
EverBank Wealth Management, Inc.

SEC File No. 801-71589

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This brochure supplement provides information about supervised persons of EverBank Wealth Management, Inc. and supplements the EverBank Wealth Management, Inc. brochure. You should have received a copy of that brochure. If you did not receive an EverBank Wealth Management, Inc. brochure or if you have any questions about the contents of this supplement, please contact us at ewmcompliance@everbank.com.

Additional information about any investment advisor representative of EverBank Wealth Management Inc. is available on the SEC's website at www.adviserinfo.sec.gov.

Francis O. Trotter, III, born 1954

A. Educational Background

- MBA, Washington University 1981
- BA, St. Olaf College 1976

B. Business Background

- Chief Executive Officer, EverBank Wealth Management, Inc 2010–Present
- Executive Vice President, EverBank; President, EverBank Direct 2002–Present

C. Professional Designations—Qualifications and Related Criteria

- Series 4, 7, 15, 24, 53, 63

D. Disciplinary Information

There are no legal or disciplinary events about Mr. Trotter to report. Public information concerning Mr. Trotter’s registration as an investment advisor representative may be found by accessing the SEC’s public disclosure site at www.adviserinfo.sec.gov.

E. Other Business Activities

Mr. Trotter holds a variety of positions within the EverBank family of companies. These other positions may occupy a substantial amount of Mr. Trotter’s time, and his compensation may be determined in significant part by his performance in these other positions. Mr. Trotter serves as EVP of both EverBank Financial Corporation (a savings and loan holding company of which EverBank Wealth Management, Inc. is an indirect wholly-owned subsidiary) and EverBank (a federal savings association that is a wholly-owned subsidiary of EverBank Financial Corporation); Director and President of CustomerOne Financial Network, Inc. (a holding company wholly-owned by EverBank) and Director and CEO of EverTrade Direct Brokerage, Inc. (a registered broker dealer that is a wholly-owned subsidiary of CustomerOne Financial Network, Inc.). Mr. Trotter is a registered representative of EverTrade Direct Brokerage, Inc. He does not receive any compensation, cash or non-cash, relating to sales of securities or other investment products. Mr. Trotter receives no distribution or service fees from the sale of mutual funds. He is subject to the EverBank Wealth Management, Inc. Code of Ethics and the EverBank Financial Corporation Code of Conduct that define the business procedures and practices that reflect the EverBank corporate family’s values, including how to deal with any conflict of interest.

F. Additional Compensation

Mr. Trotter is an employee of CustomerOne Financial Network, Inc., which is a subsidiary of EverBank. As such, he earns a salary and a possible bonus from this position, as well as any compensation he receives in his capacity as CEO of EverBank Wealth Management, Inc. Any bonus may be earned based on a variety of factors including division revenue growth and profitability, as well as personal contributions and other subjective factors.

G. Supervision

Mr. Trotter is directly supervised by EverBank Wealth Management, Inc.’s President, David L. Conover, whose phone number is 904.279.7169, with respect to Mr. Trotter’s advisory activities. The President, or his designee(s), must review and approve the opening of each new advisory relationship and oversee quarterly reviews of client accounts. The President, or his designee(s), is also responsible for ensuring that any significant change in a client’s investment strategy or in the concentration of a client’s assets is appropriate for and has been reviewed with the client. Mr. Trotter’s phone number is 314.951.1600.

David L. Conover, born 1956

A. Educational Background

- BS, Rider University 1978
- ABA Graduate Trust School, Northwestern University 1982

B. Business Background

- President, Chief Operating Officer, EverBank Wealth Management, Inc 2010–Present
- Senior Vice President, Director of Advisor Services, EverBank 2004–Present

C. Professional Designations—Qualifications and Related Criteria

- Series 7, 8, 63, 66

D. Disciplinary Information

There are no legal or disciplinary events about Mr. Conover to report. Public information concerning Mr. Conover’s registration as an investment advisor representative may be found by accessing the SEC’s public disclosure site at www.adviserinfo.sec.gov.

E. Other Business Activities

Mr. Conover holds certain other positions within the EverBank family of companies. These other positions may occupy a certain amount of Mr. Conover’s time, and his compensation may be determined in part by his performance in these other positions. Mr. Conover serves as SVP, Director of Advisor Services of EverBank, a federal savings association of which EverBank Wealth Management, Inc. is an indirect wholly-owned subsidiary. EverBank wholly owns EverTrade Direct Brokerage, Inc., a registered broker dealer. Mr. Conover is a registered representative of EverTrade Direct Brokerage, Inc. He does not receive any compensation, cash or non-cash, relating to sales of securities or other investment products. Mr. Conover receives no distribution or service fees from the sale of mutual funds. He is subject to the EverBank Wealth Management, Inc. Code of Ethics and the EverBank Financial Corporation Code of Conduct that define the business procedures and practices that reflect the EverBank corporate family’s values, including how to deal with any conflict of interest.

F. Additional Compensation

As an employee of EverBank, Mr. Conover earns a salary and a possible bonus. A bonus may be earned based on a variety of factors including division revenue growth and profitability, as well as personal contributions and other subjective factors.

G. Supervision

Mr. Conover, in his capacity as President and Chief Operating Officer of EverBank Wealth Management, Inc., or his designee(s), must review and approve the opening of each new advisory relationship and oversee quarterly review of client accounts. The President, or his designee(s), is also responsible for ensuring that any significant change in a client’s investment strategy or in the concentration of a client’s assets is appropriate for and has been reviewed with the client. Mr. Conover’s phone number is 904.279.7169.

Christine Haedike, Chief Compliance Office of EverBank Wealth Management, Inc., will supervise Mr. Conover’s investment adviser activities. This will include, but is not limited to, a review regarding any new accounts Mr. Conover opens, and a quarterly review of any accounts Mr. Conover handles. Ms. Haedike’s phone number is 314.951.1646.

Christine D. Haedike, born 1966

A. Educational Background

- BS, The University of Illinois 1988

B. Business Background

- Vice President, Chief Compliance Officer, EverBank Wealth Management, Inc 2011–Present
- Vice President, Chief Compliance Officer, EverTrade Direct Brokerage, Inc 2011–Present
- Senior Vice President, Director of Internal Audit, First Allied Securities, Inc 2010–2011
- Executive Vice President, Chief Compliance Officer, First Allied Advisory Services 2006–2010
- Executive Vice President, Chief Compliance Officer, FFP Securities, Inc 2003–2010

C. Professional Designations—Qualifications and Related Criteria

- Series 7, 63, 24, 9/10, 53, 65
- Life, Health, Variable Insurance licenses

D. Disciplinary Information

There are no legal or disciplinary events about Ms. Haedike to report. Public information concerning Ms. Haedike’s registration as an investment advisor representative may be found by accessing the SEC’s public disclosure site at www.adviserinfo.sec.gov

E. Other Business Activities

Ms. Haedike serves as VP, Chief Compliance Officer of EverTrade Direct Brokerage, Inc., an affiliated broker/dealer. She is also a registered representative of EverTrade Direct Brokerage, Inc. She does not receive any compensation, cash or non-cash, relating to sales of securities or other investment products. Ms. Haedike receives no distribution or service fees from the sale of mutual funds. She is subject to the EverBank Wealth Management, Inc. Code of Ethics and the EverBank Financial Corporation Code of Conduct that define the business procedures and practices that reflect the EverBank corporate family’s values, including how to deal with any conflict of interest.

F. Additional Compensation

As an employee of EverBank, Ms. Haedike earns a salary and possible bonus. A bonus may be earned based on a variety of factors including division revenue growth and profitability, as well as personal contributions and other subjective factors.

G. Supervision

Ms. Haedike, as Chief Compliance Officer of EverBank Wealth Management, Inc., is directly supervised by its President, David L. Conover. Mr. Conover’s phone number is 904.279.7169. The President, or his designee(s), must review and approve the opening of each new advisory relationship and oversee quarterly reviews of client accounts. The President, or his designee(s), is also responsible for ensuring that any significant change in a client’s investment strategy or in the concentration of a client’s assets is appropriate for and has been reviewed with the client.

Chris Gaffney, born 1965

A. Educational Background

- BSBA, Washington University 1987

B. Business Background

- Senior Vice President, Director of Sales, EverBank 2003–Present
- VP, EverBank Wealth Management 2012–Present
- Chief Operating Officer, Coachman Homes..... 1998–2003
- VP Mercantile Bank..... 1997–1998
- VP, International Markets, Mark Twain Bank..... 1989–1997

C. Professional Designations—Qualifications and Related Criteria

- Series 7, 63

Mr. Gaffney holds the professional designation of Chartered Financial Analyst. The Chartered Financial Analyst (CFA) charter is a graduate-level investment credential established in 1962 and awarded by CFA Institute- the largest global association of investment professionals.

There are currently more than 90,000 CFA charter holders working in 134 countries. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as member; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code Ethics and Standards of Professional Conduct.

CFA Ethical Standards

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforce through an active professional conduct program, require CFA charter holders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

Global Recognition

Regulatory bodies in 22 countries and territories recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Current Knowledge and Continuing Education

The three levels of the CFA Program test a proficiency with a range of fundamental and investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

To learn more about the CFA charter, visit www.cfainstitute.org

D. Disciplinary Information

There are no legal or disciplinary events about Mr. Gaffney to report. Public information concerning Mr. Gaffney's registration as an investment advisor representative may be found by accessing the SEC's public disclosure site at www.adviserinfo.sec.gov.

E. Other Business Activities

Mr. Gaffney is also a registered representative of EverTrade Direct Brokerage, Inc. He does not receive any compensation, cash or non-cash, relating to sales of securities or other investment products. Mr. Gaffney receives no distribution or service fees from the sale of mutual funds. He is subject to the EverBank Wealth Management, Inc. Code of Ethics and the EverBank Financial Corporation code of conduct that define the business procedures and practices that reflect the EverBank corporate family's values, including how to deal with any conflict of interest.

F. Additional Compensation

As an employee of EverBank, Mr. Gaffney earns a salary and a possible bonus. A bonus may be earned based on a variety of factors including division revenue growth and profitability, as well as personal contributions and other subjective factors.

G. Supervision

Mr. Gaffney is directly supervised by EverBank Wealth Management, Inc.'s President, David L. Conover, whose phone number is 904-279-7169. The President or his designee(s) must review and approve the opening of each new advisory relationship and oversee quarterly reviews of client accounts. The President or his designee(s) is also responsible for ensuring that any significant change in a client's investment strategy or in the concentration of a client's assets is appropriate for and has been reviewed with the client.

Christie J. Briscoe Zarkovich, born 1974

A. Educational Background

- BS, The Colorado School of Mines 1996
- MS, University of Denver 2001
- MBA, University of Denver 2001

B. Business Background

- Vice President, Portfolio Manager, EverBank Wealth Management, Inc 2011–Present
- Director of investments, The UC Berkeley Endowment Management Company 2010
- Associate Director of investments, The William and Flora Hewlett Foundation 2007–2010

C. Professional Designations—Qualifications and Related Criteria

Ms. Zarkovich holds the professional designation of Chartered Financial Analyst. The Chartered Financial Analyst (CFA) charter is a graduate-level investment credential established in 1962 and awarded by CFA Institute—the largest global association of investment professionals.

There are currently more than 90,000 CFA charterholders working in 134 countries. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as member; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code Ethics and Standards of Professional Conduct.

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The three levels of the CFA Program test a proficiency with a range of fundamental and investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

To learn more about the CFA charter, visit www.cfainstitute.org

D. Disciplinary Information

There are no legal or disciplinary events about Ms. Zarkovich to report. Public information concerning Ms. Zarkovich's registration as an investment advisor representative may be found by accessing the SEC's public disclosure site at www.adviserinfo.sec.gov.

E. Other Business Activities

Ms. Zarkovich serves as an Advisor to the Investment Committee of University of North Florida Foundation ("UNFF"), the Finance Committee of the Women's Giving Alliance ("WGA"), and on the Board of Directors of The Women's Center of Jacksonville ("WCJ"). UNFF, WGA, and WCJ are 501(c)(3) not for profit organizations located in Jacksonville, FL.

Ms. Zarkovich does not receive any compensation, cash or non-cash, relating to sales of securities or other investment products. She receives no distribution or service fees from the sale of mutual funds. She is subject to the EverBank Wealth Management, Inc. Code of Ethics and the EverBank Financial Corporation Code of Conduct that define the business procedures and practices that reflect the EverBank corporate family's values, including how to deal with any conflict of interest.

F. Additional Compensation

Ms. Zarkovich is an employee of EverBank Wealth Management, Inc. As such, she earns a salary and a possible bonus. A bonus may be earned based on a variety of factors including division revenue growth and profitability, as well as personal contributions and other subjective factors.

G. Supervision

Ms. Zarkovich is directly supervised by EverBank Wealth Management, Inc.'s President, David L. Conover, whose phone number is 904.279.7169. The President, or his designee(s), must review and approve the opening of each new advisory relationship and oversee quarterly reviews of client accounts. The President, or his designee(s), is also responsible for ensuring that any significant change in a client's investment strategy or in the concentration of a client's assets is appropriate for and has been reviewed with the client.

Jamie Hogan, born 1969

A. Educational Background

- BBA, Southern Illinois University at Edwardsville 1995

B. Business Background

- Wealth Management Advisor, EverBank Wealth Management, Inc 2010–Present
- Product Manager II, EverBank 2009–Present
- Financial Advisor, Merrill Lynch 2005–2007
- Associate Vice President, Manager of Financial and Portfolio Planning Services, AG Edwards 1996–2005

C. Professional Designations—Qualifications and Related Criteria

- Series 7, 66

D. Disciplinary Information

There are no legal or disciplinary events about Mr. Hogan to report. Public information concerning Mr. Hogan’s registration as an investment advisor representative may be found by accessing the SEC’s public disclosure site at www.adviserinfo.sec.gov.

E. Other Business Activities

Mr. Hogan is a Vice President and Wealth Management Advisor for EverBank Wealth Management, Inc. EverBank Wealth Management, Inc.’s affiliate, EverBank, wholly owns EverTrade Direct Brokerage, Inc., a registered broker dealer for which Mr. Hogan is a registered representative. Mr. Hogan does not receive any compensation, cash or non-cash, relating to sales of securities or other investment products. He receives no distribution or service fees from the sale of mutual funds. Mr. Hogan is subject to the EverBank Wealth Management, Inc. Code of Ethics and the EverBank Financial Corporation Code of Conduct that define the business procedures and practices that reflect the EverBank corporate family’s values, including how to deal with any conflict of interest.

F. Additional Compensation

Mr. Hogan is an employee of EverBank Wealth Management, Inc. As such, he earns a salary and a possible bonus. A bonus may be earned based on a variety of factors including division revenue growth and profitability, as well as personal contributions and other subjective factors.

G. Supervision

Mr. Hogan is directly supervised by EverBank Wealth Management, Inc.’s President, David L. Conover, whose phone number is 904.279.7169. The President, or his designee(s), must review and approve the opening of each new advisory relationship and oversee quarterly reviews of client accounts. The President, or his designee(s), is also responsible for ensuring that any significant change in a client’s investment strategy or in the concentration of a client’s assets is appropriate for and has been reviewed with the client.

Mark Martorell, born 1970

A. Educational Background

- BS, The Florida Atlantic University 1992

B. Business Background

- Vice President, Wealth Management Specialist, EverBank Wealth Management, Inc 2011–Present
- Vice President, Branch Manager, Charles Schwab and Co 2005–2010

C. Professional Designations—Qualifications and Related Criteria

- Series 7, 9, 10, 63, 65

D. Disciplinary Information

There are no legal or disciplinary events about Mr. Martorell to report. Public information concerning Mr. Martorell’s registration as an investment advisor representative may be found by accessing the SEC’s public disclosure site at www.adviserinfo.sec.gov.

E. Other Business Activities

Mr. Martorell is also a registered representative of EverTrade Direct Brokerage, Inc. He does not receive any compensation, cash or non-cash, relating to sales of securities or other investment products. Mr. Martorell receives no distribution or service fees from the sale of mutual funds. He is subject to the EverBank Wealth Management, Inc. Code of Ethics and the EverBank Financial Corporation Code of Conduct that define the business procedures and practices that reflect the EverBank corporate family’s values, including how to deal with any conflict of interest.

F. Additional Compensation

As an employee of EverBank, Mr. Martorell earns a salary and possible bonus. A bonus may be earned based on a variety of factors including division revenue growth and profitability, as well as personal contributions and other subjective factors. Mr. Martorell will be eligible to receive a percentage of gross investment management fees charged to a client for the first two years after the account is established.

G. Supervision

Mr. Martorell is directly supervised by EverBank Wealth Management, Inc.’s President, David L. Conover, whose phone number is 904.279.7169. The President, or his designee(s), must review and approve the opening of each new advisory relationship and oversee quarterly reviews of client accounts. The President, or his designee(s), is also responsible for ensuring that any significant change in a client’s investment strategy or in the concentration of a client’s assets is appropriate for and has been reviewed with the client.

John Sastry, born 1966

A. Educational Background

- BA, Truman State University.....1988
- Juris Doctor, University of Missouri.....1991

B. Business Background

- Vice President, Wealth Management Specialist, EverBank Wealth Management, Inc2011–Present
- Senior Specialist, Edward Jones.....2006–2010
- First Allied Securities, Director of Financial Planning 2004–2006

C. Professional Designations—Qualifications and Related Criteria

- Series 7, 66, 24
- Certified Financial Planner – The CFP® Certification Exam is a 10-hour exam which includes three major case problems and is designed to assess the candidate’s ability to apply his or her knowledge to the areas to financial planning.

After passing the examination, the candidate must demonstrate having certain requisite work experience in the financial planning field. The CFP® Board defines work experience as “the supervision, direct support, teaching or personal delivery of all or part of the personal financial planning process to a client” and such experience must fall within one or more of the following six primary elements of financial planning:

- Establishing and Defining the Client Relationship
- Gathering Client Data and Goals
- Analyzing and Evaluating the Client’s Financial Status
- Developing and Presenting Financial Planning Recommendations and Alternatives
- Implementing the Financial Planning Recommendations
- Monitoring the Financial Planning Recommendations

In addition to passing the exam the candidate must also have completed the following:

- Three years full-time or equivalent (2,000 hours per year) part-time experience in the financial planning field
- Be approved by the CFP® Board during initial certification, which involves an extensive background check—including an inquiry into a candidate’s ethics, character and a criminal background check.

D. Disciplinary Information

There are no legal or disciplinary events about Mr. Sastry to report. Public information concerning Mr. Sastry’s registration as an investment advisor representative may be found by accessing the SEC’s public disclosure site at www.adviserinfo.sec.gov.

E. Other Business Activities

Mr. Sastry is also a registered representative of EverTrade Direct Brokerage, Inc. Mr. Sastry does not receive any compensation, cash or non-cash, relating to sales of securities or other investment products. He receives no distribution or service fees from the sale of mutual funds. Mr. Sastry is subject to the EverBank Wealth Management, Inc. Code of Ethics and the EverBank Financial Corporation Code of Conduct that define the business procedures and practices that reflect the EverBank corporate family’s values, including how to deal with any conflict of interest.

F. Additional Compensation

As an employee of EverBank, Mr. Sastry earns a salary and possible bonus. A bonus may be earned based on a variety of factors including division revenue growth and profitability, as well as personal contributions and other subjective factors.

G. Supervision

Mr. Sastry is directly supervised by EverBank Wealth Management, Inc.'s President, David L. Conover, whose phone number is 904.279.7169. The President, or his designee(s), must review and approve the opening of each new advisory relationship and oversee quarterly reviews of client accounts. The President, or his designee(s), is also responsible for ensuring that any significant change in a client's investment strategy or in the concentration of a client's assets is appropriate for and has been reviewed with the client.

Paul Ardekani, born 1981

A. Educational Background

- BSBA, in Finance and Economics, St. Louis University, John Cook School of Business..... 2004

B. Business Background

- Vice President, Wealth Management Specialist, EverBank Wealth Management, Inc2012–Present
- Financial Advisor, Wells Fargo Advisors, LLC 2010–2012
- Financial Advisor, Merrill Lynch.....2008–2010
- Client Service Advisor, Smith Barney 2007–2008

C. Professional Designations—Qualifications and Related Criteria

- Series 7, 66

D. Disciplinary Information

There are no legal or disciplinary events about Mr. Ardekani to report. Public information concerning Mr. Ardekani’s registration as an investment advisor representative may be found by accessing the SEC’s public disclosure site at www.adviserinfo.sec.gov.

E. Other Business Activities

Mr. Ardekani is also a registered representative of EverTrade Direct Brokerage, Inc. Mr. Ardekani does not receive any compensation, cash or non-cash, relating to sales of securities or other investment products. He receives no distribution or service fees from the sale of mutual funds. Mr. Ardekani is subject to the EverBank Wealth Management, Inc. Code of Ethics and the EverBank Financial Corporation Code of Conduct that define the business procedures and practices that reflect the EverBank corporate family’s values, including how to deal with any conflict of interest.

F. Additional Compensation

As an employee of EverBank, Mr. Ardekani earns a salary and possible bonus. A bonus may be earned based on a variety of factors including division revenue growth and profitability, as well as personal contributions and other subjective factors.

G. Supervision

Mr. Ardekani is directly supervised by EverBank Wealth Management, Inc.’s President, David L. Conover, whose phone number is 904.279.7169. The President, or his designee(s), must review and approve the opening of each new advisory relationship and oversee quarterly reviews of client accounts. The President, or his designee(s), is also responsible for ensuring that any significant change in a client’s investment strategy or in the concentration of a client’s assets is appropriate for and has been reviewed with the client.

Brian Clark, born 1971

A. Educational Background

- BS, Jacksonville State University 1994

B. Business Background

- Vice President, Wealth Management Specialist, EverBank Wealth management, Inc..... 2012-present
- Wells Fargo Advisors, Financial Advisor 2010-2012
- Wells Fargo Bank, NA VP Manager Southeast 2001-2010

C. Professional Designations—Qualifications and Related Criteria

- Series 7, 66
- Life, Health, LTC, Variable insurance licenses
- Certified Corporate Trust Specialist

D. Disciplinary Information

There are no legal or disciplinary events about Mr. Clark to report. Public information concerning Mr. Clark’s registration as an investment advisor representative may be found by accessing the SEC’s public disclosure site at www.adviserinfo.sec.gov.

E. Other Business Activities

Mr. Clark is also a registered representative of EverTrade Direct Brokerage, Inc. He does not receive any compensation, cash or non-cash, relating to sales of securities or other investment products. Mr. Clark receives no distribution or service fees from the sale of mutual funds. He is subject to the EverBank Wealth Management, Inc. Code of Ethics and the EverBank Financial Corporation Code of Conduct that define the business procedures and practices that reflect the EverBank corporate family’s values, including how to deal with any conflict of interest.

F. Additional Compensation

As an employee of EverBank, Mr. Clark earns a salary and possible bonus. A bonus may be earned based on a variety of factors including division revenue growth and profitability, as well as personal contributions and other subjective factors. Mr. Clark will be eligible to receive a percentage of gross investment management fees charged to a client for the first two years after the account is established.

G. Supervision

Mr. Clark is directly supervised by EverBank Wealth Management, Inc.’s President, David L. Conover, whose phone number is 904.279.7169. The President or his designee(s) must review and approve the opening of each new advisory relationship and oversee quarterly reviews of client accounts. The President or his designee(s) is also responsible for ensuring that any significant change in a client’s investment strategy or in the concentration of a client’s assets is appropriate for and has been reviewed with the client.