Zoe Securities Order Routing and Payment for Order Flow Disclosure

Pursuant to Regulation NMS Rule 606 ("Rule 606"), all broker-dealers (including introducing firms) that route orders on behalf of customers are required to make publicly available quarterly reports that, among other things, identify the venues to which customer orders are routed for execution and also disclose the material aspects of the broker-dealer's relationship with such venues. In accordance with Rule 606 we provide a summary of order routing activity that is made available to us by our clearing firm, Apex Clearing Corp. You can view the report <u>here</u>.

We are required to disclose at the time your account is opened, and annually thereafter, our practices with respect to receiving payment for order flow. Apex routes your orders to other broker-dealers or market centers for execution. These broker-dealers and market centers may include dealers who make markets in these securities. Both we and Apex may receive compensation for routing equity orders to such dealers. In exchange for routing your orders to certain market centers, we receive monetary rebates per executed share for orders that add liquidity to its book and/or rebates for aggregate exchange fees. The rebates are shared with us by Apex and are considered payment for order flow even though it may not necessarily offset our aggregate payments for removing liquidity. The amount of the rebate depends on the agreement reached with Apex and will be provided to you upon written request.