Rule 5320 generally provides that a broker-dealer that accepts and holds an order in an equity security from its own customer or customer of another broker-dealer is prohibited from trading that security on the same side of the market for its own account at a price that would satisfy the customer order, unless the firm immediately thereafter executes the customer's order up to the size and at the same or better price at which it traded for its own account. Described below are specific exceptions to the Rule and an explanation of how SFI will handle such exceptions. Please note that consistent with the existing regulatory guidance, not held orders are outside the scope of Rule 5320. Thus, SFI is permitted to trade a security on the same side of the market for its own account at the same price or better while working a not held customer order.

- *Large Orders Exception:* Large orders (orders of 10,000 or more shares with a total value of $100,000) are excepted from the requirements of Rule 5320. SFI will generally work such orders in accordance with customer instructions. While working such orders, SFI may trade for its own account at prices that would satisfy the customer order. The Firm does not apply the institutional customer exception afforded to it under Supplementary Material .01 of Rule 5320.

- *No-Knowledge Exception:* Where a firm implements and utilizes an effective system of internal controls to prevent one trading unit from obtaining knowledge of customer orders held by a separate trading unit, Rule 5320 permits the respective separate trading units to trade independent of one another for purposes of the Rule. SFI has established and implemented information barriers reasonably designed to prevent each Equities Trading Unit from obtaining knowledge of open client orders that are not being handled by that particular unit. As a result of these information barriers, an Equities Trading Unit that is not handling or otherwise aware of a client order existing within another Equities Trading Unit may trade continuously for its own account in securities and other financial products, including at prices (or implied prices) that would otherwise satisfy that client order, without also triggering an obligation to execute that order.

- *Riskless Principal Exception:* Riskless principal transactions are exempt from the Rule provided the transactions are identified and reported as such, that the customer order was received prior to the principal off-setting transaction, and otherwise complies with applicable Rules relating to riskless principal transactions. While handling such orders, SFI may trade for its own account at prices that would satisfy the customer order.

- *ISO Exception:* Intermarket sweep orders (ISO) are exempt from the Rule when the customer order is received after the Firm routed the ISO. In cases where the Firm routes an ISO to facilitate a customer order and that customer has consented to not receiving the better prices obtained by the ISO, SFI is exempt from Rule 5320. See Opt-In for Order Protection below.

Opt-In for Order Protection:

Institutional customers as defined in Rule 4512(c) or other persons sending large orders as described above may opt-in to order protection under the Rule by providing written notice with respect to all or any portion of its order(s) by contacting the SFI Compliance Department at 329 Park Ave. North, Ste. 350 Winter Park, FL 32789 . If a customer does not opt-in to the Rule 5320 protections with respect to all or any portion of its order(s), the Firm may reasonably conclude that the customer has consented to the Firm trading a security on the same side of the market for its own account at a price that would satisfy the customer's order as described herein. However, please note that even when a customer has opted in to the FINRA Rule 5320 protections, a broker-dealer may still obtain consent on an order-by-order basis to trade ahead of or along with an order from that client.