

RBC BROKERAGE ACCOUNTS

IRA CLIENT DISCLOSURE WORKSHEET

OFG'S BUSINESS MODEL AND ASSOCIATED MATERIAL CONFLICTS OF INTEREST

OFG Financial Services, Inc. ("OFG") is registered as a broker-dealer with the U.S. Securities and Exchange Commission ("SEC") and with various states, offering retail securities brokerage services and engaging in the business of selling mutual funds, variable annuities, Section 529 College Savings Plans, and other general securities. OFG is a member of the Financial Industry Regulatory Authority ("FINRA") and the Securities Investor Protection Corporation ("SIPC"). OFG also provides investment advisory services as a state-registered investment adviser.

OFG and its Representatives acknowledge we act as "fiduciaries" with respect to recommendations for Your IRA account. With the utmost care, prudence and diligence, we will attempt, in Your best interest, to provide You with an IRA investment product matching Your investment objectives, risk tolerance, and financial circumstances and needs, without regard to the financial or other interests of OFG or OFG's Representatives.

However, OFG and its Representatives do receive commissions for broker-dealer transactions. This disclosure worksheet outlines the approximate fees/expenses that will be charged to Your account and the commissions that will be paid to OFG and your OFG Representative.

SCHEDULE OF TYPICAL ACCOUNT FEES AND SERVICE CHARGES: **RBC CAPITAL MARKETS BROKERAGE ACCOUNTS**

<u>Fees/Expenses for RBC IRA Accounts:</u>		
	RBC Fee	OFG Commission
Annual Account Fee (for accounts < \$150,000)	\$35	
Account Closing Fee	\$120	
Stock/Bond/ETF Trading Fee	\$50, or 0.5%-1.0% of trade value.	RBC Fee - \$20
<u>A Share Mutual Fund Transaction Sales Charges and Broker-Dealer Commissions (Breakpoint Schedule):</u>		
Account Value	Initial Sales Charge from Fund Company	OFG Commission
Less than \$25,000	5.75%	5.00%
\$25,000 but less than \$50,000	5.00%	4.25%
\$50,000 but less than \$100,000	4.50%	3.75%
\$100,000 but less than \$250,000	3.50%	2.75%
\$250,000 but less than \$500,000	2.50%	2.00%
\$500,000 but less than \$750,000	2.00%	1.60%
\$750,000 but less than \$1 million	1.50%	1.20%
\$1 million and above *	0.00%	1.00%
Annual Fund Investment Expenses Deducted from Your Account by RBC **		0.60% - 2.25%
Portion of This Expense Paid as an Annual Ongoing 12b-1 Commission to OFG (After Year 1)		0.25%
<u>C Share Mutual Fund Transaction Expenses and Broker-Dealer Commissions:</u>		
Annual Fund Investment Expenses Deducted from Your Account by RBC **		1.20% - 2.90%
Portion of This Expense Paid as an Annual Ongoing 12b-1 Commission to OFG *		1.00%
* Redemptions within 1 year are subject to a 1.00% contingent deferred sales charge.		
** Fund expenses vary by fund, see Your fund's prospectus for details.		
<u>Unit Investment Trusts (UITs) Sales Charges and Broker-Dealer Commissions</u>		
Product Type	Initial Sales Charge from UIT Company	OFG Commission
13- and 15- Month Products	1.85%	1.25%
2-Year Products	2.75%	2.00%
5-Year Products	3.95%	3.00%

The table on the previous page is representative of typical RBC brokerage products sold by OFG. Fees and commissions for certain account types and funds may slightly deviate from the table above. Your OFG Representative will discuss with You any deviations applicable to the type of account You are opening or to the funds You have chosen.

Your OFG Representative will typically receive 70-75% of the OFG Commission amounts listed above.

DESCRIPTION OF OFG'S POLICIES AND PROCEDURES

OFG maintains policies and procedures relating to conflict-mitigation and incentive practices as required by applicable laws and regulations, including the U.S. Department of Labor's Fiduciary Rule. These policies and procedures require a commitment to the highest ethical standards and placing customers' best interests first. All OFG advisers have a duty to know, understand and comply with these policies and procedures and are required to report any violation of such policies and procedures to OFG's Chief Compliance Officer. OFG will provide You a copy of such policies and procedures upon request and without charge. You can request a copy from your OFG adviser.

DIFFERENTIAL COMPENSATION AMONG MUTUAL FUND SHARE CLASSES

Mutual funds typically offer multiple share classes for investment. You should be aware that the internal operating expenses assessed by a mutual fund, as well as the timing and amount of compensation received by OFG, will generally vary between the different share classes and can affect the overall performance and rate of return to investors. For example, retail class A and C shares typically differ in the areas of higher/lower upfront compensation or higher/lower ongoing 12b-1 fees. In addition, these shares classes could have higher operating expenses than institutional shares which may only be available to fee-based investment advisers or qualified retirement accounts and/or subject to minimum investment restrictions. You should not automatically assume that You will be invested in the share class with the lowest possible operating expense. The share classes that result in higher compensation to OFG generally will also have higher operating expenses associated with them. This could present a conflict of interest and could give OFG a financial incentive to recommend share classes with higher operating expenses. However, a range of factors may be considered by Your OFG Representative in determining the appropriateness of a particular mutual fund share class for your IRA Account. OFG encourages You to ask Your OFG Representative about the various share class options available to You and the impact the different share classes may have both on the compensation OFG receives, and the investment cost and total fees You pay.

Other than the commissions outlined in the table above, OFG does not receive any other third party payments with respect to this investment.

OFG'S COMPENSATION AND INCENTIVE ARRANGEMENTS WITH ITS REPRESENTATIVES

OFG's Representatives work on a commission-only basis, and typically receive 70-75% of the gross commission received by OFG. The compensation structure consists of these base commissions and other incentive opportunities for performance to various standards. A Representative's commission generally depends on the services and products being provided.

ATTESTATION: I attest to receiving this disclosure form and discussing it with my OFG Representative.

CLIENT SIGNATURE

CLIENT NAME

OFG REPRESENTATIVE SIGNATURE

OFG REPRESENTATIVE NAME