infection** with SARS-CoV-2, the virus that causes COVID-19. [Viral tests](#) check a respiratory sample (such as swabs of the inside of the nose) for **current infection** with SARS-CoV-2.

Q: What company is administering the tests?

A: InHouse Physicians. We were assisted by Mercer our benefits broker, in identifying a vendor that had a stellar reputation across multiple fronts. InHouse Physicians is providing these same services for McDonald's, Sony, Abbott, Labs and municipality of New York City.

Q: Would Cboe consider testing once a week rather than twice a week?

A: Currently, we are conducting twice-a-week testing for unvaccinated individuals (once-a-week if an individual is vaccinated or has previously tested positive) to increase the likelihood of capturing any positive cases and will maintain this schedule for the foreseeable future. We will continue to monitor the current state to evaluate any potential changes to our current commitment to testing.

Q: Do these protocols apply to everyone, even those who may infrequently access the floor?

A: These protocols apply to everyone accessing the floor, except those who are fully vaccinated and have submitted a completed vaccination acknowledgement form. Any person accessing the floor, even if for a brief period, on a testing day is required to test.

Q: What are the testing plans/considerations with respect to vendors and tech support that will not be accessing the floor on a consistent basis?

A: If someone is accessing the floor on a testing day, even for a brief period, they will be held to the same protocols and are required to test.

Q: If someone is not scheduled to be on the floor on the day of testing, can the person return to the floor in between actual testing days or do they have to wait until the next testing date?

A: The testing process is rolling and intended to capture any potential positive COVID cases. If an individual is not scheduled to be onsite during a testing day, they can return to the floor and would be expected to get tested on the next first testing date that they would be on the floor. We will be conducting ongoing monitoring of testing and individuals as it is core to our focus on safety and health for individuals on the floor. **A pattern and practice of missing test dates may result in further action by the exchange.**

Q: What if a positive test is received, with or without symptoms, can it be challenged?

A: Individuals who receive a positive test result from the onsite COVID test may opt to take a confirmatory PCR test for verification. If a subsequent PCR test yields a negative result, the individual may submit proof of the negative test result to Cboe's Senior Director of Market Structure (Tony Carone, acarone@cboe.com) to regain access to Cboe facilities prior to the completion of the isolation and quarantine protocols set forth herein. Additionally, if someone tests positive, IHP also provides full services including telemedicine through full return to work management. There is also a hotline for people who test positive for any questions they may have.

Q: What is the cycle threshold Cboe is using to determine a positive test?

A: 45 cycles

Q: When and how will individuals who have been tested be alerted to results?

A: Each individual TPH will receive an email with their test results approximately 2 hours post-test date. There may be times when the results may take longer due to how many tests are being processed as COVID spikes have been occurring.

Q: If one of the current floor staff was out of office (not COVID related) and they needed to bring in a substitute to fill in – would the sub need to do anything from the COVID testing perspective prior to accessing the floor, or would they just have to go through our protocols for the days that they were accessing our facility?

A: No, the substitute does not need to get a test prior to accessing the floor. They do have to follow all the other safety and health protocols such as entry screening, following 6 feet social distancing and wear a mask (if not fully



vaccinated) in accordance with Cboe's facial covering guidelines.

Q: How will testing results be shared to firms?

A: Each TPH that receives a test will be able to access their test results online and then share with appropriate personnel at their firm. Cboe's Senior Director of Market Structure, Tony Carone, will also have access to these results.

Q: If a TPH tests positive but then tests negative the next 3 days in a row is the TPH still out the 14-day period?

A: If someone receives a positive test through IHP they will be out for the CDC recommended number of days, dependent on whether or not they are asymptomatic or symptomatic. However, individuals who receive a positive test result from the onsite COVID test may opt to take a confirmatory PCR test for verification. If a subsequent PCR test yields a negative result, the individual may submit proof of the negative test result to Cboe's Senior Director of Market Structure (Tony Carone, acarone@cboe.com) to regain access to Cboe facilities prior to the completion of the isolation and quarantine protocols set forth below.

Q: Can you explain further how the CBOE will ensure testing participant's medical privacy if they were to test positive? How will CBOE ensure the TPH's HIPPA rights are protected?

A: Neither the TPH nor Cboe are a HIPAA covered entity. However, all medical records are encrypted and/or password protected in keeping with how we manage medical privacy for our employees and have used the same protocols for all TPHs.

Q: Does receiving a COVID-19 vaccination eliminate the requirement to participate in bi-weekly COVID testing?

A: If an individual has been fully vaccinated (or has previously tested positive), the individual may be exempted from participating in the bi-weekly onsite COVID testing once 14 days have passed since the individual's final vaccination dose, provided:

- The CCO of the individual's TPH firm submits a completed vaccination acknowledgment form to Cboe's Senior Director of Market Structure; and
- The individual does not exhibit any COVID-19 symptoms.

Even if exempted from the bi-weekly onsite COVID testing, a fully vaccinated individual must still participate in the arrival check-in/onsite health screening procedures, and, if exhibiting symptoms, is subject to the isolation and quarantine protocols set forth above. Fully vaccinated individuals will be permitted to move from one side of the floor to another intra-day, provided the TPH CCO has provided adequate notification to and received approval from Tony Carone.

Q: What is the cost of a Covid test?

A: The cost is all-inclusive and a flat \$105 per test per person.

Q: If firms can obtain a vendor to conduct the same PCR testing at a better rate, could we organize our own testing and provide Cboe with the vendor emailed results?

A: No, Cboe will only be using InHouse Physicians as the sole testing organization. InHouse Physicians will also be managing other services including Cboe's requirement to notify the Department of Public Health for every positive result and is another reason why we need to maintain one vendor.



Q: Will the PCR testing firm submit the \$105/test cost for insurance reimbursement (re: CARES Act) on a TPH's behalf, or will TPHs be required to process such paperwork themselves?

A: Since the TPHs are not Cboe employees, the TPH will need to manage these details by contacting their Benefits Broker or contact person for your medical plan. Currently, Cboe is finalizing the process to inform each TPH of the name and number of tests per person for billing. This information and/or the email notification of a test completion without results is another option for each TPH to discuss with their broker and/or medical plan contact person.

Q: Are the healthcare providers themselves being tested?

A: Yes, they are also tested on a regular basis.

GENERAL PROTOCOL QUESTIONS

Q: Why is an unvaccinated person who was in close contact with a Covid positive individual supposed to get a test since they are already required to quarantine for 14 days? I don't see this in the CDC guidelines which you refer us to.

A: This has been a Cboe operating protocol that has not been specifically outlined in the playbook. It has been added to the current version of the playbook that we posted to the portal. The intent is to continue with our conservative approach and ensure that we take every step to ensure health and safety of people on the floor.

Q: What is the process for validating close contacts in the event two parties disagree as to whether they had close contact?

A: Cboe is following the CDC guidance on the questions that need to be asked for contact tracing and has consistently provided those questions to the TPH CCO or designee who is accountable for completing that contact tracing. Cboe will take the results of that contact tracing and leverage for decision making purposes. If additional information comes to bear, we will consider that information and this could include a formal attestation. With that, the safety and health of the individuals on the floor is the primary guiding principle and Cboe will continue to take a conservative approach.

Q: If an unvaccinated individual has tested negative after a confirmed exposure, would Cboe be willing or able to shorten the quarantine/lock out period if the individual obtains a second negative test result a few days later?

A: No, we will continue to hold to the CDC guidelines that were also evaluated by Cboe's medical team and outlined in the playbook.

Q: In the event the medical screening protocol sends TPH home incorrectly, what will be Cboe's procedure?

A: We have taken multiple steps to outline protocol details and ensure the communication and training behind them runs efficiently and accurately. Should there ever be a concern contact your Coverage team.

Q: Will Cboe employees now be restricted to one side of the floor?

A: Cboe staff limits the number of individuals permitted to access both north and south sides of the floor. Going forward, staff will limit their contact to one side or the other as much as possible.

Q: Whom should we be turning to for quick but authorized/official answers on other playbook related questions as they arise?

A: Please contact Jordan Newmark (jnewmark@cboe.com) and copy Tony Carone (acarone@cboe.com).



TRAVEL RESTRICTIONS

Q: Does the new City of Chicago Travel amendment with color coded states apply to essential workers?

A: Yes. The details can be found [here](#). There is also a very descriptive FAQ that we recommend each TPH review.

Q: Can I get a COVID test if I travelled to an orange state to avoid quarantine?

A: Yes, if you are unvaccinated and travel to an orange state, you may avoid quarantine by obtaining a negative COVID-19 test result no more than 72 hours prior to arrival in Chicago and providing a copy of the negative test results to your TPH CCO. Details can be found [here](#).

Q: For someone who lives in a border state, can you confirm that the order does not apply and they can continue going to the floor?

A: The City of Chicago Order applies to neighboring states. However, there is an exception for “essential workers”. Please note that the Order expressly provides that this exception is not available for non-work travel.

Q: For non-essential travel to a border state, are traders expected to follow the color-coded guidelines?

A: Cboe is relying on the City of Chicago’s Order and its labeling of all states as Orange or Yellow, which includes neighboring states.

Q: Are there any requirements for travel to a CDC Level 2 country?

A: At this time, no specific requirements in the Playbook for CDC Level 2 destinations, as there are for CDC Level 3 or higher destinations.

CONTACT TRACING

Q: What is Contact tracing?

A: Contact tracing has been used for decades by state and local health departments to slow or stop the spread of infectious diseases. Contact tracing slows the spread of COVID-19 by:

- Letting people know they may have been exposed to COVID-19 and should monitor their health for signs and [symptoms of COVID-19](#)
- Helping people who may have been exposed to COVID-19 get tested
- Asking people to [self-isolate](#) if they have COVID-19 or [self-quarantine](#) if they are a [close contact](#) of someone with COVID-19

Q: Who is considered a close contact to someone with COVID-19?

A: For COVID-19, a [close contact](#) is anyone who was within 6 feet of an infected person for a total of 15 minutes or more. An infected person can spread COVID-19 starting 48 hours (or 2 days) before the person has any symptoms or tests positive for COVID-19.

Q: Am I considered a close contact if I was wearing a mask?

A: Yes, you are still considered a [close contact](#) even if you were wearing a mask while you were around someone with COVID-19. Masks are meant to protect other people in case you are infected, and not to protect you from becoming infected.

Q: If I am a close contact, will I be tested for COVID-19?

A: If you have been in [close contact](#) with someone who has COVID-19, you should be tested, even if you do not have symptoms of COVID-19. While you are waiting for your COVID-19 test result, stay home away from others ([self-quarantine](#)) and monitor your health [for symptoms of COVID-19](#) to protect your friends, family, and others from



possibly getting COVID-19.

- If your **test is positive**, you should continue to stay home and [self-isolate](#) away from others and monitor your health. If you have symptoms of COVID-19 and they worsen or become severe, seek emergency medical care. Severe symptoms include trouble breathing, persistent pain or pressure in the chest, confusion, inability to wake or stay awake, or bluish lips or face.
- If your **test is negative** and you **don't have symptoms**, you should continue to stay home and [self-quarantine](#) away from others for 14 days after your last exposure to COVID-19 and follow all recommendations from the health department. This is important because symptoms can appear up to 14 days after you've been exposed and are infected. A negative result before the end of your quarantine period does not rule out possible infection. Additionally, you do not need a repeat test unless you develop symptoms, or if you require a test to return to work.
- If your **test is negative** and you **have symptoms**, you should continue to self-quarantine away from others for 14 days after your last exposure to COVID-19 and follow all recommendations from the health department. Additional medical consultation and a second test may be needed if your symptoms do not improve.

Q: What will happen during contact tracing if I am diagnosed with COVID-19?

A: If you are diagnosed with COVID-19, someone will call you to check on your health, discuss who you have been around and ask where you spent time while you may have been able to spread COVID-19 to others. You will also be asked to continue to stay at home and [self-isolate](#), away from others.

- Self-isolation means staying at home in a specific room away from other people and [pets](#), and using a separate bathroom, if possible.
- Self-isolation helps slow the spread of COVID-19 and can help protect the health of your family, friends, neighbors, and others you may come in contact.

Watch for or monitor your [symptoms of COVID-19](#). If your symptoms worsen or become severe, you should seek medical care.

Q: What will happen during contact tracing if I have been around someone with COVID-19?

A: If you were around someone who has been diagnosed with COVID-19, someone from the health department may call you to let you know that you may have been exposed to COVID-19. Unless you are fully vaccinated, stay home and away from others for 14 days ([self-quarantine](#)) after your last contact with that person. "Self-quarantine" means staying home, away from others and monitoring your health.

- If you need to be around other people or animals in or outside of the home, wear a mask. This will help protect the people around you.


Monitor your health and watch for [symptoms of COVID-19](#). Remember, symptoms may appear 2-14 days after you were exposed to COVID-19. If your symptoms worsen or become severe, seek medical care. [Severe symptoms](#) include trouble breathing, persistent pain or pressure in the chest, new confusion, inability to wake or stay awake, or bluish lips or face.

Contact Tracing Questionnaire

The following questions should be asked of each suspected COVID-19 case as well as those who test positive. The answers to these questions should be shared with the Senior Director of Market Structure of Cboe.

Contact Tracing Questionnaire			
1. Are you experiencing any COVID-19 Symptoms?	<input type="checkbox"/>	Yes	<input type="checkbox"/> No
2. What symptoms have you been experiencing? (Describe below)			
3. What date did you first start experiencing symptoms?	<input type="text"/>	/	/ (Date)
4. Do you have a household member who is suspected of having COVID-19?	<input type="checkbox"/>	Yes	<input type="checkbox"/> No
5. Has a household member been tested?	<input type="checkbox"/>	Yes	<input type="checkbox"/> No
6. What date did your household member get tested?	<input type="text"/>	/	/ (Date)
7. What type of test did your household member receive? RT-Antigen, RT-PCR (15 min), RT-PCR (Swab)			
8. Has your household member taken any follow-up COVID tests?	<input type="checkbox"/>	Yes	<input type="checkbox"/> No
9. If your household member had a follow-up COVID test, what type?			
10. What was the date of your household member's follow-up COVID test?	<input type="text"/>	/	/ (Date)
11. Have you come into close contact of anyone who is not a household member who is suspected of having COVID-19?	<input type="checkbox"/>	Yes	<input type="checkbox"/> No
12. When was the last time (date) you were with this close contact?	<input type="text"/>	/	/ (Date)
13. Did your close contact get a COVID-19 test?	<input type="checkbox"/>	Yes	<input type="checkbox"/> No
14. What was the date your close contact received COVID-19 test results?	<input type="text"/>	/	/ (Date)
15. What was the result of your close contact's test result?	<input type="checkbox"/>	Pos	<input type="checkbox"/> Neg
16. Have you taken a COVID test?	<input type="checkbox"/>	Yes	<input type="checkbox"/> No
17. What was the date of your test?	<input type="text"/>	/	/ (Date)
18. What type of test did you receive? RT-Antigen, RT-PCR (15 min), RT-PCR (Swab)			
19. Have you had any follow-up COVID tests? RT-Antigen, RT PCR (15 min), RT-PCR (Swab)	<input type="checkbox"/>	Yes	<input type="checkbox"/> No
20. If you've had a follow-up COVID test, what type? RT-Antigen, RT-PCR (15 min), RT-PCR (Swab)			
21. What was the date of your follow-up COVID test?	<input type="text"/>	/	/ (Date)
22. Were there any close contacts you've had going back to two days before you started experiencing symptoms?	<input type="checkbox"/>	Yes	<input type="checkbox"/> No
23. If experiencing symptoms, please list the names of the people and their employers who were close contacts going back to the two days prior to onset of symptoms. List below.			
24. If you were not experiencing symptoms, who were your close contacts for the past 10 days? (On the floor, lunchroom, restroom, outside building, etc.) List Below.			
25. When was your last day on the floor?	<input type="text"/>	/	/ (Date)
26. Does this person stay on one place on the floor? If float, what are the other areas in addition to assigned location? List here.	<input type="checkbox"/>	Yes	<input type="checkbox"/> No

Based on answers to questions above, additional questions may be asked.

Version	Change Synopsis	Date of Change
1.1	Public transportation (pg. 2), Lunch guidelines, refill water bottles (pg. 3), Thermometer brand (pg. 5), Expected departure time (pg. 5)	6/2/2020
1.2	Hot Spot travel restriction -CDC/City of Chicago (pg. 6-7)	6/10/2020
1.3	TPH CCO alternate designate (pg. 6)	6/22/2020
1.4	Lunch guidelines and lunch hours (pg. 3)	6/29/2020
1.5	Disinfecting and Deep Cleaning (pg. 3)	7/7/2020
1.6	Leave and re-enter guidelines (pg. 5)	7/14/2020
1.7	Expanded lunchroom hours (pg. 3), Updated sections for Hot Spot (Arrival, pg. 4), CDC Facial Covering/Face Mask (pg. 4), Events that require notification of Cboe CHRO (Arrival, pg. 4, Denied Cboe Access, pg. 5, Contact Tracing, pg. 6), Close contact definition (pg. 6)	10/22/2020
1.8	Specific gaiter brand allowed (pg. 4), New Mid-Day Medical Screen (pg. 5-6); Return to Work Protocols and Scenarios (pg. 8-10), FAQs -CDC (pg. 11-12), Contact Tracing Questionnaire (pg. 13)	11/10/2020
1.9	COVID-19 PCR Swab test requirement (multiple pages) Onsite Testing (pg.6)	11/13/2020
2.0	Updated Isolation and FAQs	11/23/2020
2.1	Lunchroom Update (pg. 3); Annual Check-in/Onsite Health Screen (Clarification on Travel Advisories form IDPH/CDC) (pg. 4/5). Mid-Day Medical Screen (Consequences for missed screen) (pg. 6); Bi-Weekly COVID onsite testing (pg. 7) ; Isolation/Quarantine (Whole new section based on updated CDC Guidance) (pg. 8-10); Return to Work Scenarios (All updated based on new CDC guidance for potential “test out” earlier return to work) (pg. 12-14). Updated FAQ (in red) (pg. 15)	12/8/2020
2.2	Bi-Weekly COVID Testing (pg. 7-8), Quarantine Protocols (pg. 9). Isolation/Quarantine Scenarios (p. 11), Testing/Onsite COVID Test (pg. 17), Travel Restrictions FAQs (pg. 19)	1/29/2021
2.3	Bi-Weekly COVID Testing (pg. 8), Testing/Onsite COVID Test FAQs (pg. 17), and added references to “Senior Director of Market Structure” (pg. 4, 6, 8-9, 12, 16-17, 21)	3/17/2021
2.4	Deleted references to “CHRO”, “Jen Browning” and “jbrowning@cboe.com (pg. 2, 4, 6-8, 12, 16-17, 19, 21)	4/29/2021
2.5	Deleted references to “mid day” temperature screenings (pg. 6, 8, 11, 16-18)	5/5/2021
2.6	Updated mask guidance and added further distinctions for “fully vaccinated” individuals (pg. 3-6, 9, 11-12, 15, 17)	5/24/2021
2.7	Updated guidance regarding access to the onsite COVID testing area (pg. 7)	6/3/2021
2.8	Updated guidance regarding lunch/eating (p. 3), face masks (p.4), and onsite COVID testing location (p.7)	7/16/2021
2.9	Updated guidance regarding face masks (p.4)	8/4/2021
3.0	Updated guidance regarding mandatory vaccination and exemptions (p. 2) and masks/facial coverings (p. 5)	8/16/2021
3.1	Updated guidance regarding Bi-Weekly COVID Testing (pg. 6-7) and related Return to Work Scenarios (p. 13) and Testing/Onsite COVID Test FAQs	9/13/2021
3.2	Updated guidance regarding Bi-Weekly COVID Testing (pg. 6-7), as indicated by a red arrow (), as well as related FAQs	10/8/2021