

Order Flow Practices (SEC Rule 607 Disclosure Summary)

SEC Rule 607 under Regulation NMS (17 CFR §242.607) requires that all broker-dealers notify their customers at account opening and on an annual basis, of their payment for order flow (“PFOF”) practices and order routing policies. Payment for order flow (“PFOF”) refers to compensation received by a broker-dealer in exchange for routing customer orders to a particular market center, exchange, or dealer for execution. Such compensation may include cash payments, rebates, credits, discounts, or other economic incentives related to order routing.

GGHC Payment for Order Flow Disclosure

GGHC does not receive payment for order flow in connection with customer orders and does not maintain arrangements requiring minimum order flow commitments or routing incentives based on trade volume.

GGHC Order Routing Policy

GGHC continually evaluates execution venues and routing methodologies in seeking best execution for client orders. GGHC utilizes a combination of broker-dealers and algorithmic routing tools when executing client transactions. Rule 606 reports are available at:

<https://trust.gghc.com/sec-606a-reports/>