



E6 Portfolios

Client Brochure

(Form ADV Part 2A)

10 March, 2024

This brochure provides information about E6 Portfolios, LLC qualifications and business practices. If you have questions about the brochure, please contact us at hello@e6Portfolios.com.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Registration does not imply a certain level of skill or training. Provision of this brochure does not relieve E6 Portfolios, LLC of any other disclosure obligations the firm may have under federal or state law. Additional information about E6 Portfolios, LLC is available by searching the SEC website at www.adviserinfo.sec.gov by firm name or CRD number (#326617).

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ITEM 2 – MATERIAL CHANGES

Advisory Business: Item 4 has been updated because E6 Portfolios’ services have changed. The firm operates a Turnkey Asset Management Platform (“TAMP”) to registered investment advisers (“RIA”). The firm also provides investment management solutions to clients of wealth management RIAs through its Wrap Fee Programs. The updated brochure discusses the features and functions of the TAMP.

E6 Portfolios Clients: At this time, E6 portfolios will only work with clients that have a third-party Investment Advisor. We made updates throughout the brochure correcting any reference to E6 Portfolios working directly with clients who have not engaged a third-party Investment Advisor.

New Investment Strategy: Clients now have the option to lend their securities to short sellers through securities lending programs offered by the firm’s custodians.

Ownership Clarification: Item 4 has been updated because E6 Portfolios ownerships structure has changed. The firm is wholly owned by E6 Holdings, LLC

Fees: Item 5 has been updated because the firm will now charge on cash and accrued interest.

Methods of Analysis (Item 8): The firm added cyber security disclosures.

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ITEM 4 – ADVISORY BUSINESS

About E6 Portfolios

E6 Portfolios, LLC (“the Firm,” “the Adviser”) was founded on April 18, 2023 and registered as an independent RIA on July 13, 2023. The firm is organized as a Limited Liability Company in the state of Utah and is wholly owned by E6 Holding, LLC. E6 Portfolios operates a Turnkey Asset Management Platform (“TAMP”) that it offers to registered investment advisers (“RIAs”). The Firm also provides investment management solutions to clients of wealth management RIAs through its Wrap Fee Programs described below. The Adviser’s principal place of business is in Midvale, UT.

As of February 29, 2024, E6 Portfolios managed \$4,785,625 in discretionary assets and \$0 in non-discretionary assets.

Turnkey Asset Management Services

In a TAMP relationship, E6 Portfolios clients typically first work directly with their primary RIA to determine their investment needs and objectives given their unique circumstances. The primary RIA then relies on E6 Portfolios to design investment portfolios, purchase and sell securities, monitor investments, and perform various other functions. Clients cannot engage E6 Portfolios directly for investment management services. Alternatively, RIAs can engage E6 Portfolios to provide investment management services to their clients in a co-advisory or sub-advisory capacity.

E6 Portfolios turnkey asset management services include, but are not limited to:

- 1) Providing co-advisory and sub-advisory investment management services to clients of third-party RIAs;
- 2) Providing access to certain vetted third-party investment options and research;
- 3) Acting as an operational liaison between third-party RIAs and approved custodians;
- 4) Operating a billing platform for third-party RIAs with the ultimate responsibility for fee schedules set by the RIAs;
- 5) Portfolio management and trade execution for the third-party RIAs’ client accounts;
- 6) Providing third-party RIAs and their clients with monthly reports showing holdings, transactions, and performance;
- 7) Other administrative support services as agreed upon with the RIAs and their clients

The clients of the RIAs served by E6 Portfolios are not always in direct contact with the Firm. It is the responsibility of each third-party RIA to determine their client’s individual financial situation, investment goals and objectives, qualification, time horizon, portfolio liquidity and concentration, and tolerance for risk as well as any investment limitations and reasonable restrictions for their clients’ accounts. E6 Portfolios, in turn, provides investment management services based on the asset allocation and the investment portfolios selected by the third-party

RIA for their client's account(s). Each third-party RIA is responsible for maintaining communication with their clients to monitor their investment objectives as well as any changes in their client's individual circumstances. The RIA is also responsible for communicating any changes about their client(s) financial situation and investment objectives to E6 Portfolios. Clients of the third-party RIA also bear a responsibility to communicate changes in their investment objectives and risk profile to the third-party RIA. Clients should direct their questions about the suitability of E6 Portfolios' investment strategies and fees charged to their primary RIA. It is the sole responsibility of their RIA to determine whether our TAMP services and the services provided under our Wrap Fee Programs are suitable for them.

Third-party RIAs, E6 Portfolios, and their mutual clients all agree to the terms described in this section by executing a Tri-Party Agreement. Please refer to that agreement for more information.

Wrap Fee Programs

E6 Portfolios provides investment management services exclusively through two interdependent Wrap Fee Programs. The first, the E6 Portfolios SMA, SMP, UMP Wrap Fee Program, offers Separately Managed Accounts (SMA), Separately Managed Portfolios (SMP), and Unified Managed Portfolio (UMP) services to clients. The second, the E6 Portfolios Investment Strategists Wrap Fee Program, offers clients a menu of specific security models called Investment Strategists. SMA, SMP, and UMP clients use these Strategist models alone or in combination to deliver a balance of risk and opportunity that corresponds to their investment objectives and risk tolerance.

E6 Portfolios offers only investment management services to retail clients and TAMP services to third-party RIAs as described above. Investment advisory services (sometimes called "Wealth Management") are not included in E6 Portfolio offerings. Clients may want to receive Wealth Management services and may engage a Registered Investment Advisory firm other than E6 Portfolios for these services, as described above. E6 Portfolios will work with third-party Investment Advisors and all the offerings described in this brochure allow the Client to authorize a third-party Investment Advisor to communicate instructions to E6 Portfolios on their behalf if a Tri-Party Agreement is executed. However, E6 Portfolios does not make all E6 Portfolios Strategists available to all third-party advisors. E6 Portfolios reserves the right to vet and elect not to work with any third-party Advisor at its sole discretion.

Since all services are provided through the firm's two Wrap Fee Programs, please see the respective Wrap Fee Brochures for a detailed description of services provided, fees charged, and ongoing oversight provided.

Clients enrolled in Wrap Fee programs do not pay transaction expenses for accounts enrolled in the program, which could result in a lower overall cost for the client.

Investment Discretion

Clients in E6 Portfolios' Wrap Fee Programs grant the firm discretionary trading authority in the account(s) so that the firm can implement the agreed-upon Wrap Fee Program Services. Discretion includes the authority to make all decisions to investigate, buy, sell, or hold securities, cash, or other publicly traded investments on behalf of the client at E6 Portfolios' sole discretion and without first consulting the client. In their agreements with the qualified custodian, the client authorizes the custodian to follow E6 Portfolios' instructions concerning trading and other investment activity in the account on behalf of the client.

Selection of Other Investment Advisers

E6 Portfolios does recommend other investment advisers for them to actively manage client assets when it is in the client's best interest. The services provided by the third-party investment advisers can be arranged in either a sub-advisory capacity or in direct relationship with clients. The investment advisers recommended by E6 Portfolios may include non-affiliated third party investment advisers.

The discretion to select and appoint other investment advisers is subject to the terms of each client's advisory agreement. The specific terms and conditions under which a client engages a third party investment adviser can also be found in the client's written agreement with them. In addition to E6 Portfolios' Part 2A Brochure, clients may also receive the written disclosure documents of the third-party investment adviser they engage.

Consistent with its fiduciary duty to clients, E6 Portfolios conducts due diligence for each recommended third-party investment adviser. The Firm evaluation can include a review of the investment adviser's disclosure documents, documents provided by the adviser, and third-party evaluations and analyses of the adviser if E6 Portfolios considers them to be reputable.

Termination

E6 Portfolios or the client may end the advisory relationship at any time without penalty or fee by giving written notice to the other party. Clients should review their Advisory Agreement for further details. Clients enter into relationships with the account custodian directly and should review their agreement with the custodian for conditions related to terminating the agreement (such as transfer-out fees).

ITEM 5 – FEES AND COMPENSATION

E6 Portfolios clients are required to enroll in the E6 Portfolios Wrap Fee Program so all fees are assessed through the Wrap Fee Program. Please see the E6 Portfolios SMA, SMP, UMP Wrap Fee Program Brochure and the E6 Portfolios Investment Strategists Wrap Fee Program Brochure for a detailed fee schedule.

Fee Calculation and Manner of Payment

Some services in the E6 Portfolios SMA, SMP, UMP Wrap Fee Program charge flat monthly fees, while some charge asset-based fees on a tiered basis. All services in the E6 Portfolios Investment Strategists Wrap Fee Program charge asset-based fees with no tiered reductions. Any tiered reductions are calculated and applied based on all assets in the client's household under management by E6 Portfolios. A "Client household" is generally limited to a person or a couple who share finances and their minor children; E6 Portfolios reserves the right to determine the members of a client household.

All fees, whether flat monthly fees or asset-based fees are deducted from client accounts on a monthly basis in arrears. Asset-based fees are calculated based on the average daily balance (including cash) of the account during the month. Advisory fees are not collected in advance. The client's agreements with E6 Portfolios and with their qualified custodian provide authorization to deduct management fees from the client's account directly and remit that fee to the firm. E6 Portfolios will send a bill to the qualified custodian indicating the amount of the fee to be paid. The custodian will send a statement to the client, at least quarterly, indicating the fee dispersed. Each time the fee is assessed, E6 Portfolios will make a statement available to the client showing the amount of the fee and how the fee was calculated. E6 Portfolios will disclose to clients their responsibility to verify the accuracy of the fee calculation.

E6 Portfolios believes that its Wrap Fee Program fees are reasonable but the firm's fees may be more than the cost of purchasing comparable services separately or through other advisors. Relative cost would depend on many factors including the cost of each service if provided separately, the comparative volume of trading, value provided, and the cost of trading.

E6 Portfolio fees are not negotiable but in some cases preexisting fee schedules may be grandfathered in. Fees are waived for Employees and affiliates.

Because E6 Portfolios primarily recommends a related-person manager, a significant portion of advisory fees charged are paid to the portfolio managers.

Individuals recommending the wrap fee program do not receive additional compensation as a result of the client's participation in the program.

Transaction Costs

E6 Portfolios Wrap Fee programs bear the cost of all transactions that take place in the client account, including trading commissions, mutual fund ticket charges, clearance, and any other transaction costs. Because E6 Portfolios bears transaction costs, the firm may have a financial incentive to trade less frequently in Wrap Fee Program accounts than would be beneficial to the client. Similarly, many custodians offer non-transaction fee funds or do not charge commissions on ETF or equity trades. E6 Portfolios has an incentive to purchase these investments for the client rather than investments that have a trading cost.

Other Costs

Clients bear the cost of management fees and other expenses imposed directly by mutual funds or exchange traded funds held by the client; spreads paid to market makers; and any account maintenance fees agreed to with the Custodian such as custodial, account, or wire fees. See Item 12 for more information on Brokerage Practices.

Certain investment products (such as mutual funds or ETFs) incur additional fund-level expenses borne by the client and are described in full in the fund's prospectus.

E6 Portfolios Clients are assessed additional fees if they do not agree to electronic delivery of statements and other communications. If Client does not elect electronic communication from the Client's Qualified Custodian or elects to receive mailed communication from E6 Portfolios they will be assessed fees according to the schedule stated in the most recent E6 Portfolios SMA, SMP, UMP and Strategic Wrap Fee Brochure.

Margin Costs

The custodians recommended by E6 Portfolios may make margin borrowing available to clients. E6 Portfolios does not recommend margin borrowing and does not incorporate margin exposure into its strategies. However, E6 Portfolios can facilitate margin borrowing at the client's request. Margin borrowing incurs interest and other costs to the client that vary by custodian and as interest rates change. E6 Portfolios does not bill on margin balances and does not receive revenue from custodians related to margin borrowing and therefore has no incentive to recommend margin.

ITEM 6 – PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

E6 Portfolios does not accept performance-based fees.

ITEM 7 – TYPES OF CLIENTS

E6 Portfolios primarily provides its advisory services to other RIAs, and serves their clients including individuals, families, businesses, charitable organizations, and retirement plans. E6

Portfolios' investment management services do not have a formal minimum but the Firm considers overall relationship size before agreeing to work with a client.

ITEM 8 – METHODS OF ANALYSIS, INVESTMENT STRATEGIES, AND RISK OF LOSS

E6 Portfolios constructs portfolios primarily consisting of mutual funds, closed-end funds, ETFs, and individual securities. The Firm's Portfolio Management team conducts thorough evaluation and due diligence on the selected securities for its investment portfolios. E6 Portfolios' Investment Committee provides oversight of the Firm's Portfolio Management team and approved investment strategies. In evaluating securities for the Firm's investment strategies, E6 Portfolios considers, among other things, the investment strategies of the funds, potential risks and returns (net of fees), as well as considerations regarding the associated fund company. Additionally, the firm relies on outside experts including Chartered Financial Analysts (CFAs), research firms, publicly available models published by reputable financial institutions, reputable third-party research firms, and Nobel Prize winning economists for advice on asset allocation and security selection methodology.

With this intellectual framework, the Portfolio Management team relies on tools that include:

- Fundamental analysis of security, sector, and asset class characteristics
- Modern Portfolio Theory (MPT) best practices, including optimal allocation across asset classes and geographies, optimal index constitution, etc.
- Competing or complimentary theories of portfolio construction with an academic basis or verifiable evidence of merit
- Analysis of market and economic trends and conditions (GDP, interest rates, etc.)
- Published third party model portfolios by reputable and vetted institutions
- Investment vehicle characteristics including asset class coverage, performance, cost, etc.

Within this framework, the SMA SMP UMP Wrap Program focuses on meeting the investment needs of individual clients. Investment outcomes should be informed by client-specific factors including their tax-sensitivity, time horizon, beliefs and values, account size, investments held elsewhere, as well as platform limitations such as custodial capabilities, ease of use, reporting, and relative cost.

For this reason, the E6 Portfolios SMA SMP UMP Wrap Fee Program can be used together with multiple different individual investment models offered by the E6 Portfolios Strategist Wrap Fee program. Each Strategist introduces risks specific to the model and those risks are outlined fully in the E6 Portfolios Strategist Wrap Fee brochure.

Please see the E6 Portfolios SMA, SMP, UMP Wrap Fee Program Brochure and the E6 Portfolios Investment Strategists Wrap Fee Program Brochure for a detailed description of the investment strategies offered by each program and the accompanying risks.

E6 Portfolios' Investment Committee

The Firm's Investment Committee is directed by Roy Jones (President) and Jason Lindquist (Director of Investments). The Investment Committee may include advisors or leadership from the third-party RIAs the firm works with, independent experts, and even clients as members or contributors. The committee meets as necessary, to discuss major investment initiatives and to consider proposed changes to E6 Portfolios' investment strategies, research priorities, and service providers that assist the Portfolio Management team.

Securities Lending

Clients of E6 Portfolios have the option to lend their securities to short sellers through securities lending programs offered by the Firm's custodians. To do this, the client must sign an agreement with their account's custodian to participate in their securities lending program. The main benefit of stock lending is its income potential. If the client's shares are loaned out—which may or may not happen based on market demand—they will earn interest which they will typically split with the broker. Most brokerage, retirement, and trust accounts are eligible, and clients can terminate the agreement or sell their shares at any time, even if they're on loan.

When enrolled, shares loaned out may not be protected by SIPC. However, SEC rules require custodians to provide clients with U.S. Treasury or cash collateral in the same amount as the value of client shares to protect consumers in the unlikely event of default. When shares are lent out, clients forfeit their right to vote by proxy. Lending programs may increase the number of shares available in the market for short-selling which could potentially affect the price of the loaned security.

Cybersecurity

The computer systems, networks, and devices used by E6 Portfolios and our service providers to carry out routine business operations employ a variety of protections designed to prevent damage or interruption from computer viruses, network failures, computer and telecommunication failures, infiltration by unauthorized persons, and security breaches. Despite the various protections utilized, systems, networks, or devices potentially can be breached. A client could be negatively impacted as a result of a cybersecurity breach. Cybersecurity breaches can include unauthorized access to systems, networks, or devices; infection from computer viruses or other malicious software code; and attacks that shut down, disable, slow, or otherwise disrupt operations, business processes, or website access or functionality.

Cybersecurity breaches may cause disruptions and impact business operations, potentially resulting in one or more of the following: financial losses to a client; impediments to trading; inability of E6 Portfolios and other service providers to transact business; violations of applicable privacy and other laws; regulatory fines, penalties, reputational damage, reimbursement or other compensation costs, or additional compliance costs; or the inadvertent release of confidential information.

Similar adverse consequences could result from cybersecurity breaches affecting issuers of securities in which a client invests; governmental and other regulatory authorities; exchange and other financial market operators; banks, brokers, dealers, and other financial institutions; and other parties. In addition, substantial costs can be incurred by these entities in order to prevent any cybersecurity breaches in the future.

ITEM 9 – DISCIPLINARY INFORMATION

There are no legal or disciplinary disclosures material to a client's consideration of E6 Portfolios.

ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

M. H. LeBlang, Inc. (dba "MHL Investments" or "MHL") is a broker-dealer and affiliated with E6 Portfolios. MHL Investments is a member of FINRA and the Securities Investor Protection Corporation (SIPC). Roy Jones and Joshua Jones are Investment Advisor Representatives of Everspire, Registered Representatives and agents of MHL Investments, Principals of TomiPlan, and owners of all three companies. Dually registered E6 Portfolios associates can receive standard sales commissions from sponsors of alternative investment products through MHL Investments. All sales commissions are paid from the revenues of the product sponsors.

These activities represents a conflict of interest because they can create an incentive to recommend products based on the compensation received, rather than on the client's needs. These conflicts are disclosed through delivery of this Form ADV Brochure.

MHL is also active as an insurance agency. As a result, Roy Jones and Joshua Jones, as licensed agents, can receive compensation for the sale of insurance products. This compensation through MHL is separate and distinct from E6 Portfolio's investment management revenue, and clients only pay once for services.

Registered Representatives of MHL or any other broker/dealer who works with E6 Portfolios may have an incentive to recommend investment products based on the variable compensation received. E6 Portfolios mitigates this conflict by limiting the offerings on the E6 Platform to publicly traded securities for individuals licensed as a Registered Representative. As a result, Registered Representatives of any broker/dealer are prohibited from offering their clients insurance, private placements, interval funds, non-traded securities, and other illiquid

investments through E6 Portfolios as a condition to access the E6 Portfolios platform. E6 Portfolios will also not work with third-party Registered Investment Advisors who allow the sale of AUM-based insurance, private placements, and illiquid investments.

In combination, these policies mean that dually registered individuals who utilize E6 Portfolios should only receive commission revenue for the portion of their portfolio comprised of insurance, private placements, and illiquid investments offered by their broker dealer and agency and they only receive recurring AUM-based fee for liquid, publicly traded securities portfolios. This policy addresses conflicts of interest under the hybrid model such as recommending a mutual fund for a commission versus a fee-based account or a private placement for a commission versus a fee-based account. It also increases transparency for the client. Clients of dually registered individuals can elect to only pay fees by limiting their relationship with their financial advisor to E6 Portfolios.

Conflicts of interest are present in every relationship and every corner of the financial industry. E6 Portfolios encourages clients to openly discuss conflicts of interest in detail with their advisor and select an advisor who is committed to transparency and the fiduciary standard of conduct, and has the professionalism and character to act in their best interest at all times regardless of how they are compensated.

Relationship with TomiPlan

E6 Portfolios believes that clients are best served when they have a financial plan in place prior to investing. E6 Portfolios works with any qualified, credentialed financial planner selected by the client, and refers clients who do not already have a financial planner to TomiPlan if they are in need of Financial Planning services. E6 Portfolios also provides TomiPlan with investment data aggregation capabilities used by licensed TomiPlan partners to assist their mutual clients with financial planning services.

TomiPlan is an affiliated company under shared ownership with E6 Portfolios so we have an incentive to recommend the TomiPlan. E6 Portfolios mitigates this conflict of interest by disclosing the relationship and prohibiting the sharing to, or receiving of, revenue between E6 Portfolios and TomiPlan.

E6 Portfolios provides data aggregation and white label reporting services to TomiPlan and also generates and provides financial planning assumptions (interest rate projections, asset class expected returns, etc) to TomiPlan.

Relationship with Everspire and Synchrony Wealth Management

Aegis Wealth Group LLC /dba Everspire is a Registered Investment Advisor and is affiliated with E6 Portfolios because it is owned by the same individuals. Synchrony Wealth Management provides all investment advisory services through Everspire but is not under shared ownership with Everspire or E6 Portfolios. Both Everspire and Synchrony Wealth Management focus on

Wealth Management by providing dedicated financial advisors to help clients implement financial plans. Both firms recommend E6 Portfolios to its clients for investment management services. E6 Portfolios also provides billing and white-label reporting services to Everspire and Synchrony. E6 Portfolios recommends Everspire or Synchrony Wealth Management to its clients who may be in need of a dedicated advisor. This presents a conflict of interest since Everspire or Synchrony benefits from the advisory revenue and E6 Portfolios is affiliated with both firms. E6 Portfolios mitigates this conflict of interest by disclosing it and prohibiting direct compensation or sharing of revenue between E6 Portfolios and Aegis Wealth Group LLC /dba Everspire or Synchrony Wealth Management.

E6 Portfolios does not recommend or select other investment managers for clients.

Relationship with Third-Party Investment Advisors

E6 Portfolios clients can authorize E6 Portfolios to accept instructions from the client's third-party investment advisor. This authorization is granted under the Tri-Party Agreement. This third-party investment advisor agreement instructs E6 Portfolios to accept instructions regarding Risk Profile selection, changes in risk profile, cash movement, purchase or sale of investments, suitability of investments, cash management, and other account issues from the third-party investment advisor.

Communications from the third-party Investment Advisor contain significant decisions about investment strategy, risk profile, E6 Portfolios offering selected (and therefore the fees paid). Client agrees under separate agreement to inform E6 Portfolios of changes to the relationship between Client and the third-party Investment Advisor and to provide E6 Portfolios with accurate contact information and inform the firm of any changes to their contact information. See Item 4 above, "Turnkey Asset Management Services" for more information.

Selection and Compensation of Other Advisors and Managers; Client Referrals

In circumstances when a client needs a highly specialized solution, E6 Portfolios can recommend or select specialized investment advisor partners for clients, with the additional fee offset by a corresponding E6 Portfolios fee reduction of their standard fee arrangement. Specialized solutions might include services like enhanced tax loss harvesting services or defensive derivative overlays not offered by E6 Portfolios. Other investment advisors can recommend E6 Portfolios to their clients or engage E6 Portfolios directly to provide investment management services. E6 Portfolios does not compensate advisors for referrals and does not accept compensation for referrals.

ITEM 11 – CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

E6 Portfolios has adopted a Code of Ethics in accordance with rules issued by the SEC under the Investment Advisers Act of 1940. The Code of Ethics contains provisions that, among other things:

- Set forth standards of conduct expected of advisory personnel;
- Safeguard material non-public information about clients and client transactions;
- Require access persons to report their personal securities transactions;
- Defines conflicts of interest and describes prohibited activities;
- Requires compliance with the broad antifraud provisions of the Advisers Act; and
- Adheres to the principles outlined in “Real Fiduciary Practices: Professional Conduct Guidance for Advisors,” published by the Institute for the Fiduciary Standard.

E6 Portfolios’ complete Code of Ethics is available upon request by contacting our office at hello@e6Portfolios.com.

Investing Personal Money in the Same Securities as Clients

E6 Portfolios and its associated persons do not recommend to or buy or sell for clients any securities in which the firm or its associated persons have a material financial interest.

E6 Portfolios’ related persons often invest in the same or similar securities to those that are held by clients through their chosen Strategist model(s). Many transactions are mutual funds, which do not present trading conflicts of interest. However, ETF, stock, and bond transactions can present a conflict of interest because client trades in the security have the potential to affect the share price and create opportunities for “front running” and other abuses. To mitigate conflicts of interest, related persons are required to link securities accounts to the E6 Portfolios platform for supervision or report their transactions quarterly. Employee trades are reported to the firm and reviewed to ensure that E6 Portfolios clients are not disadvantaged by the trading activity.

ITEM 12 – BROKERAGE PRACTICES

E6 Portfolios relies on the specific capabilities of the qualified custodians clients use in order to implement its Strategist offerings. As a result, not all of our Wrap Fee Program services are available at every custodian. Please see the E6 Portfolios SMA SMP UMP Wrap Fee Brochure for more information on which offerings are available at which custodians.

E6 Portfolios recommends Qualified Custodians to Clients based on quality of execution, reliability, impartiality, service, capabilities, quality of technology, and reasonableness of cost in relation to comparable broker/dealers. E6 Portfolios monitors broker/dealer compensation and evaluates whether it is in clients’ interest to explore new custody options. E6 Portfolios does not accept direct payments or soft dollar benefits from brokers. However, since E6 Portfolios

pays differing transaction fees and platform fees to different custodians, there is an incentive to recommend the custodian that incurs the lowest transaction costs to E6 Portfolios.

Qualified custodians provide E6 Portfolios and its clients access to institutional brokerage services including a range of investment products, execution of securities transactions, and custody of client assets. The investment products available through institutional platforms include some to which clients might not otherwise have access or that would require higher minimums by clients acting individually. These services directly benefit clients or their account(s) and are made available on an unsolicited basis and at no charge to us or the client.

Qualified custodians also make available other products and services that benefit E6 Portfolios but may not directly benefit the client or their account(s) directly or at all. For example, the custodian may provide research resources that may be used to improve service to all or some client accounts, including accounts not maintained at the custodian providing the research. Qualified custodians also provide software and other technology; support for third-party service providers; trade aggregation for multiple client accounts; market data; and assistance with back-office functions, recordkeeping, and client reporting.

Other services may help E6 Portfolios develop its business. These services might include educational conferences and events; technology, compliance, legal, and business consulting; publications and conferences on practice management; and access to employee benefits providers, human capital consultants, and insurance providers. Custodians may provide some of these services themselves or may arrange for third-party vendors to provide the services to E6 Portfolios at a discount or at no cost. These services are not contingent on E6 Portfolios committing any specific amount of business to the custodian in trading commissions or assets in custody, nor are they based on E6 Portfolios giving any particular investment advice or buying particular securities for clients. Access to resources that do not directly benefit clients may play a part in E6 Portfolios' choice of custodians. E6 Portfolios addresses this conflict of interest by carefully vetting its custodians based their ability to assist in E6 Portfolios in delivering the best value and experience and providing clients a range of custodial options.

E6 Portfolios does not receive client referrals from its qualified custodians and the firm does not allow directed brokerage.

Clients can request an alternative broker/dealer for custody of their assets. However, the alternative custodian may not approve E6 Portfolios on their platform or E6 Portfolios may not be able to implement a specific Strategist on that platform. E6 Portfolios will consider relationship size before agreeing to work with a client-requested additional custodian.

E6 Portfolios aggregates client trades on a best-efforts basis. A significant portion of client assets are invested in mutual funds which are not vulnerable to trading conflicts of interest. Client assets may also be invested in ETFs or individual securities. These transactions are generally small in size relative to the daily volume in the security which minimizes any potential inequities created by sequence of transaction. For Investment Strategists that rely on a

Qualified Custodian providing automated investing services, trade aggregation may be done at the Custodial level but be out of E6 Portfolios' control. Other circumstances inherently preclude aggregation, such as client-directed liquidation or distribution of funds, new deposits arriving in only one account, etc. These factors and aggregation practices mean that it is possible that one client may receive less favorable execution than another in some cases.

However, E6 Portfolios does use aggregated trading whenever possible when the same ETF or security is purchased or sold for more than one client at the same time. In cases where aggregated trading is used, a target trade size and allocation among client accounts will be established, the shares will be purchased or sold, an average price established, and the trade allocated among client accounts at the established average price. If it is not possible to buy or sell the planned number of shares, the partial trade will be allocated among clients proportionally according to the planned allocation. In some cases, E6 Portfolios may make use of aggregated trading for the same security more than once during a single trading day for different groups of clients, resulting in different average prices for different groups of clients.

E6 Portfolios can assist with enrolling clients in custodial securities lending or yield enhancement programs when available and shares all the revenue from these programs with the clients to enhance returns. These programs may increase the number of shares available in the market for short-selling. Clients must notify E6 Portfolios if they wish to opt-out of these services.

ITEM 13 – REVIEW OF ACCOUNTS

Client accounts are reviewed on an ongoing basis to ensure that the investments in their account correspond with their stated risk profile and investment goals and rebalanced accordingly. Clients are required to inform their primary adviser of material changes in their risk profile, investment goals, or investment portfolio election. The client's primary adviser will inform E6 Portfolios of changes to the client's risk profile, investment goals, and/or investment portfolio election.

E6 Portfolios publishes statements for each client which are available online or from the mobile app. This report shows a summary of activity (including fees and performance), allocation information, detailed analytics, and a fee calculation and invoice. Additionally, clients can print a wide variety of custom reports on demand.

Account custodians generate brokerage statements no less than quarterly. These statements are provided by the custodian to the client and list the account positions, activity, and fees paid to E6 Portfolios. Clients can elect to receive trade confirmations from the account custodian whenever activity occurs and trade confirmations are archived on the custodial portal where they can be accessed at any time. Clients are encouraged to compare their E6 Portfolios' report with their brokerage account statements provided by the custodian.

ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION

The firm does not directly or indirectly compensate any person who is not a supervised person, nor receive any economic benefit from anyone other than a client for providing services to the firm's clients.

ITEM 15 – CUSTODY

E6 Portfolios will never take custody of client funds or securities. However, because E6 Portfolios withdraws advisory fees directly from client accounts, the SEC deems the firm to have custody in a limited capacity. A qualified custodian sends account statements quarterly, or more frequent, to E6 Portfolios clients and clients should carefully review those statements.

As a courtesy to clients, E6 Portfolios monthly statements are capable of supporting a wide range of custodians, including accounts not advised by E6 Portfolios. The firm makes every effort to insure these consolidated statements are accurate but clients should compare them to the statements they receive from the qualified custodian.

ITEM 16 – INVESTMENT DISCRETION

E6 Portfolios' clients grant the Firm discretionary trading authority in the account(s) so that the firm can implement the agreed-upon offering. Discretion includes the authority to make all decisions to investigate, buy, sell, or hold securities, cash, or other publicly traded investments on behalf of the client at E6 Portfolios' sole discretion and without first consulting the client. In their agreements with the qualified custodian, the client authorizes the custodian to follow E6 Portfolios' instructions concerning trading and other investment activity in the account on behalf of the client.

Unless otherwise agreed, in cases where a client grants discretion, the accounts a client transfers to E6 Portfolios will be liquidated and the proceeds reinvested in the strategy chosen by the client.

ITEM 17 – VOTING CLIENT SECURITIES

E6 Portfolios does not accept authority to vote Client securities. Clients will receive proxy voting information directly from their account custodian unless the client directs the custodian that they do not wish to receive those communications. E6 Portfolios does not generally provide information or recommendations to clients regarding specific proxy votes.

ITEM 18 – FINANCIAL INFORMATION

E6 Portfolios does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance. E6 Portfolios does not have discretionary authority or custody of

client funds or securities, or require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance.

E6 Portfolios has never been the subject of a bankruptcy petition.