

## **Axos Invest Firm Disclosures**

#### **Form CRS**

The Securities and Exchange Commission adopted new rules requiring all SEC-registered investment advisers and broker-dealers with retail clients to create a Client Relationship Summary ("Form CRS"). The Form CRS is designed to help solve investor confusion over the differences between Investment Advisers and Broker Dealers. You may request a copy of this form, free of charge, by contacting us at <a href="mailto:support@axosinvest.com">support@axosinvest.com</a>.

## **Business Continuity Plan**

Axos Invest has developed a Business Continuity Plan. If, after reading the following, you have questions about the Business Continuity Plan, please contact Axos Invest at <a href="mailto:support@axosinvest.com">support@axosinvest.com</a>.

#### **FINRA Brokercheck**

BrokerCheck is a free tool to research the background and experience of financial brokers, advisers and firms. The tool allows you the ability to make informed choices about brokers and brokerage firms; gives you a snapshot of a broker's employment history, regulatory actions, and investment-related licensing information, arbitrations and complaints; and, tells you instantly whether a person or firm is registered, as required by law, to sell securities (stocks, bonds, mutual funds and more), offer investment advice or both.

#### <u>Securities Investor Protection Corporation</u>

The Securities Investor Protection Corporation, commonly known as the SIPC, is a non-profit corporation that has been protecting investors for 50 years. SIPC protects securities customers of its members up to \$500,000 (including \$250,000 for claims for cash). You may obtain an explanatory brochure <a href="here">here</a> or by dialing 202-371-8300.

## **Privacy Policy**

Axos Invest is required to communicate its policies related to the privacy of customer information. We are proud of our privacy practices and procedures and we want you to know how we work with your representative to protect your information and use your information to service your account. For questions on the Privacy Policy, please contact us at <a href="mailto:privacy@axosinvest.com">privacy@axosinvest.com</a>.

#### California Consumer Protection Act Disclosure

The California legislature recently enacted the California Consumer Privacy Act of 2018 ("CCPA")—a law that relates to personal information about California residents. This Notice is provided to advise you of types of personal information that Axos Invest and or its affiliates may collect about you that may be covered by the CCPA and the purposes for which we collect such information. For questions on CCPA, please contact us at <a href="mailto:privacy@axosinvest.com">privacy@axosinvest.com</a>.



#### **Customer Identification Disclaimer**

To help the government fight the funding of terrorism and money-laundering activities, federal law requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account.

#### **Axos Invest Additional Disclosure Document**

As a matter of practice, Axos Invest takes the opportunity to disclose all risks associated with their products, its responsibilities as an Introducing broker-dealer (Axos Invest LLC) for its Managed Account and Self-Directed Account Programs and its responsibility as a registered investment adviser for Managed Account Program. (Axos Invest, Inc.) This packet includes:

- Our Business Continuity Plan
- Privacy Notice
- SIPC and FINRA Disclosures
- Trusted Contact Disclosure
- Responsibilities of Axos Invest and Axos Clearing

## Order Routing Practice Disclosures for Self Directed and Managed Accounts (SEC Rules 606 & 607)

#### **Axos Invest LLC**

Pursuant to SEC Rule 606, Axos Invest LLC is required to make publicly available a quarterly report with regard to its routing of non-directed orders. For the purpose of this Rule, we have entered into an agreement with S3 Matching Technologies to disclose all required information pertaining to this rule. This information can be accessed on the internet at: https://external.s3.com/rule606/wise/.

Axos Invest LLC previously adopted its prior clearing firm's (Apex Clearing Corporation) 606 report from 1Q 2019 to 4Q 2020. Those historical disclosures can be accessed on the internet at: <a href="http://public.s3.com/rule606/apex/">http://public.s3.com/rule606/apex/</a>. Axos Invest LLC did not receive payment for order flow from Apex Clearing Corporation.

Pursuant to SEC Rule 607, Axos Invest LLC is required to disclose at the time your account is opened, and annually thereafter, our payment for order flow practices. Axos Invest LLC routes your equity orders to broker-dealers or market centers (i.e., primary exchanges or electronic communication networks ("ECN") for execution. These broker-dealers and market centers may include dealers who make markets in these securities. Axos Invest LLC may receive any compensation for routing equity orders to dealers. In exchange for routing your equity orders to certain market centers, we may receive monetary rebates per executed share for equity orders that add liquidity to its book and/or rebates for aggregate exchange fees. The rebates are considered payment for order flow even though it may not necessarily offset our aggregate payments for removing liquidity.

Order routing decisions are based on a number of factors including the size of the order, the opportunity for price improvement and the quality of order executions. However, Axos Invest LLC regularly reviews routing decisions, market centers and test trade executions to ensure that your orders meet our duty of best execution.



## Terms of Use

Axos Invest, Inc. is a registered investment advisor that operates an advisory service, which interacts with Users and Clients through the website www.axos.com/invest and blog. By using the Axos Invest website, blog, and the collection of features, tools, technology, and software operated or offered by Axos Invest (collectively the "Site"), you agree to these Terms of Use.

# Axos Invest Managed Account Disclosures Form ADV

You may review Axos Invest's registration that was filed with the Securities & Exchange Commission, known as Form ADV, through the Investment Adviser Public Disclosure website. Form ADV contains information about an investment adviser and its business operations.

## Form ADV Part 2A

You may review Axos Invest's Investment Adviser Brochure, which discloses information about our firm. You will receive a copy of this at the time you open a Managed Portfolio Account with Axos Invest. You may also request a copy of this brochure, free of charge, by contacting us at <a href="mailto:support@axosinvest.com">support@axosinvest.com</a>.

## **Axos Invest Managed Account Fee Schedule**

Please review our fees that are charged on our Managed Account Program.

# **Axos Invest Self-Directed Accounts**

## **Axos Invest Fee Schedule & Subscription Plan**

Please review our fees that are charged on our Self-Directed Trading Program.

## **Axos Invest/Axos Clearing Margin Disclosure Statement**

Pursuant to FINRA Rule 2264, Axos Invest is required to disclose to you the risks associated with opening a margin account, and risks involved with trading securities on margin. These risks are covered in our Margin Disclosure Statement.

#### **Axos Clearing Legal Disclosures**

Please review the legal disclosures associated with our affiliated clearing firm, Axos Clearing LLC.