

Relationship Summary:

1. Introduction:

El Castillo Investments, LLC provides brokerage and investment advisory services to retail investors.

2. Services:

- a. **Investment Club:** At El Castillo Investments, LLC, we are committed to fostering financial education and community engagement. Our Investment Club provides an inclusive platform for the community to participate in the stock market collectively. This collaborative approach allows members to share insights, discuss investment strategies, and collectively navigate the dynamic landscape of the financial markets.
- b. **Advisory Information:** Upon request, El Castillo Investments, LLC provides personalized advisory services. This includes expert guidance on buying, selling, and managing investment assets. Our advisory services are tailored to meet individual financial goals and are offered for a fee. We strive to empower our clients with informed decision-making, supporting them on their financial journey.

3. Fees:

At El Castillo Investments, LLC, transparency is paramount. Our fee structure is designed to align with your financial success, ensuring a fair and straightforward approach.

- a. **Annual Management Fee:** We charge a 2% annual fee on assets under management (AUM). This fee is calculated based on the total value of the assets we manage on your behalf. It reflects our commitment to optimizing your portfolio and ensuring it aligns with your financial objectives.
- b. **Withdrawal Fee:** In the event of a withdrawal, we apply a 2% fee on the withdrawn amount. This fee helps cover administrative costs associated with processing and managing withdrawal requests.
- c. **Advisory Fee:** For clients seeking personalized advisory information, we offer guidance based on a fee structure that aligns with the amount of funds under consideration. This advisory fee may also be set at 2% and is determined in consultation with our clients. This ensures that the guidance provided is tailored to your financial goals and backed by a fair compensation structure.
- d. Our commitment is to provide value through transparent and competitive fees, allowing you to make informed decisions about your financial future.

4. Conflicts of Interest:

Participation of Family and Friends in the Investment Club:

- a. Disclosure: El Castillo Investments acknowledges that family and friends participate in the Investment Club.
- b. Mitigation: The profit-sharing structure is transparent, based on the percentage of ownership from the pooled funds of each member. Ownership percentages are disclosed to all members, ensuring fairness and transparency.

Recommendation of Certain Assets Held in Private Portfolio and Investment Club:

- a. Disclosure: El Castillo Investments recommends certain assets that are held in its private portfolio and the Investment Club to outside parties.
- b. Mitigation: While these recommendations are made, it's crucial to transparently disclose the nature of the recommendation and the fact that El Castillo Investments has an interest in these assets. This ensures that clients are aware of any potential conflicts and can make informed decisions.

5. Standards of Conduct - El Castillo Investments, LLC

At El Castillo Investments, we are committed to upholding the highest standards of conduct to ensure the trust and well-being of our clients. These standards guide our actions, decisions, and interactions in providing financial services. We pledge to adhere to the following principles:

Fiduciary Duty:

We recognize and embrace our fiduciary duty to act in the best interests of our clients. Client interests will always take precedence over our own, and we will avoid conflicts of interest that could compromise the trust placed in us.

Transparency:

We are dedicated to transparent communication. We will provide clear, accurate, and comprehensive information about our services, fees, and any potential conflicts of interest. Our goal is to empower clients with the knowledge needed to make informed financial decisions.

Fair Dealing:

Every client will be treated fairly, equitably, and without discrimination. Our recommendations and services will be tailored to the unique needs and circumstances of each client, ensuring a personalized and unbiased approach.

Diligence and Care:

We commit to exercising due diligence and care in all aspects of our services. This includes staying informed about market conditions, assessing the suitability of our recommendations, and regularly monitoring and managing client portfolios.

Professional Competence:

We will maintain a high level of professional competence by staying current with industry trends, regulations, and best practices. Continuous education and training are essential for delivering quality service to our clients.

Conflict of Interest Management:

Identifying and managing conflicts of interest is a priority. We will disclose any potential conflicts to our clients, implement measures to mitigate conflicts, and make decisions that prioritize our clients' interests.

Compliance with Regulations:

We are committed to compliance with all relevant laws and regulations governing our industry. Adhering to regulatory requirements is foundational to maintaining a legal and ethical framework for our business operations.

These Standards of Conduct are a testament to our dedication to the principles of integrity, transparency, and client-centric service. We will continuously strive to exceed these standards in our pursuit of excellence on behalf of our valued clients.

Contact Information:

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