



**Polar Investment Counsel Inc.**  
Brokers & Investment Advisors; Member: FINRA, NFA, MSRB, SIPC  
Securities Accounts Cleared Through: Southwest Securities Inc. Member NYSE, FINRA, SIPC  
Futures Accounts Placed With: Zephyr Investment Group Inc.

## Securities And Exchange Commission Rule 11Ac1-6

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### Disclosure of Order Execution and Routing Practices

Polar Investment Counsel, Inc., has prepared this document pursuant to a U.S. Securities and Exchange commission rule requiring all brokerage firms to make publicly available, quarterly reports on their order routing practices. This document provides information on the routing of "non-directed orders" - any order that our customer has not specifically instructed us to route to a particular venue for execution. For these non-directed orders, our clearing firm has selected the execution venue on behalf of our customer.

The firm routes all of our non-directed orders to our clearing firm who in turn re-routes these orders to a venue of their choice. To view information concerning these orders, please visit [Southwest Securities, Inc.](#)

Any of the firm's clientele may at any time inquire as to the routing and execution of any of their orders, any group of their orders, or all of their orders and such information will be provided in a timely manner.

Any of the firm's clientele may at any time direct the firm to route a particular order, a group of orders, or all orders to a venue of their own choosing (a directed order).

Please direct all inquiries to:

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