

Green Pier Fintech LLC

PRODUCTS, SERVICES, AND CONFLICTS OF INTEREST

This important disclosure information about Green Pier Fintech LLC (“GPF”) is provided to comply with the federal securities laws. It does not create or modify, amend, or supersede any agreement, relationship, or obligation between you and GPF or your unaffiliated investment advisor such as a registered investment advisor, (collectively referred to as an “Intermediary” or “Intermediary Accounts”). Please consult your account agreement with us and other related documentation for the terms and conditions that govern your relationship with us. Please go to <https://general.greenpier.com/disclosures/list.html> for further information.

Introduction

This document provides retail customers (referred to as “you” or “your”) with important information regarding your relationship with GPF (referred to as “we,” “us,” or “our”), a broker-dealer registered with the U.S. Securities and Exchange Commission (“SEC”), and a member of the Financial Industry Regulatory Authority (“FINRA”) and Securities Investor Protection Corporation (“SIPC”). Within this document, you will find information regarding the products and services GPF offers, including their material limitations and risks. In addition, this document describes our best interest obligations and fiduciary status document also describes the conflicts of interest that arise in GPF’s business, including those conflicts that arise from compensation received by GPF, its affiliates, and its registered representatives (“Representatives”), and how we address those conflicts.

GPF offers brokerage accounts and services for personal investing, including retail and retirement (such as Individual Retirement Accounts [“IRAs”]) either directly to the public or through unaffiliated third-party registered investment advisers (“RIAs”). These brokerage accounts generally allow you to invest in exchange-traded funds and stocks and bonds.

When providing brokerage services to you, GPF is required to:

- Ensure that your trades are executed with diligence and competence and seek to provide best execution in light of prevailing market conditions; and
- Treat you in a manner consistent with principles of fair dealing and high standards of honesty and integrity.

Your GPF brokerage account (“GPF Account”) is self-directed. This means that you or someone you designate are solely responsible for deciding whether and how to invest in the securities, products, and services offered by GPF. You, or someone you designate, are also solely responsible for the ongoing review and monitoring of the investments held in your GPF Account. GPF will not monitor any investment recommendation made to you, or the investments held in your GPF Account. You are responsible for independently ensuring that the investments in your GPF Account remain appropriate given your situation.

There is no minimum required to open a GPF Account, but there are minimums to purchase some types of investments. All transaction charges will be identified to you in the confirmation of a transaction and/or in the account statement GPF sends to you on a periodic basis. Please see the applicable GPF Account Customer Agreement (“Customer Agreement”) and the GPF Brokerage Commission and Fee Schedule (“Fee Schedule”) for information regarding the transaction fees and other charges that apply to your GPF Account, including trade execution, clearing, and other services provided by GPF, as well as the terms and conditions applicable to your GPF Account, which can be found at <https://general.greenpier.com/disclosures/list.html>.

GPF Accounts and Intermediaries: You may have a GPF Account in connection with services provided by an unaffiliated investment advisor such as a registered investment advisor, (collectively referred to as an “Intermediary” or “Intermediary Accounts”). **While GPF and its affiliates may provide services to Intermediary Accounts, GPF does not provide recommendations to Intermediary Accounts and does not monitor Intermediary Accounts or investments held therein.** Your Intermediary may offer different investment services and products from those offered by GPF. Please contact your Intermediary for more information on the services offered, conflicts of interest, and the fees you will pay for those services.

General Investment Risks

All investments involve risk of financial loss. Historically, investments with a higher return potential also have a greater risk potential. Events that disrupt global economies and financial markets, such as war, acts of terrorism, the spread of infectious illness or other public health issues, and recessions, can magnify an investment’s inherent risks. The general risks of investing in specific products and services offered by GPF are described below. Detailed information regarding a specific investment’s risks is also provided in other disclosure and legal documents we make available to you, including prospectuses, term sheets, and memoranda. As stated previously, you, or you and your Intermediary, are responsible for deciding whether and how to invest in the securities, strategies, products, and services offered by GPF. You should carefully consider your investment objectives, and the risks, fees, expenses, and other charges associated with an investment product or service before making any investment decision.

The investments held in your Account (except for a Federal Deposit Insurance Corporation (“FDIC”) insured deposit account bank sweep) are not deposits in a bank or credit union and are not insured or guaranteed by the FDIC, the National Credit Union Association, or any other government agency.

Fees and Charges

Details regarding the fees, charges, and commissions and/or markups associated with the investment products and services described below can be found in the Fee Schedule, which is available at <https://general.greenpier.com/disclosures/list.html>.

If you work with an intermediary, your Intermediary determines with GPF the fees, charges, and/or markups you pay to GPF and its affiliates for their services. Contact your Intermediary for more information about additional fees and charges.

Available Securities

This section generally describes the securities offered by GPF, the fees you will pay, how we and/or our affiliates are compensated, the associated risks and Representative compensation.

Exchange-Traded Funds (ETFs)

GPF offers ETFs sponsored by a GPF affiliate and ETFs sponsored by third parties. Generally, GPF does not charge a commission or other transaction fee for ETFs purchased online. More information about ETF fees and costs can be found in the Fee Schedule, which you can find at <https://general.greenpier.com/disclosures/list.html>. For the specific risks associated with an ETF, please see its prospectus or summary prospectus and read it carefully.

GP’s affiliate, Fidelity Brokerage Services LLC (“FBS”), receives compensation from BlackRock Fund Advisors, the sponsor of the iShares® ETFs, in connection with a marketing program that includes promotion of iShares ETFs and inclusion of iShares funds in certain FBS and certain other

affiliates' platforms and investment programs. GP receives no additional compensation when GP customers purchase or sell iShares ETFs versus other ETFs.

Stocks

GPF makes available for purchase and sale the stocks of publicly traded companies listed on domestic exchanges. GPF does not charge you a commission for online U.S. stock transactions. A regulatory fee is charged when a stock is sold. Stock markets are volatile and can fluctuate significantly in response to company, industry, political, regulatory, market, infectious illness, or economic developments. Investing in stocks involves risks, including the loss of principal. GPF may receive monetary payments or other consideration (such as financial credits or reciprocal business) for directing equity trades to certain market centers. The details of any form of compensation received in connection with the routing of a particular order will be provided upon your request. For information regarding trading and order routing practices, including compensation, see the “Order Routing and Principal Trading by GPF Affiliates” section below and the Customer Agreement, which you can find at <https://general.greenpier.com/disclosures/list.html>.

IRAs

We offer traditional IRAs and Roth IRAs to individual investors to make investments on a tax-advantaged basis. There are no fees to open IRAs with GPF, but there are other fees associated with IRAs, which you can learn more about in the Customer Agreement and Fee Schedule provide at <https://general.greenpier.com/disclosures/list.html>.

Sweep Options

Your GPF Account includes a “core position” that holds assets awaiting further investment or withdrawal. The available sweep option available to you is a free credit balance (“GCASH”). For more information, please refer to the Customer Agreement and Core Position Disclosure, which can be found at <https://general.greenpier.com/disclosures/list.html>.

If you use the free credit balance, GPF earns interest by investing your cash overnight and can earn additional compensation through the use of unsettled funds that can generate earnings, or “float.”

Investment Advisory Services

Investment advisory services offered to you by an unaffiliated intermediary are separate and distinct from the Brokerage accounts offered by GPF. These offerings are governed by different laws and regulations and have separate agreements with different terms, conditions, and fees that reflect the differences between the services provided. It is important for you to understand that a self-directed GPF brokerage account differs from a discretionary investment advisory service. Investment advisory accounts typically charge an ongoing fee for the investment, advice, and monitoring services. Fees for these investment advisory services vary based on the scope of services provided and the value of the assets for which the services are provided.

Additional Conflicts of Interest

Agreements and Incentives with Intermediaries

If you work with GPF through an Intermediary, you have authorized your Intermediary to enter into an agreement with GPF that includes a schedule of applicable fees that will apply to your Intermediary Account. In these arrangements, GPF and the Intermediary agree to pricing for the respective Intermediary Accounts based on the nature and scope of business that the Intermediary does with GPF. For more information on the pricing that applies to your Intermediary Account, contact your Intermediary.

Order Routing and Principal Trading by GPF Affiliates

When you place a purchase or sale order for individual stocks or ETFs in your GPF Account, GPF typically will send the order to various exchanges or market centers for execution. Any order executed for your GPF Account is subject to a “best execution” obligation. In deciding where to send orders received for execution, GPF considers a number of factors including the size of the order, trading characteristics of the security, favorable execution prices (for example, the opportunity for price improvement), access to reliable market data, availability of efficient automated transaction processing, and execution cost. Some market centers or broker-dealers may execute orders at prices superior to publicly quoted market prices. For additional information on our best execution and order entry procedures, please refer to the Customer Agreement, which you can find at <https://general.greenpier.com/disclosures/list.html>.

GPF Representative compensation is not affected by order routing practices or whether we execute transactions on a principal basis.