



Dear Customer:

To better serve the investing public our regulators have adopted disclosure rules we are required to inform you of.

PRIVACY POLICY

Vining Sparks is a Financial Industry Regulatory Authority (FINRA) registered fixed income Broker / Dealer specializing in the distribution of financial services primarily to institutional investors and on rare occasion retail investors. In certain situations, we may collect nonpublic information from you on the account application and related account documentation as well as from trade records. We may share this information about you with our clearing agent(s) in order to deliver or receive the securities you have transacted with us. We do not otherwise disclose any nonpublic personal information about our customers or former customers to anyone, except as permitted by law. For example, we may share information on your transactions if we are required to disclose it by law, regulation, or court order. We restrict access to nonpublic information about you to those employees who need to know that information in order to provide products or services to you as you have instructed us. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your nonpublic personal information. If you decide to close your account(s) or become an inactive customer, we will adhere to the privacy policies and practices as described in this notice.

DISCLOSURE POLICY

The Financial Industry Regulatory Authority (FINRA), Vining Sparks' primary regulator, has provided the public a free research tool on their website called BrokerCheck located at www.finra.org/brokercheck. Through this resource tool a range of information on registered firms and registered representatives are disclosed. An investor brochure that includes information describing FINRA BrokerCheck is available to you upon request by contacting FINRA via email at brokercheck@finra.org or by calling the BrokerCheck Help Line at (800) 289-9999 Monday – Friday from 8 a.m. – 8 p.m. eastern time.

Sincerely,

Vining-Sparks IBG, L.P.

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