

Does Stoever Glass (“SG & Co”) have procedures and training to assess recommendations using a best interest standard?

SG & Co recommendations must be in your best interest. Your Financial Professional (“FP”) or firm may not place their interests ahead of yours.

The best interest standard is an overarching obligation which is satisfied by our four component obligations: Care, Disclosure, Conflict of Interest and Compliance.

Do you apply a best interest standard to recommendations of types of accounts?

SG & Co best interest standard explicitly applies to recommendations of types of accounts. Our FPs must have a reasonable basis to believe that a recommendation of any type securities account type (including IRAs) is in your best interest at the time of the recommendation.

In general, when considering recommendations of types of accounts, you should consider services and products provided in the account; projected cost of the account; alternative account types available; services you request; and your investment profile.

With regard to IRAs, in addition to the factors above, you should consider: fees and expenses; level of services available; ability to take penalty-free withdrawals; application of required minimum distributions; protections from creditors and legal judgments; holdings of employer stock; and any special features of the existing account.

SG & Co FPs do not take discretion over account(s). While FPs can offer advice and counsel, the final investment decision is yours.

Does SG & Co agree to provide account monitoring, does the Firm apply the best interest standard to both explicit and implicit hold recommendations?

SG & Co has no duty to monitor your account following a recommendation. However, we may, without any agreement with you, review the holdings in your account for the purposes of determining whether to provide a recommendation. This voluntary review is **not** considered to be “account monitoring,” and would not create an implied agreement with you to monitor the account.

Do you consider the elements of care, skill and costs when making recommendations to retail customers?

SG & Co’s Reg BI policies incorporates FINRA’s reasonable-basis (i.e. knowing the product and having a reasonable basis to believe it is appropriate for your account) and customer-specific suitability (i.e. knowing your investment objectives and having a reasonable basis to believe a particular recommendation is appropriate for you based on your investment profile). Care, skill and costs (in addition to applying a best interest standard) is always a consideration when

making recommendations. Consideration of cost includes not only the cost of purchase, but also any costs that may apply to the future sale or exchange of the security, such as deferred sales charges or liquidation costs. However, while cost must always be considered, it is not dispositive, and not intended to limit or foreclose a recommendation of a more costly product if there is a reasonable basis to believe that product is in your best interest.

Do you guard against excessive trading, irrespective of whether the BD or AP “controls” the account?

SG & Co’s suitability obligation requires that a series of recommended transactions be appropriate and not excessive. However, the Firm applies the best interest standard to such a series of recommended transactions, even if the BD exercises *de facto* control over a customer’s account. You should not invest in any investment unless you thoroughly understand the product.

Do you consider reasonably available alternatives to the recommendation?

Your FP considers reasonably available alternatives offered to you by our Firm in determining whether there is a reasonable basis for making the recommendation. An evaluation of reasonably available alternatives does not require an evaluation of every possible alternative (including those offered outside the firm) nor require recommending one “best” product.

Do you consider how to ensure that high-risk or complex products are in a retail customer’s best interest?

Yes, SG & Co supervisors apply heightened scrutiny as to whether high-risk or complex investments, such as inverse and leveraged ETFs, are in your best interest.

Prior to or at the time of the recommendation, do you provide retail customers with full and fair written disclosure of all material facts relating to the scope and terms of the relationship with the retail customer.

SG & Co provides all customer’s with Form CRS which details what charges will be assessed to you.

At or prior to making a recommendation, do you make full and fair written disclosure of all material facts relating to conflicts of interest?

SG & Co FPs must disclose all material facts relating to conflicts of interest associated with a recommendation. This does not require that information regarding conflicts be disclosed on a recommendation-by-recommendation basis. Standardized written disclosure of this information may be found in Form CRS.

FP’s may supplement written disclosure with oral disclosure.

Do you ensure that you do not use the term “advisor” or “adviser” unless you are a registered investment adviser, a registered municipal advisor, a registered commodity trading advisor or an advisor to a special entity?

SG & Co acts only as a broker-dealer.

Do you have policies and procedures to identify and address the firm’s conflicts of interest?

SG & Co’s written policies and procedures are reasonably designed to identify and disclose or eliminate conflicts of interest associated with recommendations. The Firm does not offer proprietary products but may sell bonds to you from the Firm’s inventory as principal.

Do you have policies and procedures to identify and mitigate the FP’s conflicts?

SG & Co offers no additional incentives to FP’s to recommend any specific investment. You should be aware that certain investments provide FP’s with higher compensation.

Do you have policies and procedures to identify and disclose material limitations on products recommended?

SG & Co may offer products with third-party arrangements, products from a select group of issuers or from the Firm’s inventory.

Do you have policies and procedures to prevent material limitations from causing the BD or FP to make recommendations that place the BD’s or FP’s interest ahead of your interest?

SG & Co has a product review processes for products that may be recommended, including establishing procedures for identifying and mitigating the conflicts of interests associated with a product and identifying if you would qualify for specific recommendations.

Do you have policies and procedures to identify and eliminate sales contests, bonuses, non-cash compensation and quotas based on the sale of specific securities or specific types of securities within a limited time?

SG & Co does not permit employees to participate in sales contests, bonuses or other non-cash compensation for the sale of specific securities.

Have you updated your policies and procedures to ensure compliance with Reg BI?

Reg BI’s Compliance Obligation requires that SG & Co establish, maintain and enforce written policies and procedures reasonably designed to achieve compliance with Reg BI. In addition, to

the required procedures the Firm includes controls, remediation of non-compliance, training, and periodic review and testing.

Have you implemented training to ensure that APs are aware of Reg BI's requirements?

SG & Co requires training of all FPs to communicate firm culture, specific requirements of a firm's code of conduct and its conflicts management framework.

Does Regulation BI apply to me?

Reg BI only applies to recommendations to "retail customers." Reg BI defines a "retail customer" as a natural person, or the legal representative of such person. Reg BI would not apply when a legal representative is acting in a professional capacity as a regulated financial services industry professional retained to exercise independent professional judgment.