

**Item 1 Cover Page**

**Hub International Investment Advisory Services Inc.  
CRD No. 290090  
Form ADV Part 2A: Firm Brochure**

2300 Clayton Road, Suite 300  
Concord, CA 94520  
Phn (805) 879-9536  
Fax (888) 373-6024

Dated March 1, 2020

This brochure provides information about the qualifications and business practices of Hub International Investment Advisory Services, Inc. (HIIA). If you have any questions about the contents of this brochure, please contact us at 805-879-9536. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority.

Additional information about Hub International Investment Advisory Services, Inc. is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable IARD/CRD is 290090. Hub International Investment Advisory Services, Inc. is a Registered Investment Adviser.

Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

## Item 2 Summary of Material Changes

Form ADV Part 2 requires registered investment advisers to amend their brochures when information changes or becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes. There were no material changes from our last filing date of March 31, 2019.

The HIIA Management Team consists of David Reich, President; Adam Sokolic, Vice President/Chief Operating Officer, and Lisa Mays, Chief Compliance Officer.

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## Item 4 Advisory Business

Hub International Investment Advisory Services Inc. (HIIA) is a registered investment adviser registered with the Securities and Exchange Commission (SEC). HIIA is based in Concord, California. HIIA is a corporation that was formed in the state of Delaware established August 2017. The primary business of HIIA is as a pension consultant. HIIA provides corporate retirement plan consulting services.

HIIA is a wholly owned subsidiary of Hub International Limited (HUB), a Delaware corporation. HUB is an international insurance broker with offices in the United States, Canada and Brazil. HUB is wholly owned by Hub International Limited, a Delaware corporation which in turn is owned Hockey Intermediate Inc. (Hockey), a Delaware corporation. Hockey is owned by several private equity funds and by management and employees of Hub and its subsidiaries. The HIIA Management Team consists of David Reich, President; Adam Sokolic, Vice President/Chief Operating Officer, and Lisa Mays, Chief Compliance Officer.

This brochure describes the investment management and advisory services we offer to our clients which include, but are not limited to, provides the following investment advisory and management services to pension and profit-sharing plans, trusts, corporations and other business entities.

The following paragraphs describe our services and fees.

### Advisory Services

This brochure describes the investment advisory services we offer to clients that either are or sponsor a retirement plan (Plan) that is qualified under Internal Revenue Code and/or subject to the Employee Retirement Income Security Act (ERISA) or is a Plan that is considered nonqualified. This Summary Disclosure Statement is only for use with Plan clients; if you are not a Plan client please contact your Advisor to obtain the proper brochure.

The following paragraphs describe our services and fees. Please refer to the description of each investment advisory service listed below for information on how we tailor our advisory services to your individual needs.

### Pension Consulting Services

We offer a broad range of pension consulting services to employee benefit plans and their fiduciaries based upon the needs of the Plan and the services requested by the plan sponsor or named fiduciary.

In general, these services may include any one or all of the following:

1. Develop Retirement Plan Specifications - In order for our clients to evaluate the various retirement plan providers uniformly, we first need to determine specific client needs.
2. Marketplace Provider Search - We will search the marketplace and provide quotations from leading retirement plan vendors that are compatible with your needs.
3. Recommendations - We will make recommendations regarding vendor selection based upon study results and your goals and objectives.
4. Implementation - Where a broker dealer, that advisory representatives of our firm are registered with, is selected as broker for your retirement plan's assets, we will assist you in the implementation process.
5. Plan Review - A plan review is a comprehensive exam of all major components of your retirement plan that identifies the plan's strengths and weaknesses. The review can cover such areas as overall plan structure, costs, compliance, and investment perspectives.
6. Investment Policy Statement - We assist you in the formation and/or continued maintenance of your investment policy statement to help ensure that the plan's investment selections are appropriate based on your strategic investment objectives. Additionally, we will evaluate the investment selection to optimize the offerings made to plan participants.
7. Asset Allocation Modeling - As part of its services, we will offer to provide asset allocation models to the plan's participants. Each plan participant will be offered access to the models and can use these as guidelines for investing their retirement dollars. However, participants that use the asset allocation models do so at their

discretion and with the understanding that these models are not designed according to their individualized investment objectives and risk tolerance.

8. Communication & Education - We will help you coordinate and deliver meaningful information regarding the retirement plan to your administrators and participants.
9. Plan Management Assistance - We will act as an intermediary between you and the plan vendor to ensure that the relationship is maximized, and the retirement plan is operating at its optimal level. Where we are assisting in converting from one vendor to another, we will help manage the conversion so as to lessen the burden on your internal resources.
10. Ongoing Investment Selection Consulting - We will also provide annual investment reviews, which compare the current investment options to those with the investment peer groups. Moreover, we will apply its proprietary analysis to your existing investment selections and provide recommendations as to whether the plan should add investments to, or remove investments from, the available selections.

### Provider Search

We will provide a detailed comparison and analysis of plan providers. In addition to providers that we identify through our proprietary search, the analysis can also include provider(s) selected by you.

### Manager Monitoring Services

Advisors may act as the liaison between the Plan and third-party administrator(s) that provide services to the Plan. In general, Advisors will provide cost-effective ideas for the Plan to consider in their effort to assist the Plan with the management of their expenses. Advisors may manage the selection process among perspective administrators. During this process Advisors will conduct market analysis, negotiate with administrators, evaluate and compare each administrator, or host administrator presentations. Advisors will provide Plan clients with a detailed analysis of their assessment. Advisors will provide a recommendation of a new administrator based on their review. Advisors recommendations could be based on the administrative, recordkeeping, compliance, employee communications or investment-related services provided by administrator but most importantly the fees for their services. Advisors may facilitate and manage the conversion process of changing administrators through various means of communication and oversight of action items on behalf of the Plan.

We offer non-discretionary pension consulting services to employee benefit Plans (Plan) based upon the needs of the Plan and the services requested by the Plan Sponsor (Client). In general, fiduciary services may include any or all of the following:

### Non-discretionary Investment Advice for Plan Menu

We will recommend, for selection by the Plan or other authorized fiduciary, specific investments to be offered as investment options to participants under the Plan consistent with the Plan's Investment Policy Statement or other relevant guidelines, as applicable. We will recommend, for selection by Plan or other authorized fiduciary, investment replacements if an existing investment is no longer suitable, and will assist in the transition to the replacement investment if requested by Plan or such fiduciary.

### Performance Monitoring

We will assist Plan with respect to its duties to perform ongoing monitoring of the Plan's investment alternatives in accordance with the Plan's Investment Policy Statement or other relevant guidelines, as applicable, and ERISA. Such assistance will include reviews of the relevant portfolio's historical performance and investment characteristics, and the applicable asset manager's investment processes and philosophy.

### Non-Fiduciary Consulting Services may include any or all of the following:

**Periodic Meetings with the Plan Sponsor** - We will attend periodic meetings with Plan as mutually agreed to assist the Plan's fiduciary with non-fiduciary support, and to provide group enrollment meetings.

**Assistance with Selection of Investment Options** - We will provide assistance regarding the selection of a broad range of investment options. The Plan retains the sole responsibility to comply with the provisions of ERISA 404(c).

**Education Services to Plan Committee** - We will provide education and training for Plan participants of Plan who are serving a fiduciary role under the Plan (e.g., members of an investment committee selected by the Plan Sponsor). Such education and training will include guidance concerning their fiduciary roles on any applicable committee, including their investment-related duties under the Plan, at times mutually agreeable to the parties.

**Participant Education Services** – We will offer to meet with Plan participants during scheduled onsite meetings on an annual or semi-annual basis, or more frequently as requested, to provide investment education. In accordance with the Department of Labor's Interpretative Bulletin 96-1, we may provide Plan participants with information about the Plan, general financial and investment information and information and materials relating to asset allocation models available through the Plan. We may also provide Plan participants with interactive investment materials to assist Plan participants in assessing their future retirement income needs and the impact of different asset allocations on retirement income.

We may also provide additional non-fiduciary services to the Plan on an individually negotiated basis. All services, whether discussed above or customized for the Plan based upon requirements from the Client shall be detailed in a written agreement and be consistent with the parameters set forth in the Plan documents. Our advisory fees for these additional customized services will be negotiated with the Client on a case-by case basis and clearly set forth in the written agreement between the Client and our firm.

Pursuant to adopted regulations of the U.S. Department of Labor, we are required to provide the plan's responsible Plan fiduciary (the person who has the authority to engage us as an investment adviser to the plan) with a written statement of the services we provide to the plan, the compensation we receive for providing those services, and our status (which is described below).

The services we provide are described above, and in the service agreement executed between the Plan and our firm. These services are designed to assist retirement plan sponsors, trustees and/or plan committees in meeting their plan management and fiduciary obligations under the Employee Retirement Income Security Act (ERISA) or other applicable law. Our compensation for these services is described herein and also in the service agreement. We do not reasonably expect to receive any other compensation, directly or indirectly, for the services we provide to the Plan. If we receive any other compensation for such services, we will (i) offset the compensation against our stated fees, and (ii) we will promptly disclose to the Plan's responsible Plan fiduciary the amount of such compensation, the services rendered for such compensation, and the source of such compensation.

In providing services to the Plan, our status is that of an investment adviser registered with appropriate state authorities as an investment adviser as that term is defined in relevant state regulations, and we are not subject to any disqualifications under Section 411 of ERISA. In performing certain fiduciary services as described in the agreement executed between the Plan and our firm, we are acting as a fiduciary of the Plan within the meaning of Section 3(21) under ERISA.

### **Advisory Services Fees**

Advisors charge Plan clients for the services above either by a flat fee or an asset-based charge in accordance with the ranges described below. Fees for services are negotiable and may vary depending on the facts and circumstances of a specific Plan, such as the scope of services to be provided, the duration of services and the size of the Plan client, such as the number of employees, amount assets and other demographic factors. Our flat fees range from \$10,000 - \$100,000 but can be more or less as agreed to with your Advisor; asset-based fees are based upon the market value of the Plan assets and generally range from 0.25 – 1 percent of Plan assets. In accordance with ERISA and corresponding interpretations, an Advisor may offset their fees by the amount of payments, if any, received from other sources.

### **Additional Fee Information**

You may pay an asset-based fee on a quarterly basis in advance or arrears, as determined between you and your Advisor. Advisor does not require the prepayment of more than \$500 in fees and six or more months in advance. All

fees are negotiable, subject to the amounts set forth above. We may waive or charge a lesser fee from time to time for our services. The fees we charge may be higher or lower than those charged by other advisers for comparable services. The fees that we charge to manage assets in your account may be more than the amount you would pay us to buy or sell securities on a commission basis in a non-managed account.

### **Commission Based Income**

For pension consulting services, investment advisor representatives of our firm, who are also registered representatives with Broker Dealer Financial, may earn commissions through Broker Dealer Financial for effecting securities transactions on your behalf. Where commissions are earned as a result of these services, the amount of the advisory fee that is payable by you will be offset in the amount of commissions received.

### **Types of Investments**

We offer advice on equity securities, warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities, US Government securities, options contracts on securities and commodities, futures contracts on securities and commodities, and interests in partnerships investing in real estate and oil and gas.

### **Financial Planning & Consultation**

Advisor does not provide financial planning services to individual clients.

### **Regulatory Assets Under Management/Advisement**

As of 12/31/2019, we have \$2,793,002,255.38 Under Management/Advisement.

## **Item 5 Fees and Compensation**

Please refer to the "Advisory Business" section in this brochure for information on our advisory fees according to each service we offer.

### **Additional Fees and Expenses**

As part of our investment advisory services to you, we may invest, or recommend that you invest, in mutual funds and exchange traded funds. The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. You will also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian through whom your account transactions are executed. We do not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer or custodian. To fully understand the total cost you will incur, you should review all the fees charged by mutual funds, exchange traded funds, our firm, and others. For information on our brokerage practices, please refer to the "Brokerage Practices" section of this brochure.

### **Compensation for the Sale of Securities or Other Investment Products**

Persons providing investment advice on behalf of our firm may be registered representatives with an affiliated broker dealer. In their capacity as registered representatives, these persons will receive commission-based compensation in connection with the purchase and sale of securities, including 12b-1 fees for the sale of investment company products. Compensation earned by these persons in their capacities as a registered representative is separate and in addition to our advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of our firm who are registered representatives have an incentive to effect securities transactions for the purpose of generating commissions rather than solely based on your needs. However, you are under no obligation, contractually or otherwise, to purchase securities products through any person affiliated with our firm.

Although persons providing investment advice on behalf of our firm may be licensed as independent insurance agents,

it is a general policy not to solicit insurance business from our corporate retirement plan clients. If these persons were to sell insurance products to our advisory clients, they would be compensated by commissions and this may present a conflict of interest. Additionally, it is our firm policy to recommend insurance products to our non-retirement plan clients based solely on their needs and objectives, and only when appropriate. All of our clients are under no obligation, contractually or otherwise, to purchase insurance products through our firm or any person affiliated with our firm.

## Item 6 Performance-Based Fees and Side-by-Side Management

We do not accept performance-based fees or participate in side-by-side management. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees.

Performance-based fees are fees that are based on a share of capital gains or capital appreciation of a client's account. Our fees are calculated as described in the Advisory Business section above and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in your advisory account.

## Item 7 Types of Clients

We provide services to Plan clients qualified under Section 401 (a), 401(k), 403(b) or 457 (b) of the Internal Revenue Code of 1986 and/or subject to the Employee Retirement Income Security Act of 1974 (ERISA) or which are otherwise considered nonqualified.

We may also provide investment advice and services to individuals, corporations and other business organizations, trustee, estates and charitable organizations. We generally require a minimum account level of \$50,000 of these types of clients, although we may waive the account minimum from time to time at our discretion. More information on the services we provide non-Plan clients may be found in our other Client Brochure.

## Item 8 Methods of Analysis, Investment Strategies and Risk of Loss

We analyze investment providers, retirement plan platforms and other service providers by reviewing the background of the administrator, processes undertaken by the administrators and any applicable disclosure documents. We also make available resources from affiliated and unaffiliated third parties for Advisors to use in evaluating the services to provide to their Plan clients. Advisors may perform their own research from third-party resources that are generally available to the public. Performance reports may use a Modified Dietz, Money Weighted Rate of Return or Internal Rate of calculations. It is also possible systems may change, which would change the methodology used to calculate performance to a Time Weighted Rate of Return.

Our investment strategies and advice may vary depending upon each Plan's specific plan objective. As such, we determine investments and allocations based upon a Plan's predefined objectives, risk tolerance, time horizon, financial horizon, financial information, liquidity needs, and other various suitability factors. A Plan's restrictions and guidelines may affect the composition of your portfolio.

### Risks of Methods of Analysis

**Technical Analysis** - The risk of market timing based on technical analysis is that charts may not accurately predict future price movements. Current prices of securities may reflect all information known about the security and day to day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

**Fundamental Analysis** - The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

### Risk of Loss

Investing in securities involves risk of loss that a Plan should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms,



or insulate a Plan from losses due to market corrections or declines. We cannot offer any guarantees or promises that a Plan's financial goals and objectives will be met. Past performance is in no way an indication of future performance.

### **Recommendation of Particular Types of Securities**

As disclosed under the "Advisory Business" section in this Brochure, we primarily recommend mutual funds however; we may recommend other types of investments as appropriate for you since each client has different needs and different tolerance for risk. Each type of security has its own unique set of risks associated with it and it would not be possible to list here all of the specific risks of every type of investment. Even within the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with it.

Mutual funds and exchange traded funds are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities or any combination thereof. The fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. While mutual funds and ETFs generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage (i.e., borrows money) to a significant degree, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. Exchange traded funds differ from mutual funds since they can be bought and sold throughout the day like stocks and their price can fluctuate throughout the day. The returns on mutual funds and ETFs can be reduced by the costs to manage the funds. In addition, while some mutual funds are "no load" and charge no fee to buy into, or sell out of, the fund, other types of mutual funds charge such fees which can also reduce returns. Mutual funds can also be "closed end" or "open end." So-called "open end" mutual funds continue to allow in new investors indefinitely, which can dilute other investors' interests.

### **Item 9 Disciplinary Information**

We are required to disclose whether there are legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management. If our firm or IARs have been involved in one of these events, we must disclose that information in our ADV 2A brochure for ten years following the date of the event, unless (1) the event was resolved in our or the IAR's favor, or was reversed, suspended or vacated, or (2) the event is not material.

HIIA and its employees and IARs have not been involved in any legal or disciplinary events in the past ten years that would be material to a client's evaluation of the company or its personnel. We have no legal or disciplinary events relating to our firm's advisory services to Plan clients or otherwise.

### **Item 10 Other Financial Industry Activities and Affiliations**

Advisors providing investment advice on behalf of our firm are registered representatives with Broker Dealer Financial, a securities broker-dealer, and a member of the Financial Industry Regulatory Authority and the Securities Investor Protection Corporation.

We have an affiliated company that is an insurance agency. Advisors providing investment advice on behalf of our firm are licensed insurance agents independent from our firm. In this capacity our Advisors may, from time-to-time, conduct insurance transactions for our corporate retirement plan clients. If these persons were to sell insurance products to our advisory clients, they would be compensated by commissions and this may present a conflict of interest. Advisors may recommend insurance products to our clients based solely on their needs and objectives, and only when appropriate. All of our clients are under no obligation, contractually or otherwise, to purchase insurance products through our affiliated insurance agency or any person affiliated with our firm.



## **Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

### **Code of Ethics**

We strive to comply with applicable laws and regulations governing our practices. Therefore, our Code of Ethics includes guidelines for professional standards of conduct for our Associated Persons. Our goal is to protect your interests at all times and to demonstrate our commitment to our fiduciary duties of honesty, good faith, and fair dealing with you. All of our Advisors are expected to adhere strictly to these guidelines. Persons associated with our firm are also required to report any violations of our Code of Ethics. Additionally, we maintain and enforce written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about you or your account holdings by persons associated with our firm.

Clients or prospective clients may obtain a copy of our Code of Ethics by contacting us at the telephone number on the cover page of this brochure.

### **Participation or Interest in Client Transactions**

Neither our firm nor any of our Advisors has any material financial interest in client transactions beyond the provision of investment advisory services as disclosed in this brochure.

### **Personal Trading Practices**

Our firm or persons associated with our firm may buy or sell the same securities that we recommend to you or securities in which you are already invested. A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To eliminate this conflict of interest, it is our policy that neither our Associated Persons nor we shall have priority over your account in the purchase or sale of securities.

## **Item 12 Brokerage Practices**

We may recommend the brokerage and custodial services of an unaffiliated Broker Dealer, where our advisors are registered. We believe that the Broker Dealer provides quality execution services for you at competitive prices. Price is not the sole factor we consider in evaluating best execution. We also consider the quality of the brokerage services provided by outside Broker Dealers, including the value of research provided, the firm's reputation, execution capabilities, commission rates, and responsiveness to our clients and our firm. In recognition of the value of research services and additional brokerage products and services the Broker Dealer provides, you may pay higher commissions and/or trading costs than those that may be available elsewhere.

### **Brokerage for Client Referrals**

We do not receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

### **Directed Brokerage**

Persons providing investment advice on behalf of our firm who are registered representatives of unaffiliated broker dealers may recommend brokerage services. These individuals are subject to applicable rules that restrict them from conducting securities transactions away from their broker dealer unless they provide the representative with written authorization to do so. Therefore, these individuals are generally limited to conducting securities transactions through their broker dealer. It may be the case that their broker dealer charges higher transaction costs and/or custodial fees than another broker charges for the same types of services. If transactions are executed through an unaffiliated broker dealer, these individuals (in their separate capacities as registered representatives of that registered entity) may earn commission-based compensation as result of placing the recommended securities transactions. This practice presents a conflict of interest because these registered representatives have an incentive to effect securities transactions for the purpose of generating commissions rather than solely based on your needs. You may utilize the

broker-dealer of your choice and have no obligation to purchase or sell securities through such broker as we recommend.

### **Block Trades**

When we invest in mutual funds, we do not combine multiple orders for shares of the same fund purchased for advisory accounts we manage (this practice is commonly referred to as "block trading") because mutual funds do not trade in blocks. For securities such as ETFs and stocks, we will combine the multiple orders for the same security into block trades whenever appropriate.

### **Item 13 Review of Accounts**

Our Advisors will contact you, and typically meet with you at least annually, to review the performance of your account and any changes to your Plan's financial situation and investment goals and objectives. In addition, our Advisors typically review the quarterly performance report received from your account custodian. Advisors may also perform account reviews more frequently when market conditions dictate. Other conditions that may trigger a review are changes in laws, new investment information and changes to your situation. We also require you, in our standard client agreement, to inform your Advisor promptly of any changes to you information, including changes to your financial situation or investment objectives and policies. You will receive confirmations of all transactions, monthly statements and/or quarterly performance reports from the designated custodian of you Plan assets. Our Advisors are available during normal business hours to answer questions or concerns you may have.

### **Item 14 Client Referrals and Other compensation**

Advisors providing investment advice on behalf of our firm may be licensed insurance agents and may be registered representatives with unaffiliated broker dealers. We may also enter into arrangements where we and our Advisors refer you to unaffiliated investment advisers that will provide advisory services to you. When we make such a referral, we and our Advisors will typically receive a portion of the total fee the investment adviser charges you for so long as they provide you services. We and your Advisor may receive a transaction fee for such services as a solicitor. Any such arrangements will be designed to comply with the Advisers Act and ERISA. We may receive securities commissions, service fees, 12b-1 fees and other third-party payments if you implement our recommendations through the unaffiliated broker dealer. A portion of such compensation may be paid to your Advisor in accordance with ERISA. Relative to mutual fund purchases, for the period in which you maintain an investment with the mutual fund, we and your Advisor may receive 12b-1 fees directly from the mutual fund company or ongoing fees from the adviser, underwriter or distributor of the mutual fund company. There is a conflict of interest when we recommend these products or services since they could result in increased compensation to us and our Advisors.

### **Item 15 Custody**

We do not directly debit advisory fees from your Plan account and we do not exercise custody over your funds or securities. Your funds and securities will be held with a bank, broker-dealer, or other independent, qualified custodian, or your retirement plan provider. If you have a question regarding your account statement or if you did not receive a statement from your custodian, please contact your custodian directly.

### **Item 16 Investment Discretion**

In limited circumstances, you will grant us discretion to change the investment options within the platform selected by you and the adopted investment policy. Our investment authority is subject to specified investment objectives, guidelines, and/or conditions imposed by you. For example, you may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio and/or restrictions or prohibitions of transactions in the securities of a specific industry. You may amend these limitations as required. Such amendments must be submitted in writing.

## **Item 17 Voting Client Securities**

We will not vote proxies on behalf of your advisory accounts. At your request, we may offer you advice regarding corporate actions and the exercise of your proxy voting rights. If you own shares of common stock or mutual funds, you are responsible for exercising your right to vote as a shareholder. In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward any electronic solicitation to vote proxies.

## **Item 18 Financial Information**

We do not have any financial condition likely to impair our ability to meet our contractual commitments to you.

## **Item 19 Requirements for State-Registered Advisers**

Please refer to the Form ADV 2b Brochure Supplements for information about each investment adviser representative.

## **Item 20 Miscellaneous Information**

### **Class Action Lawsuits**

We do not determine if securities held by your Plan portfolio are the subject of a class action lawsuit or whether the Plan sponsor is eligible to participate in class action settlements or litigation nor do we initiate or participate in litigation to recover damages on your Plan's behalf for injuries as a result of actions, misconduct, or negligence by issuers of securities held by you.

### **Privacy Policy**

We view protecting your private information as a top priority. Pursuant to applicable privacy requirements, we have instituted policies and procedures to ensure that we keep your personal information private and secure. We do not disclose any nonpublic personal information about you to any nonaffiliated third parties, except as permitted by law. In the course of servicing your account, we may share some information with our service providers, such as transfer agents, custodians, broker-dealers, accountants, consultants, and attorneys. We restrict internal access to nonpublic personal information about you to employees who need that information in order to provide products or services to you. We maintain physical and procedural safeguards that comply with regulatory standards to guard your nonpublic personal information and to ensure our integrity and confidentiality. We will not sell information about you or your accounts to anyone. We do not share your information unless it is required to process a transaction, at your request, or required by law. You will receive a copy of our privacy notice prior to or at the time you sign an advisory agreement with our firm. Thereafter, we will deliver a copy of the current privacy policy notice to you on an annual basis. Please contact our main office at the telephone number on the cover page of this brochure if you have any questions regarding this policy.

### **Business Continuity Plan**

We maintain a business continuity plan designed to minimize the impact of disasters, emergencies, and other unforeseen circumstances involving our services and communications.