

*In evaluating an investment manager (each, an “Investment Manager”), Clients should review: (i) the information contained in this document, including any costs associated with trades executed away from Stifel during the period shown, and (ii) the Investment Manager’s Form ADV Part 2A Brochure. Clients should also ask their Financial Advisor about the Investment Manager’s trading-away practices before selecting, or while reviewing, a particular investment strategy.*

### **Investment Managers Utilized in Stifel’s Programs That Include Separately Managed Accounts (“SMAs”) May Trade Away From Stifel**

Investment Managers in Stifel’s Opportunity, Connect, Select Manager, and Investment Management Consulting Programs have discretion to effect trades on behalf of clients through broker-dealers other than Stifel. An Investment Manager may trade away if it determines, in its sole discretion, such trades would be in the best interests of its clients, such as to satisfy its best execution obligations.

### **Costs Associated With Trades Executed Away From Stifel Are Not Included in a Client’s Advisory Fees**

As outlined in our investment advisory client account agreement, clients enrolled in our Opportunity, Select, and Investment Management Consulting Programs generally pay an annualized wrap fee that includes certain fees and charges for the services of the Investment Manager and Stifel, including costs related to transactions in client accounts effected through Stifel. Clients enrolled in our Connect Program who utilize an Investment Manager pay an advisory fee to Stifel as well as a separate advisory fee to the Investment Manager. However, for all transactions executed through other broker-dealers, clients will likely, but will not necessarily, incur additional costs, such as commissions or markups/markdowns embedded in the price of the security that are **in addition to, and not included in**, the advisory fee. As such, clients are separately responsible for any execution costs incurred in connection with such trades. These additional costs are not reflected on client account statements; however, if the Investment Manager has provided the appropriate information to Stifel regarding such additional costs, they may be indicated on client trade confirmations or on client quarterly transaction confirmation reports provided to those clients who have elected to suppress immediate trade confirmations.<sup>1</sup>

### **General Information on Investment Managers’ Best Execution Obligations**

Investment Managers are investment advisers that have a fiduciary obligation to act in the best interests of their advisory clients and are therefore required to seek to obtain “best execution” in effecting trades on behalf of such clients. Under the Investment Advisers Act of 1940, “best execution” generally means executing transactions in a manner such that the client’s total cost or proceeds are the most favorable under the circumstances. Although it is important for Investment Managers to seek the best price for a security in the marketplace and minimize unnecessary brokerage costs in satisfying its obligations, these are not the only factors used to determine whether the Investment Manager has satisfied its obligations. It is not an obligation to get the lowest possible commission cost or to solicit competitive bids for each transaction, but rather, the Investment Manager should determine whether the transaction represents the best qualitative execution for its clients. In selecting a broker-dealer, Investment Managers should consider the full range and quality of services offered by the broker-dealer, including the value of the research provided (if any), execution capability, commission rate charged, the broker-dealer’s financial responsibility, and its responsiveness. *It is also important to note that Stifel does not monitor, review, or otherwise evaluate whether an Investment Manager is satisfying its best execution obligations to clients.*

<sup>1</sup> *All other information shown does not reflect any additional execution costs resulting from trades executed through other broker-dealers.*

*Additional information about an Investment Manager’s brokerage practices, including the factors that the Investment Manager considers in satisfying its best execution obligations, which may vary according to the type(s) of securities traded, is contained in each Investment Manager’s Form ADV Part 2A Brochure.*

## **Types of Securities Traded**

Investment Managers whose strategies consist primarily (or substantially) of fixed income securities, foreign securities (including American Depositary Receipts or ordinary shares), exchange traded funds, and/or small-cap securities are generally more likely to trade away from Stifel. This means that clients investing in such strategies are more likely to incur execution costs in addition to the fee paid to Stifel. Clients should, therefore, take these costs into consideration when selecting and/or deciding to remain invested in the affected strategies.

## **Trade Aggregation**

Investment Managers typically manage wrap client accounts for multiple firms using the same strategy, and may also manage other directly sourced accounts side-by-side with wrap client accounts. In certain cases, an Investment Manager may decide to aggregate all client transactions into a block trade that is executed through one broker-dealer, rather than separately through each participating firm (such as Stifel). Aggregating transactions into a single block may enable the Investment Manager to obtain a better price or additional investment opportunities for its clients, as well as allow the Investment Manager to exercise more control over the execution, including (for example) potentially avoiding an adverse effect on the price of a security that could result from simultaneously placing a number of separate, successive, and/or competing client orders.

## **Investment Managers' Historical Trading Away Practices**

A list of Investment Managers with trading discretion over client accounts that have notified Stifel that they traded away from Stifel during the previous calendar year is attached. This list includes the names of the applicable strategies, information about the trade-away practices of the Investment Manager for a particular strategy, and the average associated costs (if any) during the previous calendar year. The information contained in this list is based solely upon information provided to Stifel by each Investment Manager and has not been independently verified by Stifel. As a result, Stifel does not make any representations as to the accuracy of the information.

The information in the attached list regarding an Investment Manager's prior trade-away practices is not a guarantee that such Investment Manager will exercise or repeat the same practices in the future, in general, and/or with the same frequency. It is possible that Investment Managers could trade away more or less frequently, or at a higher or lower commission rate, fee, or other expenses, resulting in greater or lesser costs than those indicated. Individual clients enrolled in the strategies noted may experience different results. Similarly, it is possible that Investment Managers that have not previously, or recently, traded away from Stifel will do so in the future.

## Commodities

| Stifel Advisory Program | Manager                      | Portfolio Name                      | Trade Away? | Dollar-weighted percentage of trades executed away from Stifel | Execution Costs Charged by the Executing Broker for the trades |
|-------------------------|------------------------------|-------------------------------------|-------------|--|--|
| Connect                 | Advisory Research Inc        | Master Limited Partnership          | No          | N/A  | N/A  |
| Opportunity             | AT Investment Advisors       | Energy Infrastructure Strategy      | No          | N/A  | N/A  |
| Connect                 | Miller/Howard Investments    | Master Limited Partnership Strategy | No          | N/A  | N/A  |
| Opportunity             | Neuberger Berman (Neubridge) | Rachlin Income Plus                 | No          | N/A  | N/A  |
| Opportunity             | Neuberger Berman (Neubridge) | Rachlin MLPs Only                   | No          | N/A  | N/A  |
| Opportunity             | Salient Partners             | Master Limited Partnership          | No          | N/A  | N/A  |

## Convertible Bonds

| Stifel Advisory Program | Manager                           | Portfolio Name                             | Trade Away? | Dollar-weighted percentage of trades executed away from Stifel | Execution Costs Charged by the Executing Broker for the trades |
|-------------------------|-----------------------------------|--|-------------|--|--|
| Opportunity             | Advent Capital Management         | Phoenix Convertible Income                 | Yes         | 100%   | \$0.00   |
| Opportunity             | Laffer Investments                | Convertible Income                         | Yes         | 99.43%   | \$0.00   |
| Opportunity             | Laffer Investments                | Convertible                                | Yes         | 94.50%   | \$0.00   |
| Stifel Select - SMA     | Laffer Investments Inc            | Convertible                                | Yes         | 94.50%   | \$0.00   |
| Stifel Select - SMA     | Laffer Investments Inc            | Convertible Income                         | Yes         | 99.43%   | \$0.00   |
| Opportunity             | New York Life Investment Mgmt LLC | MacKay Shields Convertible SMA             | Yes         | 82%  | \$0.00   |
| Connect                 | SSI Investment Management         | SSI Outright Investment Grade Convertibles | Yes         | 100.00%  | \$0.84   |
| Connect                 | Wellesley Investment Advisors     | Convertibles                               | Yes         | 97.00%   | \$0.00   |

## Emerging Markets Equity

| Stifel Advisory Program | Manager          | Portfolio Name       | Trade Away? | Dollar-weighted percentage of trades executed away from Stifel | Execution Costs Charged by the Executing Broker for the trades |
|-------------------------|------------------|----------------------|-------------|--|--|
| Opportunity             | Gratry & Company | Emerging Markets ADR | No          | N/A  | N/A  |

## High Yield Fixed Income

| Stifel Advisory Program | Manager                   | Portfolio Name                    | Trade Away? | Dollar-weighted percentage of trades executed away from Stifel | Execution Costs Charged by the Executing Broker for the trades |
|-------------------------|---------------------------|-----------------------------------|-------------|--|--|
| Opportunity             | Hamlin Capital Management | High Yield Municipal Fixed Income | Yes         | 100%   | <sup>4</sup>   |
| Opportunity             | Seix Advisors             | High Yield Bond                   | Yes         | 100%   | \$0.00   |

## International Developed Equity

| Stifel Advisory Program | Manager                              | Portfolio Name                          | Trade Away? | Dollar-weighted percentage of trades executed away from Stifel | Execution Costs Charged by the Executing Broker for the trades |
|-------------------------|--------------------------------------|---|-------------|--|--|
| Connect                 | 1919 Investment Counsel              | SRI International ADR Equity            | No          | N/A  | N/A  |
| Opportunity             | AllianceBernstein                    | International Large Cap Value           | No          | N/A  | N/A  |
| Opportunity             | Allianz Global Investors             | NFJ Int Large Cap Value                 | No          | N/A  | N/A  |
| Opportunity             | Aristotle Capital Management         | International Equity ADR                | No          | N/A  | N/A  |
| Opportunity             | Brandes Investment Partners          | International Equity                    | Yes         | 80.42%   | \$1.92 Cps   |
| Connect                 | C.M. Bidwell and Associates          | International Core                      | No          | N/A  | N/A  |
| Opportunity             | Cambiar Investors                    | International Equity ADR                | No          | N/A  | N/A  |
| Opportunity             | Cumberland Advisors Inc              | International ETF                       | Yes         | 1%   | \$0.00   |
| Opportunity             | Dorsey Wright Money Management       | Systematic RS International             | No          | N/A  | N/A  |
| Opportunity             | First Trust Advisors, LP             | Morningstar International Core          | No          | N/A  | N/A  |
| Opportunity             | First Trust Advisors, LP             | Morningstar International Value         | No          | N/A  | N/A  |
| Opportunity             | Franklin Portfolio Advisors - Equity | Templeton International Equity ADR Only | Yes         | 55%  | \$0.0075 - \$0.04 Cps  |
| Opportunity             | Franklin Portfolio Advisors - Equity | Templeton International Equity          | Yes         | 55%  | \$0.0075 - \$0.04 Cps  |
| Opportunity             | Gratry & Company                     | International Equity ADR                | No          | N/A  | N/A  |
| Opportunity             | Gratry & Company                     | International Managed ETF               | No          | N/A  | N/A  |
| Opportunity             | Gratry & Company                     | International Growth                    | No          | N/A  | N/A  |
| IMC Program - SMA       | Harding Loevner                      | International Equity ADR                | Yes         | 24%  | \$1.90 Cps   |
| Opportunity             | Harding Loevner                      | International Growth ADR                | Yes         | 24%  | \$1.90 Cps   |
| Opportunity             | Neuberger Berman LLC                 | International ADR                       | No          | N/A  | N/A  |
| Connect                 | North Coast Asset Management         | International                           | No          | N/A  | N/A  |
| Opportunity             | NWQ Investment Management            | International Value ADR                 | No          | N/A  | N/A  |
| IMC Program - SMA       | Parametric Portfolio Associates      | International Equity                    | Yes         | < 1%   | 0.05 Bps   |
| IMC Program - SMA       | Parametric Portfolio Associates      | International Equity Income             | Yes         | < 1%   | 0.05 Bps   |
| Opportunity             | Parametric Portfolio Associates      | MSCI EAFE ADR Benchmark                 | Yes         | < 1%   | 0.05 Bps   |
| Connect                 | Schafer Cullen Capital Management    | International High Dividend ADR         | Yes         | 15.82%   | \$0.02   |
| Opportunity             | Schafer Cullen Capital Management    | International High Dividend             | Yes         | 5.99%  | \$0.02 Cps   |
| Connect                 | Thornburg Investment Management      | International ADR                       | Yes         | 83.00%   | \$0.031  |
| IMC Program - SMA       | Thornburg Investment Management Co   | International ADR                       | Yes         | 83%  | 3.1 Cps  |
| Connect                 | WCM Investment Management            | Focused Growth International            | No          | N/A  | N/A  |

## Multi Asset Class Equity

| Stifel Advisory Program | Manager  | Portfolio Name                                   | Trade Away? | Dollar-weighted percentage of trades executed | Execution Costs Charged by the Executing Broker for |
|-------------------------|--|--|-------------|---|---|
| Opportunity             | 1919 Investment Counsel                        | SRI Balanced                                     | No          | N/A   | N/A   |
| Connect                 | 1919 Investment Counsel                        | Custom 5 All Equity                              | No          | N/A   | N/A   |
| Opportunity             | AllianceBernstein                              | Global Equity                                    | No          | N/A   | N/A   |
| Opportunity             | Brandes Investment Partners                    | Global Balanced (Large Cap Value)                | Yes         | 35.54%  | \$1.54 Cps  |
| Opportunity             | Brandes Investment Partners                    | Global Equity / Large Cap Value                  | Yes         | 75.83%  | \$1.73 Cps  |
| Connect                 | Capital Wealth Planning                        | Enhanced Dividend Income                         | No          | N/A   | N/A   |
| Opportunity             | Confluence Investment Management               | IDEA Plus - Options Agreement Required           | No          | N/A   | N/A   |
| Connect                 | Cortland Associates, Inc                       | All Cap  | Yes         | 100.00%                                       | N/A   |
| Opportunity             | Crossmark Global Investments                   | Theta/CIP Blend - Options Agreement Required     | No          | N/A   | N/A   |
| Opportunity             | Crossmark Global Investments                   | Covered Call Income - Options Agreement Required | No          | N/A   | N/A   |
| Connect                 | Crossmark Global Investments                   | Global Equity Income                             | No          | N/A   | N/A   |
| Connect                 | CS McKee LP                                    | Value Equity                                     | Yes         | 100.00%                                       | \$0.02  |
| Opportunity             | Cumberland Advisors Inc                        | Global Equity ETF                                | Yes         | 1%  | \$0.00  |
| Connect                 | Donaldson Capital Management                   | Endowment Cornerstone                            | No          | N/A   | N/A   |
| Connect                 | Donaldson Capital Management                   | Rising Dividend                                  | No          | N/A   | N/A   |
| Connect                 | EquityCompass Strategies                       | Global Leaders Portfolio                         | Yes         | <1%   | \$0.015   |
| Connect                 | EquityCompass Strategies                       | Custom Mutual Fund                               | No          | N/A   | N/A   |
| Connect                 | EquityCompass Strategies                       | Stifel Quality Dividend                          | No          | N/A   | N/A   |
| Connect                 | EquityCompass Strategies                       | Select Quality Growth & Income                   | Yes         | 35.00%  | \$0.015   |
| Opportunity             | EquityCompass Strategies (Opportunity Program) | Tactical Total Core Municipal - Custom           | No          | N/A   | N/A   |
| Opportunity             | EquityCompass Strategies (Opportunity Program) | Global Leaders Portfolio                         | Yes         | < 1%  | \$0.015 cps   |
| Opportunity             | First Trust Advisors, LP                       | Morningstar Global Core                          | No          | N/A   | N/A   |
| Opportunity             | First Trust Advisors, LP                       | Morningstar Multi Discipline 100% Equity         | No          | N/A   | N/A   |
| Opportunity             | Franklin Portfolio Advisors - Equity           | Global Equity                                    | Yes         | 55%   | \$0.0075 - \$0.04 Cps                               |
| Opportunity             | Gratry & Company                               | Global Equity                                    | No          | N/A   | N/A   |
| Connect                 | Griffin Asset Management                       | Growth   | No          | N/A   | N/A   |
| Connect                 | Hilton Capital Management                      | Tactical Income                                  | No          | N/A   | N/A   |
| Opportunity             | Horizon Asset Management                       | Core Value                                       | No          | N/A   | N/A   |
| Connect                 | Horizon Asset Management                       | Core Value                                       | No          | N/A   | N/A   |
| Connect                 | Horizon Asset Management                       | Research Select                                  | No          | N/A   | N/A   |
| Connect                 | Laffer Investments                             | Laffer Strategic Equity Income                   | Yes         | 91.69%  | \$0.00  |
| IMC Program - SMA       | Lattice Strategies LLC                         | Lattice Risk Optimized Advancing Markets         | No          | N/A   | N/A   |
| Opportunity             | Legg Mason PPG                                 | Legg Mason MDA4                                  | Yes         | 65%   | \$0.0135 Cps  |
| Opportunity             | Legg Mason PPG                                 | Legg Mason MDA7                                  | Yes         | 73%   | \$0.0130 Cps  |
| Opportunity             | Legg Mason PPG                                 | Legg Mason MDA7A                                 | Yes         | 81%   | \$0.0133 Cps  |
| Opportunity             | Legg Mason PPG                                 | Legg Mason MDA8                                  | Yes         | 93%   | \$0.0126 Cps  |
| Connect                 | Marshfield Associates                          | Core Value Equity                                | No          | N/A   | N/A   |
| Connect                 | Neuberger Berman                               | Equity Income                                    | No          | N/A   | N/A   |
| Connect                 | Nottingham Advisors                            | Global Equity                                    | No          | N/A   | N/A   |
| Connect                 | OShaughnessy Asset Management                  | Enhanced Dividend                                | No          | N/A   | N/A   |
| Connect                 | OShaughnessy Asset Management                  | Market Leaders Value                             | No          | N/A   | N/A   |
| IMC Program - SMA       | Parametric Portfolio Associates                | Custom Core US Cap RAFI 3000                     | Yes         | < 1%  | 0.05 Bps  |
| Connect                 | Relative Value Partners                        | Balanced Strategy                                | No          | N/A   | N/A   |
| Connect                 | Uniplan Investment Counsel                     | High Income Total Return                         | No          | N/A   | N/A   |
| Connect                 | Wealth Trust-Duncker Streett                   | All Cap Growth                                   | No          | N/A   | N/A   |
| Connect                 | Woodley Farra Manion Port Mgmt                 | Dividend Strategy                                | No          | N/A   | N/A   |

## Multi Asset Class Fixed Income

| Stifel Advisory Program | Manager                         | Portfolio Name                              | Trade Away? | Dollar-weighted percentage of trades executed away from Stifel | Execution Costs Charged by the Executing Broker for the trades |
|-------------------------|---------------------------------|---|-------------|--|--|
| Opportunity             | 1919 Investment Counsel         | Taxable Full Duration Fixed Income          | No          | N/A  | N/A  |
| Opportunity             | 1919 Investment Counsel         | Intermediate Government/Credit Fixed Income | No          | N/A  | N/A  |
| Opportunity             | 1919 Investment Counsel         | SRI Full Duration Fixed Income              | No          | N/A  | N/A  |
| Opportunity             | 1919 Investment Counsel         | SRI Intermediate Duration Fixed Income      | No          | N/A  | N/A  |
| Opportunity             | 1919 Investment Counsel         | Taxable Intermediate Duration Fixed Income  | No          | N/A  | N/A  |
| Connect                 | 1919 Investment Counsel         | SRI SRI Customized Fixed Income             | No          | N/A  | N/A  |
| Connect                 | 1919 Investment Counsel         | SRI Cash Management                         | No          | N/A  | N/A  |
| Opportunity             | Abner Herrman & Brock LLC       | Fixed Income                                | Yes         | 100%   | \$0.00   |
| Opportunity             | AllianceBernstein               | Tax Aware                                   | Yes         | 60 - 70%   | \$0.00   |
| IMC Program - SMA       | Appleton Partners               | Taxable Fixed Income                        | Yes         | 100%   | \$0.00   |
| Connect                 | Ascent Investment Partners      | Core Taxable Fixed Income                   | Yes         | 95.00%   | \$0.00   |
| Connect                 | Ascent Investment Partners      | Intermediate Taxable Fixed Income           | Yes         | 95.00%   | \$0.00   |
| Opportunity             | Ascent Investment Partners      | Core Taxable Fixed Income                   | Yes         | 95%  | \$0.00   |
| Opportunity             | Ascent Investment Partners      | Taxable Intermediate Fixed Income           | Yes         | 95%  | \$0.00   |
| Connect                 | Belle Haven Investments         | Cash Management                             | Yes         | 100.00%  | \$0.00   |
| Connect                 | Boyd Watterson Asset Management | Limited Duration                            | Yes         | 100.00%  | \$0.00   |
| Connect                 | Boyd Watterson Asset Management | Intermediate SMA                            | Yes         | 100.00%  | \$0.00   |
| Connect                 | Boyd Watterson Asset Management | Ultra Enhanced Core SMA Fixed Income        | Yes         | 100.00%  | \$0.00   |
| Stifel Select - SMA     | Boyd Watterson Asset Mgmt, LLC  | Disciplined Core SMA Fixed Income           | Yes         | 100%   | \$0.00   |
| Stifel Select - SMA     | Boyd Watterson Asset Mgmt, LLC  | Intermediate SMA Fixed Income               | Yes         | 100%   | \$0.00   |
| Stifel Select - SMA     | Boyd Watterson Asset Mgmt, LLC  | Limited Duration                            | Yes         | 100%   | \$0.00   |
| Stifel Select - SMA     | Boyd Watterson Asset Mgmt, LLC  | Managed Income Solution                     | Yes         | 100%   | \$0.00   |
| Stifel Select - SMA     | Boyd Watterson Asset Mgmt, LLC  | Ultra Enhanced Core SMA Fixed Income        | Yes         | 100%   | \$0.00   |

|                     |  |   |     |         |              |
|---------------------|--|---|-----|---------|--------------|
| Opportunity         | Brandes Investment Partners                | Core Plus Fixed Income                        | No  | N/A     | N/A          |
| Connect             | Carret Asset Management                    | Taxable Fixed Income                          | Yes | 100.00% | \$0.00       |
| Connect             | CCM Investment Advisors                    | Fixed Income                                  | No  | N/A     | N/A          |
| Opportunity         | Cincinnati Asset Management                | Broad Market                                  | Yes | 100%    | \$0.00       |
| Opportunity         | Cincinnati Asset Management                | Investment Grade                              | Yes | 99%     | \$0.00       |
| Connect             | Cincinnati Asset Management                | Broad Market                                  | Yes | 100.00% | \$0.00       |
| Connect             | Cincinnati Asset Management                | Investment Grade                              | Yes | 99.00%  | \$0.00       |
| Connect             | Cincinnati Asset Management                | Short Duration                                | Yes | 99.00%  | \$0.00       |
| Connect             | ClearArc Capital                           | 1-3 Year Government/Corporate                 | Yes | 100.00% | N/A          |
| Stifel Select - SMA | Crawford Investment Counsel Inc            | Managed Income                                | Yes | 100%    | \$0.00       |
| Opportunity         | Crossmark Global Investments               | Current Income                                | No  | N/A     | N/A          |
| Opportunity         | Crossmark Global Investments               | Fixed Income                                  | No  | N/A     | N/A          |
| Opportunity         | Crossmark Global Investments               | Intermediate Fixed Income                     | No  | N/A     | N/A          |
| Connect             | CS McKee LP                                | Aggregate Fixed Income                        | Yes | 99.00%  | <sup>1</sup> |
| Opportunity         | Cumberland Advisors Inc                    | Total Return Taxable Fixed Income             | Yes | 100%    | \$0.00       |
| Opportunity         | Diamond Hill Capital Management            | Strategic Income                              | No  | N/A     | N/A          |
| Opportunity         | Dolan McEniry Capital Mgmt                 | Core Plus Fixed Income                        | Yes | 100%    | \$0.00       |
| Opportunity         | Dolan McEniry Capital Mgmt                 | Credit Portfolio (Corporate Only)             | Yes | 100%    | \$0.00       |
| Connect             | Eagle Asset Management                     | High Quality Taxable                          | Yes | 95-100% | <sup>3</sup> |
| Connect             | Eaton Vance Management                     | Tax Advantaged Bond Strategy                  | Yes | 100.00% | \$0.00       |
| Connect             | Eaton Vance Management                     | Tax Advantaged Bond Strategy Long             | Yes | 100.00% | \$0.00       |
| Connect             | EquityCompass Strategies                   | Ziegler/TWCM Taxable Intermediate             | No  | N/A     | N/A          |
| Connect             | EquityCompass Strategies                   | Ziegler/TWCM National Intermediate Tax Exempt | No  | N/A     | N/A          |
| Opportunity         | First Trust Advisors, LP                   | FTA Taxable Fixed Inc Closed End Fd Strategy  | No  | N/A     | N/A          |
| Opportunity         | Franklin Portfolio Advisors - Fixed Income | Franklin Intermediate Fixed Inc SMA Taxable   | Yes | 100%    | \$0.00       |
| Connect             | Grey Owl Capital                           | GO Fixed Income                               | No  | N/A     | N/A          |
| Opportunity         | GW&K Investment Mgmt                       | Core Bond                                     | Yes | 100%    | \$0.00       |
| Opportunity         | GW&K Investment Mgmt                       | Enhanced Core Bond                            | Yes | 100%    | \$0.00       |
| Opportunity         | GW&K Investment Mgmt                       | Total Return Bond                             | Yes | 100%    | \$0.00       |
| Opportunity         | HGK Asset Management                       | Short Term Fixed Income                       | Yes | 54%     | \$0.00       |
| Opportunity         | Legg Mason PPG                             | Western Asset Active Bond Aggregate Portfolio | Yes | 100%    | \$0.00       |
| Opportunity         | Legg Mason PPG                             | Western Asset Gov/Corp                        | Yes | 100.00% | \$0.00       |
| Connect             | Lord Abbett & Co                           | Intermediate Tax-Exempt Fixed Income          | Yes | 100.00% | <sup>5</sup> |
| Opportunity         | Madison Investment Advisors                | Intermediate Fixed Income                     | Yes | 100%    | \$0.00       |
| Connect             | Neuberger Berman                           | Core Fixed Income                             | No  | N/A     | N/A          |
| Connect             | Neuberger Berman                           | Taxable Intermediate                          | No  | N/A     | N/A          |
| Opportunity         | Neuberger Berman (Neubridge)               | Broad Taxable/Core Quality Bias               | Yes | 100%    | \$0.00       |
| Opportunity         | Neuberger Berman (Neubridge)               | Intermediate Duration Quality Bias            | Yes | 100%    | \$0.00       |
| Opportunity         | Neuberger Berman (Neubridge)               | Short Duration Quality Bias                   | Yes | 100%    | \$0.00       |
| Opportunity         | Neuberger Berman LLC                       | Taxable Intermediate Maturity                 | Yes | 1.34%   | \$0.00       |
| Connect             | Nottingham Advisors                        | Global Income                                 | Yes | 84.00%  | \$0.03/share |
| Connect             | Nottingham Advisors                        | Real Return                                   | No  | N/A     | N/A          |
| Opportunity         | Nuveen Asset Management                    | Intermediate Txble Fix Inc Corp Credit        | No  | N/A     | N/A          |
| Opportunity         | Nuveen Asset Management                    | Intermediate Txble Fix Inc Govt Only          | No  | N/A     | N/A          |
| Connect             | Oppenheimer Investment Management          | Intermediate                                  | Yes | 98.60%  | N/A          |
| Connect             | Orleans Capital                            | Fixed Income Management                       | Yes | 90.00%  | <sup>6</sup> |
| Opportunity         | PIMCO Investments                          | Total Return                                  | Yes | 100%    | \$0.00       |
| Opportunity         | Reinhart Partners Inc                      | Intermediate Fixed Income                     | Yes | 92%     | \$0.00       |
| Opportunity         | Reinhart Partners Inc                      | Limited Duration Fixed Income                 | Yes | 95%     | \$0.00       |
| Opportunity         | RNC Genter Capital Management              | Taxable Fixed Income                          | Yes | 100%    | \$0.00       |
| Opportunity         | RNC Genter Capital Management              | Taxable/Muni Blend Fixed Income               | Yes | 100%    | \$0.00       |
| Stifel Select - SMA | RNC Genter Capital Management              | Taxable Quality Intermediate                  | Yes | 100%    | \$0.00       |
| Opportunity         | Roosevelt Investment Group                 | Current Income Portfolio                      | No  | N/A     | N/A          |
| Opportunity         | Roosevelt Investment Group                 | Core Fixed Income                             | No  | N/A     | N/A          |
| Opportunity         | Roosevelt Investment Group                 | Intermediate Fixed Income                     | No  | N/A     | N/A          |
| Connect             | SEIX Investment Advisors                   | Fixed Income                                  | Yes | 100.00% | <sup>7</sup> |
| Opportunity         | Tom Johnson Investment Mgmt LLC            | Fixed Income                                  | No  | N/A     | N/A          |
| Opportunity         | Tom Johnson Investment Mgmt LLC            | Intermediate Fixed Income                     | No  | N/A     | N/A          |
| Score               | Washington Crossing Advisors               | Laddered Bond Portfolio 1-10 Years            | No  | N/A     | N/A          |
| Score               | Washington Crossing Advisors               | Laddered Bond Portfolio 1-7 Years             | No  | N/A     | N/A          |
| Connect             | Wilbanks Smith and Thomas                  | US Bond                                       | No  | N/A     | N/A          |
| Opportunity         | Ziegler Capital Mgmt - BPG Fixed           | Core Taxable Customized                       | Yes | 100%    | \$0.00       |
| Opportunity         | Ziegler Capital Mgmt - BPG Fixed           | Core Taxable Int Duration                     | Yes | 100%    | \$0.00       |
| Opportunity         | Ziegler Capital Mgmt - BPG Fixed           | Core Taxable Short Duration                   | Yes | 100%    | \$0.00       |
| Opportunity         | Ziegler Capital Mgmt - BPG Fixed           | Core Taxable Ult Sht Duration                 | Yes | 100%    | \$0.00       |
| Opportunity         | Ziegler Capital Mgmt - BPG Fixed           | Tax Responsive Customized                     | Yes | 100%    | \$0.00       |
| Opportunity         | Ziegler Capital Mgmt - BPG Fixed           | Tax Responsive Int Duration                   | Yes | 100%    | \$0.00       |
| Opportunity         | Ziegler Capital Mgmt - BPG Fixed           | Tax Responsive Long Duration                  | Yes | 100%    | \$0.00       |
| Opportunity         | Ziegler Capital Mgmt - BPG Fixed           | Tax Responsive Short Duration                 | Yes | 100%    | \$0.00       |
| Opportunity         | Ziegler Capital Mgmt - TWCM Fixed Income   | Core Intermediate Fixed Income                | Yes | 100%    | \$0.00       |
| Opportunity         | Ziegler Capital Mgmt - TWCM Fixed Income   | National Intermediate Tax Exempt              | Yes | 100%    | \$0.00       |

### Multi Asset Class Other

| Stifel Advisory Program | Manager                 | Portfolio Name                                 | Trade Away? | Dollar-weighted percentage of trades executed away from Stifel | Execution Costs Charged by the Executing Broker for the trades |
|-------------------------|-------------------------|--|-------------|--|--|
| Connect                 | 1919 Investment Counsel | Balanced Growth & Income - Taxable w/ Alts     | No          | N/A  | N/A  |
| Connect                 | 1919 Investment Counsel | Balanced Growth & Income - Tax Exempt w/ Alts  | No          | N/A  | N/A  |
| Connect                 | 1919 Investment Counsel | Balanced Growth - Taxable with Alternatives    | No          | N/A  | N/A  |
| Connect                 | 1919 Investment Counsel | Balanced Growth - Tax Exempt with Alternatives | No          | N/A  | N/A  |
| Connect                 | 1919 Investment Counsel | Custom 1 Balanced 80/20                        | No          | N/A  | N/A  |

|                     |                                  |   |     |          |                |
|---------------------|----------------------------------|---|-----|----------|----------------|
| Connect             | 1919 Investment Counsel          | Custom 4 Balanced 50/50                           | No  | N/A      | N/A            |
| Connect             | 1919 Investment Counsel          | Growth - Taxable without Alternatives             | No  | N/A      | N/A            |
| Connect             | 1919 Investment Counsel          | Growth - Taxable with Alternatives                | No  | N/A      | N/A            |
| Connect             | 1919 Investment Counsel          | SRI Balanced                                      | No  | N/A      | N/A            |
| Connect             | 1919 Investment Counsel          | SRI Customized Balanced Growth                    | No  | N/A      | N/A            |
| Connect             | 1919 Investment Counsel          | Growth  | No  | N/A      | N/A            |
| Opportunity         | Abner Herrman & Brock LLC        | Core Balanced 45/55                               | Yes | 55%      | \$0.00         |
| Opportunity         | Abner Herrman & Brock LLC        | Core Balanced w/Municipal 45/55                   | Yes | 55%      | \$0.00         |
| Opportunity         | Abner Herrman & Brock LLC        | Core Balanced 50/50                               | Yes | 50%      | \$0.00         |
| Opportunity         | Abner Herrman & Brock LLC        | Core Balanced 65/35                               | Yes | 35%      | \$0.00         |
| Opportunity         | Abner Herrman & Brock LLC        | Core Balanced 70/30                               | Yes | 30%      | \$0.00         |
| Opportunity         | Abner Herrman & Brock LLC        | Core Balanced 80/20                               | Yes | 20%      | \$0.00         |
| Opportunity         | AllianceBernstein                | Strategic Research Balanced                       | No  | N/A      | N/A            |
| Opportunity         | Allianz Global Investors         | NFJ/PIMCO Balanced Large Cap Value                | No  | N/A      | N/A            |
| Opportunity         | Anchor Capital Advisors LLC      | Balanced  | No  | N/A      | N/A            |
| Connect             | Astor Investment Management      | Dynamic Allocation                                | Yes | 85.80%   | \$0-0.01/share |
| Connect             | Astor Investment Management      | Sector Tactical Asset Rotation                    | Yes | 87.50%   | \$0-0.01/share |
| Opportunity         | Atalanta Sosnoff Management LLC  | 50% Equity/50% Fixed                              | No  | N/A      | N/A            |
| Opportunity         | Atalanta Sosnoff Management LLC  | 65% Equity/35% Fixed                              | No  | N/A      | N/A            |
| Opportunity         | Atalanta Sosnoff Management LLC  | 70% Equity/30% Fixed                              | No  | N/A      | N/A            |
| Opportunity         | Atalanta Sosnoff Management LLC  | Balanced Large Cap Core                           | No  | N/A      | N/A            |
| Connect             | Beese Fulmer Investment Mgmt     | Balanced  | No  | N/A      | N/A            |
| Connect             | Bluestone Capital Management     | Bluestone Elite                                   | No  | N/A      | N/A            |
| Connect             | Bluestone Capital Management     | Bluestone Income                                  | No  | N/A      | N/A            |
| Connect             | Bluestone Capital Management     | Bluestone Income Plus - Opt Agmt Required         | No  | N/A      | N/A            |
| Opportunity         | Cambridge Financial Group        | Balanced Large Cap Core                           | No  | N/A      | N/A            |
| Stifel Select - SMA | CCM Investment Advisers, LLC     | Total Return Balanced                             | Yes | 1.24%    | \$0.00         |
| Connect             | CCM Investment Advisers          | Core Balanced                                     | Yes | 1.24%    | \$0.00         |
| Connect             | CCM Investment Advisers          | Moderate Risk Balanced                            | Yes | 0.79%    | \$0.00         |
| Connect             | CCM Investment Advisers          | Core Balanced Plus                                | No  | N/A      | N/A            |
| Connect             | CCM Investment Advisers          | Equity  | No  | N/A      | N/A            |
| Connect             | CCM Investment Advisers          | Low Risk Balanced                                 | No  | N/A      | N/A            |
| Connect             | Colrain Capital                  | Individual Management                             | Yes | 100.00%  | \$0.03/share   |
| Opportunity         | Confluence Investment Management | 60% All Cap Value/40% Taxable Fixed Income        | Yes | 30.56%   | 0.01 Cps       |
| Opportunity         | Confluence Investment Management | 70% All Cap Value/30% Taxable Fixed Income        | Yes | 30.56%   | 0.01 Cps       |
| Opportunity         | Confluence Investment Management | 20% Equity Income / 80% Taxable Fixed Income      | Yes | 9.56%    | 0.01 Cps       |
| Opportunity         | Confluence Investment Management | 20% Equity Income / 80% Tax-Exempt Fixed Income   | Yes | 9.56%    | 0.01 Cps       |
| Opportunity         | Confluence Investment Management | 30% Equity Income / 70% Taxable Fixed Income      | Yes | 9.56%    | 0.01 Cps       |
| Opportunity         | Confluence Investment Management | 30% Equity Income / 70% Tax-Exempt Fixed Income   | Yes | 9.56%    | 0.01 Cps       |
| Opportunity         | Confluence Investment Management | 40% Equity Income / 60% Taxable Fixed Income      | Yes | 9.56%    | 0.01 Cps       |
| Opportunity         | Confluence Investment Management | 40% Equity Income / 60% Tax-Exempt Fixed Income   | Yes | 9.56%    | 0.01 Cps       |
| Opportunity         | Confluence Investment Management | 50% Equity Income / 50% Taxable Fixed Income      | Yes | 9.56%    | 0.01 Cps       |
| Opportunity         | Confluence Investment Management | 50% Equity Income / 50% Tax-Exempt Fixed Income   | Yes | 9.56%    | 0.01 Cps       |
| Opportunity         | Confluence Investment Management | 60% Equity Income / 40% Taxable Fixed Income      | Yes | 9.56%    | 0.01 Cps       |
| Opportunity         | Confluence Investment Management | 60% Equity Income / 40% Tax-Exempt Fixed Income   | Yes | 9.56%    | 0.01 Cps       |
| Opportunity         | Confluence Investment Management | 70% Equity Income / 30% Taxable Fixed Income      | Yes | 9.56%    | 0.01 Cps       |
| Opportunity         | Confluence Investment Management | 70% Equity Income / 30% Tax-Exempt Fixed Income   | Yes | 9.56%    | 0.01 Cps       |
| Opportunity         | Confluence Investment Management | 80% Equity Income / 20% Taxable Fixed Income      | Yes | 9.56%    | 0.01 Cps       |
| Opportunity         | Confluence Investment Management | 80% Equity Inc/20% Tax-Exempt Fixed Inc           | Yes | 9.56%    | 0.01 Cps       |
| Opportunity         | Confluence Investment Management | 20% Large Value / 80% Tax-Exempt Fixed Income     | Yes | 9.05%    | 0.01 Cps       |
| Opportunity         | Confluence Investment Management | 20% Large Value / 80% Taxable Fixed Income        | Yes | 9.05%    | 0.01 Cps       |
| Opportunity         | Confluence Investment Management | 30% Large Value / 70% Tax-Exempt Fixed Income     | Yes | 9.05%    | 0.01 Cps       |
| Opportunity         | Confluence Investment Management | 30% Large Value / 70% Taxable Fixed Income        | Yes | 9.05%    | 0.01 Cps       |
| Opportunity         | Confluence Investment Management | 40% Large Value / 60% Tax-Exempt Fixed Income     | Yes | 9.05%    | 0.01 Cps       |
| Opportunity         | Confluence Investment Management | 40% Large Value / 60% Taxable Fixed Income        | Yes | 9.05%    | 0.01 Cps       |
| Opportunity         | Confluence Investment Management | 50% Large Value / 50% Tax-Exempt Fixed Income     | Yes | 9.05%    | 0.01 Cps       |
| Opportunity         | Confluence Investment Management | 50% Large Value / 50% Taxable Fixed Income        | Yes | 9.05%    | 0.01 Cps       |
| Opportunity         | Confluence Investment Management | 60% Large Value / 40% Tax-Exempt Fixed Income     | Yes | 9.05%    | 0.01 Cps       |
| Opportunity         | Confluence Investment Management | 60% Large Value / 40% Taxable Fixed Income        | Yes | 9.05%    | 0.01 Cps       |
| Opportunity         | Confluence Investment Management | 70% Large Value / 30% Tax-Exempt Fixed Income     | Yes | 9.05%    | 0.01 Cps       |
| Opportunity         | Confluence Investment Management | 70% Large Value / 30% Taxable Fixed Income        | Yes | 9.05%    | 0.01 Cps       |
| Opportunity         | Confluence Investment Management | 80% Large Value / 20% Tax-Exempt Fixed Income     | Yes | 9.05%    | 0.01 Cps       |
| Opportunity         | Confluence Investment Management | 80% Large Value / 20% Taxable Fixed Income        | Yes | 9.05%    | 0.01 Cps       |
| Connect             | Copeland Capital Management      | Balanced  | No  | N/A      | N/A            |
| Connect             | Cornerstone Investment Prtnrs    | Balanced  | No  | N/A      | N/A            |
| Opportunity         | Crossmark Global Investments     | 60% Global Equity/40% CIP                         | No  | N/A      | N/A            |
| Opportunity         | Crossmark Global Investments     | Balanced Large Cap Core                           | No  | N/A      | N/A            |
| Opportunity         | Crossmark Global Investments     | Balanced Large Cap Growth                         | No  | N/A      | N/A            |
| Opportunity         | Crossmark Global Investments     | 50% Equity/50% Muni                               | No  | N/A      | N/A            |
| Opportunity         | Crossmark Global Investments     | 60% Equity / 40% Muni                             | No  | N/A      | N/A            |
| Opportunity         | Crossmark Global Investments     | Balanced Municipal 85% Muni / 15% Equity          | No  | N/A      | N/A            |
| Opportunity         | Crossmark Global Investments     | 80% Current Inc/20% Global Equity Income          | No  | N/A      | N/A            |
| Opportunity         | Crossmark Global Investments     | Custom Balanced                                   | No  | N/A      | N/A            |
| Opportunity         | Crossmark Global Investments     | Custom Theta Bal-Prior Approval/Option Agmt Reqrd | No  | N/A      | N/A            |
| Opportunity         | Crossmark Global Investments     | Custom Balanced                                   | No  | N/A      | N/A            |
| Opportunity         | Crossmark Global Investments     | Custom Global Equity Inc/Current Income           | No  | N/A      | N/A            |
| Opportunity         | Crossmark Global Investments     | Custom Global Equity Income/Fixed Income          | No  | N/A      | N/A            |
| Opportunity         | Crossmark Global Investments     | THETA/Municipal (Custom)                          | No  | N/A      | N/A            |
| Opportunity         | Crossmark Global Investments     | 60% Theta/40% Muni - Options Agreement Required   | No  | N/A      | N/A            |
| Opportunity         | Crossmark Global Investments     | Custom Theta/STFI                                 | No  | N/A      | N/A            |
| Opportunity         | Crossmark Global Investments     | Custom Theta/STFI 2                               | No  | N/A      | N/A            |
| Opportunity         | Cumberland Advisors Inc          | Balanced  | Yes | 40 - 45% | \$0.00         |
| Connect             | Dana Investment Advisors         | Catholic Balanced                                 | Yes | 100.00%  | <sup>2</sup>   |
| Connect             | Dana Investment Advisors         | Limited Volatility                                | Yes | 100.00%  | <sup>2</sup>   |
| Connect             | Delta Asset Management           | Balanced  | No  | N/A      | N/A            |
| Opportunity         | Dorsey Wright Money Management   | Balanced  | No  | N/A      | N/A            |

|                   |   |  |     |          |                     |
|-------------------|---|--|-----|----------|---------------------|
| Opportunity       | Dorsey Wright Money Management                    | Systematic RS Balanced                             | No  | N/A      | N/A                 |
| Opportunity       | Dorsey Wright Money Management                    | Systematic RS Global Macro                         | No  | N/A      | N/A                 |
| Connect           | Dover Partners                                    | Large Cap Value Balanced Aggressive                | No  | N/A      | N/A                 |
| Connect           | Dover Partners                                    | Large Cap Value Balanced Conservative              | No  | N/A      | N/A                 |
| Connect           | DT Investment Partners                            | Conservative Growth & Income                       | Yes | 82.90%   | \$0.00              |
| Connect           | DT Investment Partners                            | Moderate Growth & Income                           | Yes | 82.90%   | \$0.00              |
| Connect           | DT Investment Partners                            | Ultra Conservative                                 | No  | N/A      | N/A                 |
| Connect           | Edgewood Management                               | Growth   | No  | N/A      | N/A                 |
| Connect           | EquityCompass Strategies                          | Risk Management Strategy                           | No  | N/A      | N/A                 |
| Opportunity       | EquityCompass Strategies (Opportunity Program)    | Core Retirement Portfolio                          | Yes | < 1%     | \$0.015 cps         |
| Opportunity       | EquityCompass Strategies (Opportunity Program)    | Risk Management Strategy - Custom                  | No  | N/A      | N/A                 |
| Opportunity       | Estabrook Capital Management                      | Balanced Large Cap Core                            | No  | N/A      | N/A                 |
| Opportunity       | First Trust Advisors, LP                          | ETF Allocation Moderate Growth                     | No  | N/A      | N/A                 |
| Opportunity       | First Trust Advisors, LP                          | ETF Allocation Growth                              | No  | N/A      | N/A                 |
| Opportunity       | First Trust Advisors, LP                          | Morningstar Multi Discipline 20/80                 | No  | N/A      | N/A                 |
| Opportunity       | First Trust Advisors, LP                          | Morningstar Multi Discipline 40/60                 | No  | N/A      | N/A                 |
| Opportunity       | First Trust Advisors, LP                          | Morningstar Multi Discipline 60/40                 | No  | N/A      | N/A                 |
| Opportunity       | First Trust Advisors, LP                          | Morningstar Multi Discipline 75/25                 | No  | N/A      | N/A                 |
| Opportunity       | First Trust Advisors, LP                          | Morningstar Multi Discipline 90/10                 | No  | N/A      | N/A                 |
| Opportunity       | First Trust Advisors, LP                          | Value Line Balanced                                | No  | N/A      | N/A                 |
| IMC Program - SMA | Good Harbor Financial                             | US Tactical Core                                   | Yes | 100%     | \$0.5 - 1 Cps       |
| Connect           | Harris Associates LP                              | Private Client Advisor                             | No  | N/A      | N/A                 |
| Opportunity       | Hays Advisory, LLC                                | Conservative Growth                                | Yes | 100%     | \$0.00              |
| Opportunity       | Hays Advisory, LLC                                | Moderate Growth                                    | Yes | 100%     | \$0.00              |
| Connect           | Hays Advisory, LLC                                | TMAC Equity Focused ETF                            | Yes | 100.00%  | \$0.00              |
| Connect           | Hays Advisory, LLC                                | TMA ETF  | Yes | 100.00%  | \$0.00              |
| Connect           | Horizon Asset Management                          | Special Opportunity Investing                      | No  | N/A      | N/A                 |
| Opportunity       | John Hancock Asset Management                     | Sovereign Balanced Dividend Performers             | No  | N/A      | N/A                 |
| Opportunity       | Knightsbridge Asset Mgmt LLC                      | Balanced All Cap Value                             | Yes | 100%     | \$0.00              |
| IMC Program - SMA | Lattice Strategies LLC                            | Lattice Defensive Alternatives                     | No  | N/A      | N/A                 |
| IMC Program - SMA | Lattice Strategies LLC                            | Lattice Risk Optimized Core 40                     | No  | N/A      | N/A                 |
| Opportunity       | Legg Mason PPG                                    | Western Asset Active Bond Aggregate Custom         | Yes | 100%     | \$0.00              |
| Opportunity       | Legg Mason PPG                                    | Legg Mason All Cap Value Balanced 60/40            | Yes | 69%      | \$0.0132 Cps        |
| Opportunity       | Legg Mason PPG                                    | Legg Mason Appreciation Balanced                   | Yes | 82%      | \$0.0123 Cps        |
| Opportunity       | Legg Mason PPG                                    | Legg Mason Balanced Income                         | Yes | 60%      | \$0.0126 Cps        |
| Opportunity       | Legg Mason PPG                                    | Legg Mason Balanced Income w/Munis                 | Yes | 95%      | \$0.0126 Cps        |
| Opportunity       | Legg Mason PPG                                    | ClearBridge Custom (w/ Prior Approval)             | Yes | 36%      | \$0.0095 Cps        |
| Opportunity       | Legg Mason PPG                                    | Legg Mason Custom MDA (w/ Prior Approval)          | Yes | 36%      | \$0.0095 Cps        |
| Opportunity       | Legg Mason PPG                                    | Custom Balanced                                    | Yes | 36%      | \$0.0095 Cps        |
| Opportunity       | Legg Mason PPG                                    | Custom   | Yes | 36%      | \$0.0095 Cps        |
| Opportunity       | Legg Mason PPG                                    | Legg Mason Dividend Strategy Balanced 60/40        | Yes | 51%      | \$0.0144 Cps        |
| Opportunity       | Legg Mason PPG                                    | Legg Mason Dividend Strategy Balanced Tax Favored  | Yes | 65%      | \$0.0142 Cps        |
| Opportunity       | Legg Mason PPG                                    | Legg Mason Large Cap Growth Balanced 60/40         | Yes | 55%      | \$0.0139 Cps        |
| Opportunity       | Legg Mason PPG                                    | Legg Mason MDA0 Balanced 70/30                     | Yes | 59%      | \$0.0132 Cps        |
| Opportunity       | Legg Mason PPG                                    | Legg Mason MDA0 Balanced 60/40                     | Yes | 76%      | \$0.0132 Cps        |
| Opportunity       | Legg Mason PPG                                    | Legg Mason MDA1A Balanced - Multi Cap Blend II Bal | Yes | 98%      | \$0.0133 Cps        |
| Opportunity       | Legg Mason PPG                                    | Legg Mason MDA1 Balanced                           | Yes | 97%      | \$0.0120 Cps        |
| Opportunity       | Legg Mason PPG                                    | Legg Mason MDA4 Balanced                           | Yes | 80%      | \$0.0133 Cps        |
| Opportunity       | Legg Mason PPG                                    | Legg Mason MDA4 Balanced Tax Favored               | Yes | 88%      | \$0.0132 Cps        |
| Opportunity       | Legg Mason PPG                                    | Legg Mason MDA5A Balanced                          | Yes | 96%      | \$0.0134 Cps        |
| Opportunity       | Legg Mason PPG                                    | Legg Mason MDA5 Balanced                           | Yes | 59%      | \$0.0123 Cps        |
| Opportunity       | Legg Mason PPG                                    | Legg Mason MDA8 Balanced 70/30 with GSM7           | Yes | 86%      | \$0.0127 Cps        |
| Opportunity       | Legg Mason PPG                                    | Legg Mason MDA8 Balanced 60/40                     | Yes | 53%      | \$0.0127 Cps        |
| Opportunity       | Legg Mason PPG                                    | Legg Mason MDA8 Balanced 70/30 with Gov/Corp       | Yes | 43%      | \$0.0125 Cps        |
| Opportunity       | Legg Mason PPG                                    | Legg Mason MDA8 Balanced Tax Favored               | Yes | 76%      | \$0.0127 Cps        |
| Opportunity       | Madison Investment Advisors                       | Balanced Large Cap Core                            | No  | N/A      | N/A                 |
| Connect           | Manning and Napier Advisors                       | Equity Focused Blend Plus                          | No  | N/A      | N/A                 |
| Connect           | Manning and Napier Advisors                       | Equity Oriented                                    | No  | N/A      | N/A                 |
| Connect           | Manning and Napier Advisors                       | Long Term Growth                                   | No  | N/A      | N/A                 |
| Connect           | Messner & Smith                                   | Balanced   | No  | N/A      | N/A                 |
| Connect           | Messner & Smith                                   | Messner/Smith Custom                               | No  | N/A      | N/A                 |
| Connect           | Messner & Smith                                   | Tactical Strategy                                  | No  | N/A      | N/A                 |
| Connect           | Mount Yale Asset Management                       | Income Equity - Non MLP                            | No  | N/A      | N/A                 |
| Connect           | Mount Yale Asset Management                       | Equity Income                                      | No  | N/A      | N/A                 |
| Connect           | Mount Yale Asset Management                       | Custom   | No  | N/A      | N/A                 |
| Connect           | Mount Yale Asset Management                       | Growth w/ Alts                                     | No  | N/A      | N/A                 |
| Connect           | Neuberger Berman                                  | Socially Responsible Investing                     | No  | N/A      | N/A                 |
| Connect           | Neuberger Berman (Neubridge)                      | The Kaminsky Team Customized                       | Yes | 1.22%    | \$0.00              |
| Connect           | North Coast Asset Management                      | Tactical ETF                                       | No  | N/A      | N/A                 |
| Connect           | Nottingham Advisors                               | Global All Asset                                   | Yes | 80.00%   | \$0.03/share        |
| Connect           | Nottingham Advisors                               | Global Balanced                                    | Yes | 74.00%   | \$0.03/share        |
| Opportunity       | Nuveen Asset Mgmt-former Santa Barbara Asset Mgmt | Stable Growth Balanced                             | No  | N/A      | N/A                 |
| Opportunity       | NWQ Investment Management                         | Large Cap Value - Balanced                         | No  | N/A      | N/A                 |
| Connect           | Palouse Capital Mgmt Inc.                         | Balanced Total Return Equity                       | No  | N/A      | N/A                 |
| Connect           | Principal Global Investors LLC                    | Spectrum Tax Advantage                             | Yes | 75-80%   | \$0.00              |
| Opportunity       | Principal Global Investors LLC                    | Spectrum Preferred Securities                      | Yes | 75 - 80% | \$0.00              |
| Connect           | Relative Value Partners                           | Durable Income                                     | No  | N/A      | N/A                 |
| Opportunity       | Roosevelt Investment Group                        | Balanced   | Yes | 62%      | \$0.00 - \$0.05 Cps |
| Connect           | Schafer Cullen Capital Management                 | Balanced   | No  | N/A      | N/A                 |
| Connect           | Tandem Investment Advisors                        | Balanced   | Yes | 26.33%   | \$0.015/share       |
| Connect           | The Philadelphia Trust Company                    | Balanced   | No  | N/A      | N/A                 |
| Connect           | Tillar-Wenstrup Advisors                          | Diversified Equity Balanced                        | No  | N/A      | N/A                 |
| Connect           | Tillar-Wenstrup Advisors                          | Core Balanced                                      | No  | N/A      | N/A                 |
| Opportunity       | Tom Johnson Investment Mgmt LLC                   | Balanced   | No  | N/A      | N/A                 |

|             |                             |  |     |         |             |
|-------------|-----------------------------|--|-----|---------|-------------|
| Connect     | Trust Investment Advisors   | Fixed Income and Preferreds                      | No  | N/A     | N/A         |
| Opportunity | ValueWorks                  | Balanced Large Cap Core                          | No  | N/A     | N/A         |
| Connect     | Windham Capital Management  | Moderate Plus Tax Managed                        | No  | N/A     | N/A         |
| Connect     | Windham Capital Management  | Moderate Plus Tax Exempt                         | No  | N/A     | N/A         |
| Connect     | Winthrop Capital Management | Conservative                                     | Yes | 100.00% | \$0.00      |
| Connect     | Woodmont Investment Counsel | Growth & Income                                  | No  | N/A     | N/A         |
| Opportunity | Ziegler Capital Mgmt        | Red Granite Balanced LCG (includes fixed income) | Yes | < 5%    | \$0.015 Cps |

## Real Estate

| Stifel Advisory Program | Manager                        | Portfolio Name             | Trade Away? | Dollar-weighted percentage of trades executed away from Stifel | Execution Costs Charged by the Executing Broker for the trades |
|-------------------------|--------------------------------|----------------------------|-------------|--|--|
| IMC Program - SMA       | Adelante Capital Mgmt          | Total Return Strategy REIT | No          | N/A  | N/A  |
| Opportunity             | Davis Selected Advisers        | Real Estate Securities     | No          | N/A  | N/A  |
| Opportunity             | Invesco Advisers               | Invesco REIT Portfolio     | No          | N/A  | N/A  |
| Opportunity             | Uniplan Investment Counsel Inc | REIT                       | Yes         | 0 -1%  | \$0.00   |

## U.S. Government Fixed Income

| Stifel Advisory Program | Manager                     | Portfolio Name         | Trade Away? | Dollar-weighted percentage of trades executed away from Stifel | Execution Costs Charged by the Executing Broker for the trades |
|-------------------------|-----------------------------|------------------------|-------------|--|--|
| Opportunity             | Madison Investment Advisors | Intermediate Govt Only | Yes         | 100%   | \$0.00   |

## U.S. Large Cap Equity

| Stifel Advisory Program | Manager                          | Portfolio Name                         | Trade Away? | Dollar-weighted percentage of trades executed away from Stifel | Execution Costs Charged by the Executing Broker for the trades |
|-------------------------|----------------------------------|--|-------------|--|--|
| Connect                 | 1919 Investment Counsel          | Fossil Free/Low Carbon/Clean Energy    | No          | N/A  | N/A  |
| Connect                 | 1919 Investment Counsel          | Socially Responsive Equity             | No          | N/A  | N/A  |
| Connect                 | 1919 Investment Counsel          | SRI Customized Equity Value            | No          | N/A  | N/A  |
| Opportunity             | Abner Herrman & Brock LLC        | Large Cap Core                         | No          | N/A  | N/A  |
| Opportunity             | ACR - Alpine Capital Research    | Equity Quality Return                  | No          | N/A  | N/A  |
| Connect                 | ACR-Alpine Investment Mgmt       | Equity                                 | No          | N/A  | N/A  |
| Connect                 | Advisory Research BDC            | Business Development Companies         | No          | N/A  | N/A  |
| Connect                 | Affinity Investment Advisors     | Core Equity                            | No          | N/A  | N/A  |
| Opportunity             | AllianceBernstein                | Large Cap Core                         | No          | N/A  | N/A  |
| Opportunity             | Atalanta Sosnoff Management LLC  | Relative Value                         | No          | N/A  | N/A  |
| Connect                 | Beese Fulmer Investment Mgmt     | Core Equity                            | No          | N/A  | N/A  |
| Connect                 | Berkshire Asset Management       | Dividend                               | No          | N/A  | N/A  |
| Opportunity             | Brandes Investment Partners      | U.S. Value (All Cap Value)             | Yes         | 33.77%   | \$1.65 Cps   |
| Connect                 | C.M. Bidwell and Associates      | All Cap Core                           | No          | N/A  | N/A  |
| Connect                 | C.M. Bidwell and Associates      | Large Cap Core                         | No          | N/A  | N/A  |
| Opportunity             | Cambridge Financial Group        | Large Cap Growth                       | No          | N/A  | N/A  |
| Connect                 | CoBiz Wealth                     | Core Equity                            | No          | N/A  | N/A  |
| Opportunity             | Confluence Investment Management | Equity Income                          | No          | N/A  | N/A  |
| Opportunity             | Confluence Investment Management | Business Development Company Portfolio | No          | N/A  | N/A  |
| Opportunity             | Confluence Investment Management | All Cap Value                          | Yes         | 0.44%  | 0.01 Cps   |
| Opportunity             | Confluence Investment Management | Value Opportunity                      | Yes         | 5.23%  | 0.01 Cps   |
| Opportunity             | Confluence Investment Management | Increasing Dividend Equity             | Yes         | 6.72%  | 0.01 Cps   |
| Opportunity             | Confluence Investment Management | Large Cap Value                        | Yes         | 0.89%  | 0.01 Cps   |
| Connect                 | Confluence Investment Mgmt       | Equity Income                          | No          | N/A  | N/A  |
| Connect                 | Cornerstone Investment Ptnrs     | Concentrated Equity                    | No          | N/A  | N/A  |
| Stifel Select - SMA     | Crawford Investment Counsel Inc  | Dividend Growth                        | No          | N/A  | N/A  |
| Stifel Select - SMA     | Crawford Investment Counsel Inc  | Dividend Yield                         | No          | N/A  | N/A  |
| Connect                 | Cullinan Associates              | Buy Writing                            | No          | N/A  | N/A  |
| Connect                 | Cullinan Associates              | Dividend Writing                       | No          | N/A  | N/A  |
| Connect                 | Cullinan Associates              | Over Writing                           | No          | N/A  | N/A  |
| Opportunity             | Cumberland Advisors Inc          | US ETF                                 | Yes         | 1%   | \$0.00   |
| Opportunity             | Dana Investment Advisors         | Large Cap Core                         | No          | N/A  | N/A  |
| Connect                 | Dana Investment Advisors         | Large Cap Core                         | No          | N/A  | N/A  |
| Opportunity             | Davis Selected Advisers          | All Cap Core                           | No          | N/A  | N/A  |
| Opportunity             | Davis Selected Advisers          | Large Cap Value                        | No          | N/A  | N/A  |
| IMC Program - SMA       | Davis Selected Advisers          | Large Cap Value                        | No          | N/A  | N/A  |
| Opportunity             | Dearborn Partners LLC            | Core Rising Dividend                   | No          | N/A  | N/A  |
| Opportunity             | Dearborn Partners LLC            | High & Rising Dividend                 | No          | N/A  | N/A  |
| Opportunity             | Diamond Hill Capital Management  | All Cap (Select)                       | No          | N/A  | N/A  |
| Opportunity             | Diamond Hill Capital Management  | Large Cap Value                        | No          | N/A  | N/A  |
| Opportunity             | Dorsey Wright Money Management   | Equity                                 | No          | N/A  | N/A  |
| Opportunity             | Dorsey Wright Money Management   | Growth and Income                      | No          | N/A  | N/A  |
| Opportunity             | Dorsey Wright Money Management   | Systematic RS Aggressive               | No          | N/A  | N/A  |
| Opportunity             | Dorsey Wright Money Management   | Systematic RS Conservative             | No          | N/A  | N/A  |
| Opportunity             | Dorsey Wright Money Management   | Systematic RS Core                     | No          | N/A  | N/A  |
| Connect                 | Douglas Lane & Associates        | Core Equity                            | Yes         | 95.00%   | \$10.00  |
| Stifel Select - SMA     | Eagle Asset Management           | Equity Income                          | No          | N/A  | N/A  |
| Opportunity             | Equity Investment Corp           | All Cap Value                          | No          | N/A  | N/A  |
| Opportunity             | Equity Investment Corp           | Large Cap Value                        | No          | N/A  | N/A  |
| Connect                 | Equity Investment Corporation    | Environmental Value                    | No          | N/A  | N/A  |



|                     |   |   |     |         |                      |
|---------------------|---|---|-----|---------|----------------------|
| Connect             | Equity Investment Corporation                     | All Cap Value                                     | No  | N/A     | N/A                  |
| Opportunity         | Fayez Sarofim & Co                                | Large Cap Core                                    | No  | N/A     | N/A                  |
| Opportunity         | Federated Investors                               | Income-Oriented Equity                            | Yes | 5.49%   | \$0.00               |
| Opportunity         | Fiduciary Management                              | Large Cap Core                                    | No  | N/A     | N/A                  |
| Connect             | First Hawaiian Bank                               | All Equity ETF                                    | No  | N/A     | N/A                  |
| Opportunity         | First Trust Advisors, LP                          | FTA Balanced Closed End Fund Strategy             | No  | N/A     | N/A                  |
| Opportunity         | First Trust Advisors, LP                          | Large Cap Core                                    | No  | N/A     | N/A                  |
| Opportunity         | First Trust Advisors, LP                          | Managed MVP                                       | No  | N/A     | N/A                  |
| Opportunity         | First Trust Advisors, LP                          | Value Line Rising Dividend                        | No  | N/A     | N/A                  |
| Opportunity         | First Trust Advisors, LP                          | Value Line Strategic Growth                       | No  | N/A     | N/A                  |
| Opportunity         | First Trust Advisors, LP                          | Value Line #1 Timeliness                          | No  | N/A     | N/A                  |
| Connect             | FSI Group   | Bank Value Focus Strategy                         | No  | N/A     | N/A                  |
| Connect             | Gabelli Asset Management                          | Gabelli Asset Value                               | No  | N/A     | N/A                  |
| Connect             | Granite Investment Partners                       | Large Cap Equity                                  | No  | N/A     | N/A                  |
| Connect             | Grey Owl Capital                                  | All Cap Value Equity Income                       | No  | N/A     | N/A                  |
| Opportunity         | Heartland Advisors, Inc                           | All Cap Value                                     | No  | N/A     | N/A                  |
| Connect             | Hedgeable   | Dynamic US Equity                                 | No  | N/A     | N/A                  |
| Connect             | Horizon Asset Management                          | Strategic Value Investing                         | No  | N/A     | N/A                  |
| Connect             | Kirr Marbach and Co                               | All Cap Value                                     | No  | N/A     | N/A                  |
| Opportunity         | Knightsbridge Asset Mgmt LLC                      | All Cap Value                                     | No  | N/A     | N/A                  |
| Connect             | Laffer Investments                                | Dividend Growth                                   | Yes | 97.81%  | \$0.00               |
| Connect             | Lateef Investment Management                      | Multi-Cap Growth Equity                           | No  | N/A     | N/A                  |
| Connect             | Lazard Asset Management                           | Lazard US Equity Concentrated                     | No  | N/A     | N/A                  |
| Opportunity         | Legg Mason PPG                                    | ClearBridge All Cap Growth                        | Yes | 60%     | \$0.0142 Cps         |
| Opportunity         | Legg Mason PPG                                    | ClearBridge Appreciation                          | Yes | 29%     | \$0.0081 Cps         |
| Opportunity         | Legg Mason PPG                                    | ClearBridge Dividend Strategy                     | Yes | 53%     | \$0.0125 Cps         |
| Opportunity         | Legg Mason PPG                                    | ClearBridge Large Cap Growth                      | Yes | 31%     | \$0.0143 Cps         |
| Opportunity         | Legg Mason PPG                                    | Legg Mason MDA0                                   | Yes | 70%     | \$0.0133 Cps         |
| Opportunity         | Legg Mason PPG                                    | Legg Mason MDA1                                   | Yes | 88%     | \$0.0125 Cps         |
| Opportunity         | Legg Mason PPG                                    | Legg Mason Multi-Cap Blend II                     | Yes | 96%     | \$0.0134 Cps         |
| Opportunity         | Legg Mason PPG                                    | Legg Mason MDA3                                   | Yes | 55%     | \$0.0140 Cps         |
| Opportunity         | Legg Mason PPG                                    | Legg Mason MDA5                                   | Yes | 74%     | \$0.0125 Cps         |
| Opportunity         | Legg Mason PPG                                    | Legg Mason MDA5A                                  | Yes | 76%     | \$0.0133 Cps         |
| Opportunity         | Legg Mason PPG                                    | ClearBridge Multi Cap Growth                      | Yes | 7%      | \$0.0142 Cps         |
| Connect             | Lord Abbett & Co                                  | Large Cap Value                                   | No  | N/A     | N/A                  |
| Opportunity         | Lord Abbett & Co                                  | Large Cap Value                                   | No  | N/A     | N/A                  |
| Connect             | Lyrical Asset Management                          | US Value Equity                                   | Yes | 100.00% | \$0.01-\$0.015/share |
| Connect             | MAI Wealth Advisors                               | Dividend  | No  | N/A     | N/A                  |
| Opportunity         | Matrix Asset Advisors Inc                         | Large Cap Value                                   | No  | N/A     | N/A                  |
| Opportunity         | MDT Advisers                                      | All Cap Core                                      | No  | N/A     | N/A                  |
| Connect             | Meritage Portfolio Management                     | Core Value  | No  | N/A     | N/A                  |
| Connect             | Miller/Howard Investments                         | Drill Bit to Burner Tip                           | No  | N/A     | N/A                  |
| Connect             | Miller/Howard Investments                         | Drill Bit to Burner Tip No K-1s                   | No  | N/A     | N/A                  |
| Connect             | Miller/Howard Investments                         | Income Equity - Non MLP                           | No  | N/A     | N/A                  |
| Connect             | Miller/Howard Investments                         | Equity Income                                     | No  | N/A     | N/A                  |
| Connect             | Miller/Howard Investments                         | Income-Equity Ex-Carbon Energy                    | No  | N/A     | N/A                  |
| Opportunity         | Minneapolis Portfolio Mgmt                        | All Cap Value                                     | No  | N/A     | N/A                  |
| Connect             | Montag & Caldwell, LLC                            | Large Cap Growth                                  | Yes | 98.80%  | \$0.00               |
| Connect             | Neuberger Berman                                  | Large Cap Value                                   | No  | N/A     | N/A                  |
| Opportunity         | Neuberger Berman (Neubridge)                      | Kantor All Cap Core                               | No  | N/A     | N/A                  |
| Opportunity         | Neuberger Berman (Neubridge)                      | KSE All Cap Value                                 | No  | N/A     | N/A                  |
| Opportunity         | Neuberger Berman (Neubridge)                      | Bolton Large Cap Core                             | No  | N/A     | N/A                  |
| Opportunity         | Neuberger Berman (Neubridge)                      | Straus Large Cap Value                            | No  | N/A     | N/A                  |
| Connect             | Neuberger Berman (Neubridge)                      | Ganek Nackenson Large Cap Core                    | No  | N/A     | N/A                  |
| Connect             | Neuberger Berman (Neubridge)                      | Rachlin Undervalued Growth                        | No  | N/A     | N/A                  |
| Opportunity         | Neuberger Berman (Neubridge)                      | MLG Equity Income                                 | Yes | 0.49%   | \$0.00               |
| Opportunity         | Neuberger Berman LLC                              | All Cap Core (No MLPs)                            | No  | N/A     | N/A                  |
| Opportunity         | Neuberger Berman LLC                              | All Cap Core (With MLPs)                          | No  | N/A     | N/A                  |
| Opportunity         | Neuberger Berman LLC                              | KSE All Cap Value                                 | No  | N/A     | N/A                  |
| Opportunity         | Neuberger Berman LLC                              | Kantor All Cap Core                               | No  | N/A     | N/A                  |
| Opportunity         | Neuberger Berman LLC                              | Bolton Large Cap Core                             | No  | N/A     | N/A                  |
| Opportunity         | Neuberger Berman LLC                              | Large Cap Growth                                  | No  | N/A     | N/A                  |
| Connect             | North Coast Asset Management                      | CAN SLIM  | No  | N/A     | N/A                  |
| Connect             | Nuveen Asset Management                           | Large Cap Value                                   | No  | N/A     | N/A                  |
| Opportunity         | Nuveen Asset Mgmt-former Santa Barbara Asset Mgmt | Stable Growth                                     | No  | N/A     | N/A                  |
| Opportunity         | NWQ Investment Management                         | Large Cap Value                                   | Yes | < 1%    | \$0.02 Cps           |
| Opportunity         | Oak Ridge Investments                             | All Cap Growth                                    | No  | N/A     | N/A                  |
| Opportunity         | Oak Ridge Investments                             | Large Cap Growth                                  | No  | N/A     | N/A                  |
| Stifel Select - SMA | Oak Ridge Investments, LLC                        | All Cap Growth                                    | No  | N/A     | N/A                  |
| Connect             | OShaughnessy Asset Management                     | All Cap Core                                      | No  | N/A     | N/A                  |
| Connect             | Palouse Capital Mgmt Inc.                         | Core Equity                                       | No  | N/A     | N/A                  |
| Connect             | Palouse Capital Mgmt Inc.                         | Total Return Equity                               | No  | N/A     | N/A                  |
| Connect             | Parametric Portfolio Associates                   | Tax Managed Core Large Cap Growth                 | Yes | <1%     | 0.05bps              |
| Connect             | Parametric Portfolio Associates                   | US Equity - Tax Managed Core                      | Yes | <1%     | 0.05bps              |
| IMC Program - SMA   | Parametric Portfolio Associates                   | All Cap Core                                      | Yes | < 1%    | 0.05 Bps             |
| IMC Program - SMA   | Parametric Portfolio Associates                   | Dividend Income                                   | Yes | < 1%    | 0.05 Bps             |
| IMC Program - SMA   | Parametric Portfolio Associates                   | High Income Equity                                | Yes | < 1%    | 0.05 Bps             |
| IMC Program - SMA   | Parametric Portfolio Associates                   | Large Cap Core                                    | Yes | < 1%    | 0.05 Bps             |
| IMC Program - SMA   | Parametric Portfolio Associates                   | Large Cap Growth                                  | Yes | < 1%    | 0.05 Bps             |
| IMC Program - SMA   | Parametric Portfolio Associates                   | Custom Core US Large-Mid Cap Value                | Yes | < 1%    | 0.05 Bps             |
| IMC Program - SMA   | Parametric Portfolio Associates                   | Socially Responsible                              | Yes | < 1%    | 0.05 Bps             |
| IMC Program - SMA   | Parametric Portfolio Associates                   | Custom Core US Broad Cap                          | Yes | < 1%    | 0.05 Bps             |
| IMC Program - SMA   | Parametric Portfolio Associates                   | Custom Core Value/Momentum/Profitability Domestic | Yes | < 1%    | 0.05 Bps             |

|                     |                                    |                                      |     |        |                     |
|---------------------|------------------------------------|--------------------------------------|-----|--------|---------------------|
| Opportunity         | Parametric Portfolio Associates    | All Cap Core                         | Yes | < 1%   | 0.05 Bps            |
| Opportunity         | Parametric Portfolio Associates    | Custom Core                          | Yes | < 1%   | 0.05 Bps            |
| Opportunity         | Parametric Portfolio Associates    | Russell 1000 Growth Benchmark        | Yes | < 1%   | 0.05 Bps            |
| Opportunity         | Parametric Portfolio Associates    | Russell 1000 Benchmark               | Yes | < 1%   | 0.05 Bps            |
| Opportunity         | Parametric Portfolio Associates    | S&P 500 Benchmark                    | Yes | < 1%   | 0.05 Bps            |
| Connect             | Pennsylvania Trust                 | Multi-Cap Value                      | No  | N/A    | N/A                 |
| Connect             | Pinnacle Associates                | All Cap Core                         | No  | N/A    | N/A                 |
| Connect             | Polen Capital Management           | Focused Growth                       | Yes | 80.00% | \$0.00              |
| Connect             | Poplar Forest Capital LLC          | Contrarian Value Equity Strategy     | No  | N/A    | N/A                 |
| Stifel Select - SMA | Princeton Capital Mgmt             | Core Equity                          | No  | N/A    | N/A                 |
| Stifel Select - SMA | Princeton Capital Mgmt             | Growth Equity                        | No  | N/A    | N/A                 |
| Stifel Select - SMA | Princeton Capital Mgmt             | Growth Equity                        | No  | N/A    | N/A                 |
| Stifel Select - SMA | Princeton Capital Mgmt             | Core Equity                          | No  | N/A    | N/A                 |
| Connect             | Princeton Capital Mgmt             | Core Equity                          | No  | N/A    | N/A                 |
| Connect             | Princeton Capital Mgmt             | Growth Equity                        | No  | N/A    | N/A                 |
| Connect             | Principal Global Investors LLC     | Large Cap Growth                     | No  | N/A    | N/A                 |
| Connect             | Private Capital Management         | Value Equity                         | No  | N/A    | N/A                 |
| Connect             | Renaissance Investment Mgmt        | Large Cap Growth                     | No  | N/A    | N/A                 |
| Connect             | Riverbridge Partners               | All Cap Growth                       | No  | N/A    | N/A                 |
| Opportunity         | Roosevelt Investment Group         | All Cap Core                         | Yes | 62%    | \$0.00 - \$0.05 Cps |
| Connect             | Santa Barbara Asset Management     | Dividend Growth                      | No  | N/A    | N/A                 |
| Connect             | Schafer Cullen Capital Management  | Value Equity                         | No  | N/A    | N/A                 |
| Opportunity         | Schafer Cullen Capital Management  | All Cap Value                        | No  | N/A    | N/A                 |
| Opportunity         | Schafer Cullen Capital Management  | High Dividend Equity                 | No  | N/A    | N/A                 |
| Connect             | Summit Global Investments          | US Low Volatility Equity             | No  | N/A    | N/A                 |
| Connect             | Suncoast Equity Management         | Large Cap Growth                     | No  | N/A    | N/A                 |
| IMC Program - SMA   | Sustainable Growth Advisers        | Large Cap Growth                     | No  | N/A    | N/A                 |
| Connect             | Tandem Investment Advisors         | Large Cap Core                       | Yes | 15.27% | \$0.015/share       |
| Connect             | Tandem Investment Advisors         | Equity Income                        | No  | N/A    | N/A                 |
| Connect             | Taylor Cottrill Erickson           | Large Cap Value                      | No  | N/A    | N/A                 |
| IMC Program - SMA   | TCW Investment Management          | Large Cap Growth                     | No  | N/A    | N/A                 |
| IMC Program - SMA   | TCW Investment Management          | Large Cap Relative Value             | No  | N/A    | N/A                 |
| Opportunity         | TCW Investment Management          | Large Cap Growth                     | No  | N/A    | N/A                 |
| Opportunity         | TCW Investment Management          | Large Cap Value                      | No  | N/A    | N/A                 |
| Connect             | The Philadelphia Trust Company     | Large Cap Core                       | No  | N/A    | N/A                 |
| Connect             | Thornburg Investment Management    | Large Cap Core                       | Yes | 32.00% | \$0.020             |
| Connect             | Thornburg Investment Management    | Domestic Value                       | No  | N/A    | N/A                 |
| IMC Program - SMA   | Thornburg Investment Management Co | Large Cap Core                       | Yes | 32%    | 2 Cps               |
| Connect             | Tillar-Wenstrup Advisors           | Diversified Equity                   | No  | N/A    | N/A                 |
| Connect             | Tillar-Wenstrup Advisors           | Core                                 | No  | N/A    | N/A                 |
| Connect             | Trust Investment Advisors          | Growth Equity                        | No  | N/A    | N/A                 |
| Connect             | Trust Investment Advisors          | Income Equity                        | No  | N/A    | N/A                 |
| Connect             | Trust Investment Advisors          | Value Equity                         | No  | N/A    | N/A                 |
| Opportunity         | ValueWorks                         | All Cap Value                        | No  | N/A    | N/A                 |
| IMC Program - SMA   | Wells Fargo Funds Management       | Large Cap Intrinsic Value            | No  | N/A    | N/A                 |
| IMC Program - SMA   | Wells Fargo Funds Management       | Fundamental Large Cap Select Growth  | No  | N/A    | N/A                 |
| Opportunity         | Wells Fargo Funds Management       | Fundamentals Large Cap Select Growth | No  | N/A    | N/A                 |
| Connect             | Wells Fargo Funds Mgmt             | Large Cap Core                       | No  | N/A    | N/A                 |
| IMC Program - SMA   | Westfield Capital Management Co    | Large Cap Growth Equity              | No  | N/A    | N/A                 |
| Opportunity         | Westfield Capital Management Co    | All Cap Growth Equity                | No  | N/A    | N/A                 |
| Connect             | Woodley Farra Manion Port Mgmt     | Large Cap Value                      | No  | N/A    | N/A                 |
| Connect             | Zacks Investment Management        | Dividend                             | No  | N/A    | N/A                 |
| Connect             | Ziegler Capital Mgmt               | Large Cap Core                       | No  | N/A    | N/A                 |
| Opportunity         | Ziegler Capital Mgmt - BPG Equity  | Core High Dividend Equities          | Yes | 40%    | \$0.015 Cps         |

## U.S. Mid Cap Equity

| Stifel Advisory Program | Manager                       | Portfolio Name                | Trade Away? | Dollar-weighted percentage of trades executed away from Stifel | Execution Costs Charged by the Executing Broker for the trades |
|-------------------------|-------------------------------|-------------------------------|-------------|--|--|
| Connect                 | AMG Funds                     | Aston/Fairpointe Mid Cap Fund | No          | N/A  | N/A  |
| Connect                 | Clarkston Capital Partners    | SMID-Cap                      | No          | N/A  | N/A  |
| Connect                 | Congress Dual Contract        | Mid Cap Growth                | No          | N/A  | N/A  |
| Opportunity             | Earnest Partners              | Mid Cap Core                  | No          | N/A  | N/A  |
| Opportunity             | Equity Investment Corp        | Mid Cap Value                 | No          | N/A  | N/A  |
| Connect                 | Hahn Capital Management       | Mid Cap Value                 | No          | N/A  | N/A  |
| Connect                 | Madison Investment Advisors   | Mid Cap Equity                | No          | N/A  | N/A  |
| Opportunity             | Nuveen Asset Management       | Mid Cap Growth                | No          | N/A  | N/A  |
| Opportunity             | Oak Ridge Investments         | Mid Cap Growth                | No          | N/A  | N/A  |
| Opportunity             | Oak Ridge Investments         | Small/Mid Cap Growth          | No          | N/A  | N/A  |
| Stifel Select - SMA     | Oak Ridge Investments, LLC    | Small/Mid Cap Growth          | No          | N/A  | N/A  |
| Connect                 | OShaughnessy Asset Management | Small Mid Cap Growth          | No          | N/A  | N/A  |
| Connect                 | Palouse Capital Mgmt Inc.     | Small/Mid Value               | No          | N/A  | N/A  |
| Connect                 | Pinnacle Associates           | Small-Mid Cap Equity          | No          | N/A  | N/A  |
| Opportunity             | Pinnacle Associates LTD       | Small Mid Cap Growth          | No          | N/A  | N/A  |
| Opportunity             | Rice Hall James & Associates  | SMID Cap Opportunities        | No          | N/A  | N/A  |
| IMC Program - SMA       | Riverbridge Partners          | Small/Mid Cap Growth          | No          | N/A  | N/A  |
| Connect                 | Tandem Investment Advisors    | Mid Cap Core                  | Yes         | 26.70%   | \$0.015/share  |

## U.S. Municipal Fixed Income

| Stifel Advisory Program | Manager                                    | Portfolio Name                                  | Trade Away? | Dollar-weighted percentage of trades executed away from Stifel | Execution Costs Charged by the Executing Broker for the trades |
|-------------------------|--|---|-------------|--|--|
| Opportunity             | 1919 Investment Council                    | Intermediate Municipal Fixed Income             | No          | N/A  | N/A  |
| Opportunity             | Abner Herrman & Brock LLC                  | Municipal Fixed Income                          | Yes         | 99%  | \$0.00   |
| IMC Program - SMA       | Appleton Partners                          | Muni Bond Total Return                          | Yes         | 100%   | \$0.00   |
| Connect                 | Ascent Investment Partners                 | Municipal Fixed Income                          | Yes         | 95.00%   | \$0.00   |
| Opportunity             | Ascent Investment Partners                 | Municipal Fixed Income                          | Yes         | 95%  | \$0.00   |
| Connect                 | Belle Haven Investments                    | Ladder Plus                                     | Yes         | 100.00%  | \$0.00   |
| Connect                 | Belle Haven Investments                    | Muni Plus                                       | Yes         | 100.00%  | \$0.00   |
| Opportunity             | BlackRock Investment Management            | Intermediate-Term Municipal Fixed Income        | Yes         | 100%   | \$0.00   |
| Opportunity             | BlackRock Investment Management            | Long-Term Municipal Fixed Income                | Yes         | 100%   | \$0.00   |
| Opportunity             | BlackRock Investment Management            | Short-Term Municipal Fixed Income               | Yes         | 100%   | \$0.00   |
| Stifel Select - SMA     | Boyd Watterson Asset Mgmt, LLC             | Intermediate Muni                               | Yes         | 100%   | \$0.00   |
| Connect                 | Caprin Asset Management                    | Intermediate Muni National Strategy             | Yes         | 98.01%   | \$0-\$0.01/share   |
| Connect                 | Caprin Asset Management                    | State Specific Municipal                        | Yes         | 98.01%   | \$0-\$0.01/share   |
| Opportunity             | Crossmark Global Investments               | Municipal Fixed Income                          | No          | N/A  | N/A  |
| Opportunity             | Crossmark Global Investments               | Municipal Taxable Fixed Income                  | No          | N/A  | N/A  |
| Opportunity             | Cumberland Advisors Inc                    | Total Return Tax-Free Municipal Bond            | Yes         | 100%   | \$0.00   |
| Opportunity             | CW Henderson                               | Intermediate Municipal Fixed Income             | Yes         | 100%   | \$0.00   |
| Opportunity             | CW Henderson                               | Short Municipal Fixed Income                    | Yes         | 100%   | \$0.00   |
| Connect                 | Eagle Asset Management                     | Municipal Managed Income Solutions              | Yes         | 95-100%  | <sup>3</sup>   |
| Connect                 | Eagle Asset Management                     | Special Fixed Income (Municipal)                | Yes         | 95-100%  | <sup>3</sup>   |
| Connect                 | Eaton Vance Management                     | TABS Intermediate                               | Yes         | 100.00%  | \$0.00   |
| Opportunity             | Eaton Vance Management                     | Long-Term Municipal                             | Yes         | 100%   | \$0.00   |
| Opportunity             | Eaton Vance Management                     | Tax Adv Bond Strategies - Laddered Municipal    | Yes         | 100%   | \$0.00   |
| Opportunity             | Eaton Vance Management                     | TABS Laddered Muni Bond 1-14 Years              | Yes         | 100%   | \$0.00   |
| Opportunity             | Eaton Vance Management                     | TABS Laddered Muni Bond 5-15 Years              | Yes         | 100%   | \$0.00   |
| Opportunity             | Eaton Vance Management                     | TABS Laddered Muni Bond 10-20 Years             | Yes         | 100%   | \$0.00   |
| Opportunity             | Eaton Vance Management                     | TABS Laddered MUNI Bond 1-8 Years               | Yes         | 100%   | \$0.00   |
| Connect                 | EquityCompass Strategies                   | Ziegler/BPG Fixed Core Taxable Int Duration     | No          | N/A  | N/A  |
| Connect                 | EquityCompass Strategies                   | Ziegler/TWCM California Intermediate Tax Exempt | No          | N/A  | N/A  |
| Opportunity             | First Trust Advisors, LP                   | FTA Municipal Closed End Fund Strategy          | No          | N/A  | N/A  |
| Opportunity             | Franklin Portfolio Advisors - Fixed Income | Intermediate Municipal Fixed Income             | Yes         | 100%   | \$0.00   |
| Opportunity             | Franklin Portfolio Advisors - Fixed Income | Franklin Limited Maturity Municipal SMA         | Yes         | 100%   | \$0.00   |
| Opportunity             | GW&K Investment Mgmt                       | Municipal Fixed Income                          | Yes         | 100%   | \$0.00   |
| Opportunity             | Legg Mason PPG                             | Western Asset Current Market Muni               | Yes         | 100%   | \$0.00   |
| Opportunity             | Lord Abbett & Co                           | Muni Laddered Bond 1-5 Years                    | Yes         | 100%   | <sup>5</sup>   |
| Opportunity             | Lord Abbett & Co                           | Muni Laddered Bond 1-10 Years                   | Yes         | 100%   | <sup>5</sup>   |
| Opportunity             | Lord Abbett & Co                           | Muni Laddered Bond 1-20 Years                   | Yes         | 100%   | <sup>5</sup>   |
| Opportunity             | Lord Abbett & Co                           | Muni Laddered Bond 1-15 Years                   | Yes         | 100%   | <sup>5</sup>   |
| Opportunity             | Lord Abbett & Co                           | Muni Laddered Bond 5-10 Years                   | Yes         | 100%   | <sup>5</sup>   |
| Opportunity             | Lord Abbett & Co                           | Muni Laddered Bond 5-15 Years                   | Yes         | 100%   | <sup>5</sup>   |
| Opportunity             | Lord Abbett & Co                           | Municipal Bond                                  | Yes         | 100%   | <sup>5</sup>   |
| Connect                 | Lord Abbett & Co                           | Municipal Fixed Income                          | Yes         | 100.00%  | <sup>5</sup>   |
| Connect                 | Miller Tabak Asset Management              | Enhanced Tax-Free                               | Yes         | 95.00%   | \$0.00   |
| Connect                 | Miller Tabak Asset Management              | Intermediate Tax-Free                           | Yes         | 95.00%   | \$0.00   |
| Connect                 | Miller Tabak Asset Management              | Short Duration Tax-Free                         | Yes         | 95.00%   | \$0.00   |
| Connect                 | Neuberger Berman                           | Tax Exempt Limited Duration                     | No          | N/A  | N/A  |
| Opportunity             | Neuberger Berman (Neubridge)               | Municipal Core                                  | Yes         | 100%   | \$0.00   |
| Opportunity             | Neuberger Berman (Neubridge)               | Municipal Extended Core                         | Yes         | 100%   | \$0.00   |
| Opportunity             | Neuberger Berman (Neubridge)               | Municipal Short Core                            | Yes         | 100%   | \$0.00   |
| Opportunity             | Neuberger Berman LLC                       | Intermediate Municipal                          | Yes         | 100%   | \$0.00   |
| Opportunity             | Neuberger Berman LLC                       | Tax-Exempt Limited Maturity                     | Yes         | 100%   | \$0.00   |
| Opportunity             | Nuveen Asset Management                    | Interm Term High Qty Muni Bond                  | Yes         | 100%   | 1 - 10 Bps   |
| Opportunity             | Nuveen Asset Management                    | Limited Maturity Muni Bond                      | Yes         | 100%   | 1 - 10 Bps   |
| Opportunity             | Nuveen Asset Management                    | Long Term Muni                                  | Yes         | 100%   | 1 - 10 Bps   |
| Opportunity             | Nuveen Asset Management                    | Municipal Laddered Bond 5-15 Year               | Yes         | 100%   | 1 - 10 Bps   |
| Opportunity             | Nuveen Asset Management                    | Municipal Laddered Bond 1-10 Year               | Yes         | 100%   | 1 - 10 Bps   |
| Opportunity             | Nuveen Asset Management                    | Municipal Laddered Bond 1-15 Year               | Yes         | 100%   | 1 - 10 Bps   |
| Opportunity             | Nuveen Asset Management                    | Municipal Laddered Bond 10-25 Year              | Yes         | 100%   | 1 - 10 Bps   |
| Opportunity             | Nuveen Asset Management                    | Municipal Laddered Bond 1-7 Year                | Yes         | 100%   | 1 - 10 Bps   |
| Opportunity             | Nuveen Asset Management                    | Muni Bond Total Return                          | Yes         | 100%   | 1 - 10 Bps   |
| Opportunity             | RNC Genter Capital Management              | Municipal Fixed Income                          | Yes         | 100%   | \$0.00   |
| Stifel Select - SMA     | RNC Genter Capital Management              | Municipal Quality Intermediate                  | Yes         | 100%   | \$0.00   |
| Connect                 | Sage Advisory Services                     | Municipal Intermediate Duration                 | Yes         | 95-100%  | N/A  |
| Opportunity             | SMC Fixed Income Mgmt                      | Municipal Intermediate SMA                      | Yes         | 100%   | \$0.00   |
| Opportunity             | SMC Fixed Income Mgmt                      | Municipal Opportunities Plus SMA                | Yes         | 100%   | \$0.00   |
| Connect                 | Thornburg Investment Management            | Limited Municipal                               | Yes         | 73.00%   | N/A  |
| Opportunity             | Ziegler Capital Mgmt - BPG Fixed           | Core CA Municipal Int Duration                  | Yes         | 100%   | \$0.00   |
| Opportunity             | Ziegler Capital Mgmt - BPG Fixed           | Core CA Municipal Targeted                      | Yes         | 100%   | \$0.00   |
| Opportunity             | Ziegler Capital Mgmt - BPG Fixed           | Core Municipal Customized                       | Yes         | 100%   | \$0.00   |
| Opportunity             | Ziegler Capital Mgmt - BPG Fixed           | Core Municipal Int Duration                     | Yes         | 100%   | \$0.00   |
| Opportunity             | Ziegler Capital Mgmt - BPG Fixed           | Core Municipal Long Duration                    | Yes         | 100%   | \$0.00   |
| Opportunity             | Ziegler Capital Mgmt - BPG Fixed           | Core Municipal Short Duration                   | Yes         | 100%   | \$0.00   |
| Opportunity             | Ziegler Capital Mgmt - BPG Fixed           | Core Municipal Targeted                         | Yes         | 100%   | \$0.00   |
| Opportunity             | Ziegler Capital Mgmt - BPG Fixed           | Core MA Municipal Int Duration                  | Yes         | 100%   | \$0.00   |
| Opportunity             | Ziegler Capital Mgmt - BPG Fixed           | Core MA Municipal Targeted                      | Yes         | 100%   | \$0.00   |

|             |  |                                    |     |      |        |
|-------------|--|------------------------------------|-----|------|--------|
| Opportunity | Ziegler Capital Mgmt - BPG Fixed         | Core NY Municipal Int Duration     | Yes | 100% | \$0.00 |
| Opportunity | Ziegler Capital Mgmt - BPG Fixed         | Core NY Municipal Targeted         | Yes | 100% | \$0.00 |
| Opportunity | Ziegler Capital Mgmt - TWCM Fixed Income | California Intermediate Tax Exempt | Yes | 100% | \$0.00 |
| Opportunity | Ziegler Capital Mgmt - TWCM Fixed Income | Ultra Short Municipal              | Yes | 100% | \$0.00 |
| Opportunity | Ziegler Capital Mgmt - TWCM Fixed Income | Intermediate Duration NY Municipal | Yes | 100% | \$0.00 |

## U.S. Small Cap Equity

| Stifel Advisory Program | Manager                           | Portfolio Name                 | Trade Away? | Dollar-weighted percentage of trades executed away from Stifel | Execution Costs Charged by the Executing Broker for the trades |
|-------------------------|-----------------------------------|--------------------------------|-------------|--|--|
| Connect                 | C.M. Bidwell and Associates       | Small Cap Core                 | No          | N/A  | N/A  |
| Opportunity             | Confluence Investment Management  | Small Cap Value                | No          | N/A  | N/A  |
| Opportunity             | Eagle Asset Mgmt                  | Small Cap Growth               | No          | N/A  | N/A  |
| IMC Program - SMA       | Eagle Boston                      | Small Cap Value                | No          | N/A  | N/A  |
| Opportunity             | Earnest Partners                  | Small Cap Value                | No          | N/A  | N/A  |
| Opportunity             | First Trust Advisors, LP          | Small Cap Core                 | No          | N/A  | N/A  |
| Opportunity             | GW&K Investment Mgmt              | Small Cap Core                 | No          | N/A  | N/A  |
| Opportunity             | Heartland Advisors, Inc           | Small Cap Value                | No          | N/A  | N/A  |
| Opportunity             | Ironwood Investment Management    | Small Cap Core                 | No          | N/A  | N/A  |
| Stifel Select - SMA     | Kayne Anderson Rudnick            | Small Cap Quality Value        | No          | N/A  | N/A  |
| Opportunity             | Keeley Teton Advisors             | Small Cap Value                | No          | N/A  | N/A  |
| Connect                 | Kennedy Capital Management        | Small Cap Select               | No          | N/A  | N/A  |
| IMC Program - SMA       | NewSouth Capital Mgmt             | Small Cap Value Equity         | No          | N/A  | N/A  |
| Opportunity             | Nuveen Asset Management           | Small Cap Value                | No          | N/A  | N/A  |
| Connect                 | OShaughnessy Asset Management     | Small Cap Value                | No          | N/A  | N/A  |
| Connect                 | Parametric Portfolio Associates   | Tax Managed Core Small Cap     | Yes         | <1%  | .05bps   |
| Opportunity             | PNC Capital Advisors, Inc         | Small Cap Core                 | No          | N/A  | N/A  |
| Opportunity             | Rice Hall James & Associates      | Small Cap Growth Opportunities | No          | N/A  | N/A  |
| Opportunity             | Riverbridge Partners              | Small Cap Growth               | No          | N/A  | N/A  |
| Connect                 | Riverbridge Partners              | Eco Leaders                    | No          | N/A  | N/A  |
| Opportunity             | Schafer Cullen Capital Management | Small Cap Value                | No          | N/A  | N/A  |
| IMC Program - SMA       | Shapiro Capital Mgmt              | Small Cap Value                | No          | N/A  | N/A  |
| Connect                 | SouthernSun Asset Management      | Small Cap Value                | No          | N/A  | N/A  |

## Manager Direct Comments

- <sup>1</sup> We trade away for both fixed income and equity, as we believe we can find the best execution with our discretionary brokers. Fixed income brokers do not charge explicit commissions – all commissions and fees are incorporated into prices on the trades.
- <sup>2</sup> When looking to execute fixed income security trades for Stifel Advisory Program client accounts, Dana portfolio managers review a multitude of factors in determining which broker-dealer to place fixed income transactions through. While execution costs are an important consideration in any transaction, most transaction decisions are based upon a combination of price/yield as well as other relevant security attributes that are largely based on the idiosyncratic characteristics of the specific securities. When executing the purchase or sale of a fixed income security, Dana will attempt to contact multiple institutional fixed income brokers-dealers to begin “negotiating” the purchase or sale of the security. Many fixed income securities transacted in by Dana are unique in nature and are often not offered for sale (or purchase) directly by Stifel; therefore, Dana relies more heavily on the combination of price/yield comparisons between competing broker-dealer firms. These comparisons are often made more favorable for the Stifel Advisory Program clients when transactions for their accounts are then aggregated with trades from other non-program client accounts managed by Dana (whenever possible). This type of trade aggregation normally results in Dana placing the trade away from Stifel when doing so serves to limit the negative impact of execution costs, with any related transaction savings that are achieved through the trade aggregation being directly passed along to Stifel Advisory Program clients on a prorated basis. When trade aggregation does occur, all clients receive an average price per bond for each security traded, and the resulting yield on the security also typically ends up being more favorable for all aggregated client accounts.
- <sup>3</sup> For fixed income products, we will trade based on Best Execution at all times except for fixed closed-end funds and exchange traded funds (ETFs). We will route the orders directly over FISERV/APL to Stifel. For fixed income step-out trades, clients receive institutional execution where there is an Institutional Bond Spread but no additional cost, except for certain types of trades done on electronic trading platforms, i.e., Market Axess, Trade Web, and TMC. See below range of fees for various platforms from their respective fee schedules:
- Market Axess Open Trading fee from 0-1.5% bps to counterparty.
  - Trade Web Corporate Trading fee is 1 bp to liquidity provider.
  - TMC (The Muni Center) – For munis, the seller pays a fee depending on maturity in size ranging from a minimum of \$0.10 and a maximum of \$10 per bond. For Corporates and Agencies, a fee of \$0.50-\$1 per bond is charged to liquidity provider.
  - Arbor, Ticket fee \$0.03125-\$0.0625.
- <sup>4</sup> Hamlin does not charge clients, and clients are not subject to transaction costs independent of bid/ask spread. When engaging in cross trades among Hamlin clients, a dealer ticket charge is factored into the buy/sell spread. Client trades are aggregated into blocks, and then subjected to a \$60 ticket charge regardless of block size that is spread over the entire block being traded. Note that each interdealer trade incurs this spread, and that at minimum, a trade would incur two such spreads as bonds are traded from the selling custodian to the executing broker, and ultimately to the purchasing custodian. Please note that in some instances (e.g., rebalanced trades), the ticket charge will be spread across both purchasing and selling accounts. If the trade is occurring at a client’s direction (e.g., liquidation), then the directing client will pay the entire ticket charge. Please see Hamlin’s Form ADV Part 2A for a comprehensive discussion of brokerage practices.
- <sup>5</sup> With our municipal strategies, Lord Abbett maintains relationships with over 100 dealers across the country and believes that when executing trades the extent of our relationships provides a competitive advantage. Because we manage a large amount of municipal bond assets, we are able to leverage our market presence to gain better prices for liquidity by putting a large range of dealers in competition for our business, especially with the knowledge that they will have consistent reoccurring opportunities to trade with us. This allows us to typically attain better trade prices on our own rather than trading through the Sponsor. Furthermore, other than for client-requested cash needs, we typically trade in large block sizes by commingling holdings in many accounts, which is generally more efficiently executed by trading away from the Sponsor and attaining institutional level pricing rather than retail pricing. We do not trade away in our Large Cap Value strategy. The dealers we trade with include their commission in the net price they charge or pay to us. Lord Abbett does not control the dealer’s markup, but we monitor them through municipal bond market data. Markups/markdowns are typically smaller for larger institutional size trades and when dealers are put in competition for business, but we review the net prices to us to determine if the bid or offer is attractive for our clients. The execution of trades from Lord Abbett’s standpoint do not involve charging our clients commissions as all trades are executed at net prices. Any commissions that are charged generally come from the client’s custodian, if they are charged at all.
- <sup>6</sup> We manage fixed income portfolios and execute trades using the “best execution” policy of our firm. Heaviest weight is placed on pricing, timely response to the request for bid or offer, and timely accurate billing and settlement of trades. If trades are done away from Stifel, it is because they fall short in these areas.
- <sup>7</sup> The best price and execution are always the criteria for selecting the winning bid/offer. We trade away due to better execution.