



**COPPER
FINANCIAL**

MEMBER FINRA/SIPC

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Guided Investing Wrap Fee Program Brochure Form ADV Part 2A, Appendix 1

March 28th, 2024

ITEM 1 – COVER PAGE

This Guided Investing Wrap Fee Program Brochure provides information about the qualifications and business practices of Copper Financial Network, LLC (“Copper Financial”, “we” or “us”). If you have any questions about the content of this brochure, please contact us at 913.905.3600 or investments@cu.financial.

Copper Financial is a registered investment adviser with the United States Securities and Exchange Commission (“SEC”). Registration of an investment adviser does not imply any level of skill or training. Additional information about Copper Financial is also available on the SEC's website at adviserinfo.sec.gov. The information in this Brochure has not been approved or verified by the SEC or by any state securities authority.

Non-Deposit Investment Products offered through Copper Financial are not credit union deposits or obligations, are not NCUA or otherwise federally insured, are not credit union guaranteed, and may involve investment risk including possible loss of principal.

More information about Copper Financial can be found at <https://cu.financial/>.

ITEM 2 – MATERIAL CHANGES

Copper Financial (“we” or “us”) is required to discuss only material changes that have occurred since the last Guided Investing Wrap Fee Program Brochure update. This Guided Investing Wrap Fee Program Brochure was last updated August 17, 2023. There were no material changes to our Guided Investing Wrap Fee Program Brochure since the last update.

Other edits not deemed material may have been made during our review and update of this Guided Investing Wrap Fee Program Brochure dated March 28, 2024 to clarify existing information provided.

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GENERAL INFORMATION

Copper Financial Network, LLC (referred to as “Copper Financial”, “we” or “us”) is a broker-dealer registered with the SEC and a member of FINRA and a federally registered investment adviser.

Copper Financial is a Missouri limited liability company and is a wholly owned subsidiary of CommunityAmerica CUSO One, LLC. CommunityAmerica CUSO One, LLC is wholly owned by CommunityAmerica Credit Union (“CommunityAmerica”), a privately held organization.

Copper Financial primarily works with members of credit unions. This includes members of CommunityAmerica, our parent company, as well as members of credit unions with which we have entered into a bank networking agreement to provide investment services to their members (“Program Credit Union”). See Item 9 for additional information.

This Brochure discusses the Copper Financial Guided Investing digital advice program, a wrap fee program, and describes the Program services provided by Copper Financial, the fees associated with the Program and any conflicts arising from the offering of the Program.

Copper Financial offers other advisory programs and services in addition to the Guided Investing Wrap Fee Program. You can access the Advisory Brochures for our other advisory programs in the Advisory Brochures section of our website at cu.financial/disclosures/ or at the SEC’s Investment Adviser Public Disclosure website: www.adviserinfo.sec.gov.

The Guided Investing Wrap Fee Program may not be available to members of every Program Credit Union. The timing of when the Program will be available at each Program Credit Union will differ. Program Credit Unions may also determine they do not want Copper Financial to offer the Program to their members.

Copper Financial does not provide tax or legal advice. You should consult a tax professional to understand the tax consequences of investing in the Guided Investing Wrap Fee Program.

COPPER FINANCIAL BROKER-DEALER & INVESTMENT ADVISORY SERVICES

Copper Financial offers both investment advisory programs and services and brokerage services and products. The Guided Investing Wrap Fee Program does not offer the services of a financial professional who will make recommendations to you or who will be assigned to your account. Rather, all investment advice will be provided by us solely through an online site without the assistance of a financial professional as discussed in more detail below. Copper Financial does offer advisory programs and services and brokerage services and products where a financial professional is assigned to you and will make recommendations to you regarding those programs, products, and services.

There are important considerations when selecting the services and products best suited to your investment needs and goals, including, but not limited to your unique financial situation, investment objective, risk tolerance and investment time frame. Please see our Customer Relationship Summary (“Form CRS”) for additional information on the advisory and brokerage services offered by Copper Financial. You can find our Form CRS on our website cu.financial/disclosures/.

COPPER FINANCIAL GUIDED INVESTING WRAP FEE PROGRAM DESCRIPTION

Copper Financial serves as Sponsor of the Guided Investing Wrap Fee Program. A Sponsor is the party that is responsible for organizing or administering the program and providing the lineup of model portfolios (“Portfolios”) we recommend.

The Guided Investing Wrap Fee Program is designed to provide a way for individuals to invest money and access our advisory services, along with brokerage and custody services, for a single fee. The Program offers investment advice and delivers advisory services to you primarily through the use of a Risk Questionnaire online as discussed below.

Supporting services are provided by Copper Financial to guide you through the setup and ongoing use of the online portal where you open your account and can access information about your Guided Investing account (the “Site”). Copper Financial is available to answer questions about the Guided Investing Wrap Fee Program, but such support is solely educational in nature. Individuals employed by or associated with Copper Financial will not provide investment advice to you. Copper Financial does not provide investment advice in person, over the phone, or via email. You will not meet with a Financial Advisor (“Advisor”) to receive investment advice or recommendations related to the Guided Investing Wrap Fee Program. All advice is provided through the Site. Copper Financial will provide you with support on your Guided Investing account via telephone or email communications only.

For assistance with your Guided Investing account you can reach us at digital@cu.financial or 833.605.6681.

If you have other advisory, brokerage, or insurance accounts with Copper Financial, your Copper financial professional assigned to those accounts is not permitted to provide advice to you related to your Guided Investing advisory account nor is your financial professional compensated based on your Guided Investing account.

The Copper Financial Product Review Committee is responsible for the review and selection of Portfolios which are created and maintained by various third-party investment advisers (“Strategists”). The Portfolios are invested in Exchange-Traded Funds (“ETFs”). An ETF is a type of pooled investment security that is comprised of individual underlying securities, such as stocks and bonds. The underlying individual securities of an ETF can change at any time. The ETFs and cash in the Portfolios (“Underlying Investments”) and the weighting of the Underlying Investments within the Portfolio are determined by the Strategists.

Copper Financial provides ongoing portfolio management over your Guided Investing accounts by monitoring the Underlying Investments in your account and entering trades to rebalance the Underlying Investments to bring your account in line with the Portfolio you selected. We manage these advisory accounts on a discretionary basis which means Copper Financial has the authority to trade or rebalance your accounts without prior consent from you within the Portfolio you have chosen.

The Product Review Committee selects the Strategist(s) and each of the Portfolios to meet specific investment objectives, including diversification. The Product Review Committee assigns the Portfolio to the appropriate asset allocation. The Product Review Committee is responsible for ongoing monitoring of the selection of the Strategists and their Portfolios. As Copper Financial has discretion, the Product Review Committee has discretion to add and remove Portfolios and/or Strategists from client accounts without prior written notice to you.

From time to time, Copper Financial or the Strategists may discontinue a Portfolio without prior notice to you. In the event Copper Financial chooses to discontinue offering a Portfolio or are required by a Strategist to discontinue the use of a Portfolio, Copper Financial will use their discretion to select a new Portfolio with a similar objective of the discontinued Portfolio.

Currently the only approved Strategist whose Portfolios are recommended through the Guided Investing Wrap Fee Program is BlackRock, Inc., an unaffiliated registered investment adviser. All BlackRock Portfolios are comprised of iShares ETFs. The investment adviser to iShares is Blackrock, Inc., or an affiliate of Blackrock, Inc. The ETFs are generally categorized by asset class. For example, a stock (also referred to as “equity”) ETF will invest in securities intended to track a stock market index. Bond (also referred to as “fixed income”) ETFs invest in securities intended to track a bond market index. Each index may have other attributes specific to that index, such as geographic location or the type of market (e.g.,

developed, emerging, etc.). The Portfolios recommended in the Guided Investing Wrap Fee Program are intended to target a specific percentage of allocation of the holdings within the Portfolio across stocks and bonds, with a small allocation to cash. The percentage allocation of each Portfolio of each asset type (e.g., 80% stock, 20% bonds) is determined by the Strategist and the specific allocations can vary by plus or minus 5% at the discretion of the Strategist.

Information regarding the investment policies, investment restrictions, risks of investing, management and other fees, and other information can be found in the prospectus of each ETF included in the Portfolios, which may be obtained by visiting iShares by BlackRock, Inc. at <https://www.ishares.com/us>. We encourage investors to read such prospectuses carefully and in their entirety before making any investment decisions.

Through the Site, we gather information from you regarding your current financial status, time horizon, investment objective, and attitudes towards risk through a risk tolerance questionnaire ("Risk Questionnaire"). Our recommendation to you will be based solely on your responses to the Risk Questionnaire and not on any other information you provide in your application to open the account. If there are discrepancies between your responses to the Risk Questionnaire and information provided on your application, the responses to the Risk Questionnaire will be relied upon for the recommendations made by Copper Financial to you.

Using your responses to the Risk Questionnaire Copper Financial will generate a score that will be used by us to make a recommendation of a Portfolio in our capacity as a registered investment adviser. There are six asset allocation categories (Conservative – Fixed Income, Conservative, Conservative Growth, Moderate Growth, Growth, and Aggressive Growth) that you can score into. Based on the score you receive on the Risk Questionnaire you will receive a recommended Portfolio ("Recommended Portfolio"). If you do not believe the Recommended Portfolio is appropriate for you, you can update your responses to the Risk Questionnaire to generate a new Recommended Portfolio.

Through the Site you will be able to select a Portfolio that is more aggressive by one asset allocation category or less aggressive by one asset allocation category. If you choose to deviate from the Recommended Portfolio and select a more or less aggressive Portfolio you understand the selected Portfolio may not align with the asset allocation category corresponding to your responses to the Risk Questionnaire and that the Portfolio you select may perform worse over any time period than the Recommended Portfolio or any other investment.

The current allocation of holdings in each Portfolio is available to you in the Site at the time the Portfolios are displayed and you should review the allocation prior to selecting the Portfolio. The current allocation and specific Underlying Investments are defined by the Strategist and subject to change at any time without prior written notice to you.

You may impose reasonable restrictions on the management of your Guided Investing account by contacting us at 833.605.6681 or digital@cu.financial or in another manner prescribed on the Site. The decision as to whether an investment restriction is reasonable is solely that of Copper Financial. Copper Financial may, in its discretion, hold the amount that would have been invested in the restricted security in cash, invest in substitute securities, or invest it on a pro rata basis across the other securities in the Portfolio that are not restricted. Clients understand that the performance of an Account with restrictions will differ from, and may be worse than, the performance of an Account without restrictions. If Copper Financial cannot meet the request to impose reasonable restrictions on the account, you may choose not to open an account within the Guided Investing Wrap Fee Program.

The Guided Investing Wrap Fee Program is only intended to provide you with advice on how to work toward the goals outlined by you in the Risk Questionnaire for the assets invested in your Guided Investing account. We also provide ongoing management of the Portfolios in your account to ensure the underlying investments stay within the allocation of the Portfolio you selected any account restrictions or any modified Risk Questionnaire or account restrictions. It is your responsibility to review your overall financial situation to determine if investing in a Guided Investing Wrap Fee Program account is appropriate for you. For example, you may want to consider the level of outstanding high-interest debt that

you have before investing in the Guided Investing Wrap Fee Program, or the asset allocation of other investments held outside of your Guided Investing account to ensure you have adequate diversification across your investments. Client further understands the advice provided by Copper Financial through the Program do not consider any other assets, liabilities, or goals maintained outside of the Program.

The recommendations made by Copper Financial are based on your responses to the Risk Questionnaire on the Site. It is important that you provide accurate responses when completing the Risk Questionnaire. If there is a change in your status or you want to modify your responses to your Risk Questionnaire or modify any restriction you have placed on your account, we ask that you notify Copper Financial as soon as possible by updating your Risk Questionnaire through the digital platform or contacting us at digital@cu.financial or 833.605.6681.

Once the client has selected a Portfolio, we will initiate transactions in your account in accordance with the selected Portfolio's target allocation of Underlying Investments as determined by the Strategist. See the Trading and Rebalancing section in Item 6 below for additional information on trading within your Guided Investing account.

GUIDED INVESTING WRAP FEES

You will pay Copper Financial fees for the advisory services offered in our Guided Investing Wrap Fee Program as described below.

You may be able to obtain similar advisory services and Underlying Investments separately for a lower fee through a brokerage account or an advisory account with another investment adviser. Several factors determine whether it will cost more or less to participate in the Guided Investing Wrap Fee Program versus an investment advisory account offered by another investment adviser or a brokerage account where you can i) purchase advice and the Underlying Investments separately; ii) negotiate advisory fees based upon the size of your account; iii) determine the types of the Underlying Investments in which you invest; iv) determine the level of trading activity in your account; and v) determine whether the Underlying Investments involve internal or other expenses in addition to an investment advisory fee. You should consider these and other differences between account types and/or advisory firms when deciding whether to invest in the Guided Investing Wrap Fee Program versus an investment advisory account offered by another investment adviser or in a brokerage account. Nevertheless, cost is only one factor in determining which type of investment account is most appropriate for you. You should also consider your ability or inability to access an Advisor and/or the Underlying Investments that is best suited to your personal and investment goals and risk tolerance.

Program Fee

Clients participating in the Guided Investing Wrap Fee Program are assessed an asset-based fee of 0.25% per year by Copper Financial. The fee is not negotiable. At our sole discretion we may change the program fee. You will receive notice of any increase in the program fee in writing thirty (30) days in advance of the change becoming effective.

The fee is deducted monthly from your Guided Investing account. It is calculated based on the previous month's average daily balance of the assets under management in your account, including securities, cash, and bank sweep balances. If there is not sufficient cash in an account to pay the fee, we may, at our sole discretion, sell shares of the Underlying Investments in amounts necessary to raise sufficient cash to pay the asset-based fee.

Your fee will be specified in the Guided Investing Advisory Agreements you enter at the time you open an account within the Program.

Strategists offer their Portfolios to us free of charge for inclusion in the Guided Investing Wrap Fee Program. The Strategists limit the Underlying Investments in their Portfolios to Underlying Investments that they either manage

themselves or are managed by an affiliate of the Strategist. The Strategist or an affiliate of the Strategist is compensated for managing the ETFs purchased in each account. These fees are deducted from the Underlying Investments in your account. Copper Financial does not receive a portion of the fees earned by the Strategist from managing the ETFs in the Portfolios approved by Copper Financial for our Guided Investing Wrap Fee Program.

Fees will begin accruing in your Guided Investing Wrap Fee Program account on the first day we begin trading in your account. For accounts funded with cash, this is the first day purchase transactions of the Underlying Investments occur in your account. For accounts funded with securities we begin trading in your account the first day we sell the securities in your account and use the proceeds from the sale of securities transferred in to purchase the Underlying Investments in your account.

Strategist Fee

There is no additional fee paid by you or Copper Financial to the Strategist.

Fee Adjustments

Provided the account continues to meet minimum account size requirements outlined in Item 5 below, you may make additions to the account or withdrawals from the account at any time. Because fees are based on an account's average daily balance, there are no fee adjustments required during a period for additional deposits, partial withdrawals, or for account appreciation or depreciation. If your account is closed, a final fee billing will be submitted to the Clearing Firm prior to your account being closed. A full withdrawal of all assets in your account will be deemed the equivalent of closing your account and a final fee billing will be assessed. If an account is closed prior to the deduction of the fees from the custodial account, Copper Financial may choose to invoice you directly.

Performance-Based Fees

Copper Financial does not charge performance-based fees (fees based on a share of capital gains on, or capital appreciation of, the assets of a client).

Fees not Covered

Our program fee does not include or cover transfer taxes, fees and or taxes assessed by state and federal governments or agencies thereof. Our program fee also does not cover administrative or account maintenance fees including, but not limited to, fees for electronic funds transfers, wire transfers, checks, annual IRA account maintenance fees, outgoing account transfer fees, and account closing fees. The full list of the applicable fees can be found within the Copper Financial Brokerage Fee Schedule maintained at cu.financial/disclosures/.

Our program fee does not cover the SEC Section 31 fee ("SEC fee") and the FINRA Trading Activity Fee ("TAF"). You will be charged the mandatory SEC fee on the trades executed in your account. This fee is set by the SEC and subject to change. As of the date of this Brochure the SEC fee per transaction is \$8.00 per million dollars. See the [SEC website](#) for additional information on the fee. The TAF is set by FINRA and subject to change. As of the date of this Brochure the TAF per transaction is \$0.000166 per share for each sale of a covered equity security, with a maximum charge of \$8.30 per trade. See the [FINRA website](#) for additional information on the fee.

In addition to the Program and other fees described above, you will also incur certain fees charged by exchange-traded funds which are disclosed in the applicable prospectus. Examples of these fees include administrative expenses, internal management fees, and other service fees. For more information about these fees please read the summary or full prospectus or disclosure document for each ETF. Copper Financial does not receive a portion of these fees.

CONFLICTS

Copper Financial employees supporting the Guided Investing Wrap Fee Program are paid an annual salary plus bonuses for their work with the Guided Investing Wrap Fee Program. They do not receive compensation based on the value of the assets under management in clients' accounts who participate in the Guided Investing Wrap Fee Program. Copper Financial employees are permitted to contact prospective clients to provide additional information about the Guided Investing Wrap Fee Program. The higher the assets under management within the Guided Investing Wrap Fee Program, the higher compensation received by Copper Financial. This creates an incentive for Copper Financial to direct its employees to contact prospective clients to facilitate the opening of a Guided Investing Wrap Fee Program. This conflict is mitigated by our employees not receiving compensation directly based on the value of the assets under management in any Guided Investing account. Copper Financial also maintains policies and procedures governing the activities of our employees supporting the Guided Investing Wrap Fee Program to monitor for employees complying with the policy prohibiting them from making recommendations to invest in a Guided Investing account.

Our employees supporting the Guided Investing Wrap Fee Program may receive compensation for referring current or prospective Guided Investing clients to work with an Advisor to open an account outside of the Program. Compensation to the employee who made the referral may be in the form of a bonus or a portion of the compensation received by the Advisor from the account or transactions the client establishes with an Advisor. This creates a conflict for our employees supporting the Guided Investing Wrap Fee Program to refer clients to Advisors to receive this additional compensation. We mitigate this conflict by supervising the activities of our employees supporting the Program and our Advisors.

Employees supporting the Guided Investing Wrap Fee Program may also act in the capacity of an Advisor with clients outside of the Program and receive additional compensation for serving as the Advisor on accounts with Copper Financial outside of the Program. This creates a conflict in that the employee in their capacity supporting the Guided Investing Wrap Fee Program could attempt to identify potential clients to recommend an account outside of the Program. We mitigate this conflict by supervising the activities of our employees, including their communications and recommendations.

Copper Financial has no soft dollar arrangements, nor do we receive any client referrals from the Clearing Firm that we require for Guided Investing accounts.

Promotional Offers

Copper Financial sponsors promotional offers that provide clients with the ability to receive cash compensation "compensation" for opening and funding accounts with us. Such promotional offers include Guided Investing accounts and may also include other accounts offered by Copper Financial. The compensation may be paid by Copper Financial, its affiliates, or a Program Credit Union. The terms of the promotional offer will define if the compensation is deposited into a Guided Investing account or an account maintained at CommunityAmerica or a Program Credit Union. If the compensation is deposited into a Guided Investing account, the compensation will be subject to the fees applicable to all Guided Investing accounts as discussed below in more detail. If the compensation is deposited into an account at CommunityAmerica or a Program Credit Union the deposit and any related activity in the account is subject to any fees charged to the account by the Program Credit Union.

Copper Financial at its sole discretion may waive or rebate the Program Fee discussed in Item 4 above, in whole or in part, including but not limited to, in connection with both a promotional offer and advisory services offered to both current and former employees and independent contractors of Copper Financial, its affiliates, or a Program Credit Union.

Other terms and conditions will be disclosed at the time the promotional offer is available. Employees or contractors of Copper Financial, its affiliates, and Program Credit Unions may be eligible to participate in promotional offer unless otherwise prohibited by the terms and conditions of each promotional offer.

These promotional offers create a conflict of interest as Copper Financial is incentivizing clients to utilize the Guided Investing program rather than other investment advisory, broker-dealer, or insurance accounts offered by Copper Financial. Promotional offers are not recommendations to select a particular account type or investment strategy.

ITEM 5 – ACCOUNT REQUIREMENTS AND TYPES OF CLIENTS

TYPES OF CLIENTS

The Guided Investing Wrap Fee Program is available to individuals and will accept new clients who meet the minimum initial investment amounts described above. Individuals must be a US citizen and reside in the United States to establish and maintain a Guided Investing account.

Access to Guided Investing accounts will be made available through your Program Credit Union's online banking system. Each Program Credit Union establishes their own requirements for you to maintain access to their online banking platform. In order for you to maintain access to your Guided Investing account you are responsible for meeting those requirements, which may include maintaining membership and an account with the Program Credit Union.

If your residency or citizenship changes after the account is established or if we or Apex Clearing change our eligibility requirements, we may terminate your Guided Investing Agreements and require you to liquidate your holdings or transfer them to another custodian, where they will no longer be managed by Copper Financial.

REQUIREMENTS TO MAINTAIN AN ACCOUNT

The Guided Investing Wrap Fee Program requires an initial minimum account balance of \$200 to open the account with Copper Financial. At our sole discretion we can waive account minimum requirements and change the required account minimums without advance notice to you.

Additional deposits into an account must be a minimum of \$25. Guided Investing accounts must maintain a minimum account balance of \$150 at all times. Copper Financial reserves the right at our sole discretion to waive the ongoing minimum account balance and the minimum additional deposit amount. Guided Investing accounts which do not meet the ongoing account minimum may be terminated with notice to you at our sole discretion. Prior to closing your Guided Investing account for not meeting the \$150 minimum account balance, we may first choose to terminate the Advisory Agreement Supplement and cease charging the program fee, withdraw our discretionary authority and cease rebalancing or entering any trades in your Guided Investing account.

OPENING YOUR ACCOUNT

Opening your Guided Investing Account

You will complete the Risk Questionnaire and complete an application with other required information on the Site to establish a Guided Investing account.

You must electronically sign the Guided Investing Agreements, which include an Account Agreement, Advisory Agreement Supplement, and Consent to Electronic Delivery of Documents and Electronic Signature agreements. You will also be required to enter into a Custodial Agreement with our Clearing Firm, Apex Clearing and attest to the receipt, review, and agreement with other important agreements and disclosures.

Failure to meet the initial minimum account balance outlined above within 30 days of executing a Guided Investing Advisory Agreement may result in the termination of your Guided Investing Advisory Agreement and the closure of your account. We reserve the right to decline to enter into an Advisory Relationship with you or open an advisory account for you at our sole discretion.

All accounts participating in the Guided Investing Wrap Fee Program will be custodied with our Clearing Firm:

Apex Clearing Corporation
350 North St. Paul Street
Suite 1300
Dallas, TX 75201

Apex Clearing provides clearing and custodial services with respect to your Guided Investing account. Apex Clearing will also serve as the custodian for any IRA accounts opened in the Guided Investing Wrap Fee Program. Apex Clearing is a registered broker-dealer and is not affiliated with Copper Financial.

You will receive quarterly statements and possibly other reports directly from the Clearing Firm for your Guided Investing account. You are urged to carefully review each statement and report and alert us at digital@cu.financial or 833.605.6681 promptly if there are any discrepancies or errors.

ITEM 6 – PORTFOLIO MANAGER SELECTION AND EVALUATION

STRATEGIST SELECTION

Copper Financial retains third-party investment managers to serve as Strategists to create the Portfolios available in the Guided Investing Wrap Fee Program. Strategist and their Portfolios may be added or removed at Copper Financial's sole discretion. The Strategist(s) selected offer diversified portfolios that feature a variety of asset allocation models with the goal of providing multiple options of available Portfolios to assist you in meeting your financial goals. The list of approved Strategists is included in Item 4 above.

Strategists are solely responsible for selecting the Underlying Investments for each Portfolio. Strategists will provide ongoing monitoring of the Portfolios and the Underlying Investments included in the Portfolios. Strategists will communicate any changes in Portfolio allocations to us. This is done to ensure that each Underlying Investment selected for a Portfolio has an investment objective that remains consistent with the assigned asset allocation within each Portfolio to which it is allocated. This process will result in periodic changes to the Portfolios and Underlying Investments. These periodic changes may cause a taxable event for you.

RELATED PERSON STRATEGISTS

Neither Copper Financial nor any of our employees are affiliated with or related persons to any of the Strategists we offer through the Guided Investing Wrap Fee Program.

PORTFOLIO MANAGEMENT

Strategists are solely responsible for selecting the Underlying Investments for each Portfolio according to a specified strategy and asset allocation that is selected by our Product Review Committee. By signing the Guided Investing Advisory Agreements you will grant discretionary authority to Copper Financial to buy and sell the Underlying Investments in your

accounts, without first consulting you, based on the Portfolio's buy/sell orders or asset allocation provided by the Strategists. Discretionary authority includes the authority to determine the amount to be bought or sold without obtaining your prior consent and the timing of the transactions. This discretionary authority does not include withdrawing funds or securities from your account. Discretionary authority can be withdrawn by you in writing; however, this action will result in the termination of your Guided Investing account as it is a discretionary managed program.

We retain the Program Fee discussed in Item 4, above, to compensate us for services we provide for Guided Investing accounts.

Trading and Rebalancing

At account opening and when rebalancing, Copper Financial will allocate your account to the Underlying Investments in the proportions identified by the Strategists to the extent possible for the Portfolio you have chosen. The allocation of the Underlying Investments in an account may not exactly match the proportions identified by the Strategist due to various factors, including the available balance in an account, and the price of the Underlying Investments. Differences between the allocations provided by the Strategists and how an account is allocated, if any, should be minimal but could cause performance to vary by account. The ETF shares purchased or sold on behalf of a client and held in a Guided Investing account may be either whole shares or fractional shares.

Strategists will periodically make changes to the Underlying Investments that cause the Portfolio to deviate or drift from its original target allocation. This may also occur as a result of changes in the market value of the Underlying Investments. Copper Financial has developed parameters to determine whether or not rebalancing of an account is appropriate. By opening an account in the Guided Investing Wrap Fee Program, you will give Copper Financial discretion to rebalance an account at any time to return it to its original or new Portfolio allocation and to buy and sell Underlying Investments to implement any changes as communicated by Strategists from time to time. Additions to or withdrawals from an account will also result in rebalancing trades. Frequent withdrawals may have an adverse impact on achieving your investment goals and objectives. Buying and selling the Underlying Investments in your Guided Investing account may cause taxable events. All dividends will automatically be reinvested in accordance with the Model Allocation.

Copper Financial places aggregated or combined orders involving multiple Guided Investing accounts trading in the same securities. In conducting these transactions no client is favored over any other client and each client that participates in an aggregated transaction will participate at the average share price for transactions in the aggregated order. Copper Financial does not charge separate fees for any trade execution service provided to clients.

Prohibited Holdings

Copper Financial will not permit securities to be held in the Guided Investing Wrap Fee Program that are not one of the Underlying Investments selected by the Strategist for the Portfolio selected by you.

Trade Errors

Trade errors caused by Copper Financial which occur in the Guided Investing Wrap Fee Program will be resolved to avoid any harm to you. Corrections are reviewed and approved by Copper Financial's operations personnel. Corrections will be processed, to the extent the markets are open, in a timely manner in an attempt to ensure no material financial harm to you. Gains on trade error corrections will typically be offset by losses in our trade error account, if any. Generally, errors resulting in de minimis losses or gains may not be corrected.

Terminating your Guided Investing Advisory Agreement

You may close your Guided Investing account or terminate your Guided Investing Advisory Agreement at any time by delivering written notice to us. We also reserve the right to close your Guided Investing account or terminate your Guided

Investing Advisory Agreement at any time at our sole discretion. At the time your Guided Investing account or Guided Investing Advisory Agreement is terminated we cease billing and will stop rebalancing your account.

Termination of an account may cause a taxable event. At the time your account is closed you will be charged account termination fees and any other applicable charges as disclosed in our Brokerage Fee Schedule at <https://cu.financial/disclosures/>.

METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

Portfolios developed for Copper Financial by Strategists will be used to implement an asset allocation strategy. Asset allocation is one investment style that may assist you in selecting an appropriate mix of Underlying Investments within the Portfolio based on your financial and personal objectives, time horizon, and risk tolerance. Of course, there is no certainty that any investment strategy, including asset allocation, will be successful in achieving your investment objectives. The value of the Underlying Investments within the Model will fluctuate with the financial markets. Therefore, the Underlying Investments may be worth more or less than you originally paid for them at the time they decide to sell or redeem them.

The future performance of any specific Underlying Investment or investment strategy is not guaranteed, and you may lose money. Investing in any class of Underlying Investments (including ETFs) involves the risk of loss. Different types of Underlying Investments have varying degrees of risk. You must be prepared to experience loss of value in your Underlying Investments in your account, including loss of the original principal.

Copper Financial does not represent, guarantee, or even imply that the investment advisory services related to any program:

- can or will accurately predict future financial results;
- successfully identify market tops or bottoms;
- insulate the Underlying Investments from losses due to market corrections or declines.

There are certain additional risks that you should consider when investing including, but not limited to:

• **ETF Risk.** Owning ETFs involves certain investment management and operating expenses, which are shared on a pro rata basis by all owners of these Underlying Investments. The risk of owning an ETF is directly proportional to the risk of the Underlying Investments held by them. You may incur brokerage costs when purchasing and selling ETFs. Leveraged and inverse ETFs generally are not appropriate for many investors due to their unique characteristics and market risks. Although leveraged and inverse ETFs can be a useful investment tool for some investors and in limited circumstances, it is extremely important for you to understand that holding these types of ETFs longer than one day may result in significant losses.

• **Asset Allocation and Monitoring.** Strategists have agreed to provide Copper Financial from time to time any updates or changes they make to the Portfolios they offer, including changes to asset allocation and underlying investment selection. Copper Financial will, on a discretionary basis, without consulting you in advance, determine whether, in what manner, and when to implement a Strategist's recommended changes. Failure to implement a Strategist's changes in a timely manner or at all may result in losses in the value of your account. Also, there is no assurance that the performance of a Portfolio will meet the performance of any benchmark or index, including those that may be used in marketing materials.

• **General Risks of Investing.** All Underlying Investments and investment strategies involve risk, the degree of which may vary significantly. Investment performance can never be predicted or guaranteed, and the value of the Underlying Investments will fluctuate due to market conditions and other factors. Investments made and the actions taken by Copper Financial with respect to the Underlying Investments will be subject to various market, liquidity, economic and political

risks that cannot be controlled. You should review the offering materials and other disclosures available from each of the Underlying Investments to obtain an accurate appreciation for their associated risks and fees.

VOTING CLIENT SECURITIES

Neither Copper Financial nor the Strategist will vote proxies for Underlying Investments held in Guided Investing Wrap Fee Program accounts. You retain the responsibility for receiving and voting proxies. You will from time to time receive proxy solicitations from the Clearing Firm and/or transfer agent of the Underlying Investments. You should contact the person identified in the proxy materials with any questions about a particular proxy solicitation.

ITEM 7 – CLIENT INFORMATION PROVIDED TO PORTFOLIO MANAGERS

Copper Financial collects information from you, including nonpublic personal information, your current financial situation, current securities and other financial holdings, information about financial goals, investment objectives, risk tolerance, time horizon, and tax status, and other relevant information. This information is used to establish an account at with the Clearing Firm on your behalf, to make a recommendation on asset allocation for your account, and to recommend an appropriate Strategist and Model for your account. We disclose information about your account to Strategists to service our business relationship with you.

ITEM 8 – CLIENT CONTACT WITH PORTFOLIO MANAGERS

The Strategists with whom Copper Financial works will have no information about your Guided Investing Wrap Fee Program account. Any information about a Strategist or their Portfolios will be provided through the Site and on the statements received from the Clearing Firm. If you have questions regarding the Underlying Investments in your account, you can contact us at digital@cu.financial or by phone at 833.605.6681.

ITEM 9 – ADDITIONAL INFORMATION

DISCIPLINARY INFORMATION

We are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of us or the integrity of our investment advisory activities. Copper Financial has no applicable information to disclose.

OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

We are dually registered as a broker-dealer and federally registered investment adviser. We are also a licensed insurance agency offering annuities, life insurance, long-term disability insurance, and long-term care insurance. These are our primary businesses. We are a wholly-owned subsidiary of CommunityAmerica Credit Union, an entity qualified to sell National Credit Union Association (“NCUA”) regulated products in certain counties in Kansas and Missouri. We are a wholly-owned subsidiary of CommunityAmerica CUSO One, LLC. We may also make referrals for clients to purchase insurance products through CommunityAmerica Insurance Agency (“CAIA”), which is a related entity owned by CommunityAmerica CUSO One, LLC.

We also offer Trust Services through an arrangement with National Advisors Trust Company (“NATC”) under the marketing name CommunityAmerica Trust Services. NATC is a chartered trust bank regulated by the Office of the Comptroller of the Currency. If you enter into a Trust Service arrangement with us and NATC, we or NATC may act as trustee with respect to your investment accounts while NATC may act as trustee and for other assets in any trust. NATC will also provide record keeping and other ancillary services as trustee.

As noted in Item 4 and discussed in the Client Referrals section below in more detail, we enter into bank networking agreements with unaffiliated Program Credit Unions to offer broker-dealer, registered investment adviser, and insurance services to their credit union members. Pursuant to the networking agreement with the credit union, and to the extent permitted by law, we share a portion of the Guided Investing fees we receive with the credit union. Financial professionals may be registered with Copper Financial as a investment adviser representative, broker-dealer representative or insurance agent and will receive compensation from recommending clients to establish brokerage, financial planning, investment advisory, and/or insurance relationships with us depending on their registrations with Copper Financial. Financial professionals may also make referrals to CAIA and may receive compensation for insurance products sold through CAIA.

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

We place significant value on ethical conduct for all advisory business. In addition to our obligation to comply with the federal and state securities laws and self-regulatory agency rules we have established a Code of Ethics that sets forth a standard of business conduct required of all our personnel. Our Code of Ethics is designed to protect clients by deterring misconduct and fraudulent behavior by reinforcing fiduciary principles that governs the conduct of our personnel. As a fiduciary to its clients, a Registered Investment Adviser has a duty to provide professional, continuous, and unbiased investment advice. Fiduciaries owe their clients a duty of honesty, good faith, and fair dealing. To ensure that Copper Financial and its employees strictly adhere to the highest standard of conduct and integrity in conducting business with and on behalf of our clients, we require applicable personnel to certify to our Code of Ethics.

In addition, the Code of Ethics governs personal trading by all personnel and is intended to ensure that personal securities transactions effected by personnel are conducted in a manner that avoids any actual or potential conflict of interest between personnel and our clients or our affiliates’ clients. We collect and maintain records of securities holdings and securities transactions effected by our personnel for a prescribed period of time. These records are reviewed to identify and resolve potential conflicts of interest. We will furnish a copy of our Code of Ethics to you upon request. You may contact the Copper Financial at digital@cu.financial or by phone at 833.605.6681 to request a copy.

REVIEW OF ACCOUNTS

Copper Financial personnel periodically review Guided Investing Wrap Fee Program accounts to determine whether the Underlying Investments significantly deviate from the Model. At our sole discretion, Copper Financial will rebalance accounts to bring the Underlying Investments back into the allocation provided by the Strategist for the selected Portfolio.

As discussed in Item 4 above, Copper Financial relies on information you provide to make recommendations to you for investment advisory services through the Site. You should notify us immediately in the event of a material change to your financial circumstance, investment objective, time horizon, attitude toward risk, or any other information that might impact the recommendation of a Portfolio by us to you. We will remind you quarterly and annually that you should contact us if there have been any changes to the information provided in the Risk Questionnaire or if you would like to impose or change any reasonable restrictions for their Guided Investing account. This could result in an updated recommended Portfolio to you depending on what the changes are. Changes should be reported to us at any time through, or as instructed through the Site, or by contacting us at digital@cu.financial or 833.605.6681.

You can access the digital platform at any time to review the balances, holdings, and activity in their Guided Investing account. You will receive from qualified custodians, including our Clearing Firm, at a minimum, quarterly account statements describing positions and activity in your Guided Investing accounts. For any month there is activity in the account, you will receive a statement detailing that month's activity. We provide written performance reports and consolidated statements no less than quarterly for Guided Investing accounts. We urge you to carefully review these performance reports and consolidated statements and alert us promptly if there are any discrepancies or errors. The data in the consolidated statement is a compilation of information from various financial sources (for example, our Clearing Firm). Consolidated statements are provided for informational purposes and as a courtesy to our clients. We have an agreement with a third-party technology vendor to implement and host the consolidated statement and performance reporting platform. That vendor is not affiliated with us. We believe the data provided on consolidated statements is reliable, but the accuracy and completeness of the information is not guaranteed and has not been verified by us. In the event of any discrepancy, the statement you receive directly from the companies maintaining your account(s) are the official records of your holdings and the valuations on those statements shall prevail.

CLIENT REFERRALS AND OTHER COMPENSATION

Client Referrals

Copper Financial is affiliated with CommunityAmerica Credit Union ("CommunityAmerica"). CommunityAmerica makes referrals to its members to receive non-deposit investment products and services from Copper Financial. Employees of CommunityAmerica may refer clients to Copper Financial to speak with an Advisor regarding the investment advisory services described in Item 4 above. CommunityAmerica employees who make a referral to Copper Financial may receive a one-time payment from us of up to \$50 regardless of whether a Copper Financial account is opened by the client referred by CommunityAmerica.

As discussed above in Other Financial Industry Activities and Affiliations, Copper also maintains agreements with Program Credit Unions. Program Credit Unions are deemed to be a "promoter" of Copper Financial and provide referrals to their members to obtain non-deposit investment products and services from Copper Financial, including investment advisory services. The Program Credit Unions are typically not clients of Copper Financial. In exchange for the referrals from the Program Credit Union Copper Financial pays the Program Credit Union a referral fee, which represents a portion of the commissions and fees generated from the investment advisory accounts, brokerage accounts, and insurance contracts opened and maintained by members of the Program Credit Union. The exact referral fee paid by us is negotiated with each Program Credit Union and will be disclosed prior to your account being opened with Copper Financial. You can also contact compliance@cu.financial for additional information on the referral fee for the Program Credit Union you are a member of. The referral fee is paid to the Program Credit Union as long as your account is open and the agreement between Copper Financial and the Program Credit Union is maintained. The payment of referral fees by Copper Financial to the Program Credit Union creates a conflict of interest by incentivizing the Program Credit Union to make referrals to Copper Financial. The Program Credit Union may receive a different referral fee from Copper Financial depending on the type of account or investment you hold with Copper Financial.

Employees of Program Credit Unions may also refer clients to Copper Financial to speak with an Advisor regarding the investment advisory services described in Item 4 above. Employees of Program Credit Unions who make a referral to Copper Financial may receive a one-time nominal payment, paid by the Program Credit Union, regardless of whether a Copper Financial account is opened by the referral.

Other Compensation

In addition to the fees discussed in Item 4, above, we receive compensation from certain Strategists for on-going marketing and sales support activities including, but not limited to, training, educational meetings, due diligence reviews, and day-to-day marketing and/or promotional activities. This compensation may be paid to Copper Financial directly or paid to a

vendor on behalf of Copper Financial. This is a conflict of interest as it will result in Copper Financial providing the Strategists that provide us this additional compensation with increased access to Copper Financial and its personnel. This additional compensation could create a conflict that for Copper Financial to only provide access to Models offered by Strategists that provide the additional compensation.

We receive Payment for Order Flow (PFOF) for orders directed by us to our Clearing Firm. We route all orders eligible for PFOF to our Clearing Firm, including all orders in Guided Investing accounts, and we do not have any control or discretion over the handling of your orders after they have been routed to our Clearing Firm. Our Clearing Firm receives PFOF to the market makers, exchanges, and market centers to which it directs our orders in listed securities. Our Clearing Firm shares a portion of this income with us. The PFOF incentivizes us to trade your Guided Investing account at a greater volume. This conflict is mitigated by the fact that our discretionary trading is limited to: 1) allocating your account to the Underlying Investments as of the date your account is first invested, 2) rebalancing the Underlying Investments within the account based on changes due to additional investments by you, withdrawals by you, changes in the Underlying Investments as communicated to us by the Strategist, changes in the Portfolio to which your account is managed as instructed by you, and drift in the allocation due to the relative changes in prices for the Underlying Investments, and 3) selling positions to close our account. Please refer to the order routing disclosure on our website at <http://cu.financial/disclosures> for additional information.

The cash in Guided Investing accounts will be invested in an FDIC insured sweep account (“FDIC cash sweep vehicle”) offered by our Clearing Firm. As an alternative cash can be held as “uninvested” cash and held as “free credit balances”. The interest rate paid on free credit balances may be lower than the interest rate paid on balances in the FDIC cash sweep vehicle. You can review the terms and conditions of the FDIC sweep account on our Clearing Firm’s website at www.apexclearing.com/disclosures/. You can contact us at digital@cu.financial or 833.605.6681 to have your cash maintained as uninvested cash or “free credit balances” instead in the FDIC cash sweep vehicle. We participate in a revenue sharing program with our Clearing Firm based on the dollar amount of cash held in your Guided Investing account at Apex Clearing either in the FDIC cash sweep vehicle or as a free credit balance. The revenue sharing payment we receive is greater when clients are invested in the FDIC sweep vehicle than if a client elects to hold their cash as a free credit balance. To mitigate this conflict of interest, the interest paid to clients on balances in the FDIC cash sweep vehicle is greater than or equal to, but not lower than, interest paid to clients on free credit balances in their Guided Investing accounts. Copper Financial determines the interest rate paid to clients for the FDIC cash sweep vehicle and the free credit balances held in Guided Investing account and can increase the payout to clients by reducing its portion of revenue sharing on those balances. These payments incentivize us to recommend you hold investments in the FDIC cash sweep vehicle. We collect this revenue as soon as cash is invested in your Guided Investing account regardless of when your account is allocated to the Underlying Investments. This represents a conflict of interest as we receive revenue from the cash held in your Guided Investing account both through this revenue sharing arrangement as well as from the asset-based management fee, which includes the value of the cash held in your account. We mitigate this conflict by following the recommended allocations of cash as defined by the Strategists and following our established parameters to rebalance your Guided Investing account based on any changes recommended by the Strategists or changes in the market value of the Underlying Investments held in your account.

FINANCIAL INFORMATION

Copper Financial is not aware of any financial condition that is reasonably likely to impair its ability to meet our contractual commitments to clients. Copper Financial has also not been the subject of a bankruptcy petition at any time during the previous ten years.