State Street Global Markets, LLC

Wealth Custody Order Handling, Routing and Fractional Share Disclosure

When your investment advisor or you place a purchase or sale order for individual stocks or bonds, SSGM Wealth Custody and Clearing typically routes the order to Apex for handling but may route the order to a market center for execution or to a different broker for handling. SSGM regularly and rigorously reviews the execution quality provided by Apex and other market centers to evaluate whether executions are consistent with our best-execution obligations. In deciding where to route orders for execution, Apex considers a number of factors including the size of the order, trading characteristics of the security, favorable execution prices (for example, the opportunity for price improvement), access to reliable market data, availability of efficient automated transaction processing, and execution cost. Some market centers or broker-dealers may execute orders at prices superior to publicly quoted market prices. How your order is handled may depend on your investment advisor's order handling practices and how it places your order. You should contact your investment advisor with any questions about how your investment advisor will handle your order. If SSGM, in its sole discretion, determines that your trading activity negatively impacts our ability to provide price improvement opportunities to other customers or is otherwise disruptive to the price improvement program, we reserve the right, without notice, to restrict and/or limit your participation in the price improvement program and/or change the routing of your orders.

SEC Rule 607 requires registered broker-dealers to disclose their policies regarding the receipt of payment for order flow in connection with the routing of certain customer orders. Payment for order flow is 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. Apex will route Participating Customer's orders or representative orders to third-party market centers for execution as described in the prior paragraph. Apex will receive payment for order flow from the third-party market centers and will share a portion of that remuneration with State Street. [SSGM will receive payment for order flow from other market centers to which it routes orders.]

SSGM may facilitate trading in fractions of a share ("Fractional Shares") of a security and subsequently facilitate custody of your Fractional Shares in your Account. You understand that the number of securities eligible for Fractional Share trading may be limited. You understand that by owning Fractional Shares you may have different rights from those who own full share interests in the same security:

i. Fractional Shares may not be transferred to another broker-dealer. Should you seek to transfer your holdings to another broker-dealer, any Fractional Shares held by you will not be transferred and instead will be liquidated for cash prior to transfer. The timing of such liquidation will be at the discretion of Apex.

ii. You will not have voting rights for any of the Fractional Shares held in your Account, will not be able to make voluntary elections on any corporate action including, without limitation, any tender offers or rights offerings with respect to such Fractional Shares, and Apex, via SSGM cannot provide you or any other shareholder documentation for any holdings of less than one share.

iii. Fractional Shares are eligible to receive payment of dividends or shares of commensurate value. Based upon relevant, event specific requirements, holders of Fractional Shares may also be eligible to participate in stock splits, mergers or other mandatory corporate actions.

iv. Neither SSGM nor Apex or another trading center can guarantee that there will be a market for Fractional Shares in an equity security.