SEC Rules 606 and 607 – Order Routing Disclosures

Pursuant to SEC Rule 606, SogoTrade, Inc. is required to make publicly available a quarterly report regarding its routing of non-directed orders. SogoTrade has entered into an agreement with S3 Technologies to disclose all required information pertaining to this rule. This information can be accessed on the internet at SEC Rule 606(a) Customer Order Routing Reports.

SEC Rule 606(b) requires a broker-dealer to disclose to its customers, upon request, "the identity of the venue to which the customer's orders were routed for execution in the six months prior to the request, whether the orders were directed orders or non-directed orders, and the time of the transactions, if any, that resulted from such orders." Customers may request this information by contacting a SogoTrade customer service representative at services@sogotrade.com.

Pursuant to SEC Rule 607, SogoTrade, Inc. is required to disclose at the time your account is opened, and annually thereafter, its order routing practices and any payment for order flow the broker-dealer receives. Depending on the security traded, equity and option orders are routed to market centers, broker-dealers, primary exchanges or electronic communications networks ("routing venues"). These routing venues may include dealers who make markets in these securities. The phrase "Payment for order flow" refers to any monetary payment, service, property, or other benefit that results in remuneration, compensation, or consideration paid to a broker-dealer by a routing venue in return for directing orders to them. SogoTrade, Inc. does receive compensation for routing equity and option orders to routing venues. The routing venues pay for order flow (a) with respect to equities, for executed orders on a per share basis on REG NMS equities, and (b) for option orders, a flat rate based on the underlying symbol.

It is SogoTrade's policy to make equity and option order routing decisions based on various factors including size of order, trading characteristics of the security, favorable execution prices (including the opportunity for price improvement), likelihood of a fill, and availability of efficient automated transaction processing. SogoTrade regularly reviews the factors listed above and its routing decisions to ensure the duty of best execution is met. Best execution always takes priority when determining where to route orders. The routing venues may execute orders at prices superior to the publicly quoted market. The order-routing practices, taking into consideration all the factors listed above, are designed to result in favorable transaction processing for customers. The amount of compensation for order flow depends on the agreement reached with each routing venue. The nature and source of any payments and/or credits received in connection with any specific transactions will be furnished upon written request by contacting a SogoTrade customer service representative at services@sogotrade.com or by phone at 1-888-709-7646.

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