

Sabadell Securities USA, Inc. ("Sabadell Securities" or the "Firm") would like to take this opportunity to thank you for your continued business and we look forward to continuing to provide the highest level of service in the future. This letter is being provided in order for Sabadell Securities to remain compliant with a number of customer account disclosures required by the Financial Industry Regulatory Authority ("FINRA"). This notification is for informational purposes and does not require any action on your part.

#### **Affiliates**

SABS is a wholly owned subsidiary of Banco de Sabadell S.A. and affiliated with the Banco de Sabadell S.A. group of companies including any subsidiaries, affiliates, branches, agencies or other offices, wherever located (the "Sabadell Group"). SABS' personnel are officers, employees of or, associated with certain affiliates of the Sabadell Group. SABS may have conflicts of interest in the allocation of management and staff time, services and functions between SABS' customers and customers of its affiliates, including the Banco de Sabadell, S.A. Miami Branch.

#### **FINRA Rule 2266 and NYSE Rule 409A**

Sabadell Securities is a member of the Securities Investor Protection Corporation ("SIPC"). FINRA Rule 2266 and NYSE Rule 409A require Sabadell Securities to disclose SIPC Contact Information. SIPC plays an important role in the overall system of investor protection in the United States by, in certain specified situations, restoring funds to investors with assets in the hands of bankrupt and otherwise financially troubled brokerage firms. When a brokerage firm is closed due to bankruptcy or other financial difficulties and customer assets are missing, SIPC steps in as quickly as possible and, within certain limits, works to return customers' cash, stock, and other securities. You may obtain more information about SIPC, including a brochure entitled *How SIPC Protects You*, by contacting SIPC at:

Securities Investor Protection Corporation

805 15th Street, N.W. Suite 800

Washington, D.C. 20005-2215

phone: (202) 371-8300

Email: [asksipc@sipc.org](mailto:asksipc@sipc.org)

You may also visit SIPC's website at [www.sipc.org](http://www.sipc.org).

#### **FINRA Regulation Public Disclosure Program**

Sabadell Securities is required by FINRA Rules to provide you with information about the availability of information through FINRA's Public Disclosure Program. The investor brochure may be obtained via the FINRA Web Site ([www.finra.org](http://www.finra.org)) or through the FINRA Public Disclosure Program Hotline Number at (800) 289-9999.

#### **FINRA BrokerCheck**

FINRA BrokerCheck is a free tool to help investors make informed choices about brokers and brokerage firms, by providing information on current and former FINRA-registered securities firms and brokers. Brochures containing more details of this tool are available by calling the BrokerCheck hotline at (800) 289-9999 or online at <http://brokercheck.finra.org/>

#### **FINRA Rule 2261 Disclosure of Financial Condition to Customers**

Sabadell Securities will make available, upon request, a statement of financial condition as disclosed in its most recent balance sheet prepared either in accordance with the firm's usual practice or as required by any state or federal securities laws, or any rule or regulation thereunder.

#### **Important Information about New Account Opening Procedures / Customer Identification Program (CIP)**

The USA PATRIOT Act (Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism) was enacted to strengthen the United States government's ability to combat terrorist financing and money laundering. An essential component of the USA PATRIOT Act requires financial institutions to obtain, verify and record information that identifies each person or entity with an account relationship at a financial institution.

If you are an individual and open an account or carry out transactions with Sabadell Securities, the Firm collects the following information:

- Name
- Date of birth
- Address
- 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 card 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.

If you are a corporation, partnership, trust or other entity opening accounts with Sabadell Securities, the Firm asks for (i) name, (ii) street address (either principal place of business, a local office or other physical location), (iii) a U.S. taxpayer identification number, or if not organized or a resident in the United States or filing U.S. income tax returns, the number and country of issuance of any other government-issued document certifying the existence of the organization, and (iv) such other information or documents that we consider necessary to verify the entity's identity. Examples of additional information include articles of incorporation, a government-issued business license, a partnership agreement or a trust instrument. We may also verify the entity's identity through other means.

If the above information is not provided, Sabadell Securities may not be able to open an account or carry out transactions for you. If Sabadell Securities has already opened an account for you, they may have to close it.

### **Business Continuity Planning**

Sabadell Securities 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 is 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.

**Contacting Us** – If after a significant business disruption you cannot contact us as you usually do by calling or sending an email to your registered representative, you may call (305)351-4249 or (786)395-5865 as an alternate number for trade-related transactions, cash disbursements, and security transfers.

**Our 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. Such plans are subject to modification

**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.

Our clearing firm, Pershing LLC, backs up our important records in a geographically separate area. 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 firm that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments within four (4) hours. 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. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area. Regarding all circumstances within our control, Sabadell Securities' recovery time objective is (4) hours. In either situation, we plan to continue in business. If the significant business disruption is so severe that it prevents us from remaining in business, we will notify you using the communication means available to us. We will assure our customer's prompt access to their funds and securities..

**For more information** – If you have questions about our business continuity planning, you can contact us at 1111 Brickell Avenue, Suite 3010, Miami FL, 33131 or (786) 587-1601

**Complaints**

Complaints concerning services provided by Sabadell Securities may be directed to:

Sabadell Securities USA, Inc.  
Attn: Compliance Department/Complaints  
1111 Brickell Avenue, Suite 3010  
Miami, FL 33131

**Payment for Order Flow Practices SEC Rule 607**

As a matter of policy Sabadell Securities does not receive payment in return for directing customer equity order flow to particular market centers. Sabadell Securities sends certain equity orders to exchanges, electronic communication networks, or broker-dealers during normal business hours. Some of these market centers provide credits to Sabadell Securities or charge access fees depending upon the characteristics of the order and any subsequent execution. In addition, Sabadell Securities may execute certain equity orders as principal. The details of these payments and fees are available upon written request. Disclosure of order flow can be provided by your Sabadell Securities representative. See the Terms and Conditions section of your brokerage account statement for a description of Pershing's payment for order flow practices.

**SEC Rule 606 Disclosure of Order Routing Practices**

SEC Rule 606 requires all broker-dealers (including introducing firms) that route customer orders in equity and option securities to make publicly available quarterly reports that, among other things, identify the venues to which customer orders are routed for execution and also disclose the material aspects of the broker-dealer's relationship with such venues. In compliance with Rule 606, A copy of the firm's quarterly report on order routing is available upon request by contacting your Sabadell Securities' representative or may be obtained at our clearing firm's web site

<http://www.orderroutingdisclosure.com>

Upon written request, you may obtain the identity of the venue to which your orders were routed for the six months prior to your request and the time of transactions that may have resulted from such orders pursuant to SEC Rule 606(b)(1).

**Payment for Referred Account**

We may compensate our affiliates for their services in referring your account(s) to us. This compensation may be in the form of a percentage of the commissions, fees, trailer, and mark-ups and mark downs received by Sabadell Securities USA, Inc. in connection with your account(s) referred to us. The commissions, fees, mark-up, and mark downs charged to your account(s) will not be increased as a result of the compensation paid to affiliates.

**Mutual Fund Sales Charges, Breakpoints, and Fees**

Before investing in mutual funds, it is important that you understand the sales charges, expenses and management fees that you will be charged, as well as the breakpoint discounts to which you may be entitled. Sabadell Securities will receive ongoing or continuing compensation (even if the service provider or mutual fund investment advisor is an Affiliate) , which include 12b-1 fees, service fees, marketing and distribution fees, retrocessions, rebates, trailing commissions and/or trailers and are designed to compensate Sabadell Securities for marketing, advising clients to invest in or hold shares, and other ongoing distribution services. These fees are typically deducted from the assets of the fund or a particular share class of a fund on an ongoing basis and therefore, increase the cost and reduce investment returns. Understanding these charges and breakpoint discounts will assist you in identifying the best investment for your particular needs and may help you to reduce the cost of your investment. You should discuss these matters with your Sabadell Securities representative and review each mutual fund's prospectus and statement of additional information to obtain the specific information regarding the charges and breakpoint discounts associated with a particular mutual fund.

**Confidentiality**

Sabadell Securities's policy is to maintain the confidentiality of client order and transaction information. Please be assured that Sabadell Securities has strict policies and procedures in place on confidentiality of client information, as well as, sophisticated and secure trading and operational technology to provide superior protection of our clients' portfolio holdings and related trading activity.

## **Sabadell Securities 's Privacy Policy**

GRAMM-LEACH BLILEY ACT AND SEC REGULATION S-P and REGULATION SAM requires Sabadell Securities to disclose its privacy policy.

### **Types of Nonpublic Personal Information We Collect**

We collect nonpublic personal information about you that is either provided to us by you or obtained by us with your authorization.

### **Parties to Whom We Disclose Information**

For current and former clients, we do not disclose any nonpublic personal information obtained in the course of our business except as required or permitted by law. Permitted disclosures include, for instance, providing information to our employees and, in limited situations, to unrelated third parties who need to know that information to assist us in providing services to you. In all such situations, we stress the confidential nature of information being shared. Sabadell Securities may also share information with its affiliate.

### **Protecting the Confidentiality and Security of Current and Former Client's Information**

We retain records relating to professional services that we provide so that we are better able to assist you with your professional needs and in some cases, to comply with professional guidelines. In order to guard your nonpublic personal information, we maintain physical, electronic and procedural safeguards that comply with our professional standards.

Please call if you have any questions, or want to opt out of our information sharing. Your privacy, our professional ethics, and the ability to provide you with quality financial services are very important to us.

If there is anything that has not been addressed by the above, please contact the Compliance Department at: 1 786 587 1601