

Business Process Outsourcing

Securities Exchange Commission Rule 606 and 607 (Disclosure of Payment for Order flow and Order Routing Information)

ORDER ROUTING INFORMATION

Pursuant to federal securities regulation, firms are required to make publicly available a quarterly report with regard to its routing of non-directed orders. For the purpose of this Rule, we have entered into an agreement with Apex Clearing to route orders on behalf of Broadridge Business Process Outsourcing, LLC. Apex Clearing's order routing numbers can be accessed by utilizing the following link: https://www.apexclearing.com/disclosures.

SEC Rule 606(b) also requires broker-dealers to disclose to its customers, upon request, "the identity of the venue to which the customer's orders were routed for execution in the six months prior to the request, whether the orders were directed orders or non-directed orders, and the time of the transactions, if any, that resulted from such orders."

PAYMENT FOR ORDER FLOW DISCLOSURE

Pursuant to federal securities regulations, we are required to disclose at the time your account is opened, and annually thereafter, our payment for order flow practices.

We route your equity orders to our clearing firm for execution. They may receive payment or rebates from the executing venue and we may receive a share of those payments or rebates. The amount of the payment or rebate will be furnished to you upon written request.

Order routing decisions are based on a number of factors including the size of the order, the opportunity for price improvement and the quality of order executions. We regularly review our clearing firm's execution quality to ensure that your orders meet our duty of best execution.