



## ***Cost of Trading Away in J.P. Morgan Securities LLC ("JPMS") Wrap Fee Investment Advisory Programs***

JPMS offers wrap-fee investment advisory services through several separate sales channels that provide discretionary portfolio management of client assets by affiliated or unaffiliated Portfolio Managers (collectively referred to as "Wrap Fee Programs").

This document provides information to clients who have, or may in the future have, a Wrap Fee Program account with a JPMS "Private Client Advisor," "Financial Advisor" or "Wealth Advisor," about Portfolio Managers' discretion to place client trade orders for execution by broker-dealers other than JPMS. This practice is frequently referred to as "trading away."

The information in this document is applicable to the following Wrap Fee Programs: *Advisory Program, Chase Strategic Portfolio ("CSP") Program, Customized Bond Portfolios ("CBP") Program, Fixed Income Advisory Program, Investment Counseling Service ("ICS") Program, J.P. Morgan Core Advisory Portfolio ("JPMCAP") Program, J.P. Morgan Personal Advisors Program, Strategic Investment Services ("STRATIS") Program, and Unified Managed Account ("UMA") Program.*

The extent to which a Portfolio Manager chooses to trade away from JPMS can affect your total cost of investing in a Wrap Fee Program. When a Portfolio Manager relies on JPMS as wrap fee program sponsor to execute its portfolio trades for client accounts in a Wrap Fee Program, you are not charged commissions because trade execution by JPMS is covered by the wrap fee you pay to JPMS. The wrap fee is an annualized asset-based fee that covers all advisory, administrative, custodial, and brokerage services provided by JPMS. The wrap fee **does not cover** any (i) brokerage commissions or other charges resulting from transactions not effected through JPMS or its affiliates; (ii) "mark-ups," "markdowns," and "dealer spreads" **that we or other broker-dealers may receive when acting as principal in certain transactions**; (iii) certain costs or charges imposed by third parties, including odd-lot differentials, margin interest, transfer taxes, exchange fees, and other fees or taxes required by law; (iv) any account establishment, maintenance, documentation and termination fees for Retirement Accounts; (v) the cost of investment manager fees and other expenses charged by Funds; or (vi) any pass-through or other fees associated with investment in American Depositary Receipts.

When a Portfolio Manager chooses to trade away from JPMS with a broker-dealer other than JPMS, trade commissions are not covered by the wrap fee you pay to JPMS and your account therefore may incur commissions, along with additional costs. Portfolio Managers place orders in fixed income or debt securities with broker-dealers other than JPMS. For these fixed income trades, you will incur a mark-up, mark-down or spread charged by the other broker-dealer that is not covered by the wrap fee.<sup>1</sup>

### **INVESTMENT AND INSURANCE PRODUCTS ARE:**

- NOT FDIC INSURED • NOT INSURED BY ANY FEDERAL GOVERNMENT AGENCY • NOT A DEPOSIT OR OTHER OBLIGATION OF, OR GUARANTEED BY, JPMORGAN CHASE BANK, N.A. OR ANY OF ITS AFFILIATES • SUBJECT TO INVESTMENT RISKS, INCLUDING POSSIBLE LOSS OF THE PRINCIPAL AMOUNT INVESTED**

<sup>1</sup> Fixed income securities are primarily traded in dealer markets. These securities are directly purchased from or sold to a financial services firm acting as a dealer (or principal). A dealer executing such trades may include a commission, a markup (on securities it sells), a markdown (on securities it buys) or a spread (the difference between the price it will buy, or "bid," for the security and the price at which it will sell, or "ask," for the security) in the net price at which transactions are executed. The bid and ask are prices quoted by the dealer, so the client should understand that a dealer's bid price would be the price at which a client is selling their security, and the dealer's ask price would be the price at which a client is buying the security.

## **Best Execution Obligations**

Portfolio Managers have investment discretion over your account (or, in the case of the JPMCAP, CSP and UMA Programs, over those “sleeves” of the account consisting of separately managed account investment strategies). You direct Portfolio Managers in the Wrap Fee Programs to place trade orders with JPMS for execution, which they do subject to their duty of “best execution.” Portfolio Managers, as investment advisers, have an obligation to seek “best execution” of client trade orders. “Best execution” means that Portfolio Managers have the responsibility to execute trades through those broker-dealers that they consider able to provide the best qualitative execution under the circumstances. A Portfolio Manager may determine that JPMS or another broker-dealer’s execution capabilities provide the most favorable option under the circumstances.

A Portfolio Manager commonly reviews several factors indicative of a broker-dealer’s trade execution quality in order to comply with its best execution obligation. A Portfolio Manager can examine the full range and quality of a broker-dealer’s services, including but not limited to: the nature of the security, the size and type of transaction, the nature and character of relevant markets, the executing broker’s execution, clearance and settlement capabilities and reputation, soft dollar arrangements, and the speed, knowledge, efficiency, consistency and anonymity provided by the executing broker. Additional trading costs associated with trading away, as described below in “Trading Away and Associated Costs,” may be one of several factors a Portfolio Manager evaluates when complying with its best execution obligation. However, the best execution obligation does not require a Portfolio Manager to solicit competitive bids for each transaction or to seek the lowest available cost of trade orders, as long as the manager reasonably believes that the broker-dealer selected can be reasonably expected to provide clients with the best qualitative execution under the circumstances. There is no single formula or process required for a Portfolio Manager to meet its best execution obligation; the factors analyzed and the weight given to each factor can vary by Portfolio Manager.

## **Trade Aggregation and Trade Rotation Practices**

Portfolio Managers may manage assets in other wrap fee programs besides those offered by JPMS, and may also manage institutional or other accounts that are not part of any wrap fee program. In order to avoid buying or selling the same security for all client accounts through multiple broker-dealers, a Portfolio Manager may decide to aggregate all such client transactions into a block trade that is executed through one broker-dealer. This practice, known as “trade aggregation,” may allow a Portfolio Manager to obtain more favorable execution, including more favorable pricing, than would otherwise be available if orders were not aggregated. Trade aggregation may also aid a Portfolio Manager in avoiding an adverse effect on the price of a security that could result from simultaneously placing a number of separate successive or competing client orders. Trade aggregation by a Portfolio Manager generally results in trading away from JPMS.

Alternatively, a Portfolio Manager may employ a trade rotation process where one group of clients has a transaction effected before or after another group of a Portfolio Manager’s clients. A trade rotation process minimizes the impact of a Portfolio Manager’s trading on the securities or markets in which a Portfolio Manager trades. As a client, you should be aware that a Portfolio Manager’s trade rotation practices may at times result in a transaction being effected for your account near or at the end of the manager’s rotation. In this event, your trade orders will bear the market price impact, if any, of those trades executed earlier in the manager’s rotation, and, as a result, you may receive a less favorable net price for the trade. However, Portfolio Managers’ trade rotation procedures are designed to treat clients equitably and fairly over time.

## **Trading Away and Associated Costs**

Because you will not pay additional commission costs when JPMS is the broker-dealer that executes trade orders in your Wrap Fee Program account, Portfolio Managers may determine that JPMS’s execution capabilities as broker-dealer provide the most favorable option for placing trade orders in your account. However, as noted above, a Portfolio Manager may choose to trade away if such Portfolio Manager reasonably believes that another broker-dealer will provide a more favorable execution under the circumstances, notwithstanding any additional costs that you may incur.

When a Portfolio Manager trades away, the trades are executed with those broker-dealers that Portfolio Manager has determined will provide best execution and are cleared and settled at JPMS. If a Portfolio Manager executes trade orders away from JPMS, you may incur trading costs in addition to the fees charged by JPMS for your participation in the Wrap Fee Programs. The broker-dealer executing the trade-away transaction may charge fees that may include commissions, as well as markups, markdowns or “spreads” paid to market makers, which will be borne by you. Additionally, if a foreign currency transaction is required, a foreign broker-dealer may receive compensation in the form of a dealer spread, markup or markdown. There may be other exchange or similar fees charged by third parties, including but not limited to those relating to foreign currency conversion, creation of American Depositary Receipts (“ADRs”), and foreign tax charges. You will be able to tell by looking at your trade confirmation or account statement whether a trade

was placed away. For equity trades away, the commission will be provided on the account statement showing the additional cost incurred for the trade away by a Portfolio Manager. Fixed income trades will indicate “traded away” and will not show the additional cost incurred because trading costs are not identified separately for fixed income because they are incorporated into the net price of the trade.

Depending on the types of securities traded in a portfolio in the Wrap Fee Programs, certain Portfolio Managers may place all or substantially all of certain types of trades with another broker-dealer for execution. For example, Portfolio Managers primarily trade away fixed income, and often trade away foreign security and small-cap equity strategies. In the Wrap Fee Programs, therefore, such types of securities could be more costly to you than other types of strategies in which Portfolio Managers may more commonly place trades with JPMS, the sponsoring broker-dealer for execution.

You should note in particular that JPMS, as Wrap Fee Program sponsor, does not accept fixed income trades for execution in the Wrap Fee Programs. Because of this, when a Portfolio Manager that participates in a Wrap Fee Program wants to place a trade in a fixed income security, like a bond, note, or debenture, we will require that such Portfolio Manager trade away. Accordingly, you should expect that all fixed income trades in your account(s) in the Wrap Fee Programs will incur transactional costs in connection with the trades not covered by the wrap fee you pay to JPMS.

You should review a Portfolio Manager’s Form ADV Part 2A Brochure, ask about a Portfolio Manager’s trading practices, and consider that information carefully before selecting a Portfolio Manager and its investment strategy. In particular, you should carefully consider any additional trading costs associated with a particular Portfolio Manager and investment strategy before selecting them for your Wrap Fee Program account.

### **JPMS Wrap Fee Program Trading Away Information**

The following chart contains trading away information provided by Portfolio Managers for the year ending December 31, 2023, unless otherwise indicated. JPMS does not guarantee its accuracy. Portfolio Managers and Investment strategies are not listed if the Portfolio Manager did not trade away. If a Portfolio Manager did not provide information for the 2023 calendar year, data reflects information provided by the Portfolio Manager for 2021 calendar year.

All fixed income strategies are listed as they are expected to be traded away. Although Portfolio Managers are expected to trade away fixed income strategies resulting in additional costs, the percentage of traded away and aggregate additional cost columns may reflect zeros because markups/markdowns or spreads are included in the net price and Portfolio Managers are therefore unable to provide this information.

Information for investment strategies added to Wrap Fee Programs after December 31, 2023 is not available. Trading away information for those strategies will be added in 2024 for the year ending December 31, 2024.

You should consult each Portfolio Manager’s Form ADV Part 2A brochure (“ADV”) and/or contact your JPMS Advisor to obtain additional information about a Portfolio Manager’s trading away practices.

Past trading away practice in an investment strategy by a Portfolio Manager is not a guarantee that the Portfolio Manager will continue the same practice in the future.

Investment Strategies that invest in foreign securities may incur additional costs assessed by the exchange(s) on which trades were executed, such as exchange fees and taxes, and may also incur costs such as ADR conversion fees and currency conversion costs which may be reflected in the aggregate additional costs figures below. For example, a Portfolio Manager may purchase a security via “ordinary shares” on a foreign exchange (which may charge a fee or tax on that trade), and then the bank may charge a fee to convert the ordinary shares into American Depositary Receipts (“ADR(s)”), and there may be currency conversion costs associated with this ordinary-to-ADR conversion.

As a result, the aggregate additional cost figures below are generally higher for Investment Strategies that invest in foreign securities than for Investment Strategies that trade primarily in ADR securities (without first purchasing and subsequently converting ordinary foreign shares) on U.S. exchanges or OTC markets. The below aggregate additional cost figures include disclosure to reflect if additional ADR conversion and/or currency conversion costs were incurred and included.

**Trading Away: Advisory Program***January - December 2023*

<b>Firm</b>	<b>Strategy</b>	<b>Dollar-weighted % of client trades “traded away”</b>	<b>Aggregate additional cost incurred by clients participating in those trades* (cps cents per share) or (bps basis points per share)</b>
Appleton Partners, Inc.	Intermediate-Term Fixed Income	100.00%	\$0.00
Appleton Partners, Inc.	Short Term Municipal	100.00%	\$0.00
Baird Investment Management	Mid Cap Growth	54.00%	\$0.00
Breckinridge Capital Advisors, Inc.	Intermediate Tax-Efficient	100.00%	\$0.00
Breckinridge Capital Advisors, Inc.	Limited Tax-Efficient	100.00%	\$0.00
Franklin Templeton Investments	Appreciation ESG	0.00%	\$0.00
Franklin Templeton Investments	Dividend Strategy	0.00%	\$0.00
GW&K Investment Management	GW&K Investment Management Total Return Bond	100.00%	\$0.00
GW&K Investment Management	GW&K Investment Management Enhanced Core Bond	100.00%	\$0.00
GW&K Investment Management	GW&K Investment Management Short Term Taxable Bond	100.00%	\$0.00
GW&K Investment Management	GW&K Municipal Bond Fund	100.00%	\$0.00
Harding Loevner LP	Harding Loevner International Growth	30.60%	17.1 bps
Madison Investment Advisors, LLC	Madison Investment Advisors Intermediate Corporate Fund	100.00%	\$0.00
Nuveen Asset Management	Nuveen Concentrated Preferred Securities	100.00%	There is no explicit trading cost or commission associated with step-out trades for Nuveen Concentrated Preferred Securities strategy. Rather, there may be an implicit cost from the dealer’s bid-ask spread (difference between the dealer’s purchase and sale price).
Pictet Asset Management Limited	Pictet Clean Energy	35.50%	\$0.00
Sage Advisory Services, Ltd. Co	Sage Advisory Core Taxable	100.00%	\$0.00
Schafer Cullen Capital Management, Inc.	Schafer Cullen International High Dividend	37.39%	\$0.00

## **Trading Away: CSP**

Please note that *J.P. Morgan Private Investments Inc.* is the sub-advisor and Overlay Manager for all strategies in the Program and as such has investment discretion.

*January - December 2023*

<b>Firm</b>	<b>Strategy</b>	<b>Dollar-weighted % of client trades “traded away”</b>	<b>Aggregate additional cost incurred by clients participating in those trades* (cps cents per share) or (bps basis points per share)</b>
J.P. Morgan Investment Management Inc	Intermediate Municipal Bond	100.00%	\$0.0000

## **Trading Away: Customized Bond Portfolios**

*January - December 2023*

<b>Firm</b>	<b>Strategy</b>	<b>Dollar-weighted % of client trades “traded away”</b>	<b>Aggregate additional cost incurred by clients participating in those trades* (cps cents per share) or (bps basis points per share)</b>
J.P. Morgan Investment Management Inc.	J.P. Morgan 1-5 Year Municipal Ladder	100.00%	0.00%
J.P. Morgan Investment Management Inc.	J.P. Morgan 1-10 Year Municipal Ladder	100.00%	0.00%
J.P. Morgan Investment Management Inc.	J.P. Morgan 1-17 Year Municipal Ladder	100.00%	0.00%
J.P. Morgan Investment Management Inc.	J.P. Morgan Long Municipal Ladder	100.00%	0.00%
J.P. Morgan Investment Management Inc.	J.P. Morgan Ultra Short Corporate Ladder	100.00%	0.00%
J.P. Morgan Investment Management Inc.	J.P. Morgan 1-5 Year Corporate Ladder	100.00%	0.00%
J.P. Morgan Investment Management Inc.	J.P. Morgan 1-10 Year Corporate Ladder	100.00%	0.00%
J.P. Morgan Investment Management Inc.	J.P. Morgan 1-5 Year Corporate Cross-Over	100.00%	0.00%
J.P. Morgan Investment Management Inc.	J.P. Morgan 1-10 Year Corporate Cross-Over	100.00%	0.00%
J.P. Morgan Investment Management Inc.	J.P. Morgan Preferreds	100.00%	0.00%
J.P. Morgan Investment Management Inc.	JPM Yield Curve Enhanced Corp-MA	100.00%	0.00%

## Trading Away: ICS

January - December 2023

Firm	Strategy	Dollar-weighted % of client trades "traded away"	Aggregate additional cost incurred by clients participating in those trades* (cps cents per share) or (bps basis points per share)
Appleton Partners, Inc.	Appleton High Grade Int Gov/Credit	100.00%	\$0.00
Asset Preservation Advisors, Inc.	APA High-Quality Intermediate Tax-Exempt	100.00%	\$0.00
BlackRock Investment Management, LLC	BlackRock Short-Term Taxable FI SMA	100.00%	\$0.00
Credit Suisse Asset Management, LLC	CS Tax-Advantaged FI Limited Duration	100.00%	\$0.00
Credit Suisse Asset Management, LLC	CS Tax-Advantaged FI 5yr Target Duration	100.00%	\$0.00
Dolan McEniry Capital Management, LLC	Dolan McEniry Core Plus	100.00%	\$0.00
Dolan McEniry Capital Management, LLC	Dolan McEniry Credit	100.00%	\$0.00
Eagle Asset Management, Inc.	EGA Global Equity	0.00%	\$0.00
J.P. Morgan Investment Management Inc. (JPMIM)	JPM International ADR-MA	5.00%	8 bps
Lazard Asset Management LLC	Lazard Asset Management Equity Select ADR	28.00%	.01 CPS credit to .08 CPS Debit
Lord, Abbett & Co. LLC	Lord Abbett & Co. Long Municipal MA	100.00%	\$0.00
Madison Investment Advisors, LLC	Madison Interm Corporate Bond Wrap	100.00%	\$0.00
Nuveen Asset Management	Nuveen Intermediate-Term High Quality	100.00%	<p>1-10 bps *Additional cost is expressed in terms of an average of cents per share or other unit.</p> <p>Where Nuveen Asset Management trades away, clients generally incur implicit transaction costs and fees in addition to the wrap fee. These fees are generally in the form of mark-ups and mark-downs, or spreads, earned by the relevant securities dealer (not Nuveen Asset Management or a Nuveen affiliate) in addition to the wrap fee payable to the wrap program sponsor.</p> <p>For secondary market trades, dealer trading mark-ups typically range from 1 to 10 basis points (a few cents to several dollars) per bond depending on several factors, including position size, market strength or weakness and holding period among others. For primary market (new issue) trades, there are no additional trading costs.</p>

Firm	Strategy	Dollar-weighted % of client trades "traded away"	Aggregate additional cost incurred by clients participating in those trades* (cps cents per share) or (bps basis points per share)
Parametric Portfolio Associates LLC	Parametric TABS Muni. Ladder Long Plus	0.00%	\$0.00
Payden & Rygel	Payden & Rygel Core Bond	100.00%	\$0.00
Payden & Rygel	Payden & Rygel Low Duration	100.00%	\$0.00
Sagewood Asset Management LLC	Sagewood Volatility Yield Strategy Comp	100.00%	\$0.01
Schafer Cullen Capital Management, Inc.	Schafer Cullen Emerging Mkts High Div	54.96%	\$0.00
Shenkman Capital Management, Inc.	Shenkman Capital Mgt Convertible Comp	100.00%	\$0.00
Shenkman Capital Management, Inc.	Shenkman High Yield SMA	100.00%	\$0.00

## **Trading Away: STRATIS**

*January - December 2023*

Manager Name	Strategy Name	Dollar-Weighted Percentage of Client Trades Stepped Out	Additional Cost Incurred by Clients Participating in those Trades*
Appleton Partners, Inc.	Appleton Partners Intermediate Municipal	100.00%	\$0.00
Appleton Partners, Inc.	Appleton Partners Short Term Municipal	100.00%	\$0.00
Atlanta Capital Management	Atlanta Capital High Quality Small Cap	39.00%	\$0.00
Atlanta Capital Management	Atlanta Capital SMID-Cap	48.00%	\$0.00
Baird Equity Asset Management	Baird Mid-Cap Growth Equity	58.00%	\$0.00
BlackRock Investment Management, LLC	BlackRock Intermediate Muni FI	100.00%	\$0.00
Capital Group	Capital Group Global Equity SMA	1.32%	\$0.03
Capital Group	Capital Group International Equity SMA	51.23%	\$0.05
Delaware Investments	Macquarie Intl. ADR Eq. (Mondrian) (SMA)	29.00%	6bps for commission, ADR conversion fee ranged from (-0.05 to 0.05), and local market taxes vary by country
Federated Investment Counseling	Federated Strategic Value Dividend MA	0.00%	\$0.00
Franklin Templeton Investments	ClearBridge Appreciation	53.51%	\$0.0064
Franklin Templeton Investments	ClearBridge Appreciation ESG	22.59%	\$0.0069
Franklin Templeton Investments	ClearBridge Dividend Strategy	52.21%	\$0.0154
GW&K Investment Management	GW&K Total Return Bond Strategy	100.00%	\$0.00



Manager Name	Strategy Name	Dollar-Weighted Percentage of Client Trades Stepped Out	Additional Cost Incurred by Clients Participating in those Trades*
GW&K Investment Management	GW&K Municipal Bond Strategy	100.00%	\$0.00
Harding Loevner LP	Harding Loevner Intl Eq ADR	37.12%	16.7 bps
Kayne Anderson Rudnick Investment Management, LLC	Kayne Anderson Rd SC Quality Value Wrap	18.89%	\$0.0120
Kayne Anderson Rudnick Investment Management, LLC	Kayne Anderson Rud SMID Core	23.12%	\$0.0191
Lazard Asset Management LLC	Lazard Asset Management (Asia ex Japan)	0.00%	.01 CPS credit to .08 CPS Debit
Lazard Asset Management LLC	Lazard Emerging Markets Equity Sel ADR	15.00%	.01 CPS credit to .08 CPS Debit
Lord, Abnett & Co. LLC	Lord Abnett Long Municipals	100.00%	\$0.00
Madison Investment Advisors, LLC	Madison Interm Govt/Corp Bond	100.00%	\$0.00
Madison Investment Advisors, LLC	Madison Interm Corp Bond	100.00%	\$0.00
Pacific Investment Management Co. / Allianz	PIMCO Total Return Managed Account	100.00%	\$0.00
Pictet Asset Management Limited	Pictet Clean Energy SMA	35.50%	\$0.00
Sage Advisory Services, Ltd. Co	Sage Core Taxable Fixed Income	100.00%	\$0.00
Sage Advisory Services, Ltd. Co	Sage Intermediate Fixed Income	100.00%	\$0.00
Schafer Cullen Capital Management, Inc.	Schafer Cullen Intl Hi Div ADR	31.84%	\$0.00
Schafer Cullen Capital Management, Inc.	Schafer Cullen High Dividend Value Eq	0.35%	\$0.00
Schafer Cullen Capital Management, Inc.	Schafer Cullen Enhanced Equity Income	0.00%	\$0.00
Seix Investment Advisors LLC	Seix High Quality High Yield	0.00%	\$0.00

## **Trading Away: UMA**

*January - December 2023*

Please note that (a) *Envestnet Asset Management* (“*Envestnet*”) is the Overlay Manager for all strategies in the Program, (b) the 0% shown for Envestnet applies to the equity strategies for which Envestnet alone has investment discretion, and (c) Envestnet and the other managers shown have joint investment discretion for the fixed income strategies.

Manager Name	Strategy Name	Dollar-Weighted Percentage of Client Trades Stepped Out	Additional Cost Incurred by Clients Participating in those Trades*
Appleton Partners, Inc.	Appleton Partners Short Term Tax Exempt Fixed Income	100.00%	\$0.00
Appleton Partners, Inc.	Appleton Partners Tax Exempt Fixed Income	100.00%	\$0.00
GW&K Investment Management	GW&K Tax-Exempt Fixed Income	100.00%	\$0.00
GW&K Investment Management	GW&K Total Return Bond Strategy	100.00%	\$0.00



Manager Name	Strategy Name	Dollar-Weighted Percentage of Client Trades Stepped Out	Additional Cost Incurred by Clients Participating in those Trades*
Madison Investment Advisors, LLC	Madison Taxable Fixed Income (Corporate Only)	100.00%	\$0.00
Madison Investment Advisors, LLC	Madison Taxable Fixed Income	100.00%	\$0.00
Seix Investment Advisors LLC	Seix Investment High Yield Taxable Fixed Income	0.00%	\$0.00

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