

## **Order Routing and Payment for Order Flow Disclosure**

First and foremost, MDB Capital ("MDB") (a dba of Public Ventures, LLC) is committed to providing our customers with the best possible execution available.

## **MDB** Capital

MDB Capital does not receive payment for order flow for "held" orders. Such orders are intended to be immediately represented in the market and executed as soon as practicable. For orders that a customer gives to an MDB trader with time and/or price discretion over execution, also known as "not held" orders, MDB may receive compensation in the form of liquidity rebates or be charged costs for directing orders to particular broker dealers or market centers for execution.

In deciding where to send an order, MDB looks at a number of factors, such as size of order, trading characteristics of the security, favorable execution prices (including the opportunity for price improvement), access to reliable market data, availability of efficient automated transaction processing, and execution cost. Some market centers may execute orders at prices superior to the publicly quoted market in accordance with their rules and practices. Although you can instruct us to send an order to a particular marketplace, our order-routing policies are designed to result in transaction processing that is favorable for you. MDB reserves the right to wait for the primary exchange to open before commencing trading in a particular security.

MDB makes a reasonable effort to pass through any rebate it receives or cost assessed from order flow activity to the client account. The amount of the compensation depends on the agreement reached with each venue. The source and nature of any compensation received by MDB in connection with any transaction is available upon written request of the customer.

## **Interactive Brokers**

For customers introduced by MDB to Interactive Brokers LLC ("IB") for clearing, MDB directs order flow to IB. MDB does not receive payment for order flow.

IB transmits customer orders for execution to various exchanges or market centers based on a number of factors. These include: size of order, trading characteristics of the security, favorable execution prices (including the opportunity for price improvement), access to reliable market data, availability of efficient automated transaction processing and reduced execution costs through price concessions from the market centers. Certain of the market centers may execute orders at prices superior to the publicly quoted market in accordance with their rules or practices. While a customer may specify that an order be directed to a particular market center for

execution, the order-routing policies, taking into consideration all the factors listed above, are designed to result in favorable transaction procession for customers.

For additional information on IB's order routing and payment for order flow information please see the <u>Interactive Brokers Order Routing and Payment for Order Flow Disclosure</u>.

## **Order Routing Reports**

MDB's quarterly order routing reports are available on the MDB website at <u>www.mdb.com</u> on the SEC Rule 606(a) Order Routing Reports page by way of our Disclosures page. Upon a customer's request, information regarding the identity of the market center to which the customer's orders were routed in the six months prior to the request, whether the orders were directed or non-directed, and the time of the transaction (if any) resulting from such orders, will be disclosed to the customer.

Although MDB has used commercially reasonable efforts to provide accurate order flow data, the data is provided to you on an "as is" basis.