

NORTHBOUND SECURITIES LLC: FORM CRS RESPONSES TO CONVERSATION STARTERS

Northbound Securities LLC (“Northbound”, “we”, “us”, “our”)

Form CRS Customer Relationship Summary Responses to Conversation Starters

Effective February 1, 2022

Conversation Starter: Given my financial situation, should I choose a brokerage service? Why or why not?

Response: If you are interested in opening an account where you do not receive recommendations or advice about whether to buy or sell investments or investment strategies or account monitoring, and you make all of your own investment decisions, then a self-directed brokerage like ours could be the right fit for you. Northbound does not have an account minimum to open or maintain a brokerage account.

Conversation Starter: How will you choose investments to recommend to me?

Response: Northbound does not provide recommendations. We are not subject to a fiduciary duty to you and do not monitor or manage your account, including the monitoring of brokerage account investments, unless we state otherwise in writing.

Conversation Starter: What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

Response:

Northbound is a member of the Financial Industry Regulatory Authority (“FINRA”) and registered as a broker-dealer with the U.S. Securities and Exchange Commission and the states and territories listed on FINRA’s [BrokerCheck](#) website. Northbound’s financial professionals maintain licenses with FINRA. In general, financial professionals must have a Series 7 license to discuss account activity with customers and a Series 24 to perform supervisory duties. We do not make recommendations on securities or investment strategies. Northbound professionals are available only to provide account support, at support@sproutfi.com. If you choose our services, you must be comfortable with investing your assets on your own.

Conversation Starter: Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

Response: If you open a brokerage account through Northbound with \$10,000 and want to invest in securities, you will not pay commission fees on your trades. This means that \$0 of \$10,000 will go towards commission fees, and the entire \$10,000 will be invested in the securities you purchase. Regulatory trading fees are assessed by our clearing broker and paid by Northbound, not by you.

If you choose to use additional services, such as wire transfers or ACATS, those services are charged at the then prevailing rate. If you incur returned ACH fees, those are charged to you. For further information about Northbound fees, please see the Fee Schedule on our website at <https://www.northboundsecurities.com> or in the Disclosure Library on the “SproutFi” App.

Conversation Starter: How might your conflicts of interest affect me, and how will you address them?

Response: As discussed in our Form CRS, we are paid when you complete a transaction, which means we have an

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incentive to encourage you to make larger investments and trade more frequently. Additionally, we receive payment for directing orders when you buy or sell securities from part or all of your transactions (also known as Payment for Order Flow, or PFOF). We address these potential conflicts of interest by ensuring that all accounts are self-directed by our customers. We do not recommend any investments, nor do we recommend any investment strategies. Northbound addresses these and any other conflicts that may arise by making available all of our disclosures on our website at <https://www.northboundsecurities.com> or in the Disclosure Library on the “SproutFi” App. Northbound encourages you to read and familiarize yourself with all disclosures that are relevant to your investment relationship with us.

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

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