CONFLICT OF INTEREST DISCLOSURE

Introduction

This document outlines potential conflicts of interest that may arise during our business relationship. As an investment dealer registered with the Canadian Investment Regulatory Organization (CIRO), we are required to identify material conflicts of interest and address them in your best interest. This disclosure is provided to ensure transparency and help you make informed investment decisions.

Types of Conflicts of Interest

1. **Compensation Arrangements**

Commissions and Fees: Any fee you pay is based on the specific transaction and not the value of your account. We generally do not charge a commission for trades. However certain arrangements with your/our "authorized" business partner may preclude commission-free trading by Alpaca Clearing & Custody Canada. If your account was established by an authorized business partner, please refer to the fee schedule provided through your authorized partner's website or platform. Customers of Alpaca Clearing & Custody Canada should refer to the Alpaca Canada's Fee Schedule, who will ensure that current fee schedules are easily accessible to clients via our website and will provide a copy upon request. At the time of sale, proceeds will be credited to your account less applicable regulatory transaction fees. If you are approved to use margin in your account, you can use borrowed funds from Alpaca when self-directing trades in your account and you will incur additional fees charged on your daily borrowed balance at an annualized prevailing rate which may change from time to time. If you want to sell securities short, you will be charged the prevailing borrow rate on a full lot daily. If you choose to use additional services, such as wire transfers or ACATS, those services are charged at the then prevailing rate. If you incur returned ETF or Wire fees, those are charged to you. You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you're paying, and review your trade confirmations, and statements to identify those items. An "authorized business partner" may include other Investment Dealers, or Investment Advisers, Financial Institutions or Financial Technology Firms

Third-Party Compensation: When you buy or sell securities, Alpaca receives Payment for Order Flow (PFOF) from third-party market centers to which we route your orders for part or all your transactions, so we have an incentive for you to trade more. The way we make money creates some conflicts with your interests. Our receipt of interest on your uninvested cash both within and outside the Sweep Program gives us an incentive for you to hold more cash in your account.

Fee Differentials: Some investments (e.g. ETFs) impose additional fees that will reduce the value of your investment over time. You may incur fees if you trade on Margin, such as a Margin Interest Fee, or if you Sell Stock Short such as a Stock Borrow Fee.

2. Trading Practices

Principal Trading: We may act as principal in transactions with you, buying securities from or selling securities to you from our own inventory that supports the ability for you to buy and sell fractional shares. This creates a potential conflict as we may have an incentive to trade through our own trading inventory to fulfill the orders.

Trade Allocation: When executing trades for multiple clients, conflicts may arise in how we allocate trades, particularly for issuers corporate or mandatory action events.

Related and Connected Issuers

How We Address Conflicts of Interest

1. Disclosure

We provide this disclosure to ensure you are aware of potential conflicts of interest that may affect our relationship.

2. Controls and Supervision

We address these potential conflicts of interest by, among other things, ensuring that all accounts established directly with Alpaca are self-directed, placing the decision to trade or not to trade solely in your control. We do not recommend any investments or investment strategies, and our employees are not compensated based on commissions, fees, performance of your account, amount of your assets, or your selection of securities or services. We also seek best execution for each order without regard for any payment for order flow received from our order routing venues and provide more information on payment for order flow in our Reports. Alpaca is committed to obtaining the most favorable terms reasonably available for client orders. Our order routing practices are regularly reviewed to ensure best execution.

We maintain policies and procedures designed to identify and address conflicts of interest, including:

- Regular compliance reviews, which include periodic audits of order execution, trade allocation, and fee assessments to ensure fairness and adherence to regulatory requirements.
- Employee training on conflict identification and management

3. Client Interest Priority

We are committed to putting your interests first. This means:

- Ensuring fair pricing and execution of trades
- Allocating investment opportunities fairly among clients

4. Compensation Transparency

Alpaca employees are paid a base salary and may receive discretionary bonuses based on company and individual performance. Alpaca employees are not compensated based on commissions, fees, performance of your account, amount of your assets, or your selection of securities or services.

Personal Trading Policies

We maintain policies governing personal trading by our employees, including:

- Reporting requirements for personal securities transactions that are monitored by the CCO monthly by way of associated person(s) trade confirmations, and statement reviews.
- The firm prohibits any associated persons from trading, either personally or on behalf of others, on material nonpublic information or communicating material nonpublic information to others in violation of the law. This conduct is referred to as "insider trading". The policy applies to every associated person and extends to activities within or outside their duties at the firm.
- All policies and procedures are reviewed regularly to ensure compliance with the CSC Code of Conduct rules.

Reporting and Updates

We will update this disclosure when material changes occur. Because Alpaca Clearing & Custody Canada is a fully online investing platform, all questions and concerns should be emailed to canadacompliance@alpaca.markets with the nature of the question or concern will determine which Alpaca team member will address the issue. We do not recommend any investments, nor do we recommend any investment strategies. If your account is established via an authorized business partner, you may contact them directly. If your issue does not appear to be answered in a satisfactory manner, please email candacompliance@alpaca.markets.

Clients who believe there has been a mishandling of a conflict of interest should follow the complaint process outlined on our website.

This disclosure is provided in accordance with CIRO requirements and Canadian securities laws. Please retain this document for your records.