



**TRADE BRIDGE CAPITAL LLC  
d/b/a Savile Capital Markets**

**REGULATION BEST INTEREST DISCLOSURE**

**August 31, 2023**

This guide summarizes important information concerning the scope and terms of the brokerage services we offer and details the material conflicts of interest that arise through our delivery of brokerage services to you. We encourage you to review this information carefully, along with any applicable account agreement(s) and disclosure documentation you may receive from us.

Trade Bridge Capital LLC (“TBC”) is registered with the U.S. Securities and Exchange Commission (“SEC”) as a broker-dealer and is a member of the Financial Industry Regulatory Authority (“FINRA”) who is doing business as Savile Capital Markets (“Savile”). TBC also has an affiliate SEC-registered investment advisor, Consultiva Wealth Management Corp (“Consultiva”) which provides investment advisory services. Both entities are under common ownership and share office space and staffing amongst other services. Trade Bridge and Consultiva conduct activities under one common brand. As you review this information, we would like to remind you that our brokerage services through Trade Bridge Capital LLC d/b/a Savile Capital Markets are the primary focus of this guide.

Our Form CRS contains information about the types of services we offer, along with general information related to compensation, conflicts of interest, disciplinary action, and other reportable legal information. Additional information about Trade Bridge, Consultiva and/or its financial professionals is available on FINRA’s website at <http://brokercheck.finra.org> or [www.sec.gov](http://www.sec.gov).

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**ITEM 1 INTRODUCTION**

Trade Bridge Capital LLC is a broker-dealer registered with the SEC and member of the Financial Industry Regulatory Authority (FINRA) and the SIPC who is doing business as Savile Capital Markets (“Savile”). As a broker-dealer, TBC transacts business in many types of securities, including mutual funds, exchange-traded funds (ETFs), stocks, bonds, options, structured products, and other investment products. TBC maintains a network of individuals, referred to as “financial professionals”. Some of TBC’s financial professionals are Investment Adviser Representatives (IARs) of Consultiva an affiliated third-party investment adviser. TBC sometimes refers to these specific financial professionals as “investment advisors” or “advisors.” **When you are discussing services with a financial professional, you should ask in what capacity the financial professional is acting or will be**

**acting – as a broker-dealer registered representative and/or an IAR – when providing services to you.** This disclosure discusses important information regarding financial professionals who act as Registered Representatives of TBC. For more information about Consultiva and the services financial professionals provide when they act as IARs, please see Consultiva’ Form ADV disclosure brochures available at Investment Adviser Firm (sec.gov) or contact that investment advisor for a copy of its Form ADV Part 2.

Like various financial services providers, TBC and its financial professionals have conflicts of interest. Savile and its financial professionals are compensated directly by customers and indirectly from the investments made by customers. When customers pay us, we typically get paid an upfront commission or sales load at the time of the transaction and in some cases a deferred sales charge. If we are paid an upfront commission, it means that we are paid more, the more transactions a customer makes. When we are paid indirectly from the investments made by customers, we receive ongoing compensation, typically called a “trail” payment, for as long as a customer holds an investment. In addition, we receive compensation from the sponsors of some of the investment products that customers purchase through us. The amount we receive varies depending on the particular type of investment ultimately processed for each customer. The compensation described in this disclosure represents the maximum gain or profit we receive from an investment before subtraction of our expenses.

Please also note that not all of the conflicts described in this disclosure apply to a particular financial professional, his/her services or all the products we sell. The types and amounts of compensation we receive change over time. You should ask your financial professional if you have any questions about compensation, costs, fees, or conflicts of interest.

## **ITEM 2 COMMISSIONS, FEES, AND OTHER TYPES OF SALES COMPENSATION**

### **Commissions and Sales Charges**

TBC receives upfront commissions when it executes transactions that result in the purchase or sale of a security. A commission, which also may be called a sales load, sales charge, or placement fee, is typically paid at the time of the sale and can reduce the amount available to invest or can be charged directly against an investment. Commissions are often based on the amount of assets invested. TBC receives the sales charge or commission and shares it with your financial professional. In some cases, a portion of the sales charge or commission is retained by the investment’s sponsor. Commissions vary from product to product, which creates an incentive to sell a higher commission security rather than a lower commission security. The maximum and typical commissions for common investment products are listed in Schedule II. For more information about other commissions that apply to a particular transaction, please refer to the applicable investment prospectus or other offering document.

### **Markups and Markdowns – Principal or Dealer Transactions**

When TBC buys from or sells a security to you in a principal capacity, TBC buys or sells the security directly to or from you, rather than acting as your agent to buy or sell the security from a third party. These transactions are also known as “dealer transactions.” In these circumstances, if we sell a security at a price higher than what we paid for it, we will earn a markup. Conversely, if we buy a security from you at a price lower than what we sell it for, we will earn a markdown. Transactions in bonds and other fixed-income securities such as structured products often occur as dealer transactions.

Please see *Trade Bridge Security Transaction Pricing Guideline Summary (Exhibit II)* for further details related to commission and markups/markdown charges by type of product.

### **Clearing Firm Direct Fees and Charges**

If you hold an account at TBC, TBC charges miscellaneous fees directly to your account such as fees for transaction processing, account transfers, and retirement account maintenance. For direct fees that apply per transaction, TBC receives more fees based on the greater number of transactions that result from its financial professional’s recommendations. These direct fees and charges are set out in Exhibit I of the Brokerage Account Fees & Charges and are not shared with financial professionals.

### **ITEM 3 THIRD PARTY COMPENSATION**

TBC and financial professionals receive compensation from investment product sponsors and other third parties in connection with investments that TBC customers make in securities such as mutual funds, and alternative investments. Some types of third-party compensation are received by TBC and shared with financial professionals, and other types are retained only by TBC.

#### **Third Party Compensation Shared by TBC and Financial Professionals Trail Compensation**

TBC and its financial professionals receive ongoing compensation from certain investment products such as mutual funds, and alternative investments. This compensation (commonly known as trails or Rule 12b-1 fees) is typically paid from the assets of the investment product under a distribution or servicing arrangement with the investment sponsor and is calculated as an annual percentage of assets invested by TBC customers. The more assets you invest in the product, the more fees will be paid to TBC. Therefore, we have an incentive to encourage you to increase the size of your investment. The amount of trails received varies from product to product. This creates an incentive to recommend a product that pays a higher trail rather than a lower trail. We also have an incentive to recommend a product that pays trails (regardless of amount) rather than products that do not pay trails. For more information about trail compensation received with respect to a particular investment, please refer to the prospectus or offering document for the investment.

#### **Non-Cash Compensation**

TBC employees and financial professionals can receive non-cash compensation from investment sponsors that is not in connection with any particular customer or investment. Compensation includes such items as gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational meetings, customer workshops or events, or marketing or advertising initiatives, including services for identifying prospective customers. Investment sponsors may also pay or reimburse TBC and/or its financial professionals, for the costs associated with education or training events that may be attended by TBC employees and financial professionals and for TBC sponsored conferences and events.

#### **Third Party Compensation received by TBC- FDIC Insured Deposit Program “The program”**

If a customer holds an account through TBC at StoneX, the customer may elect to participate in the FDIC Insured Deposit Program offered by StoneX. In the program, uninvested cash balances are invested or “swept” into the program at insured bank deposits accounts at multiple FDIC insured banks (Participating banks). StoneX receives interest revenue from the program, which is shared with TBC. The range of these payments to TBC are variable, from “0” to 20 basis points.

#### **Third Party Compensation Retained by Trade Bridge-Money Market Funds**

A customer may elect to invest cash balances in a Money Market Funds. Under its agreement with each fund in which TBC deposits customer cash, TBC receives from the sponsor of the fund, a fee from the fund equal to a percentage of the average daily deposit balance in the money market fund. Interest rates under money market funds may be lower than the interest rates available if customers make deposits directly with a bank or other depository institution outside of TBC’s brokerage platform or invests in some other money market fund or other cash equivalent. Customers should compare the terms, interest rates, required minimum amounts and other features with other types of accounts and investments for cash. Trade Bridge receipt of compensation related to money market assets creates a conflict of interest and incentive for Trade Bridge and its representatives to elect certain sponsors or providers that maintain a relationship with the Firm.

### **ITEM 4 PRODUCT COSTS AND RELATED CONFLICTS**

Financial professionals provide recommendations with respect to a broad range of investment products, including stocks, bonds, ETFs, mutual funds, and alternative investments. Each type of investment product carries unique risks, and many investment products charge fees and costs that are separate from and in addition to the commissions and fees that TBC and financial professionals receive. You can learn more about these risks, fees and costs charged by an investment product by reviewing the investment product’s prospectus, offering memorandum, or other disclosure documents.

▪ ***Share Class and Fund Selection.***

TBC offers various share classes of mutual funds. As an example, certain mutual fund share classes, often referred to as Class A shares, charge a sales charge and an ongoing trail. For other mutual fund share classes, often titled Class C shares, there is upfront sale charge paid, as well as an ongoing trail payment and a contingent deferred sales charge to the investor if there is a redemption within a certain period of time after purchase. Depending on the length of the holding period for the mutual fund, and other factors, one share class may be less expensive to the investor than another, and TBC and the financial professional may earn more or less in compensation for one share class than another. Because of their characteristics and sales load structure, mutual funds generally are longer term investments. Frequent purchases and sales of mutual funds can result in significant sales charges unless the transactions are limited to exchanges among mutual funds offered by a sponsor that permits exchanges without additional sales charges. TBC maintains policies and procedures that are designed to detect and prevent excessive mutual fund switching, but you should monitor your account and discuss with your financial professional any frequent mutual fund purchases and sales.

We may be compensated in other ways by sponsors of no-load funds, such as through revenue sharing payments. Because of the limited compensation from no-load funds, we have an incentive to limit the availability of no-load funds we offer and to recommend you invest in funds that impose sales charges and trails.

TBC also offers various mutual funds and ETFs, some of which have similar or identical investment strategies but differing fee structures. For example, a mutual fund that is designed to track an index of securities, such as the S&P 500 Index, may have higher or different types of fees than an ETF that is designed to track the same index. Whether a fund or ETF is more expensive than another fund or ETF with a similar or identical investment strategy may depend on factors such as length of holding, size of the initial investment and other factors. TBC and a financial professional may earn more compensation for one fund or ETF than another, giving TBC and the financial professional an incentive to recommend the product that pays more compensation to us.

***Understanding Risk***

It is important for you to understand that all investment recommendations and activities involve risk, including the risk that you may lose your entire principal. Further, some investments involve more risk than other investments. Higher-risk investments may have the potential for higher returns but also for greater losses. The higher your “risk tolerance,” meaning the amount of risk or loss you are willing and able to accept in order to achieve your investment goals, the more you may decide to invest in higher-risk investments offering the potential for greater returns. We align risk tolerances with investment needs to offer you different investment objectives from which to choose. You should select the investment objective and risk tolerance best aligned with your brokerage account goals and needs.

Investment goals typically have different time horizons and different income and growth objectives. Generally, investment goals are on a spectrum, with “Income” investors typically holding the smallest percentage of higher risk investments, followed by “Growth and Income” investors holding some higher-risk investments, and finally “Growth” investors holding a significant portion of their portfolio in higher-risk investments. Risk tolerance also varies, and we measure it on a continuum that increases from “Conservative” to “Moderate” to “Aggressive,” and finally “Trading and Speculation.” Our recommendations are based in part on your risk tolerance and investment objective as outlined above. We encourage you to carefully consider your investment objective and risk tolerance before investing.

**ITEM 5 CUSTOMER REFERRALS, OTHER COMPENSATION, AND OTHER CONFLICTS**

**Payment for Referrals**

TBC does not have a referral program for domestic individuals or entities. In another type of agreement, foreign financial professionals can become registered as foreign finders, or the firm may establish sub-clearings agreements and share in brokerage commissions in connection with the referrals.

### **Margin & Loan Advance**

TBC, through its custodians, offers customers the ability to purchase securities on credit, also known as margin purchases. When a customer purchases securities on margin, TBC extends a line of credit to the customer and charges interest on the margin balance. TBC has a financial incentive to encourage margin borrowing because TBC earns compensation in the form of interest, transaction charges and other fees on investments made with borrowed amounts. That financial incentive creates a conflict of interest so far as TBC and financial professionals benefit from your decision to borrow and incur the various fees and interest described above. If contemplating use of margin, please consult the TBC Margin Agreement and related disclosures for additional details.

### **Error Correction**

If a customer holds an account at TBC and a trade error caused by TBC occurs in the account, TBC will cancel the trade and remove the resulting monetary loss for the customer from the account. If a trade correction is required as a result of a customer error (e.g., if a customer does not make full payment for purchases or fails to deliver negotiable securities for liquidations before trade settlement), TBC will cancel the trade and any resulting monetary loss will be borne by the customer. In the case of a trade that requires a correction and that resulted in a monetary gain to the customer, such gain may be removed from the account and may result in a financial benefit to TBC.

### **Limitations on Investment Recommendations**

TBC and its financial professionals offer and recommend investment products. Other firms may offer products and services not available through TBC, or the same or similar investment products and services at lower cost. In addition, TBC may only offer certain products in a brokerage account, even though there is a version of the product that may be offered at a lower cost through an advisory account, and vice versa.

The scope of products and services offered by certain financial professionals may also be more limited than what is available through other financial professionals. A financial professional's ability to offer individual products and services depends on his/her licensing, training, or branch office policy restrictions. For example, a financial professional maintaining a Series 6, Series 63 and Life Insurance Agent license is limited to providing investment company securities, such as mutual funds and UITs and variable annuity contracts. A financial professional maintaining a Series 7, Series 63 and Life Insurance Agent license can provide solutions including all securities available for sale by a Series 6 representative as well as individual stocks, bonds, and alternative investments, among others. As another example, a financial professional may only be licensed to provide brokerage services, and not advisory services, or vice versa. To provide investment advisory services, a financial professional is often required to be registered as an IAR (Investment Advisor Representative) with the state in which he/she has a place of business.

You should ask your financial professional about the securities or services he/she is licensed or qualified to sell, and his/her ability to service investments that you transfer to TBC from another firm. You should also review the licenses held by your financial professional by visiting the FINRA Broker Check system at <http://brokercheck.finra.org>.

## **ITEM 6 FINANCIAL PROFESSIONAL COMPENSATION, FEES, AND RELATED CONFLICTS**

TBC compensates financial professionals pursuant to an independent contractor agreement, or as employees. TBC

### **Financial Professional Compensation.**

TBC typically pays its financial professional a percentage of the revenue he/she generates from sales of products and services. The percentage received can vary depending on his or her agreements with TBC, its parent company Savile Capital Group and the investment product or service recommended. When compensation is based on the level of production or assets, the financial professional has a financial incentive to meet those production or asset levels. TBC and branch managers have an obligation to supervise financial professionals and may decide to terminate a financial professional's association with TBC based on performance, a disciplinary event, or other factors. The amount of revenue a financial professional generates creates a conflict of interest when considering whether to terminate a financial professional.

Financial professionals have the ability to provide discounts and fee waivers on certain investment products and have the discretion to provide such discounts and waivers to clients that generate higher amounts of revenue or do more transactions with the financial professional. Providing a discount or a fee waiver, which is at the discretion of the financial professional, will result in the financial professional earning less compensation which creates a conflict of interest with you.

Financial professionals are eligible to receive equity awards from participating in incentive and recognition programs that are based on total production, total revenue, length of service, total assets in accounts that they service, and such other criteria as TBC may establish from time to time.

Financial professionals who join TBC from other firms generally receive payments in connection with that move. These payments may take various forms, including salary guarantees, upfront bonuses or forgivable loans, and various forms of compensation contingent on their continued employment. The amount paid to financial professionals under these arrangements generally is based to a large extent on the size of the business at their prior firm. In addition, they typically are eligible for future bonus payments based on the total assets in the accounts that they service at TBC and/or revenue generated from those accounts at some defined point in the future. These bonuses are in addition to the incentive compensation to which they are otherwise entitled as financial professionals. Financial professionals who join from other firms have a financial incentive to recommend that you transfer your account to us.

### **Other Benefits**

TBC may charge financial professionals' various fees under its independent contractor agreement for, among other things, trade execution, administrative services, insurance, certain outside business activity related to supervision, technology, and licensing. Depending on the situation, these fees make it more or less profitable for the financial professional to offer and recommend certain services or products over others. In certain cases, these fees are reduced based on the financial professional's overall business production or the amount of assets serviced by the financial professional, which gives the financial professional an incentive to recommend that you invest more in your account or engage in more frequent transactions. Transaction fees charged to your financial professional can also vary depending on the specific security that the financial professional recommends. As an example, the transaction fees a financial professional must pay to TBC to purchase or sell a mutual fund for your account may differ between funds, which creates an incentive for your financial professional to recommend the fund that carries the lowest transaction charge.

### **Financial Professional's Outside Business Activities**

Financial professionals are permitted to engage in certain TBC-approved business activities other than the provision of brokerage and advisory services through TBC, and in certain cases, a financial professional receives more compensation, benefits, and non-cash compensation through the outside business than through TBC. Some financial professionals may be accountants, real estate agents, insurance agents, and refer customers to other service providers and receive referral fees. As an example, a financial professional could provide third party administration to retirement plans through a separate firm. If a financial professional provides investment services to a retirement plan as a representative of TBC and provides administration services to the plan through a separate firm, this typically means the financial professional is compensated from the plan for the two services. If you engage with a financial professional for services separate from TBC, you may wish to discuss with him/her any questions you have about the compensation he/she receives from the engagement. Additional information about your financial professionals outside business activities is available FINRA's on website at <http://brokercheck.finra.org>.

### **Compensation for Other Services**

TBC and financial professionals can offer various types of advisory and brokerage programs, platforms, and services, and earn differing types and amounts of compensation depending on the type of service, program, or platform in which you participate. This variation in compensation can incentivize a financial professional to recommend services, programs or platforms that generate more compensation for TBC and the financial professional than others. For example, if you expect to trade securities frequently in your account, a brokerage account in which you pay a commission for each transaction may generate more compensation for your financial professional than an advisory account that generates compensation in the form of investment advisory fees.

## ITEM 7 OTHER FINANCIAL INDUSTRY AFFILIATIONS

TBC may maintain a sub-clearing relationship with other financial industry firms, where these other firms introduce customers to TBC, who will open accounts at StoneX. These firms will receive a percentage of the transaction-based compensation generated by the introduced customers.

### **Brokerage Account Fees & Charges**

Outlined below are various fees for related services and activities provided to customers of TBC, which in certain instances are in addition to services provided by its clearing firm. Certain fees may not apply or may be discounted based on the type of account you have and/or the amount of assets you hold in your accounts. Other fees are only charged when the associated services are requested or when special processing is required. As a result, many fees listed below may not apply to your account. Please note, a portion of the fees are comprised of direct charges assessed by the clearing firm and the balance is charged by TBC, please contact TBC Compliance Department for further details regarding the charges. Any balance difference in fees is received by TBC as additional revenue that may be utilized to offset existing operational expenses with the remaining balance constituting additional compensation to TBC. The schedule below is not an exhaustive list of all account fees and charges.

In addition to the commissions and sales charges described above, customers can also be charged direct fees by our clearing firm for miscellaneous account services, including, but not limited to transaction processing, transfers, margin, ticket charges, inactivity, and account maintenance. **Please see Exhibit I for a schedule of account fees.**

We maintain and will engage in future arrangements with certain affiliate or unaffiliate foreign financial institutions for which we act in a “clear-through” capacity. These arrangements are also known as sub-clearing arrangements. If your account was referred to TBC by way of a Sub-Clearing agreement between TBC and a third party, or by any other type of referral arrangement established with TBC, the fees assessed by the clearing firm may differ. We may assess a mark-up, or a mark-down in some of the fee’s charged to us by our clearing firm. In the case of a mark-up assessed on account fees, we may share this mark-up with the third-party who referred your account or with the register representative.

If you have any questions about fees, please contact your financial advisor.

*Please contact [compliance@savileco.com](mailto:compliance@savileco.com) for current information about TBC’s brokerage compensation and related conflicts of interest. TBC updates this disclosure from time to time and may not notify you when these changes are made, so you should contact your financial professional regarding updated.*

**EXHIBIT I- STONEX- SCHEDULE OF ACCOUNT FEES- Clearing Firm Fees and Charges**

**SCHEDULE OF ACCOUNT FEES Effective February 15, 2023**

The fees listed below do not include commissions, markups, commission equivalents or advisory fees. These fees apply to brokerage accounts carried by StoneX Financial Inc., your broker's clearing firm. Items not included in this Schedule of Account Fees will be billed at standard rates (available upon request).

<b>SERVICE FEES</b>		
ACAT Processing Transfer In	No charge	
ACAT Processing Transfer Out (Full or partial)	\$95.00	Per ACAT processed
Alternative Investments	\$5.00	Per month/per security
Alternative Investments (via AIP)	\$2.00	Per month/per security
Copies of Archived Monthly Statements/Confirms	\$10.00	Per document requested
Corporate Actions	\$50.00	Per event
DRS Reject	\$30 + pass-through of TA & DTC fees	Per event
DRS Transfer	\$100.00 + pass-through of TA & DTC fees	Per event
DTC/Government/DWAC Delivery	\$30 + pass-through of TA & DTC fees	Per receipt or delivery
Foreign Currency Negative Interest	Variable <sup>1</sup> , pass-through at cost	
Foreign Security Custody Fee (Equities and Fixed Income)	2 bps per annum (CA, DE, FR, IT, UK and Euroclear) All other countries variable <sup>1</sup>	Per position/per month (Subject to \$2.50 min)
Foreign Security Custody Fee (Non-U.S. mutual funds/UCITs)	10 bps per annum (\$2.50 minimum)	Per position/per month
Foreign Security Delivery or Cancellation	\$50.00 + settlement fees	Per event/instruction
Inactive Account Fee <sup>2</sup>	\$75.00	Per year/per account
Interested Party Confirm	\$3.25	Per confirm
Margin and COD Extensions (Reg-T)	\$10.00 + interest	Per event
Option Exercise/Assignment Surcharge	\$35.00	Per transaction
Other DTC Items (e.g., reorg, etc.)	\$30 + pass-through of TA & DTC fees	Per delivery
Overnight Delivery Package	\$50.00	Per delivery
Overnight Delivery Package (International delivery)	\$100.00	Per delivery
Paper Delivery Surcharge for Client Confirms <sup>3</sup>	\$0.75	Per confirm
Paper Delivery Surcharge for Client Statements	\$2.50	Per statement
Paper Delivery to a Non-U.S. Address	\$4.50 + applicable additional postage	Per statement/confirm
Pledge Account Annual Fee	\$50.00	Per year
Pledge Account Setup Fee	\$100.00	1-time per account
Retail Handling Fee	\$15.00	Per confirm
Rights/Warrants Subscription	\$75.00	Per issue
UIT Rollover (Manual/email request)	\$75.00	Per request
UIT Rollover (Via UniT)	\$50.00	Per request

<b>PHYSICAL SECURITY FEES<sup>4</sup></b>		
Bond Redemption/Conversions (physical certificates)	\$100.00	Per transaction
Deposit and/or Return of Physical Securities with DTC	\$50.00	Per transaction
Employee Stock Option Processing	\$50.00	Per transaction
Foreign Physical Certificate Receive/Deliver	\$250.00	Per transaction
Legal Transfer	\$50.00	Per transfer
Precious Metal Safekeeping Fee	75 bps (0.75%) of market value (\$5 quarterly min.)	Per annum, prorated quarterly
Restricted Security Clearance	\$150.00 + pass-through of TA & DTC fees	Per delivery
Transfer & Ship	\$600.00 + pass-through of TA & DTC fees	Per transfer/per certificate
Transfer & Ship (Rush)	\$750.00 + pass-through of TA & DTC fees	Per transfer/per certificate
Vault/Safekeeping	\$5.00	Per certificate/per month

<b>CASH MANAGEMENT FEES</b>		
ACH to Third Party	\$10.00	Per instruction
Check Copies	\$5.00	Per item
Federal Reserve Wire Transfer	\$25.00	Per wire
Incoming Wire Transfer	No charge	
International Wire Transfer	\$50.00	Per wire
Non-Sufficient Funds	\$40.00	Per item
Paid Overdraft Charge	\$35.00	Per item
Pre-Payment	\$35.00 + interest	Per event
Returned Deposit Item	\$40.00	Per item
Rush Order Checks	\$75.00	Per item
Stop Payment	\$30.00	Per item

<b>IRA FEES (US Customers Only)</b>		
Annual Fees (not prorated)	\$50.00	Per year/per account <sup>5</sup>
Private Placement Security - Processing Fee	\$150.00	Per investment
Private Placement Security - Custody Fee	\$5.00	Per month/per investment
Profit Sharing Plan Fee	\$65.00	Per year/per account
Termination Fee	\$50.00	Per account
Termination and Transfer	\$125.00	Per account

<b>TRANSFER ON DEATH (TOD) FEES</b>		
Establishment	\$50.00	Per account
Change of Beneficiary	\$25.00	Per account
Transfer to Beneficiary	\$100.00 + \$50.00 per beneficiary at distribution	

<b>MARGIN INTEREST</b>	
DEBIT BALANCE	MARGIN RATE
\$0 - \$50,000	StoneX Base Rate + 1.75%
\$50,001 - \$100,000	StoneX Base Rate + 1.50%
\$100,001 - 200,000	StoneX Base Rate + 1.25%
\$200,001 - 500,000	StoneX Base Rate + 1.00%
\$500,001 and over	StoneX Base Rate + 0.75%

StoneX Base Rate is the Call Money Rate (as published by the Wall Street Journal and Bankrate.com) plus 2.50% per annum.

**CHECK PAYMENT INSTRUCTIONS**  
Make checks payable to "StoneX Financial Inc." and include the affected account number.

John Doe 111 Main Street Your Town, USA	Date: <u>mm / dd / yy</u> 001
PAY TO THE <u>StoneX Financial Inc.</u> \$ <u>100.00</u>	
ORDER OF: <u>One hundred dollars</u> DOLLARS	
Notes: <u>Account Number</u>	Signature: <u>John Doe</u>

<sup>1</sup> Fee available upon request.  
<sup>2</sup> Inactive accounts are defined as accounts holding a security position for a 12-month period (August 1 - July 31) without generating a) a trade or b) a free credit or margin interest of at least \$100. Mutual fund systematic reinvestments and exchanges will be considered a trade. Dividend reinvestment activity is not considered a trade. Inactive fees do not apply to retirement accounts where Clearing Firm acts as custodian or servicing agent and collects service fees. Accounts exclusively holding book entry only fixed income positions or mutual fund positions exceeding \$50,000 are exempt from this fee. Clearing Firm reserves the right to charge this fee on a pro rata basis for accounts that terminate their relationship with Clearing Firm and upon termination of the Fully Disclosed Clearing Agreement for any reason by either party.  
<sup>3</sup> Clearing firm reserves the right to adjust the surcharge based upon changes in postal, paper, vendor or other cost factors. The paper delivery surcharge for confirmations is assessed on a per trade basis and billed as incurred.  
<sup>4</sup> All Physical Security fees are subject to additional charges (e.g. transfer agent fees, DTC fees, etc.) which will be passed through at cost.  
<sup>5</sup> Billed in September of each year.



## **EXHIBIT II- TBC TRANSACTION PRICING GUIDELINE/SCHEDULE**

### **TBC - Security Transaction Pricing Guideline Summary:**

- *Equity/ETF/ETN/:* TBC generally charges a maximum of 2% per transaction on these types of securities. TBC is able to waive or reduce this amount depending on the circumstances, but may also charge slightly more in certain circumstances, such as trades in thinly traded securities or those which take additional time.
- *Fixed Income/Bonds:* Typically, fixed income securities, such as a corporate bond, municipal bonds, collateralized mortgage obligations (CMO), and other types of fixed income securities are charged a markup or markdown. This means when a customer is seeking to purchase one of these securities it is first purchased by TBC and placed in a TBC account. TBC then sells that security to the customer for a higher price and moves the security from the TBC account into the customer's account. Similarly, when selling one of these securities, TBC purchases the security from the customer and moves it into a TBC account, TBC will then sell the security in the marketplace at a higher price. The maximum amount charged in the form of a markup or markdown is typically 200 bps, but this amount can go higher in certain circumstances that may make the security harder to buy or sell, including a thinly traded security or a low-priced security.
- *Structured Products:* TBC generally charges a maximum of 350 bps per transaction on these types of securities. This charge may vary depending on the complexity of the product.
- *Mutual Funds:* Mutual Funds have different share classes and the commissions charged vary depending on the class of shares. TBC has established that the maximum charge recommended for onshore and offshore is 3% of the gross proceeds, with a minimum charge of \$175 on an initial purchase however, Class A shares provide the flexibility to negotiate the front-end sales charge which can range as high as six (6) percent.
- *Options:* Commissions on options trades are based on the premium of the option transaction. Small low premium transactions may have commissions equal to higher percentages, and not necessarily equal to a large commission charge. A flat minimum transaction charge of \$175 as a commission for a low nominated transaction.