

NORTHBOUND SECURITIES LLC: FORM CRS RESPONSES TO CONVERSATION STARTERS

NORTHBOUND SECURITIES LLC: DOCUMENTO CRS DE RESPOSTAS A QUESTÕES PARA DISCUSSÃO

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| <p>Northbound Securities LLC (“Northbound”, “we”, “us”, “our”) Form CRS Customer Relationship Summary Responses to Conversation Starters Effective February 1, 2022</p> <p>Conversation Starter: Given my financial situation, should I choose a brokerage service? Why or why not?</p> <p>Response: If you are interested in opening an account where you do not receive recommendations or advice about whether to buy or sell investments or investment strategies or account monitoring, and you make all of your own investment decisions, then a self-directed brokerage like ours could be the right fit for you. Northbound does not have an account minimum to open or maintain a brokerage account.</p> <p>Conversation Starter: How will you choose investments to recommend to me?</p> <p>Response: Northbound does not provide recommendations. We are not subject to a fiduciary duty to you and do not monitor or manage your account, including the monitoring of brokerage account investments, unless we state otherwise in writing.</p> <p>Conversation Starter: What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?</p> <p>Response: Northbound is a member of the Financial Industry Regulatory Authority (“FINRA”) and registered as a broker-dealer with the U.S. Securities and Exchange Commission and the states and territories listed on FINRA’s BrokerCheck website. Northbound’s financial professionals maintain licenses with FINRA. In general, financial professionals must have a Series 7 license to discuss account activity with customers and</p> | <p>Northbound Securities LLC (“Northbound”, “nós”, “nosso”, “nossa”) Documento CRS - Customer Relationship Summary/ Resumo de Relacionamento com o Cliente Respostas a Questões para Discussão Válido a partir de 1 de fevereiro de 2022</p> <p>Questão para Discussão: Segundo a minha situação financeira, eu deveria escolher um serviço de corretagem? Por que ou por que não?</p> <p>Resposta: Se estiver interessado em abrir uma conta na qual você não recebe recomendações ou conselhos sobre comprar ou vender investimentos ou estratégias de investimento ou monitoramento de conta e você toma todas as suas decisões por conta própria, então uma corretagem autogerida como a nossa seria adequada a você. A Northbound não exige um valor mínimo para abrir ou manter uma conta de corretagem.</p> <p>Questão para Discussão: Como irá escolher os investimentos para me recomendar?</p> <p>Resposta: A Northbound não disponibiliza recomendações. Nós não estamos sujeitos a um dever fiduciário a você e não monitoramos ou gerenciamos a sua conta, incluindo o monitoramento de investimentos de contas de corretagem, a não ser que indiquemos o contrário por escrito.</p> <p>Questão para Discussão: Qual é a sua experiência relevante, incluindo licenças, educação e outras qualificações? O que essas qualificações representam?</p> <p>Resposta: A Northbound é membro da Financial Industry Regulatory Authority (“FINRA”, Autoridade Regulatória da Indústria Financeira, em tradução livre) e registrada como corretora na U.S Securities and Exchange Commission (SEC) e nos estados e territórios listados no site BrokerCheck da FINRA. Os agentes financeiros da Northbound estão licenciados pela FINRA. No geral, os agentes</p> |
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| <p>a Series 24 to perform supervisory duties. We do not make recommendations on securities or investment strategies. Northbound professionals are available only to provide account support, at support@sproutfi.com. If you choose our services, you must be comfortable with investing your assets on your own.</p> <p>Conversation Starter: Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?</p> <p>Response: If you open a brokerage account through Northbound with \$10,000 and want to invest in securities, you will not pay commission fees on your trades. This means that \$0 of \$10,000 will go towards commission fees, and the entire \$10,000 will be invested in the securities you purchase. Regulatory trading fees are assessed by our clearing broker and paid by Northbound, not by you.</p> <p>If you choose to use additional services, such as wire transfers or ACATS, those services are charged at the then prevailing rate. If you incur returned ACH fees, those are charged to you. For further information about Northbound fees, please see the Fee Schedule on our website at https://www.northboundsecurities.com or in the Disclosure Library on the “SproutFi” App.</p> <p>Conversation Starter: How might your conflicts of interest affect me, and how will you address them?</p> <p>Response: As discussed in our Form CRS, we are paid when you complete a transaction, which means we have an incentive to encourage you to make larger investments and trade more frequently. Additionally, we receive payment for directing orders when you buy or sell securities from part or all of your transactions (also known as Payment</p> | <p>financeiros devem ter uma licença da Série 7 para conversar sobre atividades da conta com clientes e da Série 24 para assumir o papel de supervisor. Não fazemos recomendações para títulos ou estratégias de investimento. Os funcionários da Northbound estão disponíveis apenas para prestar assistência a contas, em support@sproutfi.com. Se escolher nossos serviços, você deve se sentir confortável para investir seus recursos por conta própria.</p> <p>Questão para Discussão: Me ajude a entender como essas taxas e despesas podem afetar meus investimentos. Se eu te der \$10.000 para investir, quanto será destinado a taxas e custos, e quanto será investido?</p> <p>Resposta: Se você abrir uma conta de corretagem pela Northbound com \$10.000 e quiser investir em valores mobiliários, não pagará taxa de comissão na transação. Isso significa que \$0 dos \$10.000 serão destinados a taxas de comissão e todos os \$10.000 serão investidos nos valores mobiliários que comprar. Taxas regulatórias de transação são calculadas por nossos agentes de liquidação e pagas pela Northbound, não por você.</p> <p>Se escolher utilizar serviços adicionais, como transferências wire ou ACAT, esses serviços serão cobrados pela taxa vigente. Se incorrer taxas de retorno de ACH, elas serão cobradas de você. Para mais informações sobre as taxas da Northbound, por favor visite a Tabela de Taxas no site https://www.northboundsecurities.com ou na Disclosure Library do App “SproutFi”.</p> <p>Questão para Discussão: Como os seus conflitos de interesse podem me afetar e como irá lidar com eles?</p> <p>Resposta: Como escrito no nosso Documento CRS, somos pagos quando você completa uma transação, o que significa que temos um incentivo para encorajar você a fazer investimentos maiores e transações mais frequentes. Além disso, nós recebemos pagamento por direcionar ordens, quando</p> |
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for Order Flow, or PFOF). We address these potential conflicts of interest by ensuring that all accounts are self-directed by our customers. We do not recommend any investments, nor do we recommend any investment strategies. Northbound addresses these and any other conflicts that may arise by making available all of our disclosures on our website at <https://www.northboundsecurities.com> or in the Disclosure Library on the “SproutFi” App. Northbound encourages you to read and familiarize yourself with all disclosures that are relevant to your investment relationship with us.

Conversation Starters: Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I write to if I have concerns about how this person is treating me?

Response: Because your account is entirely self-directed, you should direct any questions and concerns you may have by emailing support@sproutfi.com. Your question or concern will be directed to an appropriate Northbound employee or agent. If your question or concern is improperly categorized, and the Northbound employee or agent that receives it is unable to assist you, your question or concern will be redirected to a Northbound employee or agent that will be able to respond to your question or concern. Northbound employees or agents may escalate certain questions or concerns to a manager who handles escalated matters.

Translation

This document has been translated from English for the convenience of our customers. Although all care has been taken with respect to the translation, in the event of any conflict or inconsistency between the versions, the English language version of the document shall prevail.

you buy or sell securities, on behalf of or in connection with the total of your transactions, a practice known as “payment for order flow” (PFOFs - or payment for order flow, in translation). We act to resolve these conflicts of interest in potential by ensuring that all accounts are self-directed by our customers. We do not recommend any investments, nor do we recommend any investment strategies. Northbound addresses these and any other conflicts that may arise by making available all of our disclosures on our website at <https://www.northboundsecurities.com> or in the Disclosure Library on the “SproutFi” App. Northbound encourages you to read and familiarize yourself with all disclosures that are relevant to your investment relationship with us.

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Tradução

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V.1 2-18-22