

INTL Fillmore Advisors LLC Member FINRA/SIPC/NFA

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## Payment for Order Flow Disclosure

Payment for Order Flow shall mean any monetary payment, service, property, or other benefit that results in remuneration, compensation, or consideration to a broker or dealer from any broker or dealer, national securities exchange, registered securities association, or exchange member in return for the routing of customer orders by such broker or dealer to any broker or dealer, national securities exchange, registered securities association, or exchange member for execution, including but not limited to: research, clearance, custody, products or services; reciprocal agreements for the provision of order flow; adjustment of a broker or dealer's unfavorable trading errors; offers to participate as underwriter in public offerings; stock loans or shared interest accrued thereon; discounts, rebates, or any other reductions of or credits against any fee to, or expense or other financial obligation of, the broker or dealer routing a customer order that exceeds that fee, expense or financial obligation.

INTL Fillmore Advisors LLC ("Fillmore") is required to provide you with our policies regarding receipt of payment for order flow for listed equity and options trades and for determining where to route client equity and option orders that are the subject of payment for order flow. Payment for order flow is a term used in our business that refers to potential payments between broker-dealers and market facilities for order direction. This term does not refer to commissions or fees paid by Fillmore's clients.

At all times, our foremost concern is to obtain the best executions for our clients regardless of any compensation factor. We use the compensation received to help keep our commissions competitive and provide you with quality investment and execution services

Fillmore does, from time to time, receive payment for its equity and options order flow. Currently, in return for routing an order to a specific market facility, Fillmore shall receive a cash payment or a rebate in the form of reduction of fees charged. Some of the liquidity provided may be from your orders. The source and amount of any compensation will be disclosed upon request.

Fillmore continually assesses the quality of the markets to which it routes order flow in order to obtain the best execution on behalf of its clients. In this regard, Fillmore may, depending on several factors, including the security involved or the size of the order may route client orders to other broker-dealers or clients for execution.