

FINRA Rule 5270 prohibits FINRA member broker-dealers from executing orders to buy or sell certain securities or related financial instruments when the member has material, non-public information concerning an imminent block transaction in those securities, related financial instruments, or securities underlying the related financial instruments prior to the time information concerning the block transaction has been made publicly available or has otherwise become stale or obsolete. The Rule permits certain exceptions to this prohibition, including transactions that are undertaken to fulfill or facilitate the execution of a client block order.

Stifel, Nicolaus & Company, Incorporated (“Stifel”) may rely on the Rule’s exceptions while effecting block orders for its clients. In connection with the handling of your block orders, Stifel may engage in hedging, offsetting, liquidating, facilitating, or positioning transactions (“risk-mitigating transactions”) that may occur at the same time or in advance of your order, and these activities may have an impact on market prices. Beyond these risk-mitigating transactions, Stifel and/or its affiliates will refrain from any conduct that could disadvantage or harm the execution of your orders or that would place Stifel’s financial interests ahead of yours.

Unless you inform Stifel otherwise in writing (“opt out”), we will conclude that you understand that Stifel may engage in risk-mitigating transactions in connection with your orders and we will conclude that you have given your consent to Stifel and/or its affiliates to handle your block transactions as described above. You may choose to opt out by providing written notice to Stifel at One South Street, Baltimore, Maryland 21202, Attn: Institutional Compliance Group. If you opt out, please be advised that Stifel and/or its affiliates may be limited in the range of execution alternatives. If you have any questions regarding the Rule, please call the Institutional Compliance Group at (877) 635-9529.