

# E\*TRADE Securities - Held NMS Stocks and Options Order Routing Public Report

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1st Quarter, 2023

January 2023

## S&P 500 Stocks

### Summary

Non-Directed Orders as % of All Orders	Market Orders as % of Non-Directed Orders	Marketable Limit Orders as % of Non-Directed Orders	Non-Marketable Limit Orders as % of Non-Directed Orders	Other Orders as % of Non-Directed Orders
99.48	52.97	5.79	27.93	13.30

### Venues

Venue - Non-directed Order Flow	Non-Directed Orders (%)	Market Orders (%)	Marketable Limit Orders (%)	Non-Marketable Limit Orders (%)	Other Orders (%)	Net Payment Paid/Received for Market Orders(USD)	Net Payment Paid/Received for Market Orders(cents per hundred shares)	Net Payment Paid/Received for Marketable Limit Orders(USD)	Net Payment Paid/Received for Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Non-Marketable Limit Orders(USD)	Net Payment Paid/Received for Non-Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Other Orders(USD)	Net Payment Paid/Received for Other Orders(cents per hundred shares)
CITADEL SECURITIES LLC	29.94	36.18	34.77	15.27	33.77	334,534.57	20.0000	53,472.33	20.0002	54,320.61	30.7922	89,974.70	20.5483
Virtu Americas, LLC	26.40	28.29	26.32	22.05	28.05	266,322.55	20.0000	42,526.42	18.3985	58,749.50	25.9003	61,833.46	11.7347
G1 Execution Services, LLC	21.50	15.25	17.87	35.12	19.40	135,924.16	19.5737	24,549.90	19.4674	105,406.42	29.5743	53,464.43	22.5775
Jane Street Capital	11.35	15.79	15.27	2.71	10.13	153,609.40	20.0084	23,880.78	20.0000	10,349.29	30.7899	32,094.15	19.9386
Two Sigma Securities, LLC	5.20	2.23	3.18	11.98	3.62	18,223.02	19.1562	3,409.37	15.6897	43,103.50	28.2653	13,715.08	25.5770
UBS Securities, LLC	2.28	2.26	2.13	1.94	3.10	16,168.94	20.0000	5,624.63	20.1174	8,988.24	30.4292	9,256.11	22.8792
The Nasdaq Stock Market	1.54	0.00	0.19	5.17	0.68	0.00	0.0000	-740.14	-22.3965	20,591.88	32.2010	-4.50	-0.2978
Cboe EDGX Exchange, Inc.	1.50	0.00	0.22	4.83	1.04	0.00	0.0000	-129.87	-8.2499	25,305.00	31.3062	0.00	0.0000
Members Exchange (MEMX)	0.29	0.00	0.06	0.94	0.20	0.00	0.0000	-36.89	-12.5999	5,481.73	35.0000	903.34	33.4066

### Material Aspects:

CITADEL SECURITIES LLC:

E\*TRADE Securities LLC ("E\*TRADE") routes NMS equity orders to Citadel Securities LLC ("Citadel") to facilitate liquidity provision and price improvement opportunities for its customers. Citadel generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from Citadel in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.002 per share for non-directed, NMS equity market and marketable limit order executions priced at \$1.00 per share or more and \$0.0031 per share for non-directed, NMS equity non-marketable limit order executions priced at \$1.00 per share or more. E\*TRADE does not receive payment from Citadel for NMS equity executions priced below \$1.00 per share. E\*TRADE routes NMS equity orders only to market makers that pay for customer order flow, and all such market makers pay substantially the same rates. In addition, to take advantage of rules adopted by the U.S. securities exchanges that allow retail orders to be eligible for certain potential benefits, including additional price improvement from retail liquidity programs and higher queue priority from retail attestation programs, and to allow Citadel to access such potential benefits for E\*TRADE customer orders, E\*TRADE has entered into a Retail Order Attestation and Agreement with Citadel whereby E\*TRADE attests that substantially all of its customer orders are agency retail orders. E\*TRADE and Citadel do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to Citadel.

There is a potential conflict to a market maker such as Citadel both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, a market maker such as Citadel can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. A market maker's (such as Citadel's) anticipated profit must be allocated among the three subcategories listed above, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by competition for order flow amongst market makers (as measured by the amount of price improvement provided), operating under the same general payment for order flow terms applicable to Citadel.

In addition to revenues that Citadel may collect for executing or facilitating the execution of E\*TRADE customer orders, Citadel also receives remuneration from U.S. securities exchanges to which it routes or directs E\*TRADE customer orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. exchange rebate payments could, in theory, incentivize Citadel to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to Citadel's independent order routing and best execution obligations. E\*TRADE does not share directly in any such rebates Citadel receives for executions of E\*TRADE customer orders, although Citadel could potentially use these rebates to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both.

Virtu Americas, LLC:

E\*TRADE Securities LLC ("E\*TRADE") routes NMS equity orders to Virtu Americas, LLC ("Virtu") to facilitate liquidity provision and price improvement opportunities for its customers. Virtu generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from Virtu in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.002 per share for non-directed, NMS equity market and marketable limit order executions priced at \$1.00 per share or more and \$0.0031 per share for non-directed, NMS equity non-marketable limit order executions priced at \$1.00 per share or more. E\*TRADE does not receive payment from Virtu for NMS equity executions priced below \$1.00 per share. E\*TRADE routes NMS equity orders only to market makers that pay for customer order flow, and all such market makers pay substantially the same rates. In addition, to take advantage of rules adopted by the U.S. securities exchanges that allow retail orders to be eligible for certain potential benefits, including additional price improvement from retail liquidity programs and higher queue priority from retail attestation programs, and to allow Virtu to access such potential benefits for E\*TRADE customer orders, E\*TRADE has entered into a Retail Order Attestation and Agreement with Virtu whereby E\*TRADE attests that substantially all of its customer orders are agency retail orders. E\*TRADE and Virtu do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to Virtu.

There is a potential conflict to a market maker such as Virtu both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, a market maker such as Virtu can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. A market maker's (such as Virtu's) anticipated profit must be allocated among the three subcategories listed above, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by competition for order flow amongst market makers (as measured by the amount of price improvement provided), operating under the same general payment for order flow terms applicable to Virtu.

In addition to revenues that Virtu may collect for executing or facilitating the execution of E\*TRADE customer orders, Virtu also receives remuneration from U.S. securities exchanges to which it routes or directs E\*TRADE customer orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. exchange rebate payments could, in theory, incentivize Virtu to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to Virtu's independent order routing and best execution obligations. E\*TRADE does not share directly in any such rebates Virtu receives for executions of E\*TRADE customer orders, although Virtu could potentially use these rebates to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both.

G1 Execution Services, LLC:

E\*TRADE Securities LLC ("E\*TRADE") routes NMS equity orders to G1 Execution Services, LLC ("G1X") to facilitate liquidity provision and price improvement opportunities for its customers. G1X generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from G1X in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.002 per share for non-directed, NMS equity market and marketable limit order executions priced at \$1.00 per share or more and \$0.0031 per share for non-directed, NMS equity non-marketable limit order executions priced at \$1.00 per share or more. E\*TRADE does not receive payment from G1X for NMS equity executions priced below \$1.00 per share. E\*TRADE routes NMS equity orders only to market makers that pay for customer order flow, and all such market makers pay substantially the same rates. In addition, to take advantage of rules adopted by the U.S. securities exchanges that allow retail orders to be eligible for certain potential benefits, including additional price improvement from retail liquidity programs and higher queue priority from retail attestation programs, and to allow G1X to access such potential benefits for E\*TRADE customer orders, E\*TRADE has entered into a Retail Order Attestation and Agreement with G1X whereby E\*TRADE attests that substantially all of its customer orders are agency retail orders. E\*TRADE and G1X do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to G1X.

There is a potential conflict to a market maker such as G1X both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, a market maker such as G1X can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. A market maker's (such as G1X's) anticipated profit must be allocated among the three subcategories listed above, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by competition for order flow amongst market makers (as measured by the amount of price improvement provided), operating under the same general payment for order flow terms applicable to G1X.

In addition to revenues that G1X may collect for executing or facilitating the execution of E\*TRADE customer orders, G1X also receives remuneration from U.S. securities exchanges to which it routes or directs E\*TRADE customer orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. exchange rebate payments could, in theory, incentivize G1X to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to G1X's independent order routing and best execution obligations. E\*TRADE does not share directly in any such rebates G1X receives for executions of E\*TRADE customer orders, although G1X could potentially use these rebates to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both.

Jane Street Capital:

E\*TRADE Securities LLC ("E\*TRADE") routes NMS equity orders to Jane Street Capital ("Jane Street") to facilitate liquidity provision and price improvement opportunities for its customers. Jane Street generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from Jane Street in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.002 per share for non-directed, NMS equity market and marketable limit order executions priced at \$1.00 per share or more and \$0.0031 per share for non-directed, NMS equity non-marketable limit order executions priced at \$1.00 per share or more. E\*TRADE does not receive payment from Jane Street for NMS equity executions priced below \$1.00 per share. E\*TRADE routes NMS equity orders only to market makers that pay for customer order flow, and all such market makers pay substantially the same rates. In addition, to take advantage of rules adopted by the U.S. securities exchanges that allow retail orders to be eligible for certain potential benefits, including additional price improvement from retail liquidity programs and higher queue priority from retail attestation programs, and to allow Jane Street to access such potential benefits for E\*TRADE customer orders, E\*TRADE has entered into a Retail Order Attestation and Agreement with Jane Street whereby E\*TRADE attests that substantially all of its customer orders are agency retail orders. E\*TRADE and Jane Street do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to Jane Street.

There is a potential conflict to a market maker such as Jane Street both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, a market maker such as Jane Street can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. A market maker's (such as Jane Street's) anticipated profit must be allocated among the three subcategories listed above, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by competition for order flow amongst market makers (as measured by the amount of price improvement provided), operating under the same general payment for order flow terms applicable to Jane Street.

In addition to revenues that Jane Street may collect for executing or facilitating the execution of E\*TRADE customer orders, Jane Street also receives remuneration from U.S. securities exchanges to which it routes or directs E\*TRADE customer orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. exchange rebate payments could, in theory, incentivize Jane Street to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to Jane Street's independent order routing and best execution obligations. E\*TRADE does not share directly in any such rebates Jane Street receives for executions of E\*TRADE customer orders, although Jane Street could potentially use these rebates to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both

Two Sigma Securities, LLC:

E\*TRADE Securities LLC ("E\*TRADE") routes NMS equity orders to Two Sigma Securities, LLC ("Two Sigma") to facilitate liquidity provision and price improvement opportunities for its customers. Two Sigma generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from Two Sigma in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.002 per share for non-directed, NMS equity market and marketable limit order executions priced at \$1.00 per share or more and \$0.0031 per share for non-directed, NMS equity non-marketable limit order executions priced at \$1.00 per share or more. E\*TRADE does not receive payment from Two Sigma for NMS equity executions priced below \$1.00 per share. E\*TRADE routes NMS equity orders only to market makers that pay for customer order flow, and all such market makers pay substantially the same rates. In addition, to take advantage of rules adopted by the U.S. securities exchanges that allow retail orders to be eligible for certain potential benefits, including additional price improvement from retail liquidity programs and higher queue priority from retail attestation programs, and to allow Two Sigma to access such potential benefits for E\*TRADE customer orders, E\*TRADE has entered into a Retail Order Attestation and Agreement with Two Sigma whereby E\*TRADE attests that substantially all of its customer orders are agency retail orders. E\*TRADE and Two Sigma do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to Two Sigma.

There is a potential conflict to a market maker such as Two Sigma both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, a market maker such as Two Sigma can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. A market maker's (such as Two Sigma's) anticipated profit must be allocated among the three subcategories listed above, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by competition for order flow amongst market makers (as measured by the amount of price improvement provided), operating under the same general payment for order flow terms applicable to Two Sigma.

In addition to revenues that Two Sigma may collect for executing or facilitating the execution of E\*TRADE customer orders, Two Sigma also receives remuneration from U.S. securities exchanges to which it routes or directs E\*TRADE customer orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. exchange rebate payments could, in theory, incentivize Two Sigma to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to Two Sigma's independent order routing and best execution obligations. E\*TRADE does not share directly in any such rebates Two Sigma receives for executions of E\*TRADE customer orders, although Two Sigma could potentially use these rebates to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both.

UBS Securities, LLC:

E\*TRADE Securities LLC ("E\*TRADE") routes NMS equity orders to UBS Securities, LLC ("UBS") to facilitate liquidity provision and price improvement opportunities for its customers. UBS generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from UBS in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.002 per share for non-directed, NMS equity market and marketable limit order executions priced at \$1.00 per share or more and \$0.0031 per share for non-directed, NMS equity non-marketable limit order executions priced at \$1.00 per share or more. E\*TRADE does not receive payment from UBS for NMS equity executions priced below \$1.00 per share. E\*TRADE routes NMS equity orders only to market makers that pay for customer order flow, and all such market makers pay substantially the same rates. In addition, to take advantage of rules adopted by the U.S. securities exchanges that allow retail orders to be eligible for certain potential benefits, including additional price improvement from retail liquidity programs and higher queue priority from retail attestation programs, and to allow UBS to access such potential benefits for E\*TRADE customer orders, E\*TRADE has entered into a Retail Order Attestation and Agreement with UBS whereby E\*TRADE attests that substantially all of its customer orders are agency retail orders. E\*TRADE and UBS do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to UBS.

There is a potential conflict to a market maker such as UBS both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, a market maker such as UBS can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. A market maker's (such as UBS's) anticipated profit must be allocated among the three subcategories listed above, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by competition for order flow amongst market makers (as measured by the amount of price improvement provided), operating under the same general payment for order flow terms applicable to UBS.

In addition to revenues that UBS may collect for executing or facilitating the execution of E\*TRADE customer orders, UBS also receives remuneration from U.S. securities exchanges to which it routes or directs E\*TRADE customer orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. exchange rebate payments could, in theory, incentivize UBS to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to UBS's independent order routing and best execution obligations. E\*TRADE does not share directly in any such rebates UBS receives for executions of E\*TRADE customer orders, although UBS could potentially use these rebates to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both.

The Nasdaq Stock Market:

E\*TRADE Securities LLC ("E\*TRADE") routes marketable equity orders and non-marketable NMS equity limit orders to the Nasdaq Stock Market ("NASDAQ") to facilitate liquidity provision and price improvement opportunities for its customers, as specified in the above Public Order Routing Report statistics. E\*TRADE either pays a fee or receives a rebate for each E\*TRADE customer order execution on the exchange, depending on whether the order added to or subtracted from liquidity on the exchange.

The fees and rebates referenced above are subject to volume pricing. To the extent that E\*TRADE meets the execution volume thresholds necessary to qualify for preferred pricing under NASDAQ's Fees Schedule in a given month, increased (rather than standard) rebate rates and decreased (rather than standard) fees will apply. Because NASDAQ offers higher rebates and lower fees based on a tiered volume model, there is a potential conflict in that such rebates and fees could, in theory, incentivize E\*TRADE to route a higher percentages of E\*TRADE customer orders to NASDAQ rather than another venue in order to reach a higher tier. E\*TRADE and NASDAQ do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules beyond the tiered volume model set forth in the NASDAQ Fees Schedule as described above; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to NASDAQ.

The fees E\*TRADE pays and rebates E\*TRADE receives from NASDAQ for NMS equity executions are determined based on NASDAQ's tiered volume model. Schedules delineating orders eligible for such rebates and the applicable rates are published publicly by NASDAQ in the NASDAQ Fees Schedule, available at [http://www.nasdaqtrader.com/trader.aspx?id=bx\\_pricing](http://www.nasdaqtrader.com/trader.aspx?id=bx_pricing). Please note that NASDAQ's publicly available Fees Schedule URL link and applicable rates may change without notice. In general, during Q1 2023, NASDAQ paid E\*TRADE standard rebate rates of \$0.00325 per share for executions priced at \$1.00 per share or more and did not pay any per share amount for executions priced below \$1.00 per share. Executions that removed liquidity from NASDAQ qualified for tiered pricing and E\*TRADE was charged fees of \$0.003 per share for executions priced at \$1.00 per share or more and 0.30% of the total notional value of executions priced below \$1.00 per share. For Q1 2023, E\*TRADE received rebates (net of fees) from NASDAQ in the amount of \$92,775 in January, \$95,645 in February, and \$110,735 in March.

E\*TRADE also participates in NASDAQ's retail order priority program under which eligible retail orders receive priority ahead of other available interest at a given price level or other enhanced execution benefits. E\*TRADE reviews customers' activity on a periodic basis to determine program eligibility and reserves the right to choose whether to participate in the NASDAQ retail order priority program. E\*TRADE is an affiliated company of Morgan Stanley & Co. LLC ("MS&Co"), which is a market maker on NASDAQ and may realize profits from orders it routes to NASDAQ for execution. E\*TRADE may share indirectly in such profits generated by MS&Co as a result of the corporate affiliation between MS&Co and E\*TRADE. E\*TRADE and MS&Co order execution volumes are combined on a monthly basis for tiered pricing program incentive purposes. It is possible that MS&Co could generate additional profit as a result of the combination of such order flow and the incentives of such tiered pricing program.

Cboe EDGX Exchange, Inc.:

E\*TRADE Securities LLC ("E\*TRADE") routes marketable equity orders and non-marketable NMS equity limit orders to the Cboe EDGX Exchange, Inc. ("EDGX") to facilitate liquidity provision and price improvement opportunities for its customers, as specified in the above Public Order Routing Report statistics. E\*TRADE either pays a fee or receives a rebate for each E\*TRADE customer order execution on the exchange, depending on whether the order added to or subtracted from liquidity on the exchange.

The fees and rebates referenced above are subject to volume pricing. To the extent that E\*TRADE meets the execution volume thresholds necessary to qualify for preferred pricing under EDGX's Fees Schedule in a given month, increased (rather than standard) rebate rates and decreased (rather than standard) fees will apply. Because EDGX offers higher rebates and lower fees based on a tiered volume model, there is a potential conflict in that such rebates and fees could, in theory, incentivize E\*TRADE to route a higher percentages of E\*TRADE customer orders to EDGX rather than another venue in order to reach a higher tier. E\*TRADE and EDGX do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules beyond the tiered volume model set forth in the EDGX Fees Schedule as described above; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to EDGX.

The fees E\*TRADE pays and rebates E\*TRADE receives from EDGX for NMS equity executions are determined based on EDGX's tiered volume model. Schedules delineating orders eligible for such rebates and the applicable rates are published publicly by EDGX in the EDGX Fees Schedule, available at [http://www.cboe.com/us/equities/membership/fee\\_schedule/edgx/](http://www.cboe.com/us/equities/membership/fee_schedule/edgx/). Please note that EDGX's publicly available Fees Schedule URL link and applicable rates may change without notice. In general, during Q1 2023, EDGX paid E\*TRADE standard rebate rates of \$0.0034 per share for executions priced at \$1.00 per share or more and \$0.00003 for executions priced below \$1.00 per share. Executions that removed liquidity from EDGX qualified for tiered pricing and E\*TRADE was not charged a per share fee for executions priced at \$1.00 per share or more or charged a per share fee of the total notional value of executions priced below \$1.00 per share. For Q1 2023, E\*TRADE received rebates (net of fees) from EDGX in the amount of \$131,204 in January, \$122,006 in February, and \$163,611 in March.

E\*TRADE also participates in EDGX's retail order priority program under which eligible retail orders receive priority ahead of other available interest at a given price level or other enhanced execution benefits. E\*TRADE reviews customers' activity on a periodic basis to determine program eligibility and reserves the right to choose whether to participate in the EDGX's retail order priority program. E\*TRADE is an affiliated company of Morgan Stanley & Co. LLC ("Morgan Stanley"), which is a market maker on EDGX and may realize profits from orders it routes to EDGX for execution. E\*TRADE may share indirectly in such profits generated by MS&Co as a result of the corporate affiliation between MS&Co and E\*TRADE. E\*TRADE and MS&Co order execution volumes are combined on a monthly basis for tiered pricing program incentive purposes. It is possible that MS&Co could generate additional profit as a result of the combination of such order flow and the incentives of such tiered pricing program.

Members Exchange (MEMX):

E\*TRADE Securities LLC ("E\*TRADE") routes marketable equity orders and non-marketable NMS equity limit orders to MEMX LLC ("MEMX") as specified in the above Public Order Routing Report disclosures. E\*TRADE either pays a fee or receives a rebate for each E\*TRADE customer order execution on the exchange, depending on whether the order added to or subtracted from liquidity on the exchange.

The fees and rebates referenced above are subject to volume pricing. To the extent that E\*TRADE meets the execution volume thresholds necessary to qualify for preferred pricing under MEMX's Fees Schedule in a given month, increased (rather than standard) rebate rates and decreased (rather than standard) fees will apply. Because MEMX offers higher rebates and lower fees based on a tiered volume model, there is a potential conflict in that such rebates and fees could, in theory, incentivize E\*TRADE to route a higher percentages of E\*TRADE customer orders to MEMX rather than another venue in order to reach a higher tier. E\*TRADE and MEMX do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules beyond the tiered volume model set forth in the MEMX Fees Schedule as described above; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to MEMX.

The fees E\*TRADE pays and rebates E\*TRADE receives from MEMX for NMS equity executions are determined based on MEMX's tiered volume model. Schedules delineating orders eligible for such rebates and the applicable rates are published publicly by MEMX in the MEMX Fees Schedule, available at <http://info.memxtrading.com/fee-schedule/>. Please note that MEMX's publicly available Fees Schedule URL link and applicable rates may change without notice. In general, during Q1 2023, MEMX paid E\*TRADE standard rebate rates of \$0.0035 per share for executions priced at \$1.00 per share or more and 0.075% of the total trade notional value for executions priced below \$1.00 per share. On executions that removed liquidity from MEMX qualified for tiered pricing, E\*TRADE was not charged a per share fee for executions priced at \$1.00 per share or more nor charged a per share fee for the total notional value of executions priced below \$1.00 per share. For Q1 2023, E\*TRADE received rebates (net of fees) from MEMX in the amount of \$26,215 in January, \$4,156 in February, and \$9,328 in March.

E\*TRADE is an affiliated company of Strategic Investments I, Inc., both of which are wholly owned subsidiaries of Morgan Stanley and investor-shareholders of MEMX. Accordingly, E\*TRADE, both directly and indirectly through its parent company Morgan Stanley and/or its affiliates may share in profits realized by MEMX, which could, in theory, incentivize E\*TRADE to route a higher percentages of E\*TRADE customer orders to MEMX over other execution venues. Additionally, E\*TRADE is an affiliated company of Morgan Stanley & Co., LLC ("MS&Co"), which is market maker on MEMX and may realize profits from orders it routes to MEMX for execution. E\*TRADE may share directly or indirectly in any such profits generated by MS&Co. E\*TRADE orders routed to MEMX through MS&Co will be combined with any other order flow that MS&Co routes to MEMX for the purpose of determining the applicable pricing under MEMX's tiered pricing model described above. It is possible that MS&Co could generate additional profit as a result of the combination of such order flow and the incentives of such tiered pricing program.

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## January 2023

### Non-S&P 500 Stocks

#### Summary

Non-Directed Orders as % of All Orders	Market Orders as % of Non-Directed Orders	Marketable Limit Orders as % of Non-Directed Orders	Non-Marketable Limit Orders as % of Non-Directed Orders	Other Orders as % of Non-Directed Orders
99.34	43.44	11.15	34.72	10.70

#### Venues

Venue - Non-directed Order Flow	Non-Directed Orders (%)	Market Orders (%)	Marketable Limit Orders (%)	Non-Marketable Limit Orders (%)	Other Orders (%)	Net Payment Paid/Received for Market Orders(USD)	Net Payment Paid/Received for Market Orders(cents per hundred shares)	Net Payment Paid/Received for Marketable Limit Orders(USD)	Net Payment Paid/Received for Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Non-Marketable Limit Orders(USD)	Net Payment Paid/Received for Non-Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Other Orders(USD)	Net Payment Paid/Received for Other Orders(cents per hundred shares)
CITADEL SECURITIES LLC	28.61	36.26	35.03	15.61	33.10	1,170,505.64	15.7096	486,824.46	6.8332	286,594.29	15.9548	206,091.42	15.6662
Virtu Americas, LLC	25.77	28.19	27.27	21.58	28.01	942,205.24	15.3551	357,314.69	5.6113	255,283.02	15.1886	128,313.88	2.6393
G1 Execution Services, LLC	22.42	14.95	16.57	34.23	20.50	475,486.93	15.0499	203,817.13	6.8078	534,268.77	18.5817	134,238.67	18.2470
Jane Street Capital	10.56	15.94	15.77	2.78	8.56	535,150.87	15.5760	218,812.44	6.8529	45,097.76	17.5542	56,452.76	16.3953
Two Sigma Securities, LLC	6.08	2.31	2.85	12.44	4.13	63,766.22	15.0930	31,672.53	5.3745	255,896.40	14.2050	31,754.28	21.4287
UBS Securities, LLC	2.40	2.34	2.14	2.25	3.37	54,114.36	15.6133	36,313.75	8.9164	50,767.53	14.8587	24,356.00	16.7179
Cboe EDGX Exchange, Inc.	1.92	0.00	0.18	5.08	1.23	0.00	0.0000	-444.57	-2.7270	99,297.04	19.3683	0.00	0.0000
The Nasdaq Stock Market	1.88	0.00	0.15	5.08	0.88	0.00	0.0000	-7,892.16	-15.9194	79,523.31	19.3516	-774.86	-5.8212
Members Exchange (MEMX)	0.36	0.00	0.03	0.95	0.23	0.00	0.0000	-516.86	-9.6687	18,867.30	19.3828	1,516.25	32.9993

#### Material Aspects:

CITADEL SECURITIES LLC:

E\*TRADE Securities LLC ("E\*TRADE") routes NMS equity orders to Citadel Securities LLC ("Citadel") to facilitate liquidity provision and price improvement opportunities for its customers. Citadel generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from Citadel in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.002 per share for non-directed, NMS equity market and marketable limit order executions priced at \$1.00 per share or more and \$0.0031 per share for non-directed, NMS equity non-marketable limit order executions priced at \$1.00 per share or more. E\*TRADE does not receive payment from Citadel for NMS equity executions priced below \$1.00 per share. E\*TRADE routes NMS equity orders only to market makers that pay for customer order flow, and all such market makers pay substantially the same rates. In addition, to take advantage of rules adopted by the U.S. securities exchanges that allow retail orders to be eligible for certain potential benefits, including additional price improvement from retail liquidity programs and higher queue priority from retail attestation programs, and to allow Citadel to access such potential benefits for E\*TRADE customer orders, E\*TRADE has entered into a Retail Order Attestation and Agreement with Citadel whereby E\*TRADE attests that substantially all of its customer orders are agency retail orders. E\*TRADE and Citadel do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to Citadel.

There is a potential conflict to a market maker such as Citadel both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, a market maker such as Citadel can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. A market maker's (such as Citadel's) anticipated profit must be allocated among the three subcategories listed above, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by competition for order flow amongst market makers (as measured by the amount of price improvement provided), operating under the same general payment for order flow terms applicable to Citadel.

In addition to revenues that Citadel may collect for executing or facilitating the execution of E\*TRADE customer orders, Citadel also receives remuneration from U.S. securities exchanges to which it routes or directs E\*TRADE customer orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. exchange rebate payments could, in theory, incentivize Citadel to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to Citadel's independent order routing and best execution obligations. E\*TRADE does not share directly in any such rebates Citadel receives for executions of E\*TRADE customer orders, although Citadel could potentially use these rebates to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both.

Virtu Americas, LLC:

E\*TRADE Securities LLC ("E\*TRADE") routes NMS equity orders to Virtu Americas, LLC ("Virtu") to facilitate liquidity provision and price improvement opportunities for its customers. Virtu generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from Virtu in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.002 per share for non-directed, NMS equity market and marketable limit order executions priced at \$1.00 per share or more and \$0.0031 per share for non-directed, NMS equity non-marketable limit order executions priced at \$1.00 per share or more. E\*TRADE does not receive payment from Virtu for NMS equity executions priced below \$1.00 per share. E\*TRADE routes NMS equity orders only to market makers that pay for customer order flow, and all such market makers pay substantially the same rates. In addition, to take advantage of rules adopted by the U.S. securities exchanges that allow retail orders to be eligible for certain potential benefits, including additional price improvement from retail liquidity programs and higher queue priority from retail attestation programs, and to allow Virtu to access such potential benefits for E\*TRADE customer orders, E\*TRADE has entered into a Retail Order Attestation and Agreement with Virtu whereby E\*TRADE attests that substantially all of its customer orders are agency retail orders. E\*TRADE and Virtu do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to Virtu.

There is a potential conflict to a market maker such as Virtu both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, a market maker such as Virtu can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. A market maker's (such as Virtu's) anticipated profit must be allocated among the three subcategories listed above, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by competition for order flow amongst market makers (as measured by the amount of price improvement provided), operating under the same general payment for order flow terms applicable to Virtu.

In addition to revenues that Virtu may collect for executing or facilitating the execution of E\*TRADE customer orders, Virtu also receives remuneration from U.S. securities exchanges to which it routes or directs E\*TRADE customer orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. exchange rebate payments could, in theory, incentivize Virtu to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to Virtu's independent order routing and best execution obligations. E\*TRADE does not share directly in any such rebates Virtu receives for executions of E\*TRADE customer orders, although Virtu could potentially use these rebates to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both.

G1 Execution Services, LLC:

E\*TRADE Securities LLC ("E\*TRADE") routes NMS equity orders to G1 Execution Services, LLC ("G1X") to facilitate liquidity provision and price improvement opportunities for its customers. G1X generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from G1X in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.002 per share for non-directed, NMS equity market and marketable limit order executions priced at \$1.00 per share or more and \$0.0031 per share for non-directed, NMS equity non-marketable limit order executions priced at \$1.00 per share or more. E\*TRADE does not receive payment from G1X for NMS equity executions priced below \$1.00 per share. E\*TRADE routes NMS equity orders only to market makers that pay for customer order flow, and all such market makers pay substantially the same rates. In addition, to take advantage of rules adopted by the U.S. securities exchanges that allow retail orders to be eligible for certain potential benefits, including additional price improvement from retail liquidity programs and higher queue priority from retail attestation programs, and to allow G1X to access such potential benefits for E\*TRADE customer orders, E\*TRADE has entered into a Retail Order Attestation and Agreement with G1X whereby E\*TRADE attests that substantially all of its customer orders are agency retail orders. E\*TRADE and G1X do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to G1X.

There is a potential conflict to a market maker such as G1X both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, a market maker such as G1X can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. A market maker's (such as G1X's) anticipated profit must be allocated among the three subcategories listed above, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by competition for order flow amongst market makers (as measured by the amount of price improvement provided), operating under the same general payment for order flow terms applicable to G1X.

In addition to revenues that G1X may collect for executing or facilitating the execution of E\*TRADE customer orders, G1X also receives remuneration from U.S. securities exchanges to which it routes or directs E\*TRADE customer orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. exchange rebate payments could, in theory, incentivize G1X to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to G1X's independent order routing and best execution obligations. E\*TRADE does not share directly in any such rebates G1X receives for executions of E\*TRADE customer orders, although G1X could potentially use these rebates to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both.

Jane Street Capital:

E\*TRADE Securities LLC ("E\*TRADE") routes NMS equity orders to Jane Street Capital ("Jane Street") to facilitate liquidity provision and price improvement opportunities for its customers. Jane Street generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from Jane Street in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.002 per share for non-directed, NMS equity market and marketable limit order executions priced at \$1.00 per share or more and \$0.0031 per share for non-directed, NMS equity non-marketable limit order executions priced at \$1.00 per share or more. E\*TRADE does not receive payment from Jane Street for NMS equity executions priced below \$1.00 per share. E\*TRADE routes NMS equity orders only to market makers that pay for customer order flow, and all such market makers pay substantially the same rates. In addition, to take advantage of rules adopted by the U.S. securities exchanges that allow retail orders to be eligible for certain potential benefits, including additional price improvement from retail liquidity programs and higher queue priority from retail attestation programs, and to allow Jane Street to access such potential benefits for E\*TRADE customer orders, E\*TRADE has entered into a Retail Order Attestation and Agreement with Jane Street whereby E\*TRADE attests that substantially all of its customer orders are agency retail orders. E\*TRADE and Jane Street do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to Jane Street.

There is a potential conflict to a market maker such as Jane Street both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, a market maker such as Jane Street can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. A market maker's (such as Jane Street's) anticipated profit must be allocated among the three subcategories listed above, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by competition for order flow amongst market makers (as measured by the amount of price improvement provided), operating under the same general payment for order flow terms applicable to Jane Street.

In addition to revenues that Jane Street may collect for executing or facilitating the execution of E\*TRADE customer orders, Jane Street also receives remuneration from U.S. securities exchanges to which it routes or directs E\*TRADE customer orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. exchange rebate payments could, in theory, incentivize Jane Street to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to Jane Street's independent order routing and best execution obligations. E\*TRADE does not share directly in any such rebates Jane Street receives for executions of E\*TRADE customer orders, although Jane Street could potentially use these rebates to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both.

Two Sigma Securities, LLC:

E\*TRADE Securities LLC ("E\*TRADE") routes NMS equity orders to Two Sigma Securities, LLC ("Two Sigma") to facilitate liquidity provision and price improvement opportunities for its customers. Two Sigma generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from Two Sigma in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.002 per share for non-directed, NMS equity market and marketable limit order executions priced at \$1.00 per share or more and \$0.0031 per share for non-directed, NMS equity non-marketable limit order executions priced at \$1.00 per share or more. E\*TRADE does not receive payment from Two Sigma for NMS equity executions priced below \$1.00 per share. E\*TRADE routes NMS equity orders only to market makers that pay for customer order flow, and all such market makers pay substantially the same rates. In addition, to take advantage of rules adopted by the U.S. securities exchanges that allow retail orders to be eligible for certain potential benefits, including additional price improvement from retail liquidity programs and higher queue priority from retail attestation programs, and to allow Two Sigma to access such potential benefits for E\*TRADE customer orders, E\*TRADE has entered into a Retail Order Attestation and Agreement with Two Sigma whereby E\*TRADE attests that substantially all of its customer orders are agency retail orders. E\*TRADE and Two Sigma do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to Two Sigma.

There is a potential conflict to a market maker such as Two Sigma both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, a market maker such as Two Sigma can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. A market maker's (such as Two Sigma's) anticipated profit must be allocated among the three subcategories listed above, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by competition for order flow amongst market makers (as measured by the amount of price improvement provided), operating under the same general payment for order flow terms applicable to Two Sigma.

In addition to revenues that Two Sigma may collect for executing or facilitating the execution of E\*TRADE customer orders, Two Sigma also receives remuneration from U.S. securities exchanges to which it routes or directs E\*TRADE customer orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. exchange rebate payments could, in theory, incentivize Two Sigma to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to Two Sigma's independent order routing and best execution obligations. E\*TRADE does not share directly in any such rebates Two Sigma receives for executions of E\*TRADE customer orders, although Two Sigma could potentially use these rebates to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both.

UBS Securities, LLC:

E\*TRADE Securities LLC ("E\*TRADE") routes NMS equity orders to UBS Securities, LLC ("UBS") to facilitate liquidity provision and price improvement opportunities for its customers. UBS generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from UBS in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.002 per share for non-directed, NMS equity market and marketable limit order executions priced at \$1.00 per share or more and \$0.0031 per share for non-directed, NMS equity non-marketable limit order executions priced at \$1.00 per share or more. E\*TRADE does not receive payment from UBS for NMS equity executions priced below \$1.00 per share. E\*TRADE routes NMS equity orders only to market makers that pay for customer order flow, and all such market makers pay substantially the same rates. In addition, to take advantage of rules adopted by the U.S. securities exchanges that allow retail orders to be eligible for certain potential benefits, including additional price improvement from retail liquidity programs and higher queue priority from retail attestation programs, and to allow UBS to access such potential benefits for E\*TRADE customer orders, E\*TRADE has entered into a Retail Order Attestation and Agreement with UBS whereby E\*TRADE attests that substantially all of its customer orders are agency retail orders. E\*TRADE and UBS do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to UBS.

There is a potential conflict to a market maker such as UBS both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, a market maker such as UBS can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. A market maker's (such as UBS's) anticipated profit must be allocated among the three subcategories listed above, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by competition for order flow amongst market makers (as measured by the amount of price improvement provided), operating under the same general payment for order flow terms applicable to UBS.

In addition to revenues that UBS may collect for executing or facilitating the execution of E\*TRADE customer orders, UBS also receives remuneration from U.S. securities exchanges to which it routes or directs E\*TRADE customer orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. exchange rebate payments could, in theory, incentivize UBS to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to UBS's independent order routing and best execution obligations. E\*TRADE does not share directly in any such rebates UBS receives for executions of E\*TRADE customer orders, although UBS could potentially use these rebates to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both.

Cboe EDGX Exchange, Inc.:

E\*TRADE Securities LLC ("E\*TRADE") routes marketable equity orders and non-marketable NMS equity limit orders to the Cboe EDGX Exchange, Inc. ("EDGX") to facilitate liquidity provision and price improvement opportunities for its customers, as specified in the above Public Order Routing Report statistics. E\*TRADE either pays a fee or receives a rebate for each E\*TRADE customer order execution on the exchange, depending on whether the order added to or subtracted from liquidity on the exchange.

The fees and rebates referenced above are subject to volume pricing. To the extent that E\*TRADE meets the execution volume thresholds necessary to qualify for preferred pricing under EDGX's Fees Schedule in a given month, increased (rather than standard) rebate rates and decreased (rather than standard) fees will apply. Because EDGX offers higher rebates and lower fees based on a tiered volume model, there is a potential conflict in that such rebates and fees could, in theory, incentivize E\*TRADE to route a higher percentages of E\*TRADE customer orders to EDGX rather than another venue in order to reach a higher tier. E\*TRADE and EDGX do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules beyond the tiered volume model set forth in the EDGX Fees Schedule as described above; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to EDGX.

The fees E\*TRADE pays and rebates E\*TRADE receives from EDGX for NMS equity executions are determined based on EDGX's tiered volume model. Schedules delineating orders eligible for such rebates and the applicable rates are published publicly by EDGX in the EDGX Fees Schedule, available at [http://www.cboe.com/us/equities/membership/fee\\_schedule/edgx/](http://www.cboe.com/us/equities/membership/fee_schedule/edgx/). Please note that EDGX's publicly available Fees Schedule URL link and applicable rates may change without notice. In general, during Q1 2023, EDGX paid E\*TRADE standard rebate rates of \$0.0034 per share for executions priced at \$1.00 per share or more and \$0.00003 for executions priced below \$1.00 per share. Executions that removed liquidity from EDGX qualified for tiered pricing and E\*TRADE was not charged a per share fee for executions priced at \$1.00 per share or more or charged a per share fee of the total notional value of executions priced below \$1.00 per share. For Q1 2023, E\*TRADE received rebates (net of fees) from EDGX in the amount of \$131,204 in January, \$122,006 in February, and \$163,611 in March.

E\*TRADE also participates in EDGX's retail order priority program under which eligible retail orders receive priority ahead of other available interest at a given price level or other enhanced execution benefits. E\*TRADE reviews customers' activity on a periodic basis to determine program eligibility and reserves the right to choose whether to participate in the EDGX's retail order priority program. E\*TRADE is an affiliated company of Morgan Stanley & Co. LLC ("Morgan Stanley"), which is a market maker on EDGX and may realize profits from orders it routes to EDGX for execution. E\*TRADE may share indirectly in such profits generated by MS&Co as a result of the corporate affiliation between MS&Co and E\*TRADE. E\*TRADE and MS&Co order execution volumes are combined on a monthly basis for tiered pricing program incentive purposes. It is possible that MS&Co could generate additional profit as a result of the combination of such order flow and the incentives of such tiered pricing program.

The Nasdaq Stock Market:

E\*TRADE Securities LLC ("E\*TRADE") routes marketable equity orders and non-marketable NMS equity limit orders to the Nasdaq Stock Market ("NASDAQ") to facilitate liquidity provision and price improvement opportunities for its customers, as specified in the above Public Order Routing Report statistics. E\*TRADE either pays a fee or receives a rebate for each E\*TRADE customer order execution on the exchange, depending on whether the order added to or subtracted from liquidity on the exchange.

The fees and rebates referenced above are subject to volume pricing. To the extent that E\*TRADE meets the execution volume thresholds necessary to qualify for preferred pricing under NASDAQ's Fees Schedule in a given month, increased (rather than standard) rebate rates and decreased (rather than standard) fees will apply. Because NASDAQ offers higher rebates and lower fees based on a tiered volume model, there is a potential conflict in that such rebates and fees could, in theory, incentivize E\*TRADE to route a higher percentages of E\*TRADE customer orders to NASDAQ rather than another venue in order to reach a higher tier. E\*TRADE and NASDAQ do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules beyond the tiered volume model set forth in the NASDAQ Fees Schedule as described above; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to NASDAQ.

The fees E\*TRADE pays and rebates E\*TRADE receives from NASDAQ for NMS equity executions are determined based on NASDAQ's tiered volume model. Schedules delineating orders eligible for such rebates and the applicable rates are published publicly by NASDAQ in the NASDAQ Fees Schedule, available at [http://www.nasdaqtrader.com/trader.aspx?id=bx\\_pricing](http://www.nasdaqtrader.com/trader.aspx?id=bx_pricing). Please note that NASDAQ's publicly available Fees Schedule URL link and applicable rates may change without notice. In general, during Q1 2023, NASDAQ paid E\*TRADE standard rebate rates of \$0.00325 per share for executions priced at \$1.00 per share or more and did not pay any per share amount for executions priced below \$1.00 per share. Executions that removed liquidity from NASDAQ qualified for tiered pricing and E\*TRADE was charged fees of \$0.003 per share for executions priced at \$1.00 per share or more and 0.30% of the total notional value of executions priced below \$1.00 per share. For Q1 2023, E\*TRADE received rebates (net of fees) from NASDAQ in the amount of \$92,775 in January, \$95,645 in February, and \$110,735 in March.

E\*TRADE also participates in NASDAQ's retail order priority program under which eligible retail orders receive priority ahead of other available interest at a given price level or other enhanced execution benefits. E\*TRADE reviews customers' activity on a periodic basis to determine program eligibility and reserves the right to choose whether to participate in the NASDAQ retail order priority program. E\*TRADE is an affiliated company of Morgan Stanley & Co. LLC ("MS&Co"), which is a market maker on NASDAQ and may realize profits from orders it routes to NASDAQ for execution. E\*TRADE may share indirectly in such profits generated by MS&Co as a result of the corporate affiliation between MS&Co and E\*TRADE. E\*TRADE and MS&Co order execution volumes are combined on a monthly basis for tiered pricing program incentive purposes. It is possible that MS&Co could generate additional profit as a result of the combination of such order flow and the incentives of such tiered pricing program.

Members Exchange (MEMX):

E\*TRADE Securities LLC ("E\*TRADE") routes marketable equity orders and non-marketable NMS equity limit orders to MEMX LLC ("MEMX") as specified in the above Public Order Routing Report disclosures. E\*TRADE either pays a fee or receives a rebate for each E\*TRADE customer order execution on the exchange, depending on whether the order added to or subtracted from liquidity on the exchange.

The fees and rebates referenced above are subject to volume pricing. To the extent that E\*TRADE meets the execution volume thresholds necessary to qualify for preferred pricing under MEMX's Fees Schedule in a given month, increased (rather than standard) rebate rates and decreased (rather than standard) fees will apply. Because MEMX offers higher rebates and lower fees based on a tiered volume model, there is a potential conflict in that such rebates and fees could, in theory, incentivize E\*TRADE to route a higher percentages of E\*TRADE customer orders to MEMX rather than another venue in order to reach a higher tier. E\*TRADE and MEMX do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules beyond the tiered volume model set forth in the MEMX Fees Schedule as described above; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to MEMX.

The fees E\*TRADE pays and rebates E\*TRADE receives from MEMX for NMS equity executions are determined based on MEMX's tiered volume model. Schedules delineating orders eligible for such rebates and the applicable rates are published publicly by MEMX in the MEMX Fees Schedule, available at <http://info.memxtrading.com/fee-schedule/>. Please note that MEMX's publicly available Fees Schedule URL link and applicable rates may change without notice. In general, during Q1 2023, MEMX paid E\*TRADE standard rebate rates of \$0.0035 per share for executions priced at \$1.00 per share or more and 0.075% of the total trade notional value for executions priced below \$1.00 per share. On executions that removed liquidity from MEMX qualified for tiered pricing, E\*TRADE was not charged a per share fee for executions priced at \$1.00 per share or more nor charged a per share fee for the total notional value of executions priced below \$1.00 per share. For Q1 2023, E\*TRADE received rebates (net of fees) from MEMX in the amount of \$26,215 in January, \$4,156 in February, and \$9,328 in March.

E\*TRADE is an affiliated company of Strategic Investments I, Inc., both of which are wholly owned subsidiaries of Morgan Stanley and investor-shareholders of MEMX. Accordingly, E\*TRADE, both directly and indirectly through its parent company Morgan Stanley and/or its affiliates may share in profits realized by MEMX, which could, in theory, incentivize E\*TRADE to route a higher percentages of E\*TRADE customer orders to MEMX over other execution venues. Additionally, E\*TRADE is an affiliated company of Morgan Stanley & Co., LLC ("MS&Co"), which is market maker on MEMX and may realize profits from orders it routes to MEMX for execution. E\*TRADE may share directly or indirectly in any such profits generated by MS&Co. E\*TRADE orders routed to MEMX through MS&Co will be combined with any other order flow that MS&Co routes to MEMX for the purpose of determining the applicable pricing under MEMX's tiered pricing model described above. It is possible that MS&Co could generate additional profit as a result of the combination of such order flow and the incentives of such tiered pricing program.

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# January 2023

## Options

### Summary

Non-Directed Orders as % of All Orders	Market Orders as % of Non-Directed Orders	Marketable Limit Orders as % of Non-Directed Orders	Non-Marketable Limit Orders as % of Non-Directed Orders	Other Orders as % of Non-Directed Orders
99.97	17.71	8.69	34.30	39.31

### Venues

Venue - Non-directed Order Flow	Non-Directed Orders (%)	Market Orders (%)	Marketable Limit Orders (%)	Non-Marketable Limit Orders (%)	Other Orders (%)	Net Payment Paid/Received for Market Orders(USD)	Net Payment Paid/Received for Market Orders(cents per hundred shares)	Net Payment Paid/Received for Marketable Limit Orders(USD)	Net Payment Paid/Received for Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Non-Marketable Limit Orders(USD)	Net Payment Paid/Received for Non-Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Other Orders(USD)	Net Payment Paid/Received for Other Orders(cents per hundred shares)
CITADEL SECURITIES LLC	35.28	42.15	41.52	41.32	25.53	2,751,631.15	46.5940	2,977,742.01	46.8837	1,792,096.25	44.7908	883,445.06	37.0348
Dash/IMC Financial Markets	23.42	15.93	16.30	16.37	34.52	946,904.43	42.1027	797,481.65	41.1273	621,471.25	36.3674	1,629,552.79	33.1592
Global Execution Brokers LP	21.09	26.72	26.19	26.08	13.08	1,779,780.93	46.7827	1,611,239.86	46.8423	1,338,904.98	45.8640	563,015.11	35.3854
Wolverine Execution Services, LLC	20.19	15.20	15.97	16.19	26.87	922,003.99	48.6684	848,679.20	47.5752	820,938.29	48.3424	1,656,886.29	49.2116
Morgan Stanley & Co., LLC	0.02	0.00	0.01	0.04	0.00	0.00	0.0000	0.00	0.0000	0.00	0.0000	0.00	0.0000

### Material Aspects:

CITADEL SECURITIES LLC:

E\*TRADE Securities LLC ("E\*TRADE") routes U.S.-listed options orders to Citadel Securities LLC ("Citadel") to facilitate liquidity provision and price improvement opportunities for its customers. Citadel generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from Citadel in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.48 per contract for simple and complex equity options orders. E\*TRADE does not receive remuneration from Citadel for index options executions or for Professional Customer orders, which are orders of customers who submit an average of 390 options orders per trading day, per calendar month, on a quarterly basis. E\*TRADE routes U.S.-listed options orders only (except as indicated in the next sentence) to market makers that pay for customer order flow (and all such market makers pay substantially the same rates). As an exception to the foregoing sentence, E\*TRADE routes a limited number of orders to its affiliate, Morgan Stanley & Co. LLC ("MS&Co"), from which E\*TRADE does not accept payment. E\*TRADE and Citadel do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to Citadel.

In general, public, retail, or non-professional index options order execution fees range from \$0.00 to \$1.32 per contract, depending on the index option class and premium price, with Citadel passing exchange fees for index option executions back to E\*TRADE each month. For Q1 2023, E\*TRADE paid total fees on customer index options executions of \$329,202 in January, \$303,226 in February, and \$368,424 in March.

There is a potential conflict to an options market maker such as Citadel both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the options market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, an options market maker such as Citadel can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. An options market maker's (such as Citadel's) anticipated profit must be allocated among these three sub-categories, such that an increased allocation to any one sub-category will result in a decreased allocation to one or more of the other categories, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by market maker competition for order flow (as measured by the amount of price improvement provided), under the same general payment for order flow terms applicable to Citadel.

In addition to revenues that Citadel may collect for executing or facilitating the execution of E\*TRADE customer orders, Citadel may also receive remuneration from the U.S. options exchanges to which it routes or directs E\*TRADE customer options orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. options exchange rebate payments could, in theory, incentivize Citadel to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to Citadel's independent order routing and best execution obligation. Exchange rebates provided to Citadel for E\*TRADE customer order executions by the U.S. options exchanges are not passed through to E\*TRADE or its customers although Citadel's receipt of such rebates could potentially be used to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both. Citadel does not pass through the fees that it is charged by the U.S. options exchanges for E\*TRADE customer options order executions, other than the index options fees described above.

#### Dash/IMC Financial Markets:

E\*TRADE Securities LLC ("E\*TRADE") routes U.S.-listed options orders to Dash Financial Technologies, LLC ("Dash") to facilitate liquidity provision and price improvement opportunities for its customers. Dash generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from Dash (based upon the remuneration Dash receives from the liquidity providers with which it has arrangements as described below) (i.e. payment for order flow) in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.48 per contract for simple and complex equity options orders. E\*TRADE does not receive remuneration from Dash for index options executions or for Professional Customer orders, which are orders of customers who submit an average of 390 options orders per trading day, per calendar month, on a quarterly basis. E\*TRADE only routes U.S.-listed options orders to market makers that pay for customer order flow, and all such market makers are subject to substantially the same rate of payment, apart from a limited number of orders, which E\*TRADE routes to its affiliate Morgan Stanley & Co., LLC ("MS&Co"), from which E\*TRADE does not accept payment. E\*TRADE and Dash do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to Dash.

In general, public, retail, or non-professional index options order execution fees range from \$0.00 to \$1.32 per contract depending on the index option class and premium price, with Dash passing exchange fees for index option executions to E\*TRADE each month. For Q1 2023, E\*TRADE paid total fees on customer index option executions of \$615,579 in January, \$591,332 in February, and \$723,016 in March.

In connection with Dash's handling of E\*TRADE retail equity option orders, Dash has arrangements with multiple, unaffiliated liquidity providers, including IMC Financial Markets, designed to facilitate liquidity provision and price improvement opportunities. Pursuant to these arrangements, Dash routes E\*TRADE retail equity options orders to exchanges and may preference the liquidity providers on such applicable exchange, consistent with exchange-sponsored programs which are described in the fee schedules of each such options exchange. The liquidity providers provide Dash with remuneration in connection with Dash's routing of E\*TRADE retail equity options orders, including through reciprocal order flow arrangements between Dash and such liquidity provider and/or payment per contract to Dash in return for E\*TRADE retail equity options orders that Dash routes or directs. Dash provides payment to E\*TRADE as described above based upon the compensation Dash receives from such liquidity providers.

There is a potential conflict to Dash and/or the liquidity provider to which Dash routes orders both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the liquidity provider seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, the liquidity provider can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay Dash (and for Dash, in turn, to pay E\*TRADE) for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. The liquidity provider's anticipated profit must be allocated among these three sub-categories, such that an increased allocation to any one sub-category will result in a decreased allocation to one or more of the other categories. Dash and the liquidity provider can also adjust the amount of profit that the liquidity provider shares with Dash. The allocation of resources between the three subcategories listed above, including the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders is mitigated by market maker competition for order flow (as measured by the amount of price improvement provided), under the same general payment for order flow terms applicable to Dash.

In addition to revenues that Dash may collect for executing or facilitating the execution of E\*TRADE customer orders, Dash may also receive remuneration from the U.S. options exchanges to which it routes or directs E\*TRADE customer options orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. options exchange rebate payments could, in theory, incentivize Dash to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to Dash's independent order routing and best execution obligations. Exchange rebates provided to Dash for E\*TRADE customer executions by the U.S. options exchanges are not passed through to E\*TRADE or its customers. Dash and/or its liquidity provider does not pass through the fees charged by the U.S. options exchanges for E\*TRADE customer executions, other than the index options fees described above. E\*TRADE does not share directly in any profits from U.S. options exchange rebates for executions of E\*TRADE customer orders, although Dash's and/or its liquidity provider's receipt of such rebates could potentially be used to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both.

Global Execution Brokers LP:

E\*TRADE Securities LLC ("E\*TRADE") routes U.S.-listed options orders to Global Execution Brokers LP ("G1X") to facilitate liquidity provision and price improvement opportunities for its customers. G1X generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from G1X in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.48 per contract for simple and complex equity options orders. E\*TRADE does not receive remuneration from G1X for index options executions or for Professional Customer orders, which are orders of customers who submit an average of 390 options orders per trading day, per calendar month, on a quarterly basis. E\*TRADE only routes U.S.-listed options orders to market makers that pay for customer order flow, and all such market makers are subject to substantially the same rate of payment, apart from a limited number of orders, which E\*TRADE routes to its affiliate Morgan Stanley & Co., LLC ("MS&Co"), from which E\*TRADE does not accept payment. E\*TRADE and G1X do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to G1X.

In general, public, retail, or non-professional index options order execution fees range from \$0.00 to \$1.32 per contract, depending on the index option class and premium price, with G1X passing exchange fees for index option executions back to E\*TRADE each month. For Q1 2023, E\*TRADE paid total fees on customer index options executions of \$174,831 in January, \$179,757 in February, and \$240,281 in March.

There is a potential conflict to an options market maker such as G1X both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the options market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, an options market maker such as G1X can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. An options market maker's (such as G1X's) anticipated profit must be allocated among these three sub-categories, such that an increased allocation to any one sub-category will result in a decreased allocation to one or more of the other categories, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by market maker competition for order flow (as measured by the amount of price improvement provided), under the same general payment for order flow terms applicable to G1X.

In addition to revenues that G1X may collect for executing or facilitating the execution of E\*TRADE customer orders, G1X may also receive remuneration from the U.S. options exchanges to which it routes or directs E\*TRADE customer options orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. options exchange rebate payments could, in theory, incentivize G1X to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to G1X's independent order routing and best execution obligation. Exchange rebates provided to G1X for E\*TRADE customer order executions by the U.S. options exchanges are not passed through to E\*TRADE or its customers although G1X's receipt of such rebates could potentially be used to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both. G1X does not pass through the fees that it is charged by the U.S. options exchanges for E\*TRADE customer options order executions, other than the index options fees described above.

Wolverine Execution Services, LLC:

E\*TRADE Securities LLC ("E\*TRADE") routes U.S.-listed options orders to Wolverine Execution Services, LLC ("Wolverine") to facilitate liquidity provision and price improvement opportunities for its customers. Wolverine generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from Wolverine in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.48 per contract for simple and complex equity options orders. E\*TRADE does not receive remuneration from Wolverine for index options executions or for Professional Customer orders, which are orders of customers who submit an average of 390 options orders per trading day, per calendar month, on a quarterly basis. E\*TRADE only routes U.S.-listed options orders to market makers that pay for customer order flow, and all such market makers are subject to substantially the same rate of payment, apart from a limited number of orders, which E\*TRADE routes to its affiliate Morgan Stanley & Co., LLC ("MS&Co"), from which E\*TRADE does not accept payment. E\*TRADE and Wolverine do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to Wolverine.

In general, public, retail, or non-professional index options order execution fees range from \$0.00 to \$1.32 per contract, depending on the index option class and premium price, with Wolverine passing exchange fees for index option executions back to E\*TRADE each month. For Q1 2023, E\*TRADE paid total fees on customer index options executions of \$961,983 in January, \$898,732 in February, and \$1,118,158 in March.

There is a potential conflict to an options market maker such as Wolverine both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the options market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, an options market maker such as Wolverine can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. An options market maker's (such as Wolverine's) anticipated profit must be allocated among these three sub-categories, such that an increased allocation to any one sub-category will result in a decreased allocation to one or more of the other categories, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by market maker competition for order flow (as measured by the amount of price improvement provided), under the same general payment for order flow terms applicable to Wolverine.

In addition to revenues that Wolverine may collect for executing or facilitating the execution of E\*TRADE customer orders, Wolverine may also receive remuneration from the U.S. options exchanges to which it routes or directs E\*TRADE customer options orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. options exchange rebate payments could, in theory, incentivize Wolverine to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to Wolverine's independent order routing and best execution obligation. Exchange rebates provided to Wolverine for E\*TRADE customer order executions by the U.S. options exchanges are not passed through to E\*TRADE or its customers although Wolverine's receipt of such rebates could potentially be used to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both. Wolverine does not pass through the fees that it is charged by the U.S. options exchanges for E\*TRADE customer options order executions, other than the index options fees described above.

Morgan Stanley & Co., LLC:

E\*TRADE Securities LLC ("E\*TRADE") is an affiliate of Morgan Stanley & Co., LLC. (MS&Co). E\*TRADE sends orders in U.S.-listed options to MS&Co to facilitate liquidity provision and price improvement opportunities for its customers. E\*TRADE orders in U.S.-listed options that are sent to MS&Co are then routed by MS&Co to a U.S. options exchange to be either crossed or executed against MS&Co interest and/or other liquidity on such exchanges, subject to the principles of best execution. MS&Co generates revenue from executing or facilitating the execution of E\*TRADE customer orders. E\*TRADE does not receive payments from MS&Co for the orders it routes to MS&Co and E\*TRADE and MS&Co do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to MS&Co.

In the course of providing liquidity, MS&Co may preference option orders to MS&Co's options market maker or third-party market makers on the applicable exchange, consistent with exchange-sponsored programs which are described in the fee schedules of each such options exchange. MS&Co also participates in exchange-sponsored listed option payment for order flow programs under which MS&Co may also receive remuneration from the U.S. options exchanges to which it routes or directs E\*TRADE customer options orders in the form of rebates, including from exchanges in which E\*TRADE's parent company Morgan Stanley or another affiliated entity may have a financial interest. Although MSSB has no knowledge of any facts to suggest that such is the case, these U.S. options exchange rebate payments could, in theory, incentivize MS&Co to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to MS&Co's independent order routing and best execution obligations. Exchange rebates provided and fees charged to MS&Co for E\*TRADE customer executions by the U.S. options exchanges are not passed through to E\*TRADE or its customers. However, E\*TRADE is an affiliated company of MS&Co, which is a market maker on various U.S. options exchanges and MS&Co may realize market-making profits from E\*TRADE orders routed to MS&Co for execution. In addition, E\*TRADE orders that MS&Co executes are combined on a monthly basis with other order flow that MS&Co executes for tiered pricing program incentive purposes and it is possible that MS&Co could generate additional profit as a result of the combination of such order flow and the incentives of such tiered pricing programs. As a result of E\*TRADE's corporate affiliation with MS&Co, E\*TRADE may share indirectly in any such profits (whether from market-making, from pricing programs, or otherwise) generated by MS&Co.

## February 2023

### S&P 500 Stocks

#### Summary

Non-Directed Orders as % of All Orders	Market Orders as % of Non-Directed Orders	Marketable Limit Orders as % of Non-Directed Orders	Non-Marketable Limit Orders as % of Non-Directed Orders	Other Orders as % of Non-Directed Orders
99.49	52.56	5.76	29.15	12.53

#### Venues

Venue - Non-directed Order Flow	Non-Directed Orders (%)	Market Orders (%)	Marketable Limit Orders (%)	Non-Marketable Limit Orders (%)	Other Orders (%)	Net Payment Paid/Received for Market Orders(USD)	Net Payment Paid/Received for Market Orders(cents per hundred shares)	Net Payment Paid/Received for Marketable Limit Orders(USD)	Net Payment Paid/Received for Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Non-Marketable Limit Orders(USD)	Net Payment Paid/Received for Non-Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Other Orders(USD)	Net Payment Paid/Received for Other Orders(cents per hundred shares)
CITADEL SECURITIES LLC	29.85	36.26	35.08	15.39	34.25	333,990.78	20.0000	61,136.62	20.0002	69,150.25	30.8391	80,480.70	20.2922
Virtu Americas, LLC	26.63	28.65	26.81	22.21	28.39	268,391.29	20.0000	44,941.50	18.2447	69,689.10	26.4294	54,611.07	10.9412
G1 Execution Services, LLC	21.48	14.52	16.93	36.16	18.59	129,566.12	19.4061	23,972.80	19.2854	126,291.86	29.6904	44,354.23	22.2159
Jane Street Capital	11.27	15.68	15.68	2.73	10.56	156,636.94	20.0088	27,765.84	20.0000	11,174.97	30.8450	27,519.22	19.8812
Two Sigma Securities, LLC	5.07	2.24	2.88	11.36	3.33	18,204.89	18.8566	3,525.17	16.4471	55,385.62	28.7082	8,923.06	22.9335
UBS Securities, LLC	2.53	2.66	2.46	1.96	3.34	19,236.17	19.9995	5,965.04	20.0896	11,821.42	30.4189	8,575.69	21.5854
The Nasdaq Stock Market	1.59	0.00	0.07	5.18	0.60	0.00	0.0000	-759.04	-23.8605	21,661.29	32.2253	0.00	0.0000
Cboe EDGX Exchange, Inc.	1.54	0.00	0.09	4.86	0.92	0.00	0.0000	-23.62	-5.0021	27,546.63	31.6265	0.00	0.0000
Members Exchange (MEMX)	0.04	0.00	0.00	0.13	0.03	0.00	0.0000	-1.26	-5.9406	672.48	35.0002	33.10	34.1660

#### Material Aspects:

CITADEL SECURITIES LLC:

E\*TRADE Securities LLC ("E\*TRADE") routes NMS equity orders to Citadel Securities LLC ("Citadel") to facilitate liquidity provision and price improvement opportunities for its customers. Citadel generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from Citadel in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.002 per share for non-directed, NMS equity market and marketable limit order executions priced at \$1.00 per share or more and \$0.0031 per share for non-directed, NMS equity non-marketable limit order executions priced at \$1.00 per share or more. E\*TRADE does not receive payment from Citadel for NMS equity executions priced below \$1.00 per share. E\*TRADE routes NMS equity orders only to market makers that pay for customer order flow, and all such market makers pay substantially the same rates. In addition, to take advantage of rules adopted by the U.S. securities exchanges that allow retail orders to be eligible for certain potential benefits, including additional price improvement from retail liquidity programs and higher queue priority from retail attestation programs, and to allow Citadel to access such potential benefits for E\*TRADE customer orders, E\*TRADE has entered into a Retail Order Attestation and Agreement with Citadel whereby E\*TRADE attests that substantially all of its customer orders are agency retail orders. E\*TRADE and Citadel do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to Citadel.

There is a potential conflict to a market maker such as Citadel both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, a market maker such as Citadel can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. A market maker's (such as Citadel's) anticipated profit must be allocated among the three subcategories listed above, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by competition for order flow amongst market makers (as measured by the amount of price improvement provided), operating under the same general payment for order flow terms applicable to Citadel.

In addition to revenues that Citadel may collect for executing or facilitating the execution of E\*TRADE customer orders, Citadel also receives remuneration from U.S. securities exchanges to which it routes or directs E\*TRADE customer orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. exchange rebate payments could, in theory, incentivize Citadel to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to Citadel's independent order routing and best execution obligations. E\*TRADE does not share directly in any such rebates Citadel receives for executions of E\*TRADE customer orders, although Citadel could potentially use these rebates to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both.

Virtu Americas, LLC:

E\*TRADE Securities LLC ("E\*TRADE") routes NMS equity orders to Virtu Americas, LLC ("Virtu") to facilitate liquidity provision and price improvement opportunities for its customers. Virtu generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from Virtu in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.002 per share for non-directed, NMS equity market and marketable limit order executions priced at \$1.00 per share or more and \$0.0031 per share for non-directed, NMS equity non-marketable limit order executions priced at \$1.00 per share or more. E\*TRADE does not receive payment from Virtu for NMS equity executions priced below \$1.00 per share. E\*TRADE routes NMS equity orders only to market makers that pay for customer order flow, and all such market makers pay substantially the same rates. In addition, to take advantage of rules adopted by the U.S. securities exchanges that allow retail orders to be eligible for certain potential benefits, including additional price improvement from retail liquidity programs and higher queue priority from retail attestation programs, and to allow Virtu to access such potential benefits for E\*TRADE customer orders, E\*TRADE has entered into a Retail Order Attestation and Agreement with Virtu whereby E\*TRADE attests that substantially all of its customer orders are agency retail orders. E\*TRADE and Virtu do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to Virtu.

There is a potential conflict to a market maker such as Virtu both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, a market maker such as Virtu can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. A market maker's (such as Virtu's) anticipated profit must be allocated among the three subcategories listed above, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by competition for order flow amongst market makers (as measured by the amount of price improvement provided), operating under the same general payment for order flow terms applicable to Virtu.

In addition to revenues that Virtu may collect for executing or facilitating the execution of E\*TRADE customer orders, Virtu also receives remuneration from U.S. securities exchanges to which it routes or directs E\*TRADE customer orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. exchange rebate payments could, in theory, incentivize Virtu to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to Virtu's independent order routing and best execution obligations. E\*TRADE does not share directly in any such rebates Virtu receives for executions of E\*TRADE customer orders, although Virtu could potentially use these rebates to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both.

G1 Execution Services, LLC:

E\*TRADE Securities LLC ("E\*TRADE") routes NMS equity orders to G1 Execution Services, LLC ("G1X") to facilitate liquidity provision and price improvement opportunities for its customers. G1X generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from G1X in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.002 per share for non-directed, NMS equity market and marketable limit order executions priced at \$1.00 per share or more and \$0.0031 per share for non-directed, NMS equity non-marketable limit order executions priced at \$1.00 per share or more. E\*TRADE does not receive payment from G1X for NMS equity executions priced below \$1.00 per share. E\*TRADE routes NMS equity orders only to market makers that pay for customer order flow, and all such market makers pay substantially the same rates. In addition, to take advantage of rules adopted by the U.S. securities exchanges that allow retail orders to be eligible for certain potential benefits, including additional price improvement from retail liquidity programs and higher queue priority from retail attestation programs, and to allow G1X to access such potential benefits for E\*TRADE customer orders, E\*TRADE has entered into a Retail Order Attestation and Agreement with G1X whereby E\*TRADE attests that substantially all of its customer orders are agency retail orders. E\*TRADE and G1X do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to G1X.

There is a potential conflict to a market maker such as G1X both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, a market maker such as G1X can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. A market maker's (such as G1X's) anticipated profit must be allocated among the three subcategories listed above, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by competition for order flow amongst market makers (as measured by the amount of price improvement provided), operating under the same general payment for order flow terms applicable to G1X.

In addition to revenues that G1X may collect for executing or facilitating the execution of E\*TRADE customer orders, G1X also receives remuneration from U.S. securities exchanges to which it routes or directs E\*TRADE customer orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. exchange rebate payments could, in theory, incentivize G1X to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to G1X's independent order routing and best execution obligations. E\*TRADE does not share directly in any such rebates G1X receives for executions of E\*TRADE customer orders, although G1X could potentially use these rebates to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both.

Jane Street Capital:

E\*TRADE Securities LLC ("E\*TRADE") routes NMS equity orders to Jane Street Capital ("Jane Street") to facilitate liquidity provision and price improvement opportunities for its customers. Jane Street generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from Jane Street in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.002 per share for non-directed, NMS equity market and marketable limit order executions priced at \$1.00 per share or more and \$0.0031 per share for non-directed, NMS equity non-marketable limit order executions priced at \$1.00 per share or more. E\*TRADE does not receive payment from Jane Street for NMS equity executions priced below \$1.00 per share. E\*TRADE routes NMS equity orders only to market makers that pay for customer order flow, and all such market makers pay substantially the same rates. In addition, to take advantage of rules adopted by the U.S. securities exchanges that allow retail orders to be eligible for certain potential benefits, including additional price improvement from retail liquidity programs and higher queue priority from retail attestation programs, and to allow Jane Street to access such potential benefits for E\*TRADE customer orders, E\*TRADE has entered into a Retail Order Attestation and Agreement with Jane Street whereby E\*TRADE attests that substantially all of its customer orders are agency retail orders. E\*TRADE and Jane Street do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to Jane Street.

There is a potential conflict to a market maker such as Jane Street both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, a market maker such as Jane Street can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. A market maker's (such as Jane Street's) anticipated profit must be allocated among the three subcategories listed above, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by competition for order flow amongst market makers (as measured by the amount of price improvement provided), operating under the same general payment for order flow terms applicable to Jane Street.

In addition to revenues that Jane Street may collect for executing or facilitating the execution of E\*TRADE customer orders, Jane Street also receives remuneration from U.S. securities exchanges to which it routes or directs E\*TRADE customer orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. exchange rebate payments could, in theory, incentivize Jane Street to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to Jane Street's independent order routing and best execution obligations. E\*TRADE does not share directly in any such rebates Jane Street receives for executions of E\*TRADE customer orders, although Jane Street could potentially use these rebates to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both

Two Sigma Securities, LLC:

E\*TRADE Securities LLC ("E\*TRADE") routes NMS equity orders to Two Sigma Securities, LLC ("Two Sigma") to facilitate liquidity provision and price improvement opportunities for its customers. Two Sigma generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from Two Sigma in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.002 per share for non-directed, NMS equity market and marketable limit order executions priced at \$1.00 per share or more and \$0.0031 per share for non-directed, NMS equity non-marketable limit order executions priced at \$1.00 per share or more. E\*TRADE does not receive payment from Two Sigma for NMS equity executions priced below \$1.00 per share. E\*TRADE routes NMS equity orders only to market makers that pay for customer order flow, and all such market makers pay substantially the same rates. In addition, to take advantage of rules adopted by the U.S. securities exchanges that allow retail orders to be eligible for certain potential benefits, including additional price improvement from retail liquidity programs and higher queue priority from retail attestation programs, and to allow Two Sigma to access such potential benefits for E\*TRADE customer orders, E\*TRADE has entered into a Retail Order Attestation and Agreement with Two Sigma whereby E\*TRADE attests that substantially all of its customer orders are agency retail orders. E\*TRADE and Two Sigma do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to Two Sigma.

There is a potential conflict to a market maker such as Two Sigma both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, a market maker such as Two Sigma can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. A market maker's (such as Two Sigma's) anticipated profit must be allocated among the three subcategories listed above, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by competition for order flow amongst market makers (as measured by the amount of price improvement provided), operating under the same general payment for order flow terms applicable to Two Sigma.

In addition to revenues that Two Sigma may collect for executing or facilitating the execution of E\*TRADE customer orders, Two Sigma also receives remuneration from U.S. securities exchanges to which it routes or directs E\*TRADE customer orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. exchange rebate payments could, in theory, incentivize Two Sigma to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to Two Sigma's independent order routing and best execution obligations. E\*TRADE does not share directly in any such rebates Two Sigma receives for executions of E\*TRADE customer orders, although Two Sigma could potentially use these rebates to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both.

UBS Securities, LLC:

E\*TRADE Securities LLC ("E\*TRADE") routes NMS equity orders to UBS Securities, LLC ("UBS") to facilitate liquidity provision and price improvement opportunities for its customers. UBS generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from UBS in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.002 per share for non-directed, NMS equity market and marketable limit order executions priced at \$1.00 per share or more and \$0.0031 per share for non-directed, NMS equity non-marketable limit order executions priced at \$1.00 per share or more. E\*TRADE does not receive payment from UBS for NMS equity executions priced below \$1.00 per share. E\*TRADE routes NMS equity orders only to market makers that pay for customer order flow, and all such market makers pay substantially the same rates. In addition, to take advantage of rules adopted by the U.S. securities exchanges that allow retail orders to be eligible for certain potential benefits, including additional price improvement from retail liquidity programs and higher queue priority from retail attestation programs, and to allow UBS to access such potential benefits for E\*TRADE customer orders, E\*TRADE has entered into a Retail Order Attestation and Agreement with UBS whereby E\*TRADE attests that substantially all of its customer orders are agency retail orders. E\*TRADE and UBS do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to UBS.

There is a potential conflict to a market maker such as UBS both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, a market maker such as UBS can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. A market maker's (such as UBS's) anticipated profit must be allocated among the three subcategories listed above, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by competition for order flow amongst market makers (as measured by the amount of price improvement provided), operating under the same general payment for order flow terms applicable to UBS.

In addition to revenues that UBS may collect for executing or facilitating the execution of E\*TRADE customer orders, UBS also receives remuneration from U.S. securities exchanges to which it routes or directs E\*TRADE customer orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. exchange rebate payments could, in theory, incentivize UBS to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to UBS's independent order routing and best execution obligations. E\*TRADE does not share directly in any such rebates UBS receives for executions of E\*TRADE customer orders, although UBS could potentially use these rebates to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both.

The Nasdaq Stock Market:

E\*TRADE Securities LLC ("E\*TRADE") routes marketable equity orders and non-marketable NMS equity limit orders to the Nasdaq Stock Market ("NASDAQ") to facilitate liquidity provision and price improvement opportunities for its customers, as specified in the above Public Order Routing Report statistics. E\*TRADE either pays a fee or receives a rebate for each E\*TRADE customer order execution on the exchange, depending on whether the order added to or subtracted from liquidity on the exchange.

The fees and rebates referenced above are subject to volume pricing. To the extent that E\*TRADE meets the execution volume thresholds necessary to qualify for preferred pricing under NASDAQ's Fees Schedule in a given month, increased (rather than standard) rebate rates and decreased (rather than standard) fees will apply. Because NASDAQ offers higher rebates and lower fees based on a tiered volume model, there is a potential conflict in that such rebates and fees could, in theory, incentivize E\*TRADE to route a higher percentages of E\*TRADE customer orders to NASDAQ rather than another venue in order to reach a higher tier. E\*TRADE and NASDAQ do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules beyond the tiered volume model set forth in the NASDAQ Fees Schedule as described above; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to NASDAQ.

The fees E\*TRADE pays and rebates E\*TRADE receives from NASDAQ for NMS equity executions are determined based on NASDAQ's tiered volume model. Schedules delineating orders eligible for such rebates and the applicable rates are published publicly by NASDAQ in the NASDAQ Fees Schedule, available at [http://www.nasdaqtrader.com/trader.aspx?id=bx\\_pricing](http://www.nasdaqtrader.com/trader.aspx?id=bx_pricing). Please note that NASDAQ's publicly available Fees Schedule URL link and applicable rates may change without notice. In general, during Q1 2023, NASDAQ paid E\*TRADE standard rebate rates of \$0.00325 per share for executions priced at \$1.00 per share or more and did not pay any per share amount for executions priced below \$1.00 per share. Executions that removed liquidity from NASDAQ qualified for tiered pricing and E\*TRADE was charged fees of \$0.003 per share for executions priced at \$1.00 per share or more and 0.30% of the total notional value of executions priced below \$1.00 per share. For Q1 2023, E\*TRADE received rebates (net of fees) from NASDAQ in the amount of \$92,775 in January, \$95,645 in February, and \$110,735 in March.

E\*TRADE also participates in NASDAQ's retail order priority program under which eligible retail orders receive priority ahead of other available interest at a given price level or other enhanced execution benefits. E\*TRADE reviews customers' activity on a periodic basis to determine program eligibility and reserves the right to choose whether to participate in the NASDAQ retail order priority program. E\*TRADE is an affiliated company of Morgan Stanley & Co. LLC ("MS&Co"), which is a market maker on NASDAQ and may realize profits from orders it routes to NASDAQ for execution. E\*TRADE may share indirectly in such profits generated by MS&Co as a result of the corporate affiliation between MS&Co and E\*TRADE. E\*TRADE and MS&Co order execution volumes are combined on a monthly basis for tiered pricing program incentive purposes. It is possible that MS&Co could generate additional profit as a result of the combination of such order flow and the incentives of such tiered pricing program.

Cboe EDGX Exchange, Inc.:

E\*TRADE Securities LLC ("E\*TRADE") routes marketable equity orders and non-marketable NMS equity limit orders to the Cboe EDGX Exchange, Inc. ("EDGX") to facilitate liquidity provision and price improvement opportunities for its customers, as specified in the above Public Order Routing Report statistics. E\*TRADE either pays a fee or receives a rebate for each E\*TRADE customer order execution on the exchange, depending on whether the order added to or subtracted from liquidity on the exchange.

The fees and rebates referenced above are subject to volume pricing. To the extent that E\*TRADE meets the execution volume thresholds necessary to qualify for preferred pricing under EDGX's Fees Schedule in a given month, increased (rather than standard) rebate rates and decreased (rather than standard) fees will apply. Because EDGX offers higher rebates and lower fees based on a tiered volume model, there is a potential conflict in that such rebates and fees could, in theory, incentivize E\*TRADE to route a higher percentages of E\*TRADE customer orders to EDGX rather than another venue in order to reach a higher tier. E\*TRADE and EDGX do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules beyond the tiered volume model set forth in the EDGX Fees Schedule as described above; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to EDGX.

The fees E\*TRADE pays and rebates E\*TRADE receives from EDGX for NMS equity executions are determined based on EDGX's tiered volume model. Schedules delineating orders eligible for such rebates and the applicable rates are published publicly by EDGX in the EDGX Fees Schedule, available at [http://www.cboe.com/us/equities/membership/fee\\_schedule/edgx/](http://www.cboe.com/us/equities/membership/fee_schedule/edgx/). Please note that EDGX's publicly available Fees Schedule URL link and applicable rates may change without notice. In general, during Q1 2023, EDGX paid E\*TRADE standard rebate rates of \$0.0032 per share for executions priced at \$1.00 per share or more and \$0.00003 for executions priced below \$1.00 per share. Executions that removed liquidity from EDGX qualified for tiered pricing and E\*TRADE was not charged a per share fee for executions priced at \$1.00 per share or more or charged a per share fee of the total notional value of executions priced below \$1.00 per share. For Q1 2023, E\*TRADE received rebates (net of fees) from EDGX in the amount of \$131,204 in January, \$122,006 in February, and \$163,611 in March.

E\*TRADE also participates in EDGX's retail order priority program under which eligible retail orders receive priority ahead of other available interest at a given price level or other enhanced execution benefits. E\*TRADE reviews customers' activity on a periodic basis to determine program eligibility and reserves the right to choose whether to participate in the EDGX's retail order priority program. E\*TRADE is an affiliated company of Morgan Stanley & Co. LLC ("Morgan Stanley"), which is a market maker on EDGX and may realize profits from orders it routes to EDGX for execution. E\*TRADE may share indirectly in such profits generated by MS&Co as a result of the corporate affiliation between MS&Co and E\*TRADE. E\*TRADE and MS&Co order execution volumes are combined on a monthly basis for tiered pricing program incentive purposes. It is possible that MS&Co could generate additional profit as a result of the combination of such order flow and the incentives of such tiered pricing program.

Members Exchange (MEMX):

E\*TRADE Securities LLC ("E\*TRADE") routes marketable equity orders and non-marketable NMS equity limit orders to MEMX LLC ("MEMX") as specified in the above Public Order Routing Report disclosures. E\*TRADE either pays a fee or receives a rebate for each E\*TRADE customer order execution on the exchange, depending on whether the order added to or subtracted from liquidity on the exchange.

The fees and rebates referenced above are subject to volume pricing. To the extent that E\*TRADE meets the execution volume thresholds necessary to qualify for preferred pricing under MEMX's Fees Schedule in a given month, increased (rather than standard) rebate rates and decreased (rather than standard) fees will apply. Because MEMX offers higher rebates and lower fees based on a tiered volume model, there is a potential conflict in that such rebates and fees could, in theory, incentivize E\*TRADE to route a higher percentages of E\*TRADE customer orders to MEMX rather than another venue in order to reach a higher tier. E\*TRADE and MEMX do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules beyond the tiered volume model set forth in the MEMX Fees Schedule as described above; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to MEMX.

The fees E\*TRADE pays and rebates E\*TRADE receives from MEMX for NMS equity executions are determined based on MEMX's tiered volume model. Schedules delineating orders eligible for such rebates and the applicable rates are published publicly by MEMX in the MEMX Fees Schedule, available at <http://info.memxtrading.com/fee-schedule/>. Please note that MEMX's publicly available Fees Schedule URL link and applicable rates may change without notice. In general, during Q1 2023, MEMX paid E\*TRADE standard rebate rates of \$0.0035 per share for executions priced at \$1.00 per share or more and 0.075% of the total trade notional value for executions priced below \$1.00 per share. On executions that removed liquidity from MEMX qualified for tiered pricing, E\*TRADE was not charged a per share fee for executions priced at \$1.00 per share or more nor charged a per share fee for the total notional value of executions priced below \$1.00 per share. For Q1 2023, E\*TRADE received rebates (net of fees) from MEMX in the amount of \$26,215 in January, \$4,156 in February, and \$9,328 in March.

E\*TRADE is an affiliated company of Strategic Investments I, Inc., both of which are wholly owned subsidiaries of Morgan Stanley and investor-shareholders of MEMX. Accordingly, E\*TRADE, both directly and indirectly through its parent company Morgan Stanley and/or its affiliates may share in profits realized by MEMX, which could, in theory, incentivize E\*TRADE to route a higher percentages of E\*TRADE customer orders to MEMX over other execution venues. Additionally, E\*TRADE is an affiliated company of Morgan Stanley & Co., LLC ("MS&Co"), which is market maker on MEMX and may realize profits from orders it routes to MEMX for execution. E\*TRADE may share directly or indirectly in any such profits generated by MS&Co. E\*TRADE orders routed to MEMX through MS&Co will be combined with any other order flow that MS&Co routes to MEMX for the purpose of determining the applicable pricing under MEMX's tiered pricing model described above. It is possible that MS&Co could generate additional profit as a result of the combination of such order flow and the incentives of such tiered pricing program.

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## February 2023

### Non-S&P 500 Stocks

#### Summary

Non-Directed Orders as % of All Orders	Market Orders as % of Non-Directed Orders	Marketable Limit Orders as % of Non-Directed Orders	Non-Marketable Limit Orders as % of Non-Directed Orders	Other Orders as % of Non-Directed Orders
99.19	44.41	10.79	34.26	10.54

#### Venues

Venue - Non-directed Order Flow	Non-Directed Orders (%)	Market Orders (%)	Marketable Limit Orders (%)	Non-Marketable Limit Orders (%)	Other Orders (%)	Net Payment Paid/Received for Market Orders(USD)	Net Payment Paid/Received for Market Orders(cents per hundred shares)	Net Payment Paid/Received for Marketable Limit Orders(USD)	Net Payment Paid/Received for Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Non-Marketable Limit Orders(USD)	Net Payment Paid/Received for Non-Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Other Orders(USD)	Net Payment Paid/Received for Other Orders(cents per hundred shares)
CITADEL SECURITIES LLC	28.74	36.18	35.46	15.70	32.90	1,206,756.73	17.2835	499,040.17	8.8638	301,694.33	18.8721	213,732.87	16.4787
Virtu Americas, LLC	26.11	28.66	27.50	21.73	28.17	1,010,083.07	17.1831	370,822.50	7.6692	262,119.87	16.0079	130,875.71	3.1442
G1 Execution Services, LLC	22.29	14.24	15.74	35.37	20.38	478,532.44	16.8090	195,742.18	8.7307	572,506.16	20.3790	136,329.28	19.9118
Jane Street Capital	10.70	15.95	16.01	2.85	8.66	573,111.42	17.2419	230,411.03	9.0386	50,171.39	19.7096	58,868.80	16.7178
Two Sigma Securities, LLC	5.75	2.27	2.66	11.73	4.09	64,913.42	16.1812	27,762.85	7.4538	257,896.15	15.9530	29,992.57	21.4335
UBS Securities, LLC	2.61	2.69	2.55	2.21	3.59	68,433.54	17.5563	48,501.94	11.9001	53,681.48	16.8588	28,280.09	17.0344
Cboe EDGX Exchange, Inc.	1.89	0.00	0.04	5.12	1.26	0.00	0.0000	595.27	13.7508	94,497.27	20.3662	0.00	0.0000
The Nasdaq Stock Market	1.87	0.00	0.04	5.17	0.93	0.00	0.0000	-8,390.22	-20.4584	81,153.23	21.3876	-67.25	-1.9637
Members Exchange (MEMX)	0.05	0.00	0.00	0.12	0.03	0.00	0.0000	-11.72	-8.1981	3,220.14	25.0096	242.77	34.8497

#### Material Aspects:

CITADEL SECURITIES LLC:

E\*TRADE Securities LLC ("E\*TRADE") routes NMS equity orders to Citadel Securities LLC ("Citadel") to facilitate liquidity provision and price improvement opportunities for its customers. Citadel generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from Citadel in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.002 per share for non-directed, NMS equity market and marketable limit order executions priced at \$1.00 per share or more and \$0.0031 per share for non-directed, NMS equity non-marketable limit order executions priced at \$1.00 per share or more. E\*TRADE does not receive payment from Citadel for NMS equity executions priced below \$1.00 per share. E\*TRADE routes NMS equity orders only to market makers that pay for customer order flow, and all such market makers pay substantially the same rates. In addition, to take advantage of rules adopted by the U.S. securities exchanges that allow retail orders to be eligible for certain potential benefits, including additional price improvement from retail liquidity programs and higher queue priority from retail attestation programs, and to allow Citadel to access such potential benefits for E\*TRADE customer orders, E\*TRADE has entered into a Retail Order Attestation and Agreement with Citadel whereby E\*TRADE attests that substantially all of its customer orders are agency retail orders. E\*TRADE and Citadel do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to Citadel.

There is a potential conflict to a market maker such as Citadel both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, a market maker such as Citadel can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. A market maker's (such as Citadel's) anticipated profit must be allocated among the three subcategories listed above, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by competition for order flow amongst market makers (as measured by the amount of price improvement provided), operating under the same general payment for order flow terms applicable to Citadel.

In addition to revenues that Citadel may collect for executing or facilitating the execution of E\*TRADE customer orders, Citadel also receives remuneration from U.S. securities exchanges to which it routes or directs E\*TRADE customer orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. exchange rebate payments could, in theory, incentivize Citadel to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to Citadel's independent order routing and best execution obligations. E\*TRADE does not share directly in any such rebates Citadel receives for executions of E\*TRADE customer orders, although Citadel could potentially use these rebates to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both.

Virtu Americas, LLC:

E\*TRADE Securities LLC ("E\*TRADE") routes NMS equity orders to Virtu Americas, LLC ("Virtu") to facilitate liquidity provision and price improvement opportunities for its customers. Virtu generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from Virtu in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.002 per share for non-directed, NMS equity market and marketable limit order executions priced at \$1.00 per share or more and \$0.0031 per share for non-directed, NMS equity non-marketable limit order executions priced at \$1.00 per share or more. E\*TRADE does not receive payment from Virtu for NMS equity executions priced below \$1.00 per share. E\*TRADE routes NMS equity orders only to market makers that pay for customer order flow, and all such market makers pay substantially the same rates. In addition, to take advantage of rules adopted by the U.S. securities exchanges that allow retail orders to be eligible for certain potential benefits, including additional price improvement from retail liquidity programs and higher queue priority from retail attestation programs, and to allow Virtu to access such potential benefits for E\*TRADE customer orders, E\*TRADE has entered into a Retail Order Attestation and Agreement with Virtu whereby E\*TRADE attests that substantially all of its customer orders are agency retail orders. E\*TRADE and Virtu do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to Virtu.

There is a potential conflict to a market maker such as Virtu both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, a market maker such as Virtu can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. A market maker's (such as Virtu's) anticipated profit must be allocated among the three subcategories listed above, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by competition for order flow amongst market makers (as measured by the amount of price improvement provided), operating under the same general payment for order flow terms applicable to Virtu.

In addition to revenues that Virtu may collect for executing or facilitating the execution of E\*TRADE customer orders, Virtu also receives remuneration from U.S. securities exchanges to which it routes or directs E\*TRADE customer orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. exchange rebate payments could, in theory, incentivize Virtu to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to Virtu's independent order routing and best execution obligations. E\*TRADE does not share directly in any such rebates Virtu receives for executions of E\*TRADE customer orders, although Virtu could potentially use these rebates to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both.

G1 Execution Services, LLC:

E\*TRADE Securities LLC ("E\*TRADE") routes NMS equity orders to G1 Execution Services, LLC ("G1X") to facilitate liquidity provision and price improvement opportunities for its customers. G1X generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from G1X in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.002 per share for non-directed, NMS equity market and marketable limit order executions priced at \$1.00 per share or more and \$0.0031 per share for non-directed, NMS equity non-marketable limit order executions priced at \$1.00 per share or more. E\*TRADE does not receive payment from G1X for NMS equity executions priced below \$1.00 per share. E\*TRADE routes NMS equity orders only to market makers that pay for customer order flow, and all such market makers pay substantially the same rates. In addition, to take advantage of rules adopted by the U.S. securities exchanges that allow retail orders to be eligible for certain potential benefits, including additional price improvement from retail liquidity programs and higher queue priority from retail attestation programs, and to allow G1X to access such potential benefits for E\*TRADE customer orders, E\*TRADE has entered into a Retail Order Attestation and Agreement with G1X whereby E\*TRADE attests that substantially all of its customer orders are agency retail orders. E\*TRADE and G1X do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to G1X.

There is a potential conflict to a market maker such as G1X both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, a market maker such as G1X can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. A market maker's (such as G1X's) anticipated profit must be allocated among the three subcategories listed above, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by competition for order flow amongst market makers (as measured by the amount of price improvement provided), operating under the same general payment for order flow terms applicable to G1X.

In addition to revenues that G1X may collect for executing or facilitating the execution of E\*TRADE customer orders, G1X also receives remuneration from U.S. securities exchanges to which it routes or directs E\*TRADE customer orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. exchange rebate payments could, in theory, incentivize G1X to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to G1X's independent order routing and best execution obligations. E\*TRADE does not share directly in any such rebates G1X receives for executions of E\*TRADE customer orders, although G1X could potentially use these rebates to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both.

Jane Street Capital:

E\*TRADE Securities LLC ("E\*TRADE") routes NMS equity orders to Jane Street Capital ("Jane Street") to facilitate liquidity provision and price improvement opportunities for its customers. Jane Street generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from Jane Street in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.002 per share for non-directed, NMS equity market and marketable limit order executions priced at \$1.00 per share or more and \$0.0031 per share for non-directed, NMS equity non-marketable limit order executions priced at \$1.00 per share or more. E\*TRADE does not receive payment from Jane Street for NMS equity executions priced below \$1.00 per share. E\*TRADE routes NMS equity orders only to market makers that pay for customer order flow, and all such market makers pay substantially the same rates. In addition, to take advantage of rules adopted by the U.S. securities exchanges that allow retail orders to be eligible for certain potential benefits, including additional price improvement from retail liquidity programs and higher queue priority from retail attestation programs, and to allow Jane Street to access such potential benefits for E\*TRADE customer orders, E\*TRADE has entered into a Retail Order Attestation and Agreement with Jane Street whereby E\*TRADE attests that substantially all of its customer orders are agency retail orders. E\*TRADE and Jane Street do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to Jane Street.

There is a potential conflict to a market maker such as Jane Street both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, a market maker such as Jane Street can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. A market maker's (such as Jane Street's) anticipated profit must be allocated among the three subcategories listed above, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by competition for order flow amongst market makers (as measured by the amount of price improvement provided), operating under the same general payment for order flow terms applicable to Jane Street.

In addition to revenues that Jane Street may collect for executing or facilitating the execution of E\*TRADE customer orders, Jane Street also receives remuneration from U.S. securities exchanges to which it routes or directs E\*TRADE customer orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. exchange rebate payments could, in theory, incentivize Jane Street to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to Jane Street's independent order routing and best execution obligations. E\*TRADE does not share directly in any such rebates Jane Street receives for executions of E\*TRADE customer orders, although Jane Street could potentially use these rebates to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both.

Two Sigma Securities, LLC:

E\*TRADE Securities LLC ("E\*TRADE") routes NMS equity orders to Two Sigma Securities, LLC ("Two Sigma") to facilitate liquidity provision and price improvement opportunities for its customers. Two Sigma generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from Two Sigma in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.002 per share for non-directed, NMS equity market and marketable limit order executions priced at \$1.00 per share or more and \$0.0031 per share for non-directed, NMS equity non-marketable limit order executions priced at \$1.00 per share or more. E\*TRADE does not receive payment from Two Sigma for NMS equity executions priced below \$1.00 per share. E\*TRADE routes NMS equity orders only to market makers that pay for customer order flow, and all such market makers pay substantially the same rates. In addition, to take advantage of rules adopted by the U.S. securities exchanges that allow retail orders to be eligible for certain potential benefits, including additional price improvement from retail liquidity programs and higher queue priority from retail attestation programs, and to allow Two Sigma to access such potential benefits for E\*TRADE customer orders, E\*TRADE has entered into a Retail Order Attestation and Agreement with Two Sigma whereby E\*TRADE attests that substantially all of its customer orders are agency retail orders. E\*TRADE and Two Sigma do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to Two Sigma.

There is a potential conflict to a market maker such as Two Sigma both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, a market maker such as Two Sigma can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. A market maker's (such as Two Sigma's) anticipated profit must be allocated among the three subcategories listed above, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by competition for order flow amongst market makers (as measured by the amount of price improvement provided), operating under the same general payment for order flow terms applicable to Two Sigma.

In addition to revenues that Two Sigma may collect for executing or facilitating the execution of E\*TRADE customer orders, Two Sigma also receives remuneration from U.S. securities exchanges to which it routes or directs E\*TRADE customer orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. exchange rebate payments could, in theory, incentivize Two Sigma to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to Two Sigma's independent order routing and best execution obligations. E\*TRADE does not share directly in any such rebates Two Sigma receives for executions of E\*TRADE customer orders, although Two Sigma could potentially use these rebates to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both.

UBS Securities, LLC:

E\*TRADE Securities LLC ("E\*TRADE") routes NMS equity orders to UBS Securities, LLC ("UBS") to facilitate liquidity provision and price improvement opportunities for its customers. UBS generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from UBS in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.002 per share for non-directed, NMS equity market and marketable limit order executions priced at \$1.00 per share or more and \$0.0031 per share for non-directed, NMS equity non-marketable limit order executions priced at \$1.00 per share or more. E\*TRADE does not receive payment from UBS for NMS equity executions priced below \$1.00 per share. E\*TRADE routes NMS equity orders only to market makers that pay for customer order flow, and all such market makers pay substantially the same rates. In addition, to take advantage of rules adopted by the U.S. securities exchanges that allow retail orders to be eligible for certain potential benefits, including additional price improvement from retail liquidity programs and higher queue priority from retail attestation programs, and to allow UBS to access such potential benefits for E\*TRADE customer orders, E\*TRADE has entered into a Retail Order Attestation and Agreement with UBS whereby E\*TRADE attests that substantially all of its customer orders are agency retail orders. E\*TRADE and UBS do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to UBS.

There is a potential conflict to a market maker such as UBS both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, a market maker such as UBS can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. A market maker's (such as UBS's) anticipated profit must be allocated among the three subcategories listed above, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by competition for order flow amongst market makers (as measured by the amount of price improvement provided), operating under the same general payment for order flow terms applicable to UBS.

In addition to revenues that UBS may collect for executing or facilitating the execution of E\*TRADE customer orders, UBS also receives remuneration from U.S. securities exchanges to which it routes or directs E\*TRADE customer orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. exchange rebate payments could, in theory, incentivize UBS to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to UBS's independent order routing and best execution obligations. E\*TRADE does not share directly in any such rebates UBS receives for executions of E\*TRADE customer orders, although UBS could potentially use these rebates to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both.

Cboe EDGX Exchange, Inc.:

E\*TRADE Securities LLC ("E\*TRADE") routes marketable equity orders and non-marketable NMS equity limit orders to the Cboe EDGX Exchange, Inc. ("EDGX") to facilitate liquidity provision and price improvement opportunities for its customers, as specified in the above Public Order Routing Report statistics. E\*TRADE either pays a fee or receives a rebate for each E\*TRADE customer order execution on the exchange, depending on whether the order added to or subtracted from liquidity on the exchange.

The fees and rebates referenced above are subject to volume pricing. To the extent that E\*TRADE meets the execution volume thresholds necessary to qualify for preferred pricing under EDGX's Fees Schedule in a given month, increased (rather than standard) rebate rates and decreased (rather than standard) fees will apply. Because EDGX offers higher rebates and lower fees based on a tiered volume model, there is a potential conflict in that such rebates and fees could, in theory, incentivize E\*TRADE to route a higher percentages of E\*TRADE customer orders to EDGX rather than another venue in order to reach a higher tier. E\*TRADE and EDGX do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules beyond the tiered volume model set forth in the EDGX Fees Schedule as described above; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to EDGX.

The fees E\*TRADE pays and rebates E\*TRADE receives from EDGX for NMS equity executions are determined based on EDGX's tiered volume model. Schedules delineating orders eligible for such rebates and the applicable rates are published publicly by EDGX in the EDGX Fees Schedule, available at [http://www.cboe.com/us/equities/membership/fee\\_schedule/edgx/](http://www.cboe.com/us/equities/membership/fee_schedule/edgx/). Please note that EDGX's publicly available Fees Schedule URL link and applicable rates may change without notice. In general, during Q1 2023, EDGX paid E\*TRADE standard rebate rates of \$0.0032 per share for executions priced at \$1.00 per share or more and \$0.00003 for executions priced below \$1.00 per share. Executions that removed liquidity from EDGX qualified for tiered pricing and E\*TRADE was not charged a per share fee for executions priced at \$1.00 per share or more or charged a per share fee of the total notional value of executions priced below \$1.00 per share. For Q1 2023, E\*TRADE received rebates (net of fees) from EDGX in the amount of \$131,204 in January, \$122,006 in February, and \$163,611 in March.

E\*TRADE also participates in EDGX's retail order priority program under which eligible retail orders receive priority ahead of other available interest at a given price level or other enhanced execution benefits. E\*TRADE reviews customers' activity on a periodic basis to determine program eligibility and reserves the right to choose whether to participate in the EDGX's retail order priority program. E\*TRADE is an affiliated company of Morgan Stanley & Co. LLC ("Morgan Stanley"), which is a market maker on EDGX and may realize profits from orders it routes to EDGX for execution. E\*TRADE may share indirectly in such profits generated by MS&Co as a result of the corporate affiliation between MS&Co and E\*TRADE. E\*TRADE and MS&Co order execution volumes are combined on a monthly basis for tiered pricing program incentive purposes. It is possible that MS&Co could generate additional profit as a result of the combination of such order flow and the incentives of such tiered pricing program.

The Nasdaq Stock Market:

E\*TRADE Securities LLC ("E\*TRADE") routes marketable equity orders and non-marketable NMS equity limit orders to the Nasdaq Stock Market ("NASDAQ") to facilitate liquidity provision and price improvement opportunities for its customers, as specified in the above Public Order Routing Report statistics. E\*TRADE either pays a fee or receives a rebate for each E\*TRADE customer order execution on the exchange, depending on whether the order added to or subtracted from liquidity on the exchange.

The fees and rebates referenced above are subject to volume pricing. To the extent that E\*TRADE meets the execution volume thresholds necessary to qualify for preferred pricing under NASDAQ's Fees Schedule in a given month, increased (rather than standard) rebate rates and decreased (rather than standard) fees will apply. Because NASDAQ offers higher rebates and lower fees based on a tiered volume model, there is a potential conflict in that such rebates and fees could, in theory, incentivize E\*TRADE to route a higher percentages of E\*TRADE customer orders to NASDAQ rather than another venue in order to reach a higher tier. E\*TRADE and NASDAQ do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules beyond the tiered volume model set forth in the NASDAQ Fees Schedule as described above; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to NASDAQ.

The fees E\*TRADE pays and rebates E\*TRADE receives from NASDAQ for NMS equity executions are determined based on NASDAQ's tiered volume model. Schedules delineating orders eligible for such rebates and the applicable rates are published publicly by NASDAQ in the NASDAQ Fees Schedule, available at [http://www.nasdaqtrader.com/trader.aspx?id=bx\\_pricing](http://www.nasdaqtrader.com/trader.aspx?id=bx_pricing). Please note that NASDAQ's publicly available Fees Schedule URL link and applicable rates may change without notice. In general, during Q1 2023, NASDAQ paid E\*TRADE standard rebate rates of \$0.00325 per share for executions priced at \$1.00 per share or more and did not pay any per share amount for executions priced below \$1.00 per share. Executions that removed liquidity from NASDAQ qualified for tiered pricing and E\*TRADE was charged fees of \$0.003 per share for executions priced at \$1.00 per share or more and 0.30% of the total notional value of executions priced below \$1.00 per share. For Q1 2023, E\*TRADE received rebates (net of fees) from NASDAQ in the amount of \$92,775 in January, \$95,645 in February, and \$110,735 in March.

E\*TRADE also participates in NASDAQ's retail order priority program under which eligible retail orders receive priority ahead of other available interest at a given price level or other enhanced execution benefits. E\*TRADE reviews customers' activity on a periodic basis to determine program eligibility and reserves the right to choose whether to participate in the NASDAQ retail order priority program. E\*TRADE is an affiliated company of Morgan Stanley & Co. LLC ("MS&Co"), which is a market maker on NASDAQ and may realize profits from orders it routes to NASDAQ for execution. E\*TRADE may share indirectly in such profits generated by MS&Co as a result of the corporate affiliation between MS&Co and E\*TRADE. E\*TRADE and MS&Co order execution volumes are combined on a monthly basis for tiered pricing program incentive purposes. It is possible that MS&Co could generate additional profit as a result of the combination of such order flow and the incentives of such tiered pricing program.

Members Exchange (MEMX):

E\*TRADE Securities LLC ("E\*TRADE") routes marketable equity orders and non-marketable NMS equity limit orders to MEMX LLC ("MEMX") as specified in the above Public Order Routing Report disclosures. E\*TRADE either pays a fee or receives a rebate for each E\*TRADE customer order execution on the exchange, depending on whether the order added to or subtracted from liquidity on the exchange.

The fees and rebates referenced above are subject to volume pricing. To the extent that E\*TRADE meets the execution volume thresholds necessary to qualify for preferred pricing under MEMX's Fees Schedule in a given month, increased (rather than standard) rebate rates and decreased (rather than standard) fees will apply. Because MEMX offers higher rebates and lower fees based on a tiered volume model, there is a potential conflict in that such rebates and fees could, in theory, incentivize E\*TRADE to route a higher percentages of E\*TRADE customer orders to MEMX rather than another venue in order to reach a higher tier. E\*TRADE and MEMX do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules beyond the tiered volume model set forth in the MEMX Fees Schedule as described above; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to MEMX.

The fees E\*TRADE pays and rebates E\*TRADE receives from MEMX for NMS equity executions are determined based on MEMX's tiered volume model. Schedules delineating orders eligible for such rebates and the applicable rates are published publicly by MEMX in the MEMX Fees Schedule, available at <http://info.memxtrading.com/fee-schedule/>. Please note that MEMX's publicly available Fees Schedule URL link and applicable rates may change without notice. In general, during Q1 2023, MEMX paid E\*TRADE standard rebate rates of \$0.0035 per share for executions priced at \$1.00 per share or more and 0.075% of the total trade notional value for executions priced below \$1.00 per share. On executions that removed liquidity from MEMX qualified for tiered pricing, E\*TRADE was not charged a per share fee for executions priced at \$1.00 per share or more nor charged a per share fee for the total notional value of executions priced below \$1.00 per share. For Q1 2023, E\*TRADE received rebates (net of fees) from MEMX in the amount of \$26,215 in January, \$4,156 in February, and \$9,328 in March.

E\*TRADE is an affiliated company of Strategic Investments I, Inc., both of which are wholly owned subsidiaries of Morgan Stanley and investor-shareholders of MEMX. Accordingly, E\*TRADE, both directly and indirectly through its parent company Morgan Stanley and/or its affiliates may share in profits realized by MEMX, which could, in theory, incentivize E\*TRADE to route a higher percentages of E\*TRADE customer orders to MEMX over other execution venues. Additionally, E\*TRADE is an affiliated company of Morgan Stanley & Co., LLC ("MS&Co"), which is market maker on MEMX and may realize profits from orders it routes to MEMX for execution. E\*TRADE may share directly or indirectly in any such profits generated by MS&Co. E\*TRADE orders routed to MEMX through MS&Co will be combined with any other order flow that MS&Co routes to MEMX for the purpose of determining the applicable pricing under MEMX's tiered pricing model described above. It is possible that MS&Co could generate additional profit as a result of the combination of such order flow and the incentives of such tiered pricing program.

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## February 2023

### Options

#### Summary

Non-Directed Orders as % of All Orders	Market Orders as % of Non-Directed Orders	Marketable Limit Orders as % of Non-Directed Orders	Non-Marketable Limit Orders as % of Non-Directed Orders	Other Orders as % of Non-Directed Orders
99.96	18.00	8.69	35.57	37.74

#### Venues

Venue - Non-directed Order Flow	Non-Directed Orders (%)	Market Orders (%)	Marketable Limit Orders (%)	Non-Marketable Limit Orders (%)	Other Orders (%)	Net Payment Paid/Received for Market Orders(USD)	Net Payment Paid/Received for Market Orders(cents per hundred shares)	Net Payment Paid/Received for Marketable Limit Orders(USD)	Net Payment Paid/Received for Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Non-Marketable Limit Orders(USD)	Net Payment Paid/Received for Non-Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Other Orders(USD)	Net Payment Paid/Received for Other Orders(cents per hundred shares)
CITADEL SECURITIES LLC	35.07	42.33	41.88	41.60	23.88	2,879,879.69	46.9405	2,820,520.65	47.0831	1,882,723.16	45.2563	805,927.86	36.6201
Global Execution Brokers LP	23.76	30.41	29.98	29.85	13.41	2,091,105.01	47.1650	1,700,060.40	47.1053	1,562,174.70	46.2545	456,544.48	32.1515
Dash/IMC Financial Markets	21.13	12.18	12.38	12.56	35.48	764,182.36	41.4721	528,165.12	39.7793	462,124.36	34.8808	1,470,400.14	31.6138
Wolverine Execution Services, LLC	20.03	15.08	15.74	15.94	27.23	960,456.00	48.6871	791,077.43	48.1207	831,081.96	48.5870	1,618,889.19	49.1589
Morgan Stanley & Co., LLC	0.02	0.00	0.01	0.04	0.00	0.00	0.0000	0.00	0.0000	0.00	0.0000	0.00	0.0000

#### Material Aspects:

CITADEL SECURITIES LLC:

E\*TRADE Securities LLC ("E\*TRADE") routes U.S.-listed options orders to Citadel Securities LLC ("Citadel") to facilitate liquidity provision and price improvement opportunities for its customers. Citadel generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from Citadel in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.48 per contract for simple and complex equity options orders. E\*TRADE does not receive remuneration from Citadel for index options executions or for Professional Customer orders, which are orders of customers who submit an average of 390 options orders per trading day, per calendar month, on a quarterly basis. E\*TRADE routes U.S.-listed options orders only (except as indicated in the next sentence) to market makers that pay for customer order flow (and all such market makers pay substantially the same rates). As an exception to the foregoing sentence, E\*TRADE routes a limited number of orders to its affiliate, Morgan Stanley & Co. LLC ("MS&Co"), from which E\*TRADE does not accept payment. E\*TRADE and Citadel do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to Citadel.

In general, public, retail, or non-professional index options order execution fees range from \$0.00 to \$1.32 per contract, depending on the index option class and premium price, with Citadel passing exchange fees for index option executions back to E\*TRADE each month. For Q1 2023, E\*TRADE paid total fees on customer index options executions of \$329,202 in January, \$303,226 in February, and \$368,424 in March.

There is a potential conflict to an options market maker such as Citadel both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the options market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, an options market maker such as Citadel can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. An options market maker's (such as Citadel's) anticipated profit must be allocated among these three sub-categories, such that an increased allocation to any one sub-category will result in a decreased allocation to one or more of the other categories, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by market maker competition for order flow (as measured by the amount of price improvement provided), under the same general payment for order flow terms applicable to Citadel.

In addition to revenues that Citadel may collect for executing or facilitating the execution of E\*TRADE customer orders, Citadel may also receive remuneration from the U.S. options exchanges to which it routes or directs E\*TRADE customer options orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. options exchange rebate payments could, in theory, incentivize Citadel to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to Citadel's independent order routing and best execution obligation. Exchange rebates provided to Citadel for E\*TRADE customer order executions by the U.S. options exchanges are not passed through to E\*TRADE or its customers although Citadel's receipt of such rebates could potentially be used to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both. Citadel does not pass through the fees that it is charged by the U.S. options exchanges for E\*TRADE customer options order executions, other than the index options fees described above.

Global Execution Brokers LP:

E\*TRADE Securities LLC ("E\*TRADE") routes U.S.-listed options orders to Global Execution Brokers LP ("G1X") to facilitate liquidity provision and price improvement opportunities for its customers. G1X generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from G1X in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.48 per contract for simple and complex equity options orders. E\*TRADE does not receive remuneration from G1X for index options executions or for Professional Customer orders, which are orders of customers who submit an average of 390 options orders per trading day, per calendar month, on a quarterly basis. E\*TRADE only routes U.S.-listed options orders to market makers that pay for customer order flow, and all such market makers are subject to substantially the same rate of payment, apart from a limited number of orders, which E\*TRADE routes to its affiliate Morgan Stanley & Co., LLC ("MS&Co"), from which E\*TRADE does not accept payment. E\*TRADE and G1X do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to G1X.

In general, public, retail, or non-professional index options order execution fees range from \$0.00 to \$1.32 per contract, depending on the index option class and premium price, with G1X passing exchange fees for index option executions back to E\*TRADE each month. For Q1 2023, E\*TRADE paid total fees on customer index options executions of \$174,831 in January, \$179,757 in February, and \$240,281 in March.

There is a potential conflict to an options market maker such as G1X both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the options market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, an options market maker such as G1X can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. An options market maker's (such as G1X's) anticipated profit must be allocated among these three sub-categories, such that an increased allocation to any one sub-category will result in a decreased allocation to one or more of the other categories, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by market maker competition for order flow (as measured by the amount of price improvement provided), under the same general payment for order flow terms applicable to G1X.

In addition to revenues that G1X may collect for executing or facilitating the execution of E\*TRADE customer orders, G1X may also receive remuneration from the U.S. options exchanges to which it routes or directs E\*TRADE customer options orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. options exchange rebate payments could, in theory, incentivize G1X to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to G1X's independent order routing and best execution obligation. Exchange rebates provided to G1X for E\*TRADE customer order executions by the U.S. options exchanges are not passed through to E\*TRADE or its customers although G1X's receipt of such rebates could potentially be used to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both. G1X does not pass through the fees that it is charged by the U.S. options exchanges for E\*TRADE customer options order executions, other than the index options fees described above.

Dash/IMC Financial Markets:

E\*TRADE Securities LLC ("E\*TRADE") routes U.S.-listed options orders to Dash Financial Technologies, LLC ("Dash") to facilitate liquidity provision and price improvement opportunities for its customers. Dash generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from Dash (based upon the remuneration Dash receives from the liquidity providers with which it has arrangements as described below) (i.e. payment for order flow) in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.48 per contract for simple and complex equity options orders. E\*TRADE does not receive remuneration from Dash for index options executions or for Professional Customer orders, which are orders of customers who submit an average of 390 options orders per trading day, per calendar month, on a quarterly basis. E\*TRADE only routes U.S.-listed options orders to market makers that pay for customer order flow, and all such market makers are subject to substantially the same rate of payment, apart from a limited number of orders, which E\*TRADE routes to its affiliate Morgan Stanley & Co., LLC ("MS&Co"), from which E\*TRADE does not accept payment. E\*TRADE and Dash do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to Dash.

In general, public, retail, or non-professional index options order execution fees range from \$0.00 to \$1.32 per contract depending on the index option class and premium price, with Dash passing exchange fees for index option executions to E\*TRADE each month. For Q1 2023, E\*TRADE paid total fees on customer index option executions of \$615,579 in January, \$591,332 in February, and \$723,016 in March.

In connection with Dash's handling of E\*TRADE retail equity option orders, Dash has arrangements with multiple, unaffiliated liquidity providers, including IMC Financial Markets, designed to facilitate liquidity provision and price improvement opportunities. Pursuant to these arrangements, Dash routes E\*TRADE retail equity options orders to exchanges and may preference the liquidity providers on such applicable exchange, consistent with exchange-sponsored programs which are described in the fee schedules of each such options exchange. The liquidity providers provide Dash with remuneration in connection with Dash's routing of E\*TRADE retail equity options orders, including through reciprocal order flow arrangements between Dash and such liquidity provider and/or payment per contract to Dash in return for E\*TRADE retail equity options orders that Dash routes or directs. Dash provides payment to E\*TRADE as described above based upon the compensation Dash receives from such liquidity providers.

There is a potential conflict to Dash and/or the liquidity provider to which Dash routes orders both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the liquidity provider seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, the liquidity provider can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay Dash (and for Dash, in turn, to pay E\*TRADE) for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. The liquidity provider's anticipated profit must be allocated among these three sub-categories, such that an increased allocation to any one sub-category will result in a decreased allocation to one or more of the other categories. Dash and the liquidity provider can also adjust the amount of profit that the liquidity provider shares with Dash. The allocation of resources between the three subcategories listed above, including the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders is mitigated by market maker competition for order flow (as measured by the amount of price improvement provided), under the same general payment for order flow terms applicable to Dash.

In addition to revenues that Dash may collect for executing or facilitating the execution of E\*TRADE customer orders, Dash may also receive remuneration from the U.S. options exchanges to which it routes or directs E\*TRADE customer options orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. options exchange rebate payments could, in theory, incentivize Dash to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to Dash's independent order routing and best execution obligations. Exchange rebates provided to Dash for E\*TRADE customer executions by the U.S. options exchanges are not passed through to E\*TRADE or its customers. Dash and/or its liquidity provider does not pass through the fees charged by the U.S. options exchanges for E\*TRADE customer executions, other than the index options fees described above. E\*TRADE does not share directly in any profits from U.S. options exchange rebates for executions of E\*TRADE customer orders, although Dash's and/or its liquidity provider's receipt of such rebates could potentially be used to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both.

Wolverine Execution Services, LLC:

E\*TRADE Securities LLC ("E\*TRADE") routes U.S.-listed options orders to Wolverine Execution Services, LLC ("Wolverine") to facilitate liquidity provision and price improvement opportunities for its customers. Wolverine generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from Wolverine in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.48 per contract for simple and complex equity options orders. E\*TRADE does not receive remuneration from Wolverine for index options executions or for Professional Customer orders, which are orders of customers who submit an average of 390 options orders per trading day, per calendar month, on a quarterly basis. E\*TRADE only routes U.S.-listed options orders to market makers that pay for customer order flow, and all such market makers are subject to substantially the same rate of payment, apart from a limited number of orders, which E\*TRADE routes to its affiliate Morgan Stanley & Co., LLC ("MS&Co"), from which E\*TRADE does not accept payment. E\*TRADE and Wolverine do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to Wolverine.

In general, public, retail, or non-professional index options order execution fees range from \$0.00 to \$1.32 per contract, depending on the index option class and premium price, with Wolverine passing exchange fees for index option executions back to E\*TRADE each month. For Q1 2023, E\*TRADE paid total fees on customer index options executions of \$961,983 in January, \$898,732 in February, and \$1,118,158 in March.

There is a potential conflict to an options market maker such as Wolverine both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the options market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, an options market maker such as Wolverine can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. An options market maker's (such as Wolverine's) anticipated profit must be allocated among these three sub-categories, such that an increased allocation to any one sub-category will result in a decreased allocation to one or more of the other categories, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by market maker competition for order flow (as measured by the amount of price improvement provided), under the same general payment for order flow terms applicable to Wolverine.

In addition to revenues that Wolverine may collect for executing or facilitating the execution of E\*TRADE customer orders, Wolverine may also receive remuneration from the U.S. options exchanges to which it routes or directs E\*TRADE customer options orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. options exchange rebate payments could, in theory, incentivize Wolverine to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to Wolverine's independent order routing and best execution obligation. Exchange rebates provided to Wolverine for E\*TRADE customer order executions by the U.S. options exchanges are not passed through to E\*TRADE or its customers although Wolverine's receipt of such rebates could potentially be used to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both. Wolverine does not pass through the fees that it is charged by the U.S. options exchanges for E\*TRADE customer options order executions, other than the index options fees described above.

Morgan Stanley & Co., LLC:

E\*TRADE Securities LLC ("E\*TRADE") is an affiliate of Morgan Stanley & Co., LLC. (MS&Co). E\*TRADE sends orders in U.S.-listed options to MS&Co to facilitate liquidity provision and price improvement opportunities for its customers. E\*TRADE orders in U.S.-listed options that are sent to MS&Co are then routed by MS&Co to a U.S. options exchange to be either crossed or executed against MS&Co interest and/or other liquidity on such exchanges, subject to the principles of best execution. MS&Co generates revenue from executing or facilitating the execution of E\*TRADE customer orders. E\*TRADE does not receive payments from MS&Co for the orders it routes to MS&Co and E\*TRADE and MS&Co do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to MS&Co.

In the course of providing liquidity, MS&Co may preference option orders to MS&Co's options market maker or third-party market makers on the applicable exchange, consistent with exchange-sponsored programs which are described in the fee schedules of each such options exchange. MS&Co also participates in exchange-sponsored listed option payment for order flow programs under which MS&Co may also receive remuneration from the U.S. options exchanges to which it routes or directs E\*TRADE customer options orders in the form of rebates, including from exchanges in which E\*TRADE's parent company Morgan Stanley or another affiliated entity may have a financial interest. Although MSSB has no knowledge of any facts to suggest that such is the case, these U.S. options exchange rebate payments could, in theory, incentivize MS&Co to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to MS&Co's independent order routing and best execution obligations. Exchange rebates provided and fees charged to MS&Co for E\*TRADE customer executions by the U.S. options exchanges are not passed through to E\*TRADE or its customers. However, E\*TRADE is an affiliated company of MS&Co, which is a market maker on various U.S. options exchanges and MS&Co may realize market-making profits from E\*TRADE orders routed to MS&Co for execution. In addition, E\*TRADE orders that MS&Co executes are combined on a monthly basis with other order flow that MS&Co executes for tiered pricing program incentive purposes and it is possible that MS&Co could generate additional profit as a result of the combination of such order flow and the incentives of such tiered pricing programs. As a result of E\*TRADE's corporate affiliation with MS&Co, E\*TRADE may share indirectly in any such profits (whether from market-making, from pricing programs, or otherwise) generated by MS&Co.

## March 2023

### S&P 500 Stocks

#### Summary

Non-Directed Orders as % of All Orders	Market Orders as % of Non-Directed Orders	Marketable Limit Orders as % of Non-Directed Orders	Non-Marketable Limit Orders as % of Non-Directed Orders	Other Orders as % of Non-Directed Orders
99.53	52.43	6.14	29.04	12.39

#### Venues

Venue - Non-directed Order Flow	Non-Directed Orders (%)	Market Orders (%)	Marketable Limit Orders (%)	Non-Marketable Limit Orders (%)	Other Orders (%)	Net Payment Paid/Received for Market Orders(USD)	Net Payment Paid/Received for Market Orders(cents per hundred shares)	Net Payment Paid/Received for Marketable Limit Orders(USD)	Net Payment Paid/Received for Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Non-Marketable Limit Orders(USD)	Net Payment Paid/Received for Non-Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Other Orders(USD)	Net Payment Paid/Received for Other Orders(cents per hundred shares)
CITADEL SECURITIES LLC	30.25	36.76	34.97	15.76	34.33	447,514.75	20.0000	92,214.24	20.0006	84,878.93	30.8356	102,394.04	20.4000
Virtu Americas, LLC	26.65	28.71	26.94	22.10	28.47	355,671.53	20.0000	68,605.54	18.5252	86,697.69	26.3328	72,574.25	11.3080
G1 Execution Services, LLC	20.49	12.93	15.77	36.40	17.51	155,029.22	19.4792	34,582.57	19.4398	160,706.21	29.6537	53,508.89	22.5794
Jane Street Capital	11.56	16.10	15.89	2.83	10.68	210,137.20	20.0030	44,610.06	20.0000	15,591.06	30.7316	35,467.76	20.1571
Two Sigma Securities, LLC	4.76	2.22	2.96	10.34	3.33	24,010.67	19.1382	6,077.79	16.8652	66,547.48	28.6928	13,362.48	24.0118
UBS Securities, LLC	2.99	3.28	3.09	2.03	3.95	31,880.89	20.0000	9,930.42	20.0611	16,672.54	29.7166	11,681.70	21.0296
The Nasdaq Stock Market	1.62	0.00	0.15	5.27	0.69	0.00	0.0000	-1,527.19	-28.9249	29,161.25	32.2291	-619.16	-21.9238
Cboe EDGX Exchange, Inc.	1.58	0.00	0.21	4.96	0.99	0.00	0.0000	-181.85	-5.9068	35,442.49	31.3892	0.00	0.0000

Venue - Non-directed Order Flow	Non-Directed Orders (%)	Market Orders (%)	Marketable Limit Orders (%)	Non-Marketable Limit Orders (%)	Other Orders (%)	Net Payment Paid/Received for Market Orders(USD)	Net Payment Paid/Received for Market Orders(cents per hundred shares)	Net Payment Paid/Received for Marketable Limit Orders(USD)	Net Payment Paid/Received for Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Non-Marketable Limit Orders(USD)	Net Payment Paid/Received for Non-Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Other Orders(USD)	Net Payment Paid/Received for Other Orders(cents per hundred shares)
Members Exchange (MEMX)	0.10	0.00	0.03	0.31	0.06	0.00	0.0000	-37.72	-16.0970	2,648.97	34.0000	212.86	31.9739

## Material Aspects:

### CITADEL SECURITIES LLC:

E\*TRADE Securities LLC ("E\*TRADE") routes NMS equity orders to Citadel Securities LLC ("Citadel") to facilitate liquidity provision and price improvement opportunities for its customers. Citadel generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from Citadel in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.002 per share for non-directed, NMS equity market and marketable limit order executions priced at \$1.00 per share or more and \$0.0031 per share for non-directed, NMS equity non-marketable limit order executions priced at \$1.00 per share or more. E\*TRADE does not receive payment from Citadel for NMS equity executions priced below \$1.00 per share. E\*TRADE routes NMS equity orders only to market makers that pay for customer order flow, and all such market makers pay substantially the same rates. In addition, to take advantage of rules adopted by the U.S. securities exchanges that allow retail orders to be eligible for certain potential benefits, including additional price improvement from retail liquidity programs and higher queue priority from retail attestation programs, and to allow Citadel to access such potential benefits for E\*TRADE customer orders, E\*TRADE has entered into a Retail Order Attestation and Agreement with Citadel whereby E\*TRADE attests that substantially all of its customer orders are agency retail orders. E\*TRADE and Citadel do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to Citadel.

There is a potential conflict to a market maker such as Citadel both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, a market maker such as Citadel can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. A market maker's (such as Citadel's) anticipated profit must be allocated among the three subcategories listed above, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by competition for order flow amongst market makers (as measured by the amount of price improvement provided), operating under the same general payment for order flow terms applicable to Citadel.

In addition to revenues that Citadel may collect for executing or facilitating the execution of E\*TRADE customer orders, Citadel also receives remuneration from U.S. securities exchanges to which it routes or directs E\*TRADE customer orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. exchange rebate payments could, in theory, incentivize Citadel to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to Citadel's independent order routing and best execution obligations. E\*TRADE does not share directly in any such rebates Citadel receives for executions of E\*TRADE customer orders, although Citadel could potentially use these rebates to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both.

### Virtu Americas, LLC:

E\*TRADE Securities LLC ("E\*TRADE") routes NMS equity orders to Virtu Americas, LLC ("Virtu") to facilitate liquidity provision and price improvement opportunities for its customers. Virtu generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from Virtu in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.002 per share for non-directed, NMS equity market and marketable limit order executions priced at \$1.00 per share or more and \$0.0031 per share for non-directed, NMS equity non-marketable limit order executions priced at \$1.00 per share or more. E\*TRADE does not receive payment from Virtu for NMS equity executions priced below \$1.00 per share. E\*TRADE routes NMS equity orders only to market makers that pay for customer order flow, and all such market makers pay substantially the same rates. In addition, to take advantage of rules adopted by the U.S. securities exchanges that allow retail orders to be eligible for certain potential benefits, including additional price improvement from retail liquidity programs and higher queue priority from retail attestation programs, and to allow Virtu to access such potential benefits for E\*TRADE customer orders, E\*TRADE has entered into a Retail Order Attestation and Agreement with Virtu whereby E\*TRADE attests that substantially all of its customer orders are agency retail orders. E\*TRADE and Virtu do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to Virtu.

There is a potential conflict to a market maker such as Virtu both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, a market maker such as Virtu can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. A market maker's (such as Virtu's) anticipated profit must be allocated among the three subcategories listed above, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by competition for order flow amongst market makers (as measured by the amount of price improvement provided), operating under the same general payment for order flow terms applicable to Virtu.

In addition to revenues that Virtu may collect for executing or facilitating the execution of E\*TRADE customer orders, Virtu also receives remuneration from U.S. securities exchanges to which it routes or directs E\*TRADE customer orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. exchange rebate payments could, in theory, incentivize Virtu to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to Virtu's independent order routing and best execution obligations. E\*TRADE does not share directly in any such rebates Virtu receives for executions of E\*TRADE customer orders, although Virtu could potentially use these rebates to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both.

### G1 Execution Services, LLC:

E\*TRADE Securities LLC ("E\*TRADE") routes NMS equity orders to G1 Execution Services, LLC ("G1X") to facilitate liquidity provision and price improvement opportunities for its customers. G1X generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from G1X in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.002 per share for non-directed, NMS equity market and marketable limit order executions priced at \$1.00 per share or more and \$0.0031 per share for non-directed, NMS equity non-marketable limit order executions priced at \$1.00 per share or more. E\*TRADE does not receive payment from G1X for NMS equity executions priced below \$1.00 per share. E\*TRADE routes NMS equity orders only to market makers that pay for customer order flow, and all such market makers pay substantially the same rates. In addition, to take advantage of rules adopted by the U.S. securities exchanges that allow retail orders to be eligible for certain potential benefits, including additional price improvement from retail liquidity programs and higher queue priority from retail attestation programs, and to allow G1X to access such potential benefits for E\*TRADE customer orders, E\*TRADE has entered into a Retail Order Attestation and Agreement with G1X whereby E\*TRADE attests that substantially all of its customer orders are agency retail orders. E\*TRADE and G1X do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to G1X.

There is a potential conflict to a market maker such as G1X both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, a market maker such as G1X can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. A market maker's (such as G1X's) anticipated profit must be allocated among the three subcategories listed above, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by competition for order flow amongst market makers (as measured by the amount of price improvement provided), operating under the same general payment for order flow terms applicable to G1X.

In addition to revenues that G1X may collect for executing or facilitating the execution of E\*TRADE customer orders, G1X also receives remuneration from U.S. securities exchanges to which it routes or directs E\*TRADE customer orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. exchange rebate payments could, in theory, incentivize G1X to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to G1X's independent order routing and best execution obligations. E\*TRADE does not share directly in any such rebates G1X receives for executions of E\*TRADE customer orders, although G1X could potentially use these rebates to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both.

Jane Street Capital:

E\*TRADE Securities LLC ("E\*TRADE") routes NMS equity orders to Jane Street Capital ("Jane Street") to facilitate liquidity provision and price improvement opportunities for its customers. Jane Street generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from Jane Street in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.002 per share for non-directed, NMS equity market and marketable limit order executions priced at \$1.00 per share or more and \$0.0031 per share for non-directed, NMS equity non-marketable limit order executions priced at \$1.00 per share or more. E\*TRADE does not receive payment from Jane Street for NMS equity executions priced below \$1.00 per share. E\*TRADE routes NMS equity orders only to market makers that pay for customer order flow, and all such market makers pay substantially the same rates. In addition, to take advantage of rules adopted by the U.S. securities exchanges that allow retail orders to be eligible for certain potential benefits, including additional price improvement from retail liquidity programs and higher queue priority from retail attestation programs, and to allow Jane Street to access such potential benefits for E\*TRADE customer orders, E\*TRADE has entered into a Retail Order Attestation and Agreement with Jane Street whereby E\*TRADE attests that substantially all of its customer orders are agency retail orders. E\*TRADE and Jane Street do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to Jane Street.

There is a potential conflict to a market maker such as Jane Street both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, a market maker such as Jane Street can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. A market maker's (such as Jane Street's) anticipated profit must be allocated among the three subcategories listed above, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by competition for order flow amongst market makers (as measured by the amount of price improvement provided), operating under the same general payment for order flow terms applicable to Jane Street.

In addition to revenues that Jane Street may collect for executing or facilitating the execution of E\*TRADE customer orders, Jane Street also receives remuneration from U.S. securities exchanges to which it routes or directs E\*TRADE customer orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. exchange rebate payments could, in theory, incentivize Jane Street to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to Jane Street's independent order routing and best execution obligations. E\*TRADE does not share directly in any such rebates Jane Street receives for executions of E\*TRADE customer orders, although Jane Street could potentially use these rebates to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both.

Two Sigma Securities, LLC:

E\*TRADE Securities LLC ("E\*TRADE") routes NMS equity orders to Two Sigma Securities, LLC ("Two Sigma") to facilitate liquidity provision and price improvement opportunities for its customers. Two Sigma generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from Two Sigma in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.002 per share for non-directed, NMS equity market and marketable limit order executions priced at \$1.00 per share or more and \$0.0031 per share for non-directed, NMS equity non-marketable limit order executions priced at \$1.00 per share or more. E\*TRADE does not receive payment from Two Sigma for NMS equity executions priced below \$1.00 per share. E\*TRADE routes NMS equity orders only to market makers that pay for customer order flow, and all such market makers pay substantially the same rates. In addition, to take advantage of rules adopted by the U.S. securities exchanges that allow retail orders to be eligible for certain potential benefits, including additional price improvement from retail liquidity programs and higher queue priority from retail attestation programs, and to allow Two Sigma to access such potential benefits for E\*TRADE customer orders, E\*TRADE has entered into a Retail Order Attestation and Agreement with Two Sigma whereby E\*TRADE attests that substantially all of its customer orders are agency retail orders. E\*TRADE and Two Sigma do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to Two Sigma.

There is a potential conflict to a market maker such as Two Sigma both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, a market maker such as Two Sigma can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. A market maker's (such as Two Sigma's) anticipated profit must be allocated among the three subcategories listed above, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by competition for order flow amongst market makers (as measured by the amount of price improvement provided), operating under the same general payment for order flow terms applicable to Two Sigma.

In addition to revenues that Two Sigma may collect for executing or facilitating the execution of E\*TRADE customer orders, Two Sigma also receives remuneration from U.S. securities exchanges to which it routes or directs E\*TRADE customer orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. exchange rebate payments could, in theory, incentivize Two Sigma to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to Two Sigma's independent order routing and best execution obligations. E\*TRADE does not share directly in any such rebates Two Sigma receives for executions of E\*TRADE customer orders, although Two Sigma could potentially use these rebates to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both.

UBS Securities, LLC:

E\*TRADE Securities LLC ("E\*TRADE") routes NMS equity orders to UBS Securities, LLC ("UBS") to facilitate liquidity provision and price improvement opportunities for its customers. UBS generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from UBS in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.002 per share for non-directed, NMS equity market and marketable limit order executions priced at \$1.00 per share or more and \$0.0031 per share for non-directed, NMS equity non-marketable limit order executions priced at \$1.00 per share or more. E\*TRADE does not receive payment from UBS for NMS equity executions priced below \$1.00 per share. E\*TRADE routes NMS equity orders only to market makers that pay for customer order flow, and all such market makers pay substantially the same rates. In addition, to take advantage of rules adopted by the U.S. securities exchanges that allow retail orders to be eligible for certain potential benefits, including additional price improvement from retail liquidity programs and higher queue priority from retail attestation programs, and to allow UBS to access such potential benefits for E\*TRADE customer orders, E\*TRADE has entered into a Retail Order Attestation and Agreement with UBS whereby E\*TRADE attests that substantially all of its customer orders are agency retail orders. E\*TRADE and UBS do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to UBS.

There is a potential conflict to a market maker such as UBS both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, a market maker such as UBS can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. A market maker's (such as UBS's) anticipated profit must be allocated among the three subcategories listed above, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by competition for order flow amongst market makers (as measured by the amount of price improvement provided), operating under the same general payment for order flow terms applicable to UBS.

In addition to revenues that UBS may collect for executing or facilitating the execution of E\*TRADE customer orders, UBS also receives remuneration from U.S. securities exchanges to which it routes or directs E\*TRADE customer orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. exchange rebate payments could, in theory, incentivize UBS to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to UBS's independent order routing and best execution obligations. E\*TRADE does not share directly in any such rebates UBS receives for executions of E\*TRADE customer orders, although UBS could potentially use these rebates to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both.

The Nasdaq Stock Market:

E\*TRADE Securities LLC ("E\*TRADE") routes marketable equity orders and non-marketable NMS equity limit orders to the Nasdaq Stock Market ("NASDAQ") to facilitate liquidity provision and price improvement opportunities for its customers, as specified in the above Public Order Routing Report statistics. E\*TRADE either pays a fee or receives a rebate for each E\*TRADE customer order execution on the exchange, depending on whether the order added to or subtracted from liquidity on the exchange.

The fees and rebates referenced above are subject to volume pricing. To the extent that E\*TRADE meets the execution volume thresholds necessary to qualify for preferred pricing under NASDAQ's Fees Schedule in a given month, increased (rather than standard) rebate rates and decreased (rather than standard) fees will apply. Because NASDAQ offers higher rebates and lower fees based on a tiered volume model, there is a potential conflict in that such rebates and fees could, in theory, incentivize E\*TRADE to route a higher percentages of E\*TRADE customer orders to NASDAQ rather than another venue in order to reach a higher tier. E\*TRADE and NASDAQ do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules beyond the tiered volume model set forth in the NASDAQ Fees Schedule as described above; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to NASDAQ.

The fees E\*TRADE pays and rebates E\*TRADE receives from NASDAQ for NMS equity executions are determined based on NASDAQ's tiered volume model. Schedules delineating orders eligible for such rebates and the applicable rates are published publicly by NASDAQ in the NASDAQ Fees Schedule, available at [http://www.nasdaqtrader.com/trader.aspx?id=bx\\_pricing](http://www.nasdaqtrader.com/trader.aspx?id=bx_pricing). Please note that NASDAQ's publicly available Fees Schedule URL link and applicable rates may change without notice. In general, during Q1 2023, NASDAQ paid E\*TRADE standard rebate rates of \$0.00325 per share for executions priced at \$1.00 per share or more and did not pay any per share amount for executions priced below \$1.00 per share. Executions that removed liquidity from NASDAQ qualified for tiered pricing and E\*TRADE was charged fees of \$0.003 per share for executions priced at \$1.00 per share or more and 0.30% of the total notional value of executions priced below \$1.00 per share. For Q1 2023, E\*TRADE received rebates (net of fees) from NASDAQ in the amount of \$92,775 in January, \$95,645 in February, and \$110,735 in March.

E\*TRADE also participates in NASDAQ's retail order priority program under which eligible retail orders receive priority ahead of other available interest at a given price level or other enhanced execution benefits. E\*TRADE reviews customers' activity on a periodic basis to determine program eligibility and reserves the right to choose whether to participate in the NASDAQ retail order priority program. E\*TRADE is an affiliated company of Morgan Stanley & Co. LLC ("MS&Co"), which is a market maker on NASDAQ and may realize profits from orders it routes to NASDAQ for execution. E\*TRADE may share indirectly in such profits generated by MS&Co as a result of the corporate affiliation between MS&Co and E\*TRADE. E\*TRADE and MS&Co order execution volumes are combined on a monthly basis for tiered pricing program incentive purposes. It is possible that MS&Co could generate additional profit as a result of the combination of such order flow and the incentives of such tiered pricing program.

Cboe EDGX Exchange, Inc.:

E\*TRADE Securities LLC ("E\*TRADE") routes marketable equity orders and non-marketable NMS equity limit orders to the Cboe EDGX Exchange, Inc. ("EDGX") to facilitate liquidity provision and price improvement opportunities for its customers, as specified in the above Public Order Routing Report statistics. E\*TRADE either pays a fee or receives a rebate for each E\*TRADE customer order execution on the exchange, depending on whether the order added to or subtracted from liquidity on the exchange.

The fees and rebates referenced above are subject to volume pricing. To the extent that E\*TRADE meets the execution volume thresholds necessary to qualify for preferred pricing under EDGX's Fees Schedule in a given month, increased (rather than standard) rebate rates and decreased (rather than standard) fees will apply. Because EDGX offers higher rebates and lower fees based on a tiered volume model, there is a potential conflict in that such rebates and fees could, in theory, incentivize E\*TRADE to route a higher percentages of E\*TRADE customer orders to EDGX rather than another venue in order to reach a higher tier. E\*TRADE and EDGX do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules beyond the tiered volume model set forth in the EDGX Fees Schedule as described above; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to EDGX.

The fees E\*TRADE pays and rebates E\*TRADE receives from EDGX for NMS equity executions are determined based on EDGX's tiered volume model. Schedules delineating orders eligible for such rebates and the applicable rates are published publicly by EDGX in the EDGX Fees Schedule, available at [http://www.cboe.com/us/equities/membership/fee\\_schedule/edgx/](http://www.cboe.com/us/equities/membership/fee_schedule/edgx/). Please note that EDGX's publicly available Fees Schedule URL link and applicable rates may change without notice. In general, during Q1 2023, EDGX paid E\*TRADE standard rebate rates of \$0.0034 per share for executions priced at \$1.00 per share or more and \$0.00003 for executions priced below \$1.00 per share. Executions that removed liquidity from EDGX qualified for tiered pricing and E\*TRADE was not charged a per share fee for executions priced at \$1.00 per share or more or charged a per share fee of the total notional value of executions priced below \$1.00 per share. For Q1 2023, E\*TRADE received rebates (net of fees) from EDGX in the amount of \$131,204 in January, \$122,006 in February, and \$163,611 in March.

E\*TRADE also participates in EDGX's retail order priority program under which eligible retail orders receive priority ahead of other available interest at a given price level or other enhanced execution benefits. E\*TRADE reviews customers' activity on a periodic basis to determine program eligibility and reserves the right to choose whether to participate in the EDGX's retail order priority program. E\*TRADE is an affiliated company of Morgan Stanley & Co. LLC ("Morgan Stanley"), which is a market maker on EDGX and may realize profits from orders it routes to EDGX for execution. E\*TRADE may share indirectly in such profits generated by MS&Co as a result of the corporate affiliation between MS&Co and E\*TRADE. E\*TRADE and MS&Co order execution volumes are combined on a monthly basis for tiered pricing program incentive purposes. It is possible that MS&Co could generate additional profit as a result of the combination of such order flow and the incentives of such tiered pricing program.

Members Exchange (MEMX):

E\*TRADE Securities LLC ("E\*TRADE") routes marketable equity orders and non-marketable NMS equity limit orders to MEMX LLC ("MEMX") as specified in the above Public Order Routing Report disclosures. E\*TRADE either pays a fee or receives a rebate for each E\*TRADE customer order execution on the exchange, depending on whether the order added to or subtracted from liquidity on the exchange.

The fees and rebates referenced above are subject to volume pricing. To the extent that E\*TRADE meets the execution volume thresholds necessary to qualify for preferred pricing under MEMX's Fees Schedule in a given month, increased (rather than standard) rebate rates and decreased (rather than standard) fees will apply. Because MEMX offers higher rebates and lower fees based on a tiered volume model, there is a potential conflict in that such rebates and fees could, in theory, incentivize E\*TRADE to route a higher percentages of E\*TRADE customer orders to MEMX rather than another venue in order to reach a higher tier. E\*TRADE and MEMX do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules beyond the tiered volume model set forth in the MEMX Fees Schedule as described above; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to MEMX.

The fees E\*TRADE pays and rebates E\*TRADE receives from MEMX for NMS equity executions are determined based on MEMX's tiered volume model. Schedules delineating orders eligible for such rebates and the applicable rates are published publicly by MEMX in the MEMX Fees Schedule, available at <http://info.memxtrading.com/fee-schedule/>. Please note that MEMX's publicly available Fees Schedule URL link and applicable rates may change without notice. In general, during Q1 2023, MEMX paid E\*TRADE standard rebate rates of \$0.0034 per share for executions priced at \$1.00 per share or more and 0.075% of the total trade notional value for executions priced below \$1.00 per share. On executions that removed liquidity from MEMX qualified for tiered pricing, E\*TRADE was not charged a per share fee for executions priced at \$1.00 per share or more nor charged a per share fee for the total notional value of executions priced below \$1.00 per share. For Q1 2023, E\*TRADE received rebates (net of fees) from MEMX in the amount of \$26,215 in January, \$4,156 in February, and \$9,328 in March.

E\*TRADE is an affiliated company of Strategic Investments I, Inc., both of which are wholly owned subsidiaries of Morgan Stanley and investor-shareholders of MEMX. Accordingly, E\*TRADE, both directly and indirectly through its parent company Morgan Stanley and/or its affiliates may share in profits realized by MEMX, which could, in theory, incentivize E\*TRADE to route a higher percentages of E\*TRADE customer orders to MEMX over other execution venues. Additionally, E\*TRADE is an affiliated company of Morgan Stanley & Co., LLC ("MS&Co"), which is market maker on MEMX and may realize profits from orders it routes to MEMX for execution. E\*TRADE may share directly or indirectly in any such profits generated by MS&Co. E\*TRADE orders routed to MEMX through MS&Co will be combined with any other order flow that MS&Co routes to MEMX for the purpose of determining the applicable pricing under MEMX's tiered pricing model described above. It is possible that MS&Co could generate additional profit as a result of the combination of such order flow and the incentives of such tiered pricing program.

## March 2023

### Non-S&P 500 Stocks

#### Summary

Non-Directed Orders as % of All Orders	Market Orders as % of Non-Directed Orders	Marketable Limit Orders as % of Non-Directed Orders	Non-Marketable Limit Orders as % of Non-Directed Orders	Other Orders as % of Non-Directed Orders
99.44	44.39	11.02	34.29	10.31

#### Venues

Venue - Non-directed Order Flow	Non-Directed Orders (%)	Market Orders (%)	Marketable Limit Orders (%)	Non-Marketable Limit Orders (%)	Other Orders (%)	Net Payment Paid/Received for Market Orders(USD)	Net Payment Paid/Received for Market Orders(cents per hundred shares)	Net Payment Paid/Received for Marketable Limit Orders(USD)	Net Payment Paid/Received for Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Non-Marketable Limit Orders(USD)	Net Payment Paid/Received for Non-Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Other Orders(USD)	Net Payment Paid/Received for Other Orders(cents per hundred shares)
CITADEL SECURITIES LLC	29.21	36.72	35.80	16.01	33.70	1,356,526.91	16.1085	576,246.99	7.7557	325,828.30	17.0844	256,175.72	15.6626
Virtu Americas, LLC	25.94	28.69	27.19	21.37	27.99	1,108,354.51	15.9554	394,369.25	6.2812	268,392.88	15.7532	143,351.91	2.7430
G1 Execution Services, LLC	21.52	12.85	14.94	35.63	18.88	498,036.41	15.7370	245,362.26	8.1545	618,534.08	19.2648	156,127.61	18.7864
Jane Street Capital	10.77	16.05	15.88	2.83	9.01	632,963.44	16.1800	250,674.74	7.4332	50,434.60	18.1961	69,793.78	16.3663
Two Sigma Securities, LLC	5.42	2.32	2.78	10.76	3.82	74,589.18	14.5988	39,778.62	6.7823	263,874.88	13.6763	33,065.94	20.6787
UBS Securities, LLC	3.05	3.37	3.11	2.27	4.20	93,975.08	16.6721	58,731.60	9.3542	54,821.03	14.4935	32,255.78	16.2271
Cboe EDGX Exchange, Inc.	2.01	0.00	0.15	5.42	1.35	0.00	0.0000	-1,115.08	-4.6366	109,243.36	18.8345	0.00	0.0000

Venue - Non-directed Order Flow	Non-Directed Orders (%)	Market Orders (%)	Marketable Limit Orders (%)	Non-Marketable Limit Orders (%)	Other Orders (%)	Net Payment Paid/Received for Market Orders(USD)	Net Payment Paid/Received for Market Orders(cents per hundred shares)	Net Payment Paid/Received for Marketable Limit Orders(USD)	Net Payment Paid/Received for Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Non-Marketable Limit Orders(USD)	Net Payment Paid/Received for Non-Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Other Orders(USD)	Net Payment Paid/Received for Other Orders(cents per hundred shares)
The Nasdaq Stock Market	1.97	0.00	0.14	5.40	0.96	0.00	0.0000	-12,282.43	-24.3514	88,952.95	20.4378	-2,787.11	-17.4744
Members Exchange (MEMX)	0.12	0.00	0.02	0.30	0.08	0.00	0.0000	-367.54	-8.3366	6,360.03	19.0708	511.87	33.0034

## Material Aspects:

### CITADEL SECURITIES LLC:

E\*TRADE Securities LLC ("E\*TRADE") routes NMS equity orders to Citadel Securities LLC ("Citadel") to facilitate liquidity provision and price improvement opportunities for its customers. Citadel generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from Citadel in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.002 per share for non-directed, NMS equity market and marketable limit order executions priced at \$1.00 per share or more and \$0.0031 per share for non-directed, NMS equity non-marketable limit order executions priced at \$1.00 per share or more. E\*TRADE does not receive payment from Citadel for NMS equity executions priced below \$1.00 per share. E\*TRADE routes NMS equity orders only to market makers that pay for customer order flow, and all such market makers pay substantially the same rates. In addition, to take advantage of rules adopted by the U.S. securities exchanges that allow retail orders to be eligible for certain potential benefits, including additional price improvement from retail liquidity programs and higher queue priority from retail attestation programs, and to allow Citadel to access such potential benefits for E\*TRADE customer orders, E\*TRADE has entered into a Retail Order Attestation and Agreement with Citadel whereby E\*TRADE attests that substantially all of its customer orders are agency retail orders. E\*TRADE and Citadel do not have any arrangements:

- that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- for volume-based tiered payment schedules; or
- that require E\*TRADE to route any orders or a minimum number of orders to Citadel.

There is a potential conflict to a market maker such as Citadel both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, a market maker such as Citadel can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. A market maker's (such as Citadel's) anticipated profit must be allocated among the three subcategories listed above, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by competition for order flow amongst market makers (as measured by the amount of price improvement provided), operating under the same general payment for order flow terms applicable to Citadel.

In addition to revenues that Citadel may collect for executing or facilitating the execution of E\*TRADE customer orders, Citadel also receives remuneration from U.S. securities exchanges to which it routes or directs E\*TRADE customer orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. exchange rebate payments could, in theory, incentivize Citadel to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to Citadel's independent order routing and best execution obligations. E\*TRADE does not share directly in any such rebates Citadel receives for executions of E\*TRADE customer orders, although Citadel could potentially use these rebates to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both.

### Virtu Americas, LLC:

E\*TRADE Securities LLC ("E\*TRADE") routes NMS equity orders to Virtu Americas, LLC ("Virtu") to facilitate liquidity provision and price improvement opportunities for its customers. Virtu generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from Virtu in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.002 per share for non-directed, NMS equity market and marketable limit order executions priced at \$1.00 per share or more and \$0.0031 per share for non-directed, NMS equity non-marketable limit order executions priced at \$1.00 per share or more. E\*TRADE does not receive payment from Virtu for NMS equity executions priced below \$1.00 per share. E\*TRADE routes NMS equity orders only to market makers that pay for customer order flow, and all such market makers pay substantially the same rates. In addition, to take advantage of rules adopted by the U.S. securities exchanges that allow retail orders to be eligible for certain potential benefits, including additional price improvement from retail liquidity programs and higher queue priority from retail attestation programs, and to allow Virtu to access such potential benefits for E\*TRADE customer orders, E\*TRADE has entered into a Retail Order Attestation and Agreement with Virtu whereby E\*TRADE attests that substantially all of its customer orders are agency retail orders. E\*TRADE and Virtu do not have any arrangements:

- that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- for volume-based tiered payment schedules; or
- that require E\*TRADE to route any orders or a minimum number of orders to Virtu.

There is a potential conflict to a market maker such as Virtu both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, a market maker such as Virtu can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. A market maker's (such as Virtu's) anticipated profit must be allocated among the three subcategories listed above, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by competition for order flow amongst market makers (as measured by the amount of price improvement provided), operating under the same general payment for order flow terms applicable to Virtu.

In addition to revenues that Virtu may collect for executing or facilitating the execution of E\*TRADE customer orders, Virtu also receives remuneration from U.S. securities exchanges to which it routes or directs E\*TRADE customer orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. exchange rebate payments could, in theory, incentivize Virtu to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to Virtu's independent order routing and best execution obligations. E\*TRADE does not share directly in any such rebates Virtu receives for executions of E\*TRADE customer orders, although Virtu could potentially use these rebates to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both.

### G1 Execution Services, LLC:

E\*TRADE Securities LLC ("E\*TRADE") routes NMS equity orders to G1 Execution Services, LLC ("G1X") to facilitate liquidity provision and price improvement opportunities for its customers. G1X generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from G1X in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.002 per share for non-directed, NMS equity market and marketable limit order executions priced at \$1.00 per share or more and \$0.0031 per share for non-directed, NMS equity non-marketable limit order executions priced at \$1.00 per share or more. E\*TRADE does not receive payment from G1X for NMS equity executions priced below \$1.00 per share. E\*TRADE routes NMS equity orders only to market makers that pay for customer order flow, and all such market makers pay substantially the same rates. In addition, to take advantage of rules adopted by the U.S. securities exchanges that allow retail orders to be eligible for certain potential benefits, including additional price improvement from retail liquidity programs and higher queue priority from retail attestation programs, and to allow G1X to access such potential benefits for E\*TRADE customer orders, E\*TRADE has entered into a Retail Order Attestation and Agreement with G1X whereby E\*TRADE attests that substantially all of its customer orders are agency retail orders. E\*TRADE and G1X do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to G1X.

There is a potential conflict to a market maker such as G1X both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, a market maker such as G1X can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. A market maker's (such as G1X's) anticipated profit must be allocated among the three subcategories listed above, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by competition for order flow amongst market makers (as measured by the amount of price improvement provided), operating under the same general payment for order flow terms applicable to G1X.

In addition to revenues that G1X may collect for executing or facilitating the execution of E\*TRADE customer orders, G1X also receives remuneration from U.S. securities exchanges to which it routes or directs E\*TRADE customer orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. exchange rebate payments could, in theory, incentivize G1X to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to G1X's independent order routing and best execution obligations. E\*TRADE does not share directly in any such rebates G1X receives for executions of E\*TRADE customer orders, although G1X could potentially use these rebates to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both.

Jane Street Capital:

E\*TRADE Securities LLC ("E\*TRADE") routes NMS equity orders to Jane Street Capital ("Jane Street") to facilitate liquidity provision and price improvement opportunities for its customers. Jane Street generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from Jane Street in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.002 per share for non-directed, NMS equity market and marketable limit order executions priced at \$1.00 per share or more and \$0.0031 per share for non-directed, NMS equity non-marketable limit order executions priced at \$1.00 per share or more. E\*TRADE does not receive payment from Jane Street for NMS equity executions priced below \$1.00 per share. E\*TRADE routes NMS equity orders only to market makers that pay for customer order flow, and all such market makers pay substantially the same rates. In addition, to take advantage of rules adopted by the U.S. securities exchanges that allow retail orders to be eligible for certain potential benefits, including additional price improvement from retail liquidity programs and higher queue priority from retail attestation programs, and to allow Jane Street to access such potential benefits for E\*TRADE customer orders, E\*TRADE has entered into a Retail Order Attestation and Agreement with Jane Street whereby E\*TRADE attests that substantially all of its customer orders are agency retail orders. E\*TRADE and Jane Street do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to Jane Street.

There is a potential conflict to a market maker such as Jane Street both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, a market maker such as Jane Street can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. A market maker's (such as Jane Street's) anticipated profit must be allocated among the three subcategories listed above, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by competition for order flow amongst market makers (as measured by the amount of price improvement provided), operating under the same general payment for order flow terms applicable to Jane Street.

In addition to revenues that Jane Street may collect for executing or facilitating the execution of E\*TRADE customer orders, Jane Street also receives remuneration from U.S. securities exchanges to which it routes or directs E\*TRADE customer orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. exchange rebate payments could, in theory, incentivize Jane Street to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to Jane Street's independent order routing and best execution obligations. E\*TRADE does not share directly in any such rebates Jane Street receives for executions of E\*TRADE customer orders, although Jane Street could potentially use these rebates to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both.

Two Sigma Securities, LLC:

E\*TRADE Securities LLC ("E\*TRADE") routes NMS equity orders to Two Sigma Securities, LLC ("Two Sigma") to facilitate liquidity provision and price improvement opportunities for its customers. Two Sigma generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from Two Sigma in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.002 per share for non-directed, NMS equity market and marketable limit order executions priced at \$1.00 per share or more and \$0.0031 per share for non-directed, NMS equity non-marketable limit order executions priced at \$1.00 per share or more. E\*TRADE does not receive payment from Two Sigma for NMS equity executions priced below \$1.00 per share. E\*TRADE routes NMS equity orders only to market makers that pay for customer order flow, and all such market makers pay substantially the same rates. In addition, to take advantage of rules adopted by the U.S. securities exchanges that allow retail orders to be eligible for certain potential benefits, including additional price improvement from retail liquidity programs and higher queue priority from retail attestation programs, and to allow Two Sigma to access such potential benefits for E\*TRADE customer orders, E\*TRADE has entered into a Retail Order Attestation and Agreement with Two Sigma whereby E\*TRADE attests that substantially all of its customer orders are agency retail orders. E\*TRADE and Two Sigma do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to Two Sigma.

There is a potential conflict to a market maker such as Two Sigma both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, a market maker such as Two Sigma can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. A market maker's (such as Two Sigma's) anticipated profit must be allocated among the three subcategories listed above, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by competition for order flow amongst market makers (as measured by the amount of price improvement provided), operating under the same general payment for order flow terms applicable to Two Sigma.

In addition to revenues that Two Sigma may collect for executing or facilitating the execution of E\*TRADE customer orders, Two Sigma also receives remuneration from U.S. securities exchanges to which it routes or directs E\*TRADE customer orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. exchange rebate payments could, in theory, incentivize Two Sigma to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to Two Sigma's independent order routing and best execution obligations. E\*TRADE does not share directly in any such rebates Two Sigma receives for executions of E\*TRADE customer orders, although Two Sigma could potentially use these rebates to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both.

UBS Securities, LLC:

E\*TRADE Securities LLC ("E\*TRADE") routes NMS equity orders to UBS Securities, LLC ("UBS") to facilitate liquidity provision and price improvement opportunities for its customers. UBS generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from UBS in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.002 per share for non-directed, NMS equity market and marketable limit order executions priced at \$1.00 per share or more and \$0.0031 per share for non-directed, NMS equity non-marketable limit order executions priced at \$1.00 per share or more. E\*TRADE does not receive payment from UBS for NMS equity executions priced below \$1.00 per share. E\*TRADE routes NMS equity orders only to market makers that pay for customer order flow, and all such market makers pay substantially the same rates. In addition, to take advantage of rules adopted by the U.S. securities exchanges that allow retail orders to be eligible for certain potential benefits, including additional price improvement from retail liquidity programs and higher queue priority from retail attestation programs, and to allow UBS to access such potential benefits for E\*TRADE customer orders, E\*TRADE has entered into a Retail Order Attestation and Agreement with UBS whereby E\*TRADE attests that substantially all of its customer orders are agency retail orders. E\*TRADE and UBS do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to UBS.

There is a potential conflict to a market maker such as UBS both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, a market maker such as UBS can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. A market maker's (such as UBS's) anticipated profit must be allocated among the three subcategories listed above, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by competition for order flow amongst market makers (as measured by the amount of price improvement provided), operating under the same general payment for order flow terms applicable to UBS.

In addition to revenues that UBS may collect for executing or facilitating the execution of E\*TRADE customer orders, UBS also receives remuneration from U.S. securities exchanges to which it routes or directs E\*TRADE customer orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. exchange rebate payments could, in theory, incentivize UBS to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to UBS's independent order routing and best execution obligations. E\*TRADE does not share directly in any such rebates UBS receives for executions of E\*TRADE customer orders, although UBS could potentially use these rebates to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both.

Cboe EDGX Exchange, Inc.:

E\*TRADE Securities LLC ("E\*TRADE") routes marketable equity orders and non-marketable NMS equity limit orders to the Cboe EDGX Exchange, Inc. ("EDGX") to facilitate liquidity provision and price improvement opportunities for its customers, as specified in the above Public Order Routing Report statistics. E\*TRADE either pays a fee or receives a rebate for each E\*TRADE customer order execution on the exchange, depending on whether the order added to or subtracted from liquidity on the exchange.

The fees and rebates referenced above are subject to volume pricing. To the extent that E\*TRADE meets the execution volume thresholds necessary to qualify for preferred pricing under EDGX's Fees Schedule in a given month, increased (rather than standard) rebate rates and decreased (rather than standard) fees will apply. Because EDGX offers higher rebates and lower fees based on a tiered volume model, there is a potential conflict in that such rebates and fees could, in theory, incentivize E\*TRADE to route a higher percentages of E\*TRADE customer orders to EDGX rather than another venue in order to reach a higher tier. E\*TRADE and EDGX do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules beyond the tiered volume model set forth in the EDGX Fees Schedule as described above; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to EDGX.

The fees E\*TRADE pays and rebates E\*TRADE receives from EDGX for NMS equity executions are determined based on EDGX's tiered volume model. Schedules delineating orders eligible for such rebates and the applicable rates are published publicly by EDGX in the EDGX Fees Schedule, available at [http://www.cboe.com/us/equities/membership/fee\\_schedule/edgx/](http://www.cboe.com/us/equities/membership/fee_schedule/edgx/). Please note that EDGX's publicly available Fees Schedule URL link and applicable rates may change without notice. In general, during Q1 2023, EDGX paid E\*TRADE standard rebate rates of \$0.0034 per share for executions priced at \$1.00 per share or more and \$0.0003 for executions priced below \$1.00 per share. Executions that removed liquidity from EDGX qualified for tiered pricing and E\*TRADE was not charged a per share fee for executions priced at \$1.00 per share or more or charged a per share fee of the total notional value of executions priced below \$1.00 per share. For Q1 2023, E\*TRADE received rebates (net of fees) from EDGX in the amount of \$131,204 in January, \$122,006 in February, and \$163,611 in March.

E\*TRADE also participates in EDGX's retail order priority program under which eligible retail orders receive priority ahead of other available interest at a given price level or other enhanced execution benefits. E\*TRADE reviews customers' activity on a periodic basis to determine program eligibility and reserves the right to choose whether to participate in the EDGX's retail order priority program. E\*TRADE is an affiliated company of Morgan Stanley & Co. LLC ("Morgan Stanley"), which is a market maker on EDGX and may realize profits from orders it routes to EDGX for execution. E\*TRADE may share indirectly in such profits generated by MS&Co as a result of the corporate affiliation between MS&Co and E\*TRADE. E\*TRADE and MS&Co order execution volumes are combined on a monthly basis for tiered pricing program incentive purposes. It is possible that MS&Co could generate additional profit as a result of the combination of such order flow and the incentives of such tiered pricing program.

The Nasdaq Stock Market:

E\*TRADE Securities LLC ("E\*TRADE") routes marketable equity orders and non-marketable NMS equity limit orders to the Nasdaq Stock Market ("NASDAQ") to facilitate liquidity provision and price improvement opportunities for its customers, as specified in the above Public Order Routing Report statistics. E\*TRADE either pays a fee or receives a rebate for each E\*TRADE customer order execution on the exchange, depending on whether the order added to or subtracted from liquidity on the exchange.

The fees and rebates referenced above are subject to volume pricing. To the extent that E\*TRADE meets the execution volume thresholds necessary to qualify for preferred pricing under NASDAQ's Fees Schedule in a given month, increased (rather than standard) rebate rates and decreased (rather than standard) fees will apply. Because NASDAQ offers higher rebates and lower fees based on a tiered volume model, there is a potential conflict in that such rebates and fees could, in theory, incentivize E\*TRADE to route a higher percentages of E\*TRADE customer orders to NASDAQ rather than another venue in order to reach a higher tier. E\*TRADE and NASDAQ do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules beyond the tiered volume model set forth in the NASDAQ Fees Schedule as described above; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to NASDAQ.

The fees E\*TRADE pays and rebates E\*TRADE receives from NASDAQ for NMS equity executions are determined based on NASDAQ's tiered volume model. Schedules delineating orders eligible for such rebates and the applicable rates are published publicly by NASDAQ in the NASDAQ Fees Schedule, available at [http://www.nasdaqtrader.com/trader.aspx?id=bx\\_pricing](http://www.nasdaqtrader.com/trader.aspx?id=bx_pricing). Please note that NASDAQ's publicly available Fees Schedule URL link and applicable rates may change without notice. In general, during Q1 2023, NASDAQ paid E\*TRADE standard rebate rates of \$0.00325 per share for executions priced at \$1.00 per share or more and did not pay any per share amount for executions priced below \$1.00 per share. Executions that removed liquidity from NASDAQ qualified for tiered pricing and E\*TRADE was charged fees of \$0.003 per share for executions priced at \$1.00 per share or more and 0.30% of the total notional value of executions priced below \$1.00 per share. For Q1 2023, E\*TRADE received rebates (net of fees) from NASDAQ in the amount of \$92,775 in January, \$95,645 in February, and \$110,735 in March.

E\*TRADE also participates in NASDAQ's retail order priority program under which eligible retail orders receive priority ahead of other available interest at a given price level or other enhanced execution benefits. E\*TRADE reviews customers' activity on a periodic basis to determine program eligibility and reserves the right to choose whether to participate in the NASDAQ retail order priority program. E\*TRADE is an affiliated company of Morgan Stanley & Co. LLC ("MS&Co"), which is a market maker on NASDAQ and may realize profits from orders it routes to NASDAQ for execution. E\*TRADE may share indirectly in such profits generated by MS&Co as a result of the corporate affiliation between MS&Co and E\*TRADE. E\*TRADE and MS&Co order execution volumes are combined on a monthly basis for tiered pricing program incentive purposes. It is possible that MS&Co could generate additional profit as a result of the combination of such order flow and the incentives of such tiered pricing program.

Members Exchange (MEMX):

E\*TRADE Securities LLC ("E\*TRADE") routes marketable equity orders and non-marketable NMS equity limit orders to MEMX LLC ("MEMX") as specified in the above Public Order Routing Report disclosures. E\*TRADE either pays a fee or receives a rebate for each E\*TRADE customer order execution on the exchange, depending on whether the order added to or subtracted from liquidity on the exchange.

The fees and rebates referenced above are subject to volume pricing. To the extent that E\*TRADE meets the execution volume thresholds necessary to qualify for preferred pricing under MEMX's Fees Schedule in a given month, increased (rather than standard) rebate rates and decreased (rather than standard) fees will apply. Because MEMX offers higher rebates and lower fees based on a tiered volume model, there is a potential conflict in that such rebates and fees could, in theory, incentivize E\*TRADE to route a higher percentages of E\*TRADE customer orders to MEMX rather than another venue in order to reach a higher tier. E\*TRADE and MEMX do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules beyond the tiered volume model set forth in the MEMX Fees Schedule as described above; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to MEMX.

The fees E\*TRADE pays and rebates E\*TRADE receives from MEMX for NMS equity executions are determined based on MEMX's tiered volume model. Schedules delineating orders eligible for such rebates and the applicable rates are published publicly by MEMX in the MEMX Fees Schedule, available at <http://info.memxtrading.com/fee-schedule/>. Please note that MEMX's publicly available Fees Schedule URL link and applicable rates may change without notice. In general, during Q1 2023, MEMX paid E\*TRADE standard rebate rates of \$0.0034 per share for executions priced at \$1.00 per share or more and 0.075% of the total trade notional value for executions priced below \$1.00 per share. On executions that removed liquidity from MEMX qualified for tiered pricing, E\*TRADE was not charged a per share fee for executions priced at \$1.00 per share or more nor charged a per share fee for the total notional value of executions priced below \$1.00 per share. For Q1 2023, E\*TRADE received rebates (net of fees) from MEMX in the amount of \$26,215 in January, \$4,156 in February, and \$9,328 in March.

E\*TRADE is an affiliated company of Strategic Investments I, Inc., both of which are wholly owned subsidiaries of Morgan Stanley and investor-shareholders of MEMX. Accordingly, E\*TRADE, both directly and indirectly through its parent company Morgan Stanley and/or its affiliates may share in profits realized by MEMX, which could, in theory, incentivize E\*TRADE to route a higher percentages of E\*TRADE customer orders to MEMX over other execution venues. Additionally, E\*TRADE is an affiliated company of Morgan Stanley & Co., LLC ("MS&Co"), which is market maker on MEMX and may realize profits from orders it routes to MEMX for execution. E\*TRADE may share directly or indirectly in any such profits generated by MS&Co. E\*TRADE orders routed to MEMX through MS&Co will be combined with any other order flow that MS&Co routes to MEMX for the purpose of determining the applicable pricing under MEMX's tiered pricing model described above. It is possible that MS&Co could generate additional profit as a result of the combination of such order flow and the incentives of such tiered pricing program.

## March 2023

### Options

#### Summary

Non-Directed Orders as % of All Orders	Market Orders as % of Non-Directed Orders	Marketable Limit Orders as % of Non-Directed Orders	Non-Marketable Limit Orders as % of Non-Directed Orders	Other Orders as % of Non-Directed Orders
99.95	17.27	8.42	36.45	37.85

#### Venues

Venue - Non-directed Order Flow	Non-Directed Orders (%)	Market Orders (%)	Marketable Limit Orders (%)	Non-Marketable Limit Orders (%)	Other Orders (%)	Net Payment Paid/Received for Market Orders(USD)	Net Payment Paid/Received for Market Orders(cents per hundred shares)	Net Payment Paid/Received for Marketable Limit Orders(USD)	Net Payment Paid/Received for Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Non-Marketable Limit Orders(USD)	Net Payment Paid/Received for Non-Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Other Orders(USD)	Net Payment Paid/Received for Other Orders(cents per hundred shares)
CITADEL SECURITIES LLC	34.56	42.17	41.53	41.56	22.80	3,340,880.35	46.0841	3,237,521.96	47.0154	2,238,353.03	45.3058	937,346.29	35.8736
Global Execution Brokers LP	27.20	36.09	35.49	35.27	13.53	2,885,704.80	46.4452	2,365,084.86	47.2171	2,257,519.70	46.6251	598,120.03	32.8323
Wolverine Execution Services, LLC	20.55	15.17	15.86	15.95	28.49	1,112,916.66	48.4247	897,519.48	48.4170	1,007,068.80	48.5195	2,013,919.29	49.2807
Dash/IMC Financial Markets	17.67	6.57	7.12	7.17	35.18	345,655.76	34.1478	234,209.64	32.4444	208,998.11	24.6301	1,605,450.66	29.8775
Morgan Stanley & Co., LLC	0.02	0.00	0.01	0.05	0.00	0.00	0.0000	0.00	0.0000	0.00	0.0000	0.00	0.0000

#### Material Aspects:

CITADEL SECURITIES LLC:

E\*TRADE Securities LLC ("E\*TRADE") routes U.S.-listed options orders to Citadel Securities LLC ("Citadel") to facilitate liquidity provision and price improvement opportunities for its customers. Citadel generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from Citadel in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.48 per contract for simple and complex equity options orders. E\*TRADE does not receive remuneration from Citadel for index options executions or for Professional Customer orders, which are orders of customers who submit an average of 390 options orders per trading day, per calendar month, on a quarterly basis. E\*TRADE routes U.S.-listed options orders only (except as indicated in the next sentence) to market makers that pay for customer order flow (and all such market makers pay substantially the same rates). As an exception to the foregoing sentence, E\*TRADE routes a limited number of orders to its affiliate, Morgan Stanley & Co. LLC ("MS&Co"), from which E\*TRADE does not accept payment. E\*TRADE and Citadel do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to Citadel.

In general, public, retail, or non-professional index options order execution fees range from \$0.00 to \$1.32 per contract, depending on the index option class and premium price, with Citadel passing exchange fees for index option executions back to E\*TRADE each month. For Q1 2023, E\*TRADE paid total fees on customer index options executions of \$329,202 in January, \$303,226 in February, and \$368,424 in March.

There is a potential conflict to an options market maker such as Citadel both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the options market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, an options market maker such as Citadel can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. An options market maker's (such as Citadel's) anticipated profit must be allocated among these three sub-categories, such that an increased allocation to any one sub-category will result in a decreased allocation to one or more of the other categories, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by market maker competition for order flow (as measured by the amount of price improvement provided), under the same general payment for order flow terms applicable to Citadel.

In addition to revenues that Citadel may collect for executing or facilitating the execution of E\*TRADE customer orders, Citadel may also receive remuneration from the U.S. options exchanges to which it routes or directs E\*TRADE customer options orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. options exchange rebate payments could, in theory, incentivize Citadel to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to Citadel's independent order routing and best execution obligation. Exchange rebates provided to Citadel for E\*TRADE customer order executions by the U.S. options exchanges are not passed through to E\*TRADE or its customers although Citadel's receipt of such rebates could potentially be used to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both. Citadel does not pass through the fees that it is charged by the U.S. options exchanges for E\*TRADE customer options order executions, other than the index options fees described above.

Global Execution Brokers LP:

E\*TRADE Securities LLC ("E\*TRADE") routes U.S.-listed options orders to Global Execution Brokers LP ("G1X") to facilitate liquidity provision and price improvement opportunities for its customers. G1X generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from G1X in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.48 per contract for simple and complex equity options orders. E\*TRADE does not receive remuneration from G1X for index options executions or for Professional Customer orders, which are orders of customers who submit an average of 390 options orders per trading day, per calendar month, on a quarterly basis. E\*TRADE only routes U.S.-listed options orders to market makers that pay for customer order flow, and all such market makers are subject to substantially the same rate of payment, apart from a limited number of orders, which E\*TRADE routes to its affiliate Morgan Stanley & Co., LLC ("MS&Co"), from which E\*TRADE does not accept payment. E\*TRADE and G1X do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to G1X.

In general, public, retail, or non-professional index options order execution fees range from \$0.00 to \$1.32 per contract, depending on the index option class and premium price, with G1X passing exchange fees for index option executions back to E\*TRADE each month. For Q1 2023, E\*TRADE paid total fees on customer index options executions of \$174,831 in January, \$179,757 in February, and \$240,281 in March.

There is a potential conflict to an options market maker such as G1X both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the options market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, an options market maker such as G1X can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. An options market maker's (such as G1X's) anticipated profit must be allocated among these three sub-categories, such that an increased allocation to any one sub-category will result in a decreased allocation to one or more of the other categories, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by market maker competition for order flow (as measured by the amount of price improvement provided), under the same general payment for order flow terms applicable to G1X.

In addition to revenues that G1X may collect for executing or facilitating the execution of E\*TRADE customer orders, G1X may also receive remuneration from the U.S. options exchanges to which it routes or directs E\*TRADE customer options orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. options exchange rebate payments could, in theory, incentivize G1X to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to G1X's independent order routing and best execution obligation. Exchange rebates provided to G1X for E\*TRADE customer order executions by the U.S. options exchanges are not passed through to E\*TRADE or its customers although G1X's receipt of such rebates could potentially be used to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both. G1X does not pass through the fees that it is charged by the U.S. options exchanges for E\*TRADE customer options order executions, other than the index options fees described above.

Wolverine Execution Services, LLC:

E\*TRADE Securities LLC ("E\*TRADE") routes U.S.-listed options orders to Wolverine Execution Services, LLC ("Wolverine") to facilitate liquidity provision and price improvement opportunities for its customers. Wolverine generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from Wolverine in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.48 per contract for simple and complex equity options orders. E\*TRADE does not receive remuneration from Wolverine for index options executions or for Professional Customer orders, which are orders of customers who submit an average of 390 options orders per trading day, per calendar month, on a quarterly basis. E\*TRADE only routes U.S.-listed options orders to market makers that pay for customer order flow, and all such market makers are subject to substantially the same rate of payment, apart from a limited number of orders, which E\*TRADE routes to its affiliate Morgan Stanley & Co., LLC ("MS&Co"), from which E\*TRADE does not accept payment. E\*TRADE and Wolverine do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to Wolverine.

In general, public, retail, or non-professional index options order execution fees range from \$0.00 to \$1.32 per contract, depending on the index option class and premium price, with Wolverine passing exchange fees for index option executions back to E\*TRADE each month. For Q1 2023, E\*TRADE paid total fees on customer index options executions of \$961,983 in January, \$898,732 in February, and \$1,118,158 in March.

There is a potential conflict to an options market maker such as Wolverine both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the options market maker seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, an options market maker such as Wolverine can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. An options market maker's (such as Wolverine's) anticipated profit must be allocated among these three sub-categories, such that an increased allocation to any one sub-category will result in a decreased allocation to one or more of the other categories, with the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders mitigated by market maker competition for order flow (as measured by the amount of price improvement provided), under the same general payment for order flow terms applicable to Wolverine.

In addition to revenues that Wolverine may collect for executing or facilitating the execution of E\*TRADE customer orders, Wolverine may also receive remuneration from the U.S. options exchanges to which it routes or directs E\*TRADE customer options orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. options exchange rebate payments could, in theory, incentivize Wolverine to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to Wolverine's independent order routing and best execution obligation. Exchange rebates provided to Wolverine for E\*TRADE customer order executions by the U.S. options exchanges are not passed through to E\*TRADE or its customers although Wolverine's receipt of such rebates could potentially be used to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both. Wolverine does not pass through the fees that it is charged by the U.S. options exchanges for E\*TRADE customer options order executions, other than the index options fees described above.

#### Dash/IMC Financial Markets:

E\*TRADE Securities LLC ("E\*TRADE") routes U.S.-listed options orders to Dash Financial Technologies, LLC ("Dash") to facilitate liquidity provision and price improvement opportunities for its customers. Dash generates revenue from executing or facilitating the execution of E\*TRADE customer orders. In exchange for such routing, E\*TRADE receives payments from Dash (based upon the remuneration Dash receives from the liquidity providers with which it has arrangements as described below) (i.e. payment for order flow) in the amounts outlined in the above Public Order Routing Report disclosures (i.e. payment for order flow), calculated at a rate of \$0.48 per contract for simple and complex equity options orders. E\*TRADE does not receive remuneration from Dash for index options executions or for Professional Customer orders, which are orders of customers who submit an average of 390 options orders per trading day, per calendar month, on a quarterly basis. E\*TRADE only routes U.S.-listed options orders to market makers that pay for customer order flow, and all such market makers are subject to substantially the same rate of payment, apart from a limited number of orders, which E\*TRADE routes to its affiliate Morgan Stanley & Co., LLC ("MS&Co"), from which E\*TRADE does not accept payment. E\*TRADE and Dash do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to Dash.

In general, public, retail, or non-professional index options order execution fees range from \$0.00 to \$1.32 per contract depending on the index option class and premium price, with Dash passing exchange fees for index option executions to E\*TRADE each month. For Q1 2023, E\*TRADE paid total fees on customer index option executions of \$615,579 in January, \$591,332 in February, and \$723,016 in March.

In connection with Dash's handling of E\*TRADE retail equity option orders, Dash has arrangements with multiple, unaffiliated liquidity providers, including IMC Financial Markets, designed to facilitate liquidity provision and price improvement opportunities. Pursuant to these arrangements, Dash routes E\*TRADE retail equity options orders to exchanges and may preference the liquidity providers on such applicable exchange, consistent with exchange-sponsored programs which are described in the fee schedules of each such options exchange. The liquidity providers provide Dash with remuneration in connection with Dash's routing of E\*TRADE retail equity options orders, including through reciprocal order flow arrangements between Dash and such liquidity provider and/or payment per contract to Dash in return for E\*TRADE retail equity options orders that Dash routes or directs. Dash provides payment to E\*TRADE as described above based upon the compensation Dash receives from such liquidity providers.

There is a potential conflict to Dash and/or the liquidity provider to which Dash routes orders both paying for order flow and providing price improvement, as the potential source of funds for each is the same, namely the anticipated profit the liquidity provider seeks to earn from executing or facilitating the execution of E\*TRADE customer orders. Accordingly, from such anticipated profit, the liquidity provider can (i) forgo a portion of such anticipated profit to provide price improvement; (ii) forgo a portion of such anticipated profit to pay Dash (and for Dash, in turn, to pay E\*TRADE) for order flow; or (iii) retain a larger portion of anticipated profit and not provide (or provide less) price improvement or not provide (or provide less) payment for order flow. The liquidity provider's anticipated profit must be allocated among these three sub-categories, such that an increased allocation to any one sub-category will result in a decreased allocation to one or more of the other categories. Dash and the liquidity provider can also adjust the amount of profit that the liquidity provider shares with Dash. The allocation of resources between the three subcategories listed above, including the risk of overallocation to market maker profits at the expense of providing price improvement on E\*TRADE customer orders is mitigated by market maker competition for order flow (as measured by the amount of price improvement provided), under the same general payment for order flow terms applicable to Dash.

In addition to revenues that Dash may collect for executing or facilitating the execution of E\*TRADE customer orders, Dash may also receive remuneration from the U.S. options exchanges to which it routes or directs E\*TRADE customer options orders in the form of rebates. Although E\*TRADE has no knowledge of any facts to suggest that such is the case, these U.S. options exchange rebate payments could, in theory, incentivize Dash to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to Dash's independent order routing and best execution obligations. Exchange rebates provided to Dash for E\*TRADE customer executions by the U.S. options exchanges are not passed through to E\*TRADE or its customers. Dash and/or its liquidity provider does not pass through the fees charged by the U.S. options exchanges for E\*TRADE customer executions, other than the index options fees described above. E\*TRADE does not share directly in any profits from U.S. options exchange rebates for executions of E\*TRADE customer orders, although Dash's and/or its liquidity provider's receipt of such rebates could potentially be used to provide price improvement to E\*TRADE customers, order flow payments to E\*TRADE, or both.

Morgan Stanley & Co., LLC:

E\*TRADE Securities LLC ("E\*TRADE") is an affiliate of Morgan Stanley & Co., LLC. (MS&Co). E\*TRADE sends orders in U.S.-listed options to MS&Co to facilitate liquidity provision and price improvement opportunities for its customers. E\*TRADE orders in U.S.-listed options that are sent to MS&Co are then routed by MS&Co to a U.S. options exchange to be either crossed or executed against MS&Co interest and/or other liquidity on such exchanges, subject to the principles of best execution. MS&Co generates revenue from executing or facilitating the execution of E\*TRADE customer orders. E\*TRADE does not receive payments from MS&Co for the orders it routes to MS&Co and E\*TRADE and MS&Co do not have any arrangements:

- A. that require E\*TRADE to meet certain volume thresholds or that provide incentives to E\*TRADE for meeting or exceeding certain volume thresholds;
- B. that require E\*TRADE to meet certain minimum volume thresholds or that provide disincentives to E\*TRADE for failing to meet certain minimum volume thresholds;
- C. for volume-based tiered payment schedules; or
- D. that require E\*TRADE to route any orders or a minimum number of orders to MS&Co.

In the course of providing liquidity, MS&Co may preference option orders to MS&Co's options market maker or third-party market makers on the applicable exchange, consistent with exchange-sponsored programs which are described in the fee schedules of each such options exchange. MS&Co also participates in exchange-sponsored listed option payment for order flow programs under which MS&Co may also receive remuneration from the U.S. options exchanges to which it routes or directs E\*TRADE customer options orders in the form of rebates, including from exchanges in which E\*TRADE's parent company Morgan Stanley or another affiliated entity may have a financial interest. Although MSSB has no knowledge of any facts to suggest that such is the case, these U.S. options exchange rebate payments could, in theory, incentivize MS&Co to route higher percentages of E\*TRADE customer orders to particular venues over others, subject to MS&Co's independent order routing and best execution obligations. Exchange rebates provided and fees charged to MS&Co for E\*TRADE customer executions by the U.S. options exchanges are not passed through to E\*TRADE or its customers. However, E\*TRADE is an affiliated company of MS&Co, which is a market maker on various U.S. options exchanges and MS&Co may realize market-making profits from E\*TRADE orders routed to MS&Co for execution. In addition, E\*TRADE orders that MS&Co executes are combined on a monthly basis with other order flow that MS&Co executes for tiered pricing program incentive purposes and it is possible that MS&Co could generate additional profit as a result of the combination of such order flow and the incentives of such tiered pricing programs. As a result of E\*TRADE's corporate affiliation with MS&Co, E\*TRADE may share indirectly in any such profits (whether from market-making, from pricing programs, or otherwise) generated by MS&Co.