Ally Invest Securities Form CRS – Customer Relationship Summary

Ally Invest Securities (AIS or we) is registered as a broker-dealer with the Securities and Exchange Commission (SEC) and is a member of the Financial Industry Regulatory Authority and the Securities Investor Protection Corporation. Brokerage and investment advisory services and fees differ, and it is important that you understand the differences. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

We offer a broad range of self-directed, online, non-discretionary brokerage services that provide customers the ability to invest in a wide array of investment products, such as corporate equity securities, fixed income (including corporate, agency, municipals, Treasuries, STRIPS and other zeros, and certificates of deposit), exchange-traded funds (ETFs), mutual funds, and options.

Customers may participate in securities lending through the Securities Income Program, offered through our clearing firm, Apex Clearing Corporation. For more information, visit <u>www.ally.com/invest/self-directed-trading/securities-income-program</u>.

We provide customers access to pass-through deposit insurance on uninvested funds via the FDIC-Insured Sweep Program, also offered through Apex. For more information, visit <u>www.ally.com/content/dam/pdf/invest/fdic-terms-conditions.pdf</u>. Certain conditions must be satisfied for pass-through deposit insurance coverage to apply. For a list of Program Banks where program funds are held, please visit <u>apexfintechsolutions.com/legal/disclosures/banksweep-bank-list</u>. Neither AIS nor Apex is an FDIC-insured bank, and the FDIC's deposit insurance only covers failure of insured banks, such as the Program Banks. AIS securities products are not insured by the FDIC, are not deposits, and may lose value.

We provide research and market analysis tools paired with a library of informational articles to help you improve your understanding of strategies and financial markets. However, **we do not offer investment recommendations** or accept discretionary authority over customer accounts, nor do we monitor the performance of our customers' investments. As a self-directed brokerage customer, you make the ultimate decision regarding the purchase or sale of an investment.

Apart from the self-directed brokerage services described above, we also act as broker-dealer of record for accounts managed by our affiliate, Ally Invest Advisors (AIA).

Conversation Starters

For answers to the following questions, please visit <u>www.ally.com/resources/pdf/invest/ais-conversation-starters.pdf</u>.

- Given my financial situation, should I choose a brokerage service? Why or why not?
- How will you choose investments to recommend to me?
- What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?

What fees will I pay?

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

We do not charge transaction-based fees for trades in most U.S. stocks and ETFs. We do, however, charge transaction-based fees for trades in options, fixed income products, mutual funds, securities of non-U.S. companies, and low-priced securities (meaning under \$2/share). Customers will be charged more when there are more trades of these products in their accounts, and we may therefore have an incentive to encourage customers to trade these products often.

Apart from transaction-based fees, we also charge fees for account transfers, broker-assisted trades, paper confirmations and statements, IRA closures, and maintaining non-transferable securities in your account. For more detailed information about the fees you will pay, please visit www.ally.com/go/invest/commissions-and-fees/.

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• 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?

What are your legal obligations to me when providing recommendations? How else does your firm make money and what conflicts of interest do you have?

We *do not* provide recommendations. The way we make money creates some conflicts with your interests. You should understand and ask us about conflicts because they can affect the services we provide you. Here are some examples to help you understand what this means.

- We maintain commercial relationships with certain investment companies, including BlackRock, WisdomTree, and Global X, from whom we make money. Our relationships with certain fund families do not impact the availability to our customers of mutual funds from other fund families.
- We also receive payments for routing orders to other broker-dealers, including Apex. For more information, view our Order Routing and Payment for Order Flow Disclosures at <u>www.ally.com/invest/disclosures/order-routing-and-payment-for-order-flow.html</u>.
- Our affiliate, AIA, is a registered investment adviser that provides discretionary investment advisory services to its clients. AIA's clients pay for those services in the form of an asset-based fee.
- Apex earns interest on cash balances in your account by holding them in omnibus, or unsegregated, accounts at multiple banks, including our affiliate, Ally Bank. Apex pays a portion of that interest to us.

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For answers to the following questions, please visit www.ally.com/resources/pdf/invest/ais-conversation-starters.pdf.

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

How do your financial professionals make money?

The financial professionals who service your account are compensated on a salaried or hourly basis. They do not receive compensation based on the kinds of products purchased or sold in your account, the number of trades in your account, or the dollar amount of the trades in your account. We do not offer them any sales-based incentive compensation.

Do you or your financial professionals have legal or disciplinary history?

Yes. Visit <u>Investor.gov/CRS</u> for a free and simple search tool to research us and our financial professionals.

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For answers to the following questions, please visit <u>www.ally.com/resources/pdf/invest/ais-conversation-starters.pdf</u>.

• As a financial professional, do you have any disciplinary history? For what type of conduct?

Additional information.

For additional information about our services, please visit <u>www.ally.com/invest/self-directed-trading/</u>. If you would like up-to-date information or a copy of this disclosure, please call 855-880-2559 or email <u>support@invest.ally.com</u>.

Conversation Starters

For answers to the following questions, please visit www.ally.com/resources/pdf/invest/ais-conversation-starters.pdf.

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