Quint Capital Corporation (QCC) Regulatory Disclosure

This document outlines various Regulatory Disclosure Requirements that QCC is obligated to adhere to during its normal activity in doing business with the investing public.

- **Regulatory Disclosure to the Public** - The Financial Industry Regulatory Authority (FINRA), formerly the National Association of Securities Dealers (NASD), requires that member firms provide the following information concerning the FINRA Public Disclosure Program:
    - The FINRA regulation website address is www.finra.org.
    - FINRA BrokerCheck – Access information on member firms and registered representatives at those firms. This can be accessed at brokercheck.finra.org/
    - The FINRA public disclosure hotline number is (800) 289-9999.
    - An investor brochure that includes information describing the public disclosure program may be obtained from FINRA.

- **Member Securities Investors Protection Corp. (SIPC)** - Quint Capital Corporation is a member of SIPC. Information is available at www.sipc.org or by calling (202) 371-8300.

- **Additional Investor Resources** - The following resources available on the internet may provide you with useful information about investing and securities markets:
    - www.sec.gov/education/investor-education
    - www.finra.org/investors
    - www.sipc.org

- **Business Continuity Plan Summary -** Quint Capital Corporation (QCC) has developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions are unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan**:**
    - **Business Continuity Plan** – We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and

records and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

- Our business continuity plan addresses: data backup and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.
- Both we and our clearing firm back up our important records in geographically separate areas. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, we have been advised by our clearing firms that their objectives are to restore operations and be able to complete existing transactions and accept new transactions and payments within 4 hours, if possible. Your orders and requests for funds and securities could be delayed during this period.

- **Varying Disruptions** – Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business within 4 hours, if possible. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area and recover and resume business within 24 hours or less, if possible. In either situation, we plan to continue in business, transfer operations to our clearing firms if necessary, and notify you through our website www.quintcapital.com, email and / or outbound telephone calls as to how to contact us. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customers' prompt access to their funds and securities.
- **Contacting Us** – If after a significant business disruption we do not contact you or you cannot contact us as you usually do at (212) 682 5090 or aquint@quintcapital.com, you should go to our website at www.quintcapital.com. If you cannot access us through either of those means, you should contact the clearing firm with whom your account is carried (currently The Royal Bank of Canada), for instructions on how it may provide

prompt access to funds and securities, enter orders and process other trade-related, cash and security transfer transactions for your account.

- **For more information** – If you have questions about our business continuity planning, you can contact us at 212-682-5090, 917-885-6731 or aquint@quintcapital.com.

- **Privacy Policy** – Federal regulations and state laws dictate how financial institutions may use and collect information obtained from clients and consumers. Financial institutions are required to employ physical, administrative, and technical safeguards to protect and maintain client and consumer data in their possession. Clients and consumers must be provided with notice as to the information a financial institution collects about them, how the information is used by the financial institution, and how they may opt-out of information sharing with unaffiliated third parties. Many jurisdictions require that clients be notified in the event that certain information is compromised while in possession of the financial institution. The purpose of this policy is to formalize the requirement of all Quint Capital Corporation employees, agents, contractors and third-party service providers to comply with applicable federal and local regulatory, legal and contractual requirements pertaining to client and consumer privacy. All employees, agents, contractors and third-party service providers of Quint Capital Corporation are required to comply with relevant national and local legal, regulatory and contractual requirements concerning the collection, processing and protection of private consumer and client data. See more information below.

The following information contains the QCC privacy policy designed to protect the confidentiality of current or former customers of QCC. Your relationship with QCC was established when you opened a brokerage account. We receive your nonpublic personal information for the sole purpose of servicing your account. This information is presented to you in conformity with Regulation S-P, 17 CFR 248.1-248.3, under Title V of the Gramm-Leach-Bliley Act, codified as 15 U.S.C. 6801-6831. The nonpublic personal information which identifies you or your account is hereafter referred to as "personal information." Maintaining personal information securely and confidentially is a priority of QCC.

- **Your Non-Public Personal Information** – QCC does not sell your non–public personal information. We will only disclose your non-public personal information, which includes any personally identifiable information about you, as indicated in this policy, if we have obtained your consent or we are required by law to disclose such information. In order to provide you with the highest quality of service, QCC collects the following types of nonpublic personal information:

Information from you:

Information you provide on an application for an account, a margin loan, debit card or any other financial product or service, whether in writing, in person, by telephone, electronically or by any other means, such as your name, address, social security number, assets, income, and debt; and Information we obtain for the purpose of tax reporting to you and to the various agencies to which we report as required by law, including disclosures on various Internal Revenue Service (IRS) forms that we collect for tax reporting purposes.

Information about your transactions with us:

Information that relates to account balances, payment history, trading activity and any other such transactions for which RJL provides services; Information we collect as part of authentication for purposes of servicing your account in a secure and confidential fashion; and Information we may collect through an Internet "cookie" (an information collecting device from a web server).

Information about transactions with nonaffiliated third parties:

Information provided to nonaffiliated third parties as required by law, including information shared in connection with a subpoena or other legal document compelling our compliance; and Information related to servicing your account for purposes of services.

Information from a consumer-reporting agency:

Information from a consumer reporting agency regarding your creditworthiness or credit history or other information as it pertains to lending; Information about the fact that you are a customer of RJL and we have provided you a financial product or service; and Information from other outside sources regarding their employment of, credit to, or other relationship with you, or verifying representations made by you, such as your employment history, loan or credit card balances.

- **Non-Public Personal Information Disclosed** - Nonpublic personal information is disclosed in connection with servicing your account for the purposes of providing services which includes, among other things, settlement, billing, processing, clearing, transferring, reconciling, collection and tax reporting.
- **Affiliates and Non-Affiliated Third Parties to Whom We Disclose** - QCC does not disclose any nonpublic personal information about you except as permitted by law.
- **Former Customers** - QCC will only disclose nonpublic personal information about former customers as required by law or upon your request.
- **Prioritizing Security of Information** - QCC is committed to maintaining appropriate measures to insure that your information is secure and confidential. QCC's information and security procedures include, but are not limited to, the following features: Access controls on customer information systems, including controls to authenticate and permit access only to authorized individuals and controls to prevent employees from providing customer information to unauthorized individuals who may seek to obtain this information through fraudulent means; Physical access restrictions at locations containing customer information, such as buildings, computer facilities, and record storage facilities to restrict access to unauthorized individuals; Stringent pre-employment screening, including fingerprinting, background checks and verification of previous employment; Monitoring systems and procedures to detect actual and attempted attacks on or intrusions into customer information systems; A disaster recovery plan to protect against loss of or damage to customer information due to potential environmental hazards, such as fire and water damage or technological failures.
- **Additional Information** - May be obtained by calling QCC.

- **Customer Identification Program Disclosure** - Important Information You Need to Know about Opening a New Account - To help the government fight the funding of terrorism and money laundering activities, federal law requires financial institutions to obtain, verify and record information that identifies each person who opens an account. This Notice answers some questions about this broker-dealer's Customer Identification Program. What types of information will you have to provide? At the time you open an account with us, we are required to collect information such as the following from you:

- Name
- Date of Birth
- Address
- An identification number
    - U.S. Citizen: taxpayer identification number (social security number or employer identification number)
    - Non-U.S. Citizen: taxpayer identification number, passport number and country of issuance, alien identification number or government-issued identification showing nationality, residence and a photograph of you. You may also need to show your driver's license or other identifying documents.
- A corporation, partnership, trust or other legal entity may need to provide other information such as its principal place of business, local office, employee identification number, certified articles of incorporation, government issued business license, a partnership agreement or a trust agreement.

U.S. Department of the Treasury, Securities and Exchange Commission, FINRA and New York Stock Exchange rules already require you to provide most of this information. These rules also may require you to provide additional information, such as your net worth, annual income, occupation, employment information, investment experience and objectives, and risk tolerance. What happens if I don't provide the information requested or my identity cannot be verified? We may not be able to open an account or carry out transactions for you. If we have already opened an account for you, we may have to close
it. WE THANK YOU FOR YOUR PATIENCE AND HOPE THAT YOU WILL SUPPORT OUR EFFORTS TO DENY TERRORISTS AND MONEY LAUNDERERS ACCESS TO AMERICA'S FINANCIAL SYSTEM.

- **Order Routing**
    a. **Order Routing Disclosure (RULE 606)** - In accordance with SEC Rule 606, QCC publishes statistical information about our routing practices for non-directed orders in U.S. exchange listed securities and options. These publications may be sent to you upon request. Customers may request information about how their orders have been handled including:
        1. Whether their orders were directed or non-directed
        2. Details as to the specific times for all phases of order processing.

- **Payment for Order Flow Disclosure** - QCC routes customer orders to RJFS who may route orders to national securities exchanges, alternative trading systems, which may include electronic communications networks (ECN), and other market centers. QCC does not receive compensation for routing orders to market centers. In exchange for routing orders to certain market centers, QCC may receive monetary rebates per executed share/contract for orders that add liquidity to its book. The rebates are considered payment for order flow even though it may not necessarily offset QCC's aggregate payments for removing liquidity. In this regard, in any given month, the 'credits' received by QCC from a given market center may exceed the 'debits' charged to QCC for such period. Therefore, such excess credits paid to QCC may constitute, according to regulatory interpretation, payment for order flow.

- **Day Trading Risk Disclosure** - You should consider the following points before engaging in a day-trading strategy. For purposes of this notice, a "day-trading strategy" means an overall trading strategy characterized by the regular transmission by a customer of intra-day orders to effect both purchase and sale transactions in the same security or securities.
  - **Day trading can be extremely risky -** Day trading generally is not appropriate for someone of limited resources and limited investment or trading experience and low risk tolerance. You should be prepared to lose all of the funds that you use for day trading. In particular, you should not fund day-trading activities with retirement savings, student loans, second mortgages, emergency funds, funds set aside for purposes such as education or home ownership, or funds required to meet your living expenses. Further, certain evidence indicates that an investment of less than $50,000 will significantly impair the ability of a day trader to make a profit. Of course, an investment of $50,000 or more will in no way guarantee success.
  - **Be cautious of claims of large profits from day trading -** You should be wary of advertisements or other statements that emphasize the potential for large profits in day trading. Day trading can also lead to large and immediate financial losses.
  - **Day trading requires knowledge of securities markets -** Day trading requires in-depth knowledge of the securities markets and trading techniques and strategies. In attempting to profit through day trading, you must compete with professional, licensed traders employed by securities firms. You should have appropriate experience before engaging in day trading.
  - **Day trading requires knowledge of a firm's operations -** You should be familiar with a securities firm's business practices, including the operation of the firm's order execution

systems and procedures. Under certain market conditions, you may find it difficult or impossible to liquidate a position quickly at a reasonable price. This can occur, for example, when the market for a stock suddenly drops, or if trading is halted due to recent news events or unusual trading activity. The more volatile a stock is, the greater the likelihood that problems may be encountered in executing a transaction. In addition to normal market risks, you may experience losses due to system failures.

  - **Day trading will generate substantial commissions, even if the per trade cost is low -** Day trading involves aggressive trading, and generally you will pay commissions on each trade. The total daily commissions that you pay on your trades will add to your losses or significantly reduce your earnings. For instance, assuming that a trade costs $16 and an average of 29 transactions are conducted per day, an investor would need to generate an annual profit of $111,360 just to cover commission expenses.
  - **Day trading on margin or short selling may result in losses beyond your initial investment -** When you day trade with funds borrowed from a firm or someone else, you can lose more than the funds you originally placed at risk. A decline in the value of the securities that are purchased may require you to provide additional funds to the firm to avoid the forced sale of those securities or other securities in your account. Short selling as part of your day-trading strategy also may lead to extraordinary losses, because you may have to purchase a stock at a very high price in order to cover a short position.
  - **Potential Registration Requirements -** Persons providing investment advice for others or managing securities accounts for others may need to register as either an “Investment Adviser” under the Investment Advisers Act of 1940 or as a “Broker” or “Dealer” under the Securities Exchange Act of 1934. Such activities may also trigger state registration requirements

- **Extended Hours Trading Risk Disclosure –** The following are risks associated with trading during extended hours:
  - **Risk of Lower Liquidity** - Liquidity refers to the ability of market participants to buy and sell securities. Generally, the more orders that are available in a market, the greater the liquidity. Liquidity is important because with greater liquidity it is easier for investors to buy or sell securities, and as a result, investors are more likely to pay or receive a competitive price for securities purchased or sold. There may be lower liquidity in extended hours trading as compared to regular market hours. As a result, your order may only be partially executed, or not at all.

- **Risk of Higher Volatility** - Volatility refers to the changes in price that securities undergo when trading. Generally, the higher the volatility of a security, the greater its price swings. There may be greater volatility in extended hours trading than in regular market hours. As a result, your order may only be partially executed, or not at all, or you may receive an inferior price in extended hours trading than you would during regular market hours.
- **Risk of Changing Prices** - The prices of securities traded in extended hours trading may not reflect the prices either at the end of regular market hours, or upon the opening the next morning. As a result, you may receive an inferior price in extended hours trading than you would during regular market hours.
- **Risk of Unlinked Markets** - Depending upon the extended hours trading system or the time of day, the prices displayed on a particular extended-hours trading system may not reflect the prices in other concurrently operating extended-hours trading systems dealing in the same securities. Accordingly, you may receive an inferior price in one extended-hours trading system than you would in another extended-hours trading system.
- **Risk of News Announcements** - Normally, issuers make news announcements that may affect the price of their securities after regular market hours. Similarly, important financial information is frequently announced outside of regular market hours. In extended-hours trading, these announcements may occur during trading, and if combined with lower liquidity and higher volatility, may cause an exaggerated and unsustainable effect on the price of a security.
- **Risk of Wider Spreads** - The spread refers to the difference in price between what you can buy a security for and what you can sell it for. Lower liquidity and higher volatility in extended hours trading may result in wider than normal spreads for a particular security.

- **FINRA Margin Disclosure Statement** - QCC is furnishing this document to you to provide some basic facts about purchasing securities on margin and to alert you to the risks involved with trading securities in a margin account. Before trading stocks in a margin account, you should carefully review the margin agreement provided by your firm. Consult your firm regarding any questions or concerns you may have with your margin accounts. When you purchase securities, you may pay for the securities in full, or you may borrow part of the purchase price from your brokerage firm. If you choose to borrow funds from your firm, you will open a margin account with the firm. The securities purchased are the firm's collateral for the loan to you. If the securities in your account decline in value, so does the value of the collateral supporting your loan, and, as a result, the firm can take action, such as issue a margin call and/or sell securities in your account, to maintain the required equity in the account. It is important that you fully understand the risks involved in trading securities on margin.

These risks include the following:

- You can lose more funds than you deposit in the margin account.
- A decline in the value of securities purchased on margin may require you to provide additional funds to the firm that made the loan to avoid the forced sale of those securities or other securities in your account.
- The firm can force the sale of securities in your account.
- If the equity in your account falls below the maintenance margin requirements under the law, or the firm's higher house requirements, the firm can sell the securities in your account to cover the margin deficiency.
- You will be responsible for any shortfall in the account after such a sale.
- The firm can sell your securities without contacting you.

Some investors mistakenly believe that a firm must contact them for a margin call to be valid and that the firm cannot liquidate securities in their accounts to meet the call unless the firm has contacted them first. THIS IS NOT THE CASE. Most firms will attempt to notify their customers of margin calls, but they are not required to do so. However, even if a firm has contacted a customer and provided a specific date by which the customer can meet a margin call, the firm can still take necessary steps to protect its financial interests, including immediately selling the securities without notice to the customer. You are not entitled to choose which security in your margin account is liquidated or sold to meet a margin call. Because the securities are collateral for the margin loan, the firm has the right to decide which security to sell to protect its interests. The firm can increase its house maintenance margin requirements at any time and is not required to provide you with advance written notice. These changes in firm policy often take effect immediately and may result in the issuance of a maintenance margin call. Your failure to satisfy the call may cause the member to liquidate or sell securities in your account. You are not entitled to an extension of time on a margin call. While an extension of time to meet margin requirements may be available to customers under certain conditions, a customer does not have a right to the extension.

FINRA Rule 2264. Margin Disclosure Statement

(a) No member shall open a margin account, as specified in Regulation T of the Board of Governors of the Federal Reserve System, for or on behalf of a non-institutional customer, unless, prior to or at the time of opening the account, the member has furnished to the customer, individually, in paper or electronic form, and in a separate document (or contained by itself on a separate page as part of another document), the margin disclosure statement specified in this paragraph (a). In addition, any member that permits non-institutional customers either to open accounts online or to engage in transactions in securities online must post such margin disclosure statement on the member's Web site in a clear and conspicuous manner.

Margin Disclosure Statement

Your brokerage firm is furnishing this document to you to provide some basic facts about purchasing securities on margin, and to alert you to the risks involved with trading securities in a margin account. Before trading stocks in a margin account, you should carefully review the margin agreement provided by your firm. Consult your firm regarding any questions or concerns you may have with your margin accounts.

When you purchase securities, you may pay for the securities in full or you may borrow part of the purchase price from your brokerage firm. If you choose to borrow funds from your firm, you will open a margin account with the firm. The securities purchased are the firm's collateral for the loan to you. If the securities in your account decline in value, so does the value of the collateral supporting your loan, and, as a result, the firm can take action, such as issue a margin call and/or sell securities or other assets in any of your accounts held with the member, in order to maintain the required equity in the account.

It is important that you fully understand the risks involved in trading securities on margin. These risks include the following:

- **You can lose more funds than you deposit in the margin account.** A decline in the value of securities that are purchased on margin may require you to provide additional funds to the firm that has made the loan to avoid the forced sale of those securities or other securities or assets in your account(s).

- **The firm can force the sale of securities or other assets in your account(s).** If the equity in your account falls below the maintenance margin requirements, or the firm's higher "house" requirements, the firm can sell the securities or other assets in any of your accounts held at the firm to cover the margin deficiency. You also will be responsible for any short fall in the account after such a sale.

- **The firm can sell your securities or other assets without contacting you.** Some investors mistakenly believe that a firm must contact them for a margin call to be valid, and that the firm cannot liquidate securities or other assets in their accounts to meet the call unless the firm has contacted them first. This is not the case. Most firms will attempt to notify their customers of margin calls, but they are not required to do so. However, even if a firm has contacted a customer and provided a specific date by which the customer can meet a margin call, the firm can still take necessary steps to protect its financial interests, including immediately selling the securities without notice to the customer.

- **You are not entitled to choose which securities or other assets in your account(s) are liquidated or sold to meet a margin call.** Because the securities are collateral for the margin loan, the firm has the right to decide which security to sell in order to protect its interests.

- **The firm can increase its "house" maintenance margin requirements at any time and is not required to provide you advance written notice.** These changes in firm policy often take effect immediately and may result in the issuance of a maintenance margin call. Your failure to satisfy the call may cause the member to liquidate or sell securities in your account(s).

- **You are not entitled to an extension of time on a margin call.** While an extension of time to meet margin requirements may be available to customers under certain conditions, a customer does not have a right to the extension.

(b) Members shall, with a frequency of not less than once a calendar year, deliver individually, in paper or electronic form, the disclosure statement described in paragraph (a) or the following bolded disclosures to all non-institutional customers with margin accounts:

Securities purchased on margin are the firm's collateral for the loan to you. If the securities in your account decline in value, so does the value of the collateral supporting your loan, and, as a result, the firm can take action, such as issue a margin call and/or sell securities or other assets in any of your accounts held with the member, in order to maintain the required equity in the account. It is important that you fully understand the risks involved in trading securities on margin. These risks include the following:

- **You can lose more funds than you deposit in the margin account.**

- **The firm can force the sale of securities or other assets in your account(s).**

- **The firm can sell your securities or other assets without contacting you.**

- **You are not entitled to choose which securities or other assets in your account(s) are liquidated or sold to meet a margin call.**

- **The firm can increase its "house" maintenance margin requirements at any time and is not required to provide you advance written notice.**

- **You are not entitled to an extension of time on a margin call.**

The annual disclosure statement required pursuant to this paragraph (b) may be delivered within or as part of other account documentation, and is not required to be provided in a separate document or on a separate page.

(c) In lieu of providing the disclosures specified in paragraphs (a) and (b), a member may provide to the customer and, to the extent required under paragraph (a) post on its Web site, an alternative disclosure statement, provided that the alternative disclosures shall be substantially similar to the disclosures specified in paragraphs (a) and (b).

(d) For purposes of this Rule, the term “non-institutional customer” means a customer that does not qualify as an “institutional account” under Rule 4512(c).

- **Standards of Best Execution** – On a quarterly basis, Quint Capital Corporation (QCC) produces a report that evaluates the execution quality of our securities transaction services. Please be aware that all clients are entitled to receive this information. Do not hesitate to contact us in the event you are interested in receiving a copy of this report or any additional information regarding our securities execution service.
- **Important Business and Name Structure Recognitions -** Quint Capital LLC is the parent company of the following entities:

Entity	**Doing Business As (DBA)**	**Function**	**Regulatory Authority**
Quint Capital Corporation	Champion Capital Corporation	Broker-Dealer	Financial Industry Regulatory Authority (FINRA)
Quint Capital Management	Legacy Trust Advisors	Registered Investment Advisor	States of Connecticut, Florida and New York
Quint Cap	Quint Capital Benefits	Insurance Agency	State of New York Department of Financial Services

- **Royal Bank of Canada (RBC) -** Quint Capital Corporation has a clearing and custody arrangement with RBC. This contractual arrangement provides a separation of services under which QCC is the introducing broker of record, providing execution and customer services. RBC provides safekeeping of the Client's cash and securities holdings. While the two companies are contractually bound, it should not be construed that they are affiliated with one another as partners or as part of the same company. QCC and RBC are two separate and distinct companies.
- **Customer Complaints** – All questions, comments or concerns should be directed to compliance@quintcapital.com.