



Stirlingshire

Better for Clients + Better for Advisors

Potential Conflicts of Interest

Stirlingshire BD LLC. (Stirlingshire) does not act as an investor, placement agent, underwriter, distributor, remarketing agent, structurer, investment manager, investment advisor, commodity trading advisor, proprietary trading, commodity pool operator, municipal advisor, market maker, or trader, the firm also does not produce any proprietary research.

Stirlingshire discloses that it acts as an agency broker and does provide investment recommendations. Stirlingshire does solicit and cause customers to seek to dispose of, retain or increase a position in one or more securities. There are material conflicts of interest between Stirlingshire customers that may arise in connection with Stirlingshire's performance of services for customers. Specifically Stirlingshire makes money when a client is actively trading, which may present a conflict.

Stirlingshire does allow the brokers on the platform to charge a commission when initiating a position for a legacy client, which is a client that the broker has brought to the platform when joining the firm as well as clients they have solicited to join the platform. The brokers are never allowed to charge commission on the buy side when dealing with clients that the firm has allocated to the broker. These clients are known as inbound clients. The inbound clients are those who have signed up for the platform on their own accord via the app or website with no previous relationship to or with a broker at Stirlingshire. This could create a conflict where it may be perceived that the legacy clients could potentially receive preferential treatment. Upon request, any legacy client can ask their broker's supervisor to move their account to the inbound client fee schedule, which bars all commissions on the buy-side and limits commissions to position closing orders in which there is a profit. We attempt to limit this conflict with supervisory and oversight by the Series 24 managers.