

StockCross Policy with Regard to Payment for "Order Flow"

The Securities and Exchange Commission ("SEC") requires all registered broker-dealers to disclose their policies regarding receipt of "payment for order flow." The Commission defines "payment for order flow" as "any monetary payments, services, property, or other benefits that result 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, including but not limited to research, clearance, custody, products or services, reciprocal agreements for the provision of order flow adjustment of a broker or dealer's unfavorable trading errors, effort to participate as underwriter in public offerings, stock loans or shared interest accrued thereon, discounts, rebates, or any other reductions of or credits against any fee to, or expense or other financial obligation of, the broker or dealer routing a customer order that exceeds that fee, expense or other financial obligation."

StockCross generally does not negotiate payment for order flow. However, StockCross transacts business on varying market venues, and with varying market participants, and as such is subject to the standard schedule of transaction fees found therein, which may include certain rebates and or other cost savings. In addition, StockCross may negotiate preferable rates at certain venues and or with certain participants, which also may include the payment of rebates, and or the provision of cost savings for certain order types, and or under certain conditions. In the course of transacting business StockCross may be the recipient of certain rebates and or savings. As such, StockCross may receive benefits that could be construed as falling within the above definition of "payment for order flow." STXG as a market maker does stand to share in 100% of any profits or losses generated by trading as principal with our client's orders.

Additional information regarding STXG order routing practices is available upon written request.