

Order Routing and Payment for Order Flow Disclosure

Introduction. This disclosure describes how AQUAS Financial, LLC (“AQUAS”) routes customer orders and the payment-for-order-flow arrangements it maintains, provided pursuant to SEC Rule 607 (Regulation NMS).

Order Routing. AQUAS routes customer orders to one or more market centers — principally wholesale market makers — for execution. In determining where to route an order, AQUAS considers a range of factors consistent with its duty of best execution under FINRA Rule 5310, including the price and overall quality of execution, the extent to which orders may be executed at prices superior to the national best bid and offer (price improvement), the speed and likelihood of execution, the size and type of order, and the efficiency and reliability of the execution venue. AQUAS does not provide investment advice or recommendations; you direct your own transactions.

Payment for Order Flow. AQUAS receives payment for order flow (“PFOF”) from certain of the market centers to which it routes customer orders. PFOF is compensation AQUAS receives for directing order flow to a particular venue, generally in the form of a per-share rebate on equity orders and a per-contract rebate on options orders; the amount and nature of this compensation vary by market center, security, and order type. The specific venues to which AQUAS routes, and the material aspects of those arrangements, are identified in the order-routing reports described below.

Conflict of Interest and Best Execution. Because AQUAS receives PFOF, it has a financial incentive to route orders to venues that pay it, which creates a potential conflict between that interest and its duty of best execution. AQUAS does not permit PFOF to drive its routing in a manner inconsistent with best execution. AQUAS conducts a regular and rigorous review of the execution quality its customers receive and adjusts its routing as appropriate based on that review.

Order-Routing Reports. In accordance with SEC Rule 606(a), AQUAS makes publicly available a quarterly report on its routing of customer orders, including

the venues to which it routes and the material aspects of its relationships with those venues (including PFOF), available at aquastrading.com. Upon your request, and in accordance with SEC Rule 606(b), AQUAS will also provide the identity of the venues to which your individual orders were routed during the prior six months and the time of any resulting transactions.