

WINTRUST[®]

WEALTH MANAGEMENT

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WELLS FARGO ADVISORS WRAP FEE PROGRAMS BROCHURE

This wrap fee brochure provides information about the qualifications and business practices of Wintrust Investments L.L.C. (“WTI,” “us,” “we,” “our” or “the Firm”). If you have any questions about the contents of this Brochure, please contact us at 800-621-4477. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

WTI is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

The terms “client,” “you,” and “your” are used throughout this Brochure to refer to the person(s) or organization(s) who contract with us for the services described here.

Additional information about WTI also is available on the SEC's website at www.adviserinfo.sec.gov. The SEC's website also provides information about any persons who are registered, or are required to be registered, as investment adviser representatives of WTI.

Item 2 – Material Changes

We update this Brochure no less frequently than on an annual basis.

This Item 2 summarizes any material changes to the Brochure and provides a summary of such changes. There were no material changes to this Brochure from the previous version of this Brochure dated November 23, 2019.

Additional information about WTI is available on the SEC's website at adviserinfo.sec.gov. The SEC's website also provides information about any persons who are registered, or are required to be registered, as investment adviser representatives of WTI.

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Item 4 – Services, Fees, and Compensation

Services

Wintrust Investments, LLC (“WTI” or the “Adviser”) has entered into an agreement with Wells Fargo Advisors (“WFA”), pursuant to which WFA provides advisory and/or other services with respect to the Programs. Clients of investment advisory accounts described herein are clients of WTI. WTI is not related to or affiliated with WFA or Wells Fargo Clearing Services, LLC (the “Clearing Agent”). Unless otherwise specified, WTI or Clearing Agent will maintain custody of client assets. Clearing Agent qualifies as a “qualified custodian” as described by Rule 206(4)-2 of the Investment Advisers Act. WFA and Clearing Agent each reserves the right to reject and not provide services to any client or with respect to any client account for any reason.

WFA provides advisory and other services to WTI with respect to the Personalized Unified Managed Account Program (“Personalized UMA”) and Fundssource Program. Please review the appropriate WFA Disclosure Documents for a complete description of these programs.

WFA does not provide advisory services to WTI with respect to Private Investment Management, Asset Advisor, Private Advisor Network and Custom Choice. While WTI is the sponsor of these advisory programs, WFA provides certain non-advisory services which enable WTI to offer these programs.

WTI affiliate Great Lakes Advisors (GLA) is one of many investment managers available to you in the Private Advisor Network Program. Through this relationship, WTI clients are eligible for a 5 basis point (.05%) discount on the investment manager fee.

Private Investment Management (“PIM”)

With PIM, certain specially trained WTI Adviser Representatives (called Portfolio Managers) provide investment advisory and brokerage services to your account on a discretionary basis. As a minimum criterion for providing advisory services, WTI requires our Portfolio Managers to possess satisfactory past business experience, plus any required industry examinations and registrations. Based on your investment objectives and individual needs, your Adviser Representative will have discretion to manage your assets to an appropriate investment strategy.

PIM is based on both fundamental and quantitative research and other independent research. Individual PIM Portfolio Managers may develop specific investment strategies using a mix of these analytic methods. They also establish quality and concentration requirements to provide overall discipline. Such strategies ordinarily include long and short-term securities purchases and, depending on your objectives and the Portfolio Manager’s investment philosophy, supplemental covered option writing. In special circumstances, the strategies may also include margin transactions, other option strategies and trading or short sale transactions.

Portfolio Managers may use third-party research to assist in developing security selection models for PIM. When seeking to anticipate trends and identify undervalued securities with sound fundamentals, Portfolio Managers may also use a security selection and portfolio modeling process that incorporates fundamental, technical and statistical analyses of historical data. Due to any number of factors, including

timing of deposits, investment selection process or investment needs, certain clients may receive different execution prices and investment results.

Asset Advisor

Asset Advisor is a non-discretionary, client directed investment program in which your Adviser Representative may provide a broad range of investment recommendations based on your investment objectives, financial circumstances and risk tolerance. You have the option of accepting these recommendations or selecting different investments for your account.

Most types of securities are eligible for purchase in an Asset Advisor account including, but not limited to, common and preferred stocks, exchange-traded funds, closed end funds, fee-based unit investment trusts, corporate and government bonds, certificates of deposit, options, structured products, certain mutual funds whose shares can be purchased at net asset value, and certain wrap class alternative investments, such as hedge funds and managed futures funds. Collectively, these are referred to as "Program Assets."

Hedge funds and managed futures are not suitable for all investors. Hedge funds are complex investment vehicles that often use leverage and other speculative investment practices, such as short sales, options, derivatives, futures and illiquid investments that may increase the risk of investment loss. Managed futures are speculative investments that are subject to a significant amount of risk. This Disclosure Document is not a solicitation, recommendation or invitation to invest in alternative investments and is intended solely to disclose the availability of alternative investments within Asset Advisor.

Certain assets, such as commodity futures contracts, options on such contracts, annuities, limited partnership interests, and mutual funds that cannot be purchased at net asset value are not eligible as Program Assets, and are referred to collectively as "Excluded Assets." You may purchase or sell Excluded Assets in your account, but these transactions will incur commissions or charges.

While new-issue CDs are an eligible Program Asset, the yield of new-issue CDs takes into account a sales concession in order to compensate the brokerage firms that sell the CDs. For certain advisory accounts, the underwriter retains this sales concession. Although WTI does not receive the sales concession, it has an impact on the overall yield paid to you. Since we charge an advisory fee on all eligible assets within an advisory Account, you are effectively charged both the sales concession (retained by the underwriter) and the advisory fee on the CD. These charges reduce the overall yield on the CD and, in some cases, this may result in a negative yield. You should be aware that you could obtain the same CDs without being subject to the advisory fee if you purchase it in a non-advisory brokerage Account.

An Asset Advisor account may not be used for market timing strategies or activities for mutual funds or any extreme trading activity that WTI or Clearing Agent, in its sole discretion, deems detrimental to the interest of average fund shareholders or contrary to the policies or interest of mutual fund companies with whom WTI, or Clearing Agent maintains relationships. WTI or Clearing Agent, in its sole direction, or by direction of the fund company, reserves the right to reject any transactions or to assess a redemption fee for any partial or full liquidation execution in which the account trading appears to be inconsistent with the fund's prospectus. Furthermore, WTI will cooperate, when asked by a fund company, to aid in its attempt to identify and impede the efforts of Adviser Representatives and investors engaging in market timing or extreme trading activity. If the fund company notifies WTI to reject or cancel a trade

Commented [SJ1]: Is this even applicable?

Commented [CJ2]: Do we want to make this an option? How about grandfathering what we have, and locking it down going forward?

Commented [SJ3R2]: While I agree that we should lock it down, I would leave it as is in the ADV as we don't have a mechanism to ensure full lock down at this time.

Commented [CJ4]: Do we have fee-eligible CDs that are not "marked up", thus giving the client the better yield? I don't remember if we do or not? Some structured CDs are setup this way, giving the benefit to the client in the yield or other factors

Commented [SJ5R4]: CD's that are new issues are sold at a discount, less the concession. The verbiage makes sense though as longer term CD's could incur fees in excess of their commissions as a brokerage transaction.

for any reason, WTI reserves the right to cancel such trade without prior notice to Client. WTI will not be held accountable for any losses resulting from market timing activities or any action taken under its market timing policies. In addition, the frequency of mutual fund transactions and exchanges is subject to any limits established by the application mutual funds and WTI.

Custom Choice

Custom Choice is a non-discretionary investment advisory program designed to help you allocate your assets among open-end mutual funds in accordance with your individual investment goals, objectives, and expectations. Based on the investment objectives and risk tolerance reported in your Account Profile, your Adviser Representative will recommend an appropriate mix of various open-end mutual funds and money market funds.

You have the option of accepting any of our recommendations, or selecting an alternative combination of funds. We will implement your investment decisions, but will not have investment discretion over your account, except for the limited discretion to rebalance your target asset allocation, if you authorize us to do so. Over time, as changes occur in the financial markets and/or your investment objectives and circumstances, we may recommend changes in your portfolio. In making these recommendations, we will take the updated information in your Account Profile into account. You are advised that your decisions relating to investments in mutual funds may have tax consequences that should be discussed with your tax advisor. In order to maintain your portfolio in conformance with your target asset allocation, you may authorize us to rebalance your Account using an automated rebalance trading system. You may select a quarterly, semi-annual or annual rebalance option.

Fees and Compensation

All of the program accounts described in this brochure are charged a fee on eligible assets that covers advisory, execution, custodial, and reporting services. Listed below are WTI's standard fees for these programs, which are negotiable and may differ from those described in the WFA Separately Managed Accounts Wrap Fee Brochure.

Personalized UMA

Personalized UMA	Standard Program Fee	Minimum Annual Fee
<i>Personalized UMA Multi Strategy</i>		
Optimal Blend	2.50%	\$1,500
Custom Blend	2.50%	** Based on strategy selections. See Below
<ul style="list-style-type: none"> Individual Mutual Fund (if used as an investment in a Custom Blend) 	2.00%	\$50
<ul style="list-style-type: none"> Individual ETF (If used as an investment in a Custom Blend) 	2.00%	\$50
<i>Personalized UMA Single Strategy or used as a sleeve within a Personalized UMA Multi Strategy Account</i>		
SMA Strategies - \$50,000 Minimum	2.50%	\$1,000
SMA Strategies - \$100,000 Minimum	2.50%	\$1,500

Allocation Advisors Strategies		
Strategic ETF, CAAP Plus, Tactical ETF, Active/Passive, Morningstar Strategic ETF, Morningstar High Income, Laffer Global Portfolio, Laffer Dynamic U.S. Inflation	2.25%	\$500
ESG Aware, Intuitive Investor ETF, Tactical Active/Passive	2.10%	\$150
Wells Fargo Compass Strategies	2.25%	\$1,000
Customized Portfolios Equity Strategies	2.25%	\$1,000
FundSource Optimal Blend Strategies		
Standard, Tax Managed, Capital Stability, Core American, Global Opportunities, Alternatives, Multi-Strategy, Pathways	2.00%	\$300
Foundations	2.00%	\$150

WFA does not provide advisory services to WTI with respect to Private Investment Management, Asset Advisor, Private Advisor Network and Custom Choice. While WTI is the sponsor of these advisory programs, WFA provides certain non-advisory services which enable WTI to offer these programs.

PIM

PIM accounts are charged an all-inclusive fee that covers advisory, execution, custodial and reporting services. Billed quarterly in advance, the standard PIM fee schedule is based on program eligible assets:

Total Account Value	Annualized Fee
First \$250,000	3.00%
Next \$750,000	2.50%
Next \$1,000,000	2.00%

Asset Advisor

Asset Advisor accounts are charged an all-inclusive fee that covers advisory, execution, custodial, and reporting services. Billed quarterly in advance, the standard Asset Advisor fee schedule is based on program eligible assets:

Total Account Value	Annualized Fee
First \$250,000	3.00%
Next \$750,000	2.50%
Next \$1,000,000	2.00%

Private Advisor Network

You pay a fee for both Network services and execution services. We do not impose a separate charge for brokerage commissions on agency trades or markups or markdowns on principal transactions. Billed quarterly in advance, the Private Advisor Network fee schedule is negotiable based on a maximum fee of 2.00%. You may also be subject to any other fees associated with our standard brokerage accounts,

including postage and handling fees, transfer taxes, exchange fees (among which SEC fees may be included), and any other fees required by law.

For Accounts invested in an Advanced Option Strategy, the advisory Program fee is calculated based on a target notional value as detailed in the Advanced Option Strategy Addendum you will receive. The target notional value is the agreed upon value of broad-based equity market index exposure that the underlying option contracts in the portfolio should represent. The target notional value does not change over time unless a new value is agreed upon in writing. The actual value of the index exposure in your Account can be significantly higher or lower than the target notional value

The Fee Schedule does not include the investment adviser fees of the third-party investment manager. You may pay for the services of the investment adviser separately. If applicable, you authorize us to pay the separate investment advisory management fee invoiced by the adviser by debiting your Account accordingly. It is your responsibility to determine if any such invoice from the investment adviser is proper or if the amount of fees charged is accurate. You may revoke our authorization to pay the investment adviser fee at any time by giving us written notice.

You should be aware that Program fees charged may be higher or lower than those otherwise available if you were to select a separate brokerage service and negotiate commissions in the absence of the extra advisory service provided. Our fee schedules may be subject to negotiation depending upon a range of factors, including but not limited to account sizes and overall range of services provided.

WTI affiliate Great Lakes Advisors, LLC ("GLA") is one of many investment managers available to you in the Private Advisor Network Program. Through this relationship, WTI clients are eligible for a 5 basis point (.05%) discount on the investment manager fee. As GLA is one of our affiliates, we receive a portion of the advisory fee that GLA charges (and we pass a portion on to your Adviser Representative), which creates a conflict of interest for us. Further, we have an incentive to recommend GLA Funds, which charge management fees that benefit GLA and a portion of which are passed on to us.

You should consider the value of this advisory service when making such comparisons. The combination of custodial, advisory and brokerage services may not be available separately or may require multiple accounts, documentation and fees. You should also consider the amount of anticipated trading activity when selecting among the Programs and assessing the overall cost. Advisory programs typically assume a normal amount of trading activity and, therefore, under particular circumstances, prolonged periods of inactivity or asset allocations with significant fixed income or cash weightings may result in higher fees than if you paid commissions separately paid for each transaction.

Custom Choice

Custom Choice accounts are charged an all-inclusive fee on eligible mutual funds that covers advisory, execution, custodial, and reporting services. Billed quarterly in advance, the standard Custom Choice fee schedule is based on program eligible mutual funds:

Total Account Value	Annualized Fee
First \$250,000	1.75%
Next \$750,000	1.50%
Next \$1,000,000	1.15%

You should be aware that program fees charged may be higher or lower than those otherwise available if you were to select a separate brokerage service and negotiate commissions in the absence of the extra advisory service provided. Our fee schedules may be subject to negotiation depending upon a range of factors including, but not limited to account sizes and overall range of services provided.

You should consider the value of this advisory service when making such comparisons. The combination of custodial, advisory and brokerage services may not be available separately or may require multiple accounts, documentation and fees. You should also consider the amount of anticipated trading activity when selecting among the programs and assessing the overall cost. Advisory programs typically assume a normal amount of trading activity and, therefore, under particular circumstances, prolonged periods of inactivity or asset allocations with significant fixed income or cash weightings may result in higher fees than if commissions were paid separately for each transaction.

A portion of the fees or commissions charged for the programs described will be paid to the Adviser Representative in connection with the management of accounts as well as for providing client-related services within the program. This compensation may be more or less than the Adviser Representative would receive if you paid separately for investment advice, brokerage, and other services, and may vary, depending on the program or services offered.

Unless agreed upon otherwise, you authorize us to deduct a quarterly fee calculated at the rate indicated in the Fee Schedule from your account, in advance. For the purposes of calculating program fees, "total account value" shall mean the sum of the long and short market value of all securities and mutual funds, if applicable. In valuing the account, we will use the closing prices or, if not available, the lowest published "bid-price" and if none exist, the last reported transaction if occurring within the last 45 days. For mutual funds, we use the fund's most current net asset value, as computed by the fund company. In so doing, we will use information provided by quotation services believed to be reliable.

The initial fee is calculated as of the date that the account is accepted into the program and covers the remainder of the calendar quarter. Subsequent fees will be determined for calendar quarter periods and shall be calculated on the value of the account on the last business day of the prior calendar quarter.

No fee adjustment will be made during any fee period for appreciation or depreciation in the value of the assets in your account during that period. Your account will be charged or refunded a prorated quarterly fee on any net additions or net withdrawals in the account during a month. Fees will be charged or refunded if the net addition or net withdrawal would generate a fee or refund of at least \$40 for that quarter. Fees will be assessed in the month following the net addition or net withdrawal. Fees are based on the value of the assets in your Account, and WTI shall not be compensated on the basis of a share of capital gains upon or capital appreciation of the funds or any portion of your funds.

Whenever there are changes to the fee schedule, the schedule charges previously in effect shall continue until the next billing cycle.

Additionally, your Account will normally participate in a "sweep program" for the automatic purchase and redemption of cash balances in connection with free credit balances and to satisfy debit balances in the custodial brokerage accounts (net of free credit balances). Through our Insured Bank Deposits Program ("IBD"), available cash balances in a WTI account are automatically deposited into one or more

interest-bearing, bank deposit accounts established at our affiliated Wintrust banks ("Program Banks") and insured by the Federal Deposit Insurance Corporation ("FDIC"). If cash balances are deposited in a bank deposit account in one or more affiliated Program Banks, the participating Bank(s) will benefit from use of the deposits and WTI will receive compensation from the Program Banks. This compensation will be in addition to, and will not reduce, account fees payable under the advisory Program.

Risk in the Use of Margin

To the extent margin is used in your account, you should be aware that the margin debit balance will not reduce the market value of eligible assets, and will therefore increase the asset-based fee you are charged. The increased asset-based fee may provide an incentive for your Adviser Representative to recommend the use of margin strategies. The use of margin is not suitable for all investors, since it increases leverage in your Account and therefore risk.

Other Account Fees

The fee does not include certain dealer markups or markdowns, odd lot differentials, transfer taxes, exchange fees, execution fees (foreign and/or domestic) when applicable, and any other fees required by law. Cash balances in an Account may be invested in money market mutual funds including, as permitted by law, those with which we have agreements to provide advisory, administrative, distribution, and other services and for which we receive compensation for the services rendered. In a low interest rate environment, the yield that you earn on cash and cash alternatives, including cash sweep funds, CDs and money market funds may not offset advisory fees. In some instances, the effective yield of the investment may in fact be negative.

Non-brokerage-related fees, such as IRA fees, are not included in the wrap fee and may be charged to your account separately. As more fully described in the fee schedules above, the fees you are charged may be different, depending on the asset type invested by the account.

Your Adviser Representative may suggest that you use other products and services that WTI offers, but that are not available through the program you select ("Excluded Assets"). Excluded Assets are not charged a program fee and are not considered a part of the program or program services. We generally recommend that you hold these Excluded Assets in a separate brokerage account. If an excluded fund purchased for or transferred into your account later becomes eligible for the program, program fees will apply to that fund and it may become subject to the rebalance trading system. You will incur any usual and customary brokerage charges and fees imposed on transactions in Excluded Assets which may include (i) any dealer markups and odd lot differentials and transfer taxes; (ii) charges imposed by broker-dealers and custodians other than WFA and its affiliates and fees for other products and services that we and our affiliates may offer; (iii) offering discounts, commissions and related fees in connection with underwritten public offerings of securities; (iv) margin interest and operational fees and charges; (v) IRA fees; and (vi) any redemption fees, exchange fees and or similar fees (among which SEC fees are included) imposed in connection with mutual fund transactions whereby WTI or your Adviser Representative may receive additional compensation on these Excluded Assets.

Costs of Investing in Mutual Funds

In addition to program fees, as a shareholder of a money market, mutual fund or closed-end fund, you will bear a proportionate share of the fund's expenses, including investment management fees that are paid to the fund's investment adviser. WTI may receive fees from these mutual funds or closed-end funds. For more information about these funds, refer to their prospectuses.

You should be aware that you may invest in Money Market Funds or Mutual Funds directly without incurring the fee charged for participation in a program. In addition, certain institutional investors may directly purchase a class of shares of certain money market funds or funds that do not charge shareholder services, sub-accounting or other related fees. If you do, however, you will not receive the various program services provided under the program and some mutual funds may impose a sales load on direct investments. You will receive a prospectus for each money market and mutual fund purchased, as required by securities regulations.

WTI may collect such fees directly or indirectly from some or all of the mutual funds in which you invest, and we may pay any such fees it receives to Adviser Representatives. The amount of the fees we or your Adviser Representative receive will vary, depending on the percentage paid pursuant to a fund's Rule 12b-1 plan.

Certain Funds make multiple no-load, institutional, advisory, or load-waived share classes available for purchase through investment advisory programs. These share classes may be available only through investment advisory programs and have different and lower shareholder servicing, sub-accounting, investment management and 12b-1 fees and charges from other shares classes offered by those Funds. As a result, some clients may have purchased these lower-cost institutional share classes, while others may have purchased a non-institutional share class.

Account Termination

Your account agreements may be terminated by either party at any time upon 30 days' advance written notice. If you terminate your Agreement, a pro rata refund will be made, less reasonable start-up costs. You have the right, within five (5) days of execution, to terminate the Client Agreement without penalty. Unless otherwise agreed upon by the Adviser, the client's written confirmation that it wishes to withdraw all assets from the Account shall be considered a written notice of termination of the Client Agreement by the client. In the event of cancellation of Client Agreements, fees previously paid pursuant to the fee schedule will be refunded on a pro rata basis, as of the date notice of such cancellation is received by the non-canceling party, less reasonable start-up costs.

If you choose to terminate your agreement, we can liquidate your account if you instruct us to do so. If so instructed we will liquidate your account in an orderly and efficient manner. We do not charge for such redemption; however, you should be aware that certain mutual funds impose redemption fees as stated in their fund prospectus. You should also keep in mind that the decision to liquidate security issues or mutual funds may result in tax consequences that should be discussed with your tax advisor.

We will not be responsible for market fluctuations in your account from the time of notice until complete liquidation. All efforts will be made to process the termination in an efficient and timely manner. Factors that may affect the orderly and efficient liquidation of an account might be size and types of issues, liquidity of the markets, and market makers' abilities. Should the necessary securities' markets be unavailable and trading suspended, efforts to trade will be done as soon as possible following their reopening. Due to the administrative processing time needed to terminate an advisory account, termination orders cannot be considered market orders. It may take several business days under normal market conditions to process your request.

Commented [CJ6]: WHAT??? Isn't this the SEC issue?

Commented [SJ7R6]: Yes, but this is a means to disclose potential 12b-1 payments. I'll defer to Elliott if he thinks we should remove it but I believe it covers us in case we pay at 12b1 in error.

If a program account is terminated, but you maintain a brokerage account with us, the money market fund used in a “sweep” arrangement may be changed and/or your shares may be exchanged for shares of another series of the same fund. You will bear a proportionate share of the money market fund's fees and expenses. You are subject to the customary brokerage charges for any securities positions sold in your account after the termination of program services.

Item 5 – Account Requirements and Types of Clients

Account Requirements

The minimum initial account values for the Programs in this document are listed below. Under certain circumstances, the minimum account size may be waived. WFA may act as sub-adviser for the advisory programs. The minimum and maximum account size required by WTI may differ than that required by WFA as stated in its advisory program Wrap Fee Brochure or applicable Disclosure Document. You should refer to the chart below, as appropriate, to determine the minimum account sizes permitted.

Program Name	Minimum Account Size
Personalized UMA	
<ul style="list-style-type: none"> • Personalized UMA Multi Strategy <ul style="list-style-type: none"> ○ Optimal Blend ○ Custom Blend 	<ul style="list-style-type: none"> \$200,000 or portfolio minimum \$10,000 subject to investment minimum
<ul style="list-style-type: none"> • Personalized UMA Single Strategy <ul style="list-style-type: none"> ○ SMA Strategies ○ Allocation Advisors strategies <ul style="list-style-type: none"> ▪ ESG Aware, Tactical Active/Passive and Intuitive Investor ETF ▪ Strategic ETF, Active/Passive, Morningstar Strategic ETF, Morningstar ETF, Laffer Global and Laffer Dynamic U.S. Inflation ▪ CAAP Plus and Tactical ETF ○ Wells Fargo Compass Asset Allocation strategies <ul style="list-style-type: none"> ▪ Conservative Growth & Income ▪ Moderate Growth & Income ▪ Aggressive Growth & Income ▪ Conservative Growth ▪ Moderate Growth ▪ Aggressive Growth ○ Customized Portfolios Equity strategies ○ FundSource Optimal Blend ○ FundSource Foundations Optimal Blend 	<ul style="list-style-type: none"> \$50,000 subject to Manager's minimum \$10,000 \$25,000 \$50,000 \$250,000 \$250,000 \$250,000 \$250,000 \$250,000 \$150,000 \$50,000 \$25,000 \$10,000
Private Advisor Network	\$100,000 subject to Manager's minimum

Customized Portfolios	
○ Taxable Fixed Income	\$2,000,000
○ Tax-Exempt Fixed Income (Municipals)	\$2,000,000
○ Short Term Asset Management	\$5,000,000
○ Custom Option Portfolio	\$250,000
○ Option Premium Income Strategy	\$5,000,000
PIM	\$50,000
Asset Advisor	\$25,000
Custom Choice	\$25,000
Fundsource	\$25,000

Types of Clients

WTI provides the advisory services described in this brochure to individuals, pension or profit sharing plans, trusts, estates or charitable organizations, corporations or other business entities, governmental entities and educational institutions, as well as banks or thrift institutions.

Item 6 – Portfolio Manager Selection and Evaluation

Portfolio Manager Selection

Adviser Representatives are selected to act as Portfolio Managers, based on a number of factors, including overall level of experience and the successful completion of appropriate regulatory examinations. Clients may designate the Adviser Representative; a specific Adviser Representative is not generally recommended to a client. Each Account is subject to periodic review for adherence to the investment objective and risk tolerance of the client. The investment returns, as compared with appropriate market benchmarks, are also periodically reviewed. The review is conducted by a supervising registered principal of the firm. The investment merits of individual securities are not reviewed. The supervising principal may recommend replacement of an Adviser Representative based on factors such as performance and service.

Evaluation

As our client, you will be provided with timely confirmations of all transactions. No less frequently than quarterly, you will be provided with an Account statement from WFCS reflecting any and all Account activity, including purchases and sales of securities. The Adviser will also provide you with a periodic review of the investment performance of your Account. The Adviser will discuss that review with you as deemed necessary in each case, provide answers to any questions, and discuss other factors deemed appropriate. The review will include an evaluation of Account activity and performance for the most recent quarter and the current year. This evaluation will include a measurement of, among other things, net investment earnings, Account additions and withdrawals, performance relative to one or more benchmarks, and asset allocation statistics. Performance reviews are prepared in accordance with industry standards by the Adviser Representative.

Account reviews are carried out on a periodic basis throughout the year. Account reviews include the monitoring of equity, fixed income, and cash levels for each account by investment objective (asset allocation), the concentration of any security in an account, the security selection, and the investment rating of any bond held in the account.

Conflicts of Interest

Some broker-dealers may be able to obtain better prices on securities transactions than either WTI or WFCS. Because the Adviser directs all orders for to WTI or WFCS, the Adviser will not solicit prices from other broker-dealers and may not otherwise obtain “best execution.” Accordingly, clients may receive less favorable net prices and executions of some transactions than might otherwise be obtainable from another broker-dealer.

The directors, officers, employees and registered persons of the Adviser and its affiliated broker-dealer, WTI may purchase or hold securities that are recommended for purchase or sale to clients. Personal security transactions by persons associated with the Adviser, WTI are subject to the firm’s Code of Ethics, which includes various reporting, disclosure and approval requirements, described in item 11 of the firms ADV Part 2A. The Code of Ethics applies not only to transactions by the individual, but also to transactions for accounts in which such person has an interest individually, jointly or as guardian, executor, or trustee or in which such person or the person’s spouse, minor children or other dependents residing in the same household have an interest. Compliance with the Code of Ethics is a condition of employment.

Advisory Business

Wintrust Investments, LLC (“WTI” and “Adviser”) was founded in 1931 and is 100% owned by Wintrust Bank (formerly Northshore Community Bank & Trust), a subsidiary of Wintrust Financial Corporation. WTI offers investment advisory, brokerage and insurance services. WTI is registered as an investment adviser with the SEC, is a member of the Financial Industry Regulatory Authority (“FINRA”), and is licensed to sell insurance in the states where it does so. WTI offers these services to a variety of individuals, trusts, non-profit organizations, corporations and retirement accounts.

Securities transactions for WTI clients are executed by Wells Fargo Clearing Services, LLC (“WFCS”) through a brokerage account opened at WTI. WTI is an introducing broker for your account; WFCS is the clearing broker and custodian for securities transactions executed as part of WTI’s investment advisory services.

WTI provides investment management services to individual and institutional clients on a personalized basis, reflecting the individual client’s circumstances through the following programs:

- i. Wells Fargo Advisors Investment Advisory Services (collectively “the programs”)
 - o Personalized UMA
 - Personalized UMA Multi Strategy
 - Personalized UMA Single Strategy
 - o Private Advisor Network (“Network”)
 - o Customized Portfolios
 - o Private Investment Management (“PIM”)
 - o Asset Advisor

- Custom Choice
- FundSource
- ii. Wintrust Navigator Personal Financial Planning
- iii. WTI Institutional Advisory Services
- iv. Wintrust Retirement Benefit Advisors (WRBA)

i. **Wells Fargo Advisors Investment Advisory Services**

The Programs consist of separately managed account (i.e., “wrap”) programs provided to clients for an inclusive fee, a mutual fund asset allocation program and discretionary investment advisory services for an advisory fee with the client paying separately for brokerage.

WTI offers the Programs through an arrangement with Wells Fargo Advisors. Wells Fargo Advisors is a trade name used by WFCS and Wells Fargo Advisors Financial Network, LLC, separate registered broker-dealers and non-bank affiliates of Wells Fargo & Company. Under the Programs:

- (1) A WTI investment adviser representative (“Adviser Representative”) considers a client’s pertinent financial and demographic information to develop an investment program that meets the client’s goals and objectives;
- (2) Excluding the PIM, Asset Advisor, and Custom Choice Programs, the Adviser Representative analyzes client investment objectives, time horizon, liquidity needs, and financial information and recommends an appropriate asset allocation and strategy, which may include use of various sub-managers and investment vehicles such as mutual funds, based on the client’s goals and objectives, investment time horizon, tolerance for risk and other factors deemed pertinent to the client’s individual situation;
- (3) For all Programs except Asset Advisor and Custom Choice, the sub-manager, Adviser Representative or the investment manager of the investment vehicle, as applicable, provides continuous investment management services on a discretionary basis with respect to the cash and securities in the client’s accounts under the Programs (the “Accounts”);
- (4) Wells Fargo Advisors, the sub-manager or Adviser Representative, as applicable, through WFCS, effects transactions in securities for the client’s Accounts; and
- (5) WFCS maintains custody of the client’s assets under the Program.

For the services offered under the Programs (with the exception of the Network Program), the client pays an all-inclusive fee out of which WTI pays itself, Wells Fargo Advisors, the sub-manager (as applicable) and WFCS. In the case of Network, Wells Fargo Advisors may be compensated for its services either from a fee, which is payment for both the Network services and execution services, or through brokerage commissions. Network clients pay for the services of the sub-manager separately.

Custom ChoiceWTI affiliate Great Lakes Advisors (GLA) is one of many sub-managers available to you in the Network Program. GLA acts as an investment manager for their Multi-Asset Strategy ETF Program (MAS ETF) within the Private Advisor Network Program.

Each Program (with the exceptions of Asset Advisor and Custom Choice) is a discretionary asset allocation service. Pursuant to an Investment Management Agreement each client enters into with WTI and Wells Fargo Advisors, in all Programs except for PIM you grant Wells Fargo Advisors discretionary

authority to invest and reinvest all assets in your Account, subject to review by your Adviser Representative. In the case of PIM, you grant your Adviser Representative discretionary authority to invest and reinvest all assets in your Account, subject to review by WTI. Such discretion will be exercised in accordance with your goals and objectives, as discussed above. Accordingly, Wells Fargo Advisors or WTI is empowered to buy, sell or to otherwise effect transactions in securities for your Accounts at any time without prior consultation with you, and may delegate such authority to sub-managers. Pursuant to the Investment Management Agreement for the Personalized UMA Program and the FundSource Program, we will inform Wells Fargo Advisors whenever you notify us of any changes to your financial information and investment objectives.

When you invest through the PIM, Asset Advisor and Custom Choice Programs, an Adviser Representative acts as portfolio manager for your Account. Asset Advisor and Custom Choice are non-discretionary programs in which your WTI Adviser Representative will make investment recommendations based on your investor profile information and objectives. WTI will not implement such recommendations without your prior approval.

The investment management services that WTI and/or Wells Fargo Advisors provide under each Program include:

- Assessment of the client's investment needs and objectives
- Investment policy planning
- Development of an asset allocation strategy designed to meet the client's objectives
- Recommendations on suitable style allocations
- Identification of appropriate sub-managers, investment vehicles, asset classes and/or securities suitable to the client's goals
- Evaluation of sub-managers, investment vehicles, asset classes and/or securities meeting style and allocation criteria
- Engaging selected sub-managers and/or investing in selected investment vehicles, asset classes and/or securities on behalf of the client (for all Programs except Asset Advisor and Custom Choice)
- Ongoing monitoring of performance of individual sub-managers, investment vehicles, asset classes and/or securities
- Review of the Accounts to ensure adherence to policy guidelines and asset allocation
- Recommendations for rebalancing of the Accounts, if necessary
- Reporting of the Accounts' performance and progress
- Avoidance of wash sale rule violations
- Fully integrated back office support systems, including custody, trade execution and confirmation and statement generation through WFCS.

Wells Fargo Advisors may retain sub-managers to manage the Accounts. In some cases, sub-managers construct a model portfolio which is used to invest client assets. WTI will provide you a copy of each applicable sub-manager's Part 2A of Form ADV or disclosure brochure. Regardless of Account type, your contact source is your Adviser Representative and sub-managers are generally not required to make themselves available to individual clients.

The Programs (with the exceptions of Asset Advisor and Custom Choice, which are non-discretionary programs) are intended to comply with Rule 3a-4 under the Investment Company Act of 1940. Rule 3a-4

sets forth certain requirements for programs that offer discretionary portfolio management services to a large number of clients if clients with similar investment objectives receive the same investment advice or hold the same or substantially the same securities in their accounts. Each Account is managed on the basis of the client's individual financial situation. Each client has the opportunity to select the Account's investment objective and impose reasonable restrictions on the management of the assets in the Account. In addition, WTI contacts clients annually to confirm the accuracy of their investor profile information.

Custom ChoiceCustom ChoiceCustom Choice

ii. Wintrust Navigator Personal Financial Planning

Our financial planning services typically involve a variety of advisory services aimed at managing a client's financial resources based upon an analysis of their individual needs. Financial planning services include, but are not limited to, cash flow management, retirement planning, tax planning, risk management, education funding, estate planning, and more. Our financial planning services can range from broad, comprehensive financial planning consisting of three or more of these services that is based on an ongoing relationship or hourly consulting for a specific project.

Comprehensive financial planning involves working one-on-one with us over an extended period of time. The comprehensive financial planning process focuses on the client's goals and values around money. During the process, we require the client to provide an adequate level of information and supporting documentation in order for us to provide advisory services. Once the client's information is reviewed and analyzed, we create a broad based or modular plan and present the summary of our recommendations to the client. The client is under no obligation to act on our financial planning recommendations, but the success of your plan is contingent on your engagement in the process and following through on the recommendations.

If a comprehensive financial planning approach is not suitable or does not meet your needs, a limited scope engagement is available. Our hourly rate will apply for any limited scope engagement. For a limited scope engagement, the scope of services will be agreed to in advance and an approximate range of hours will be provided.

Financial planning services include, but are not limited to:

☒ **Cash Flow and Debt Management (2-10 hours):**

We will conduct a review of your income and expenses to determine your current surplus or deficit along with advice on prioritizing how any surplus should be used or how to reduce expenses if they exceed your income. Advice may also be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. We may also recommend what we believe to be an appropriate cash reserve that should be considered for emergencies and other financial goals, along with a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.

☒ **College Savings (2-10 hours):**

Includes projecting the amount that will be needed to achieve college or other post-secondary education funding goals, along with advice on ways for you to save the desired amount. Recommendations as to savings strategies are included, and, if applicable, we may review your financial picture as it relates to the best way to contribute to grandchildren.

☑ **Employee Benefits Optimization (2-10 hours):**

We may provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible of your employee benefits. This will include a review of the benefits program, identifying savings maximization using the company match, and tracking of additional benefits such as stock options and restricted stock awards.

☑ **Business Owner (5-30 hours):**

If you are a business owner, we may consider and or recommend the various benefit programs that can be structured to meet both business and personal retirement goals. In addition, we will make recommendations regarding succession planning, disability, and retirement plans for employees.

☑ **Estate Planning (5-30 hours):**

This usually includes an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney, trusts and other related documents. Our advice also typically includes ways for you to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trust.

We always recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We may provide you with contact information for attorneys who specialize in estate planning when you wish to hire an attorney for such purposes. From time to time, we will participate in meetings or phone calls between you and your attorney with your approval or request.

☑ **Financial Goals (5-25 hours):**

We will help clients identify financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal both in the short term and the long term.

☑ **Risk Management (2-10 hours):**

A risk management review may include an analysis of your exposure to major risks that could have a significant adverse impact on your financial picture, such as premature death, disability, property and casualty losses, or the need for long term care planning. Advice may be provided on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential cost of not purchasing insurance ("self-insuring").

☑ **Investment Analysis (5 – 25 hours):**

This may involve developing an asset allocation strategy to meet clients' financial goals and risk-tolerance, providing information on investment vehicles and strategies, reviewing employee stock options, as well as assisting you in establishing your own investment account at a selected broker/dealer or custodian. The strategies and types of investments we may recommend are further discussed in this brochure.

☑ **Retirement Planning (5–30 hours):**

Our retirement planning services typically include projections of your likelihood of achieving your financial goals, typically focusing on financial independence as the primary objective. For situations where projections show less than the desired results, we may make recommendations, including

those that may impact the original projections by adjusting certain variables (i.e., working longer, saving more, spending less, taking more risk with investments).

If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.

☑ Tax Planning Strategies (5–30 hours):

Advice may include ways to minimize current and future income taxes as a part of your overall financial planning picture. For example, we may make recommendations on which type of account(s) or specific investments should be owned based in part on their “tax efficiency,” with consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may impact your situation. We recommend that you consult with a qualified tax professional before initiating any tax planning strategy, and we may provide you with contact information for accountants or attorneys who specialize in this area if you wish to hire someone for such purposes. We will participate in meetings or phone calls between you and your tax professional with your approval.

Wells Fargo Advisors does not sponsor or advise WTI in connection with its financial planning services.

Implementation

If you retain us to implement a financial plan, our advisory personnel also design and construct an investment portfolio that is consistent with the client’s financial objectives. As part of this service, the applicable Adviser Representative will recommend specific investments to be included in the client’s portfolio. While determined in large measure by the specific client’s goals/objectives, our portfolio design philosophy is a process of strategic asset allocation among three asset classes: fixed income, equities and alternative investments.

As part of a financial plan, an Adviser Representative may recommend changes to your health, life, disability or long-term care insurance coverage. You may elect to implement the insurance advice by purchasing a policy through one of our representatives in such capacity as a licensed insurance agent of various insurance agencies or companies.

Brokerage Execution will be conducted through WFCS with WTI as introducing broker. Brokerage commissions may be accessed. Transactional fees are in addition from Financial Planning Fees. Additional information on conflicts of interest and brokerage practices are disclosed later in this brochure.

iii. WTI Institutional Advisory Services

WTI provides discretionary investment advisory services to Wintrust Financial Corporation using third party custodians for which the client may also pay brokerage commissions.

With this service, (1) the Portfolio Manager completes pertinent financial and demographic information regarding the client in order to develop an investment program that meets the client’s goals and objectives; (2) the Portfolio Manager analyzes such information and recommends an appropriate asset allocation and strategy based on the client’s goals and objectives, investment time horizon, tolerance for risk and other factors deemed pertinent to the client’s individual situation; (3) the Portfolio Manager

provides continuous investment management services on a discretionary basis with respect to the cash and securities in the client's accounts ("Account") under the Program.

Pursuant to an Investment Management Agreement between the Adviser and the client; the client grants WTI discretionary authority to invest and reinvest all assets in the client's Account. Such discretion will be exercised in accordance with the client's goals and objectives, as discussed above.

The investment advisory services provided by WTI under this Program include:

- Assessment of the client investment needs and objectives
- Investment policy planning
- Development of an asset allocation strategy designed to meet the client objectives
- Recommendations on suitable style allocations
- Identification of appropriate investment vehicles, asset classes and/or securities suitable to the client goals
- Evaluation of investment vehicles, asset classes and/or securities meeting style and allocation criteria
- Investing in selected investment vehicles, asset classes and/or securities on behalf of the client
- Ongoing monitoring of performance of investment vehicles, asset classes and/or securities
- Review of the Accounts to ensure adherence to policy guidelines and asset allocation
- Recommendations for rebalancing of the Accounts, if necessary
- Reporting of the Accounts' performance and progress
- Avoidance of wash sale rule violations

Wells Fargo Advisors does not sponsor or advise WTI under this program.

iv. Wintrust Retirement Benefit Advisors (WRBA)

WTI offers a non-discretionary investment-consulting platform for participant directed retirement plans. Through this program, WTI offers initial and ongoing investment consulting services to plan sponsors, including investment policy statement review, asset style analysis and mutual fund search and selection.

Investment Consulting Fund Screening Program

For clients who are plan sponsors of participant-directed retirement plans, we offers the Qualified Plan (QP) Investment Consulting Fund Screening Program.

Administrative Services

We may also assist the retirement plan and other institutional clients with certain administrative functions as described below. These are not investment advisory services and WTI does not assume status as a fiduciary under ERISA, the Investment Advisers Act of 1940 or any other applicable law or regulation in performing these services. WTI provides the following administrative services:

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- **Board Education/Asset Classification** – WTI shall provide the client with general financial and investment information relating to such concepts as diversification and asset classification with respect to various asset classes and historic rates of return.

- **Participant Education** – WTI may provide the client and/or its employees eligible to participate in Client's Plan with general financial and investment information relating to such concepts as diversification, asset allocation and historic rates of return.
- **Provider Search Assistance.** WTI may assist plan sponsors in searches to retain third party service providers such as record keepers. This service may be provided to existing clients of WTI or on a one-time basis to plans that are not WTI. In doing so, WTI will:
 1. evaluate the plan sponsor's needs,
 2. assist the plan sponsor in preparing a Request for Proposal ("RFP"),
 3. assist the plan sponsor in soliciting a reviewing responses from potential providers,
 4. assist the plan sponsor in selecting finalists, and
 5. provide the plan sponsor with an executive summary report to assist the plan sponsor in making its final decision.
- **Fee Benchmarking.** WTI may perform a comparative analysis of fees charged by third party service providers and the expenses of funds that are available to plan sponsors in order to allow them to evaluate the level of such fees that they pay relative to similarly structured and sized retirement plans. This service may be provided to existing clients of WTI or on a one-time basis to plans that are not WTI clients and WTI may retain third-party firms to assist it in providing this service. The service shall include the following:
 1. obtaining information from plan sponsor for preparation of Fee Benchmarking report, and
 2. preparation of and assistance in the review and evaluation of the Fee Benchmarking report with the plan sponsor.

Wells Fargo Advisors does not sponsor or advise WTI under the Retirement Plan Services program.

Assets Under Management

Total regulatory assets calculated as of 12/31/2019:

Discretionary:	\$5,567,877,593
Non-Discretionary:	\$3,605,659,000

Performance Based Fees and Side-by-Side Management

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

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

For programs for which WTI maintains discretionary authority or makes investment recommendations, methods of analysis are usually based on both fundamental and quantitative research and other independent research.

Investment Strategies

All investors have objectives or goals, such as seeking income, growth & income, growth, or trading or speculating. All investors also have risk tolerance, which is the amount of risk of loss they are willing and able to tolerate in order to achieve their investment goals. Although all investments involve risk,

including the potential loss of principal, some securities, such as equities (stock), among others, involve more risk. Higher risk investments may have the potential for higher returns, but also have the potential for greater losses. Generally speaking, investment objectives are on a spectrum, with "Income" investors generally holding the smallest percentage of higher risk investments and "Trading and Speculation" investors holding the largest percentage of higher risk investments. Similarly, risk tolerances are on a spectrum such that an investor with a "Conservative" risk tolerance will accept less risk than an investor with a "Moderate" risk tolerance; a "Moderate" investor less than an "Aggressive" investor; and an "Aggressive" investor less than a "Trading & Speculation" investor. The "Aggressive" investor accepts short term market volatility associated with a large proportion of higher risk investments because he or she has a long term time horizon and seeks the greater return potential associated with these higher risk investments.

Clients should consider their objective and risk tolerance carefully and understand that Investing in securities involves risk of loss that clients should be prepared to bear.

Below are descriptions of the combined Investment Objective and Risk Tolerance:

Investment Objective - Income: Income investors seek a maximum amount of income given their risk tolerance, and are willing to forgo capital appreciation and growth of income.

Risk Tolerance- Conservative: Conservative Income investors seek the maximum amount of income consistent with a modest degree of risk. They are willing to accept a lower level of income in exchange for lower risk. Higher risk investments, such as high yield bonds and some equities, are typically not a large percentage of the account.

Risk Tolerance- Moderate: Moderate Income investors seek to balance the potential risk of capital loss with increased income potential. Higher risk investments, such as high yield bonds and some equities, may be some percentage of the account.

Risk Tolerance- Aggressive: Aggressive Income investors seek a significant level of income, are financially able and willing to risk losing a substantial portion of investment capital, and, due to their long term time horizon or other factors, they employ higher risk, more aggressive strategies that may offer higher potential income. Higher risk investments, such as high yield bonds and some equities, may be a significant percentage of the account.

Investment Objective - Growth & Income: Growth and Income investors seek current income but also seek income and capital growth over time. These investors are willing to forgo a portion of current income in order to seek potential future growth.

Risk Tolerance- Conservative: Conservative Growth and Income investors seek the maximum growth and income consistent with a relatively modest degree of risk. They are willing to accept lower potential returns in exchange for lower risk. Equities, generally dividend paying equities, may be some percentage of the account.

Risk Tolerance- Moderate: Moderate Growth and Income investors seek to balance the risk of capital loss with higher potential growth and income. High yield bonds and equities, generally dividend paying equities, may be a significant percentage of the account.

Risk Tolerance- Aggressive: Aggressive Growth and Income investors seek a significant level of growth and income, are financially able and willing to risk losing a substantial portion of investment capital, and due to their long term time horizon or other factors they pursue high risk, more

aggressive strategies that may offer higher potential returns. High yield bonds and equities, generally dividend paying equities, may be the primary assets in the account.

Investment Objective - Growth: Growth investors do not seek account income and their primary objective is capital appreciation.

Risk Tolerance- Conservative: Conservative Growth investors seek maximum growth consistent with a relatively modest degree of risk. They are willing to accept lower potential returns in exchange for lower risk. Equities may be a significant percentage of the account.

Risk Tolerance- Moderate: Moderate Growth investors seek to balance the potential risk of capital loss with their goal of higher potential growth. Equities may be the primary asset in the account.

Risk Tolerance- Aggressive: Aggressive Growth investors seek a significant level of growth, are financially able and willing to risk losing a substantial portion of investment capital, and due to their long term time horizon or other factors, they employ higher risk, more aggressive strategies that may offer higher potential returns. Higher risk investments such as equities may be as much as 100% of the account.

Trading & Speculation: Trading and Speculation investors seek out maximum return through a broad range of investment strategies, which generally involve a high level of risk, including potential for significant loss of investment capital.

Voting Securities

As a matter of firm policy and practice, WTI does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. WTI Adviser Representatives may provide advice to clients regarding the clients' voting of proxies.

Item 7 – Client Information Provided to Portfolio Managers

You must complete an Account Profile with the assistance of your Adviser Representative. The Account Profile outlines your investment objectives, financial circumstances, risk tolerance and any restrictions you may wish to impose on your investment activities. You agree to inform us in writing of any material change in your financial circumstances that might affect the manner in which your assets should be invested. Your Adviser Representative will be reasonably available to you for consultation on these matters, and will act on any changes in your Profile deemed to be material or appropriate as soon as practical after we become aware of the change.

Item 8 – Client Contact with Portfolio Managers

Your contact for information and consultation regarding your program accounts is your Adviser Representative. In certain instances, your Adviser Representative may coordinate a response with the Portfolio Manager (if applicable) or arrange for you to consult directly with the Portfolio Manager.

Item 9 – Additional Information

Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of WTI or the integrity of WTI's management. WTI has no reportable items as it relates to its investment advisory services. For additional information regarding the Firm or individual Adviser Representatives with respect to brokerage activities, please refer to Investor.gov.

Other Financial Industry Activities and Affiliations

In addition to WTI being a registered investment adviser, it and the management persons and other employees of WTI are: (1) a FINRA-registered broker-dealer, registered supervisors and registered representatives and, (2) a licensed insurance agency and licensed insurance agents. These individuals may also be insurance agents appointed with one or more insurance companies. In their separate capacities as registered representatives and/or insurance agents, these individuals are able to effect securities transactions and/or purchase insurance and insurance-related investment products for WTI's advisory clients, for which these individuals will receive separate and additional compensation. However, you are not under any obligation to engage these individuals when considering the purchase/sale of securities or insurance. The implementation of any or all recommendations is solely at your discretion.

While WTI and these individuals endeavor at all times to put the interest of the clients first as part of our fiduciary duty, you should be aware that the receipt of additional compensation itself creates a conflict of interest, and may affect the judgment of these individuals when making recommendations. These conflicts are mitigated through disclosure to you and by maintaining supervisory procedures through which we oversee the execution of Adviser Representatives' recommendations into these advisory programs.

As required, any affiliated investment advisers are specifically disclosed in Section 7.A. on Schedule D of Form ADV, Part 1. (Part 1 of our Form ADV can be accessed by following the directions provided on the Cover Page of this Firm Brochure.)

WTI is owned by Wintrust Bank, N.A., a subsidiary of Wintrust Financial Corporation (Wintrust), a financial holding company based in Rosemont, Illinois. Wintrust engages in the business of providing traditional community banking services, primarily in the Chicago metropolitan area and southeastern Wisconsin, and operates other financing businesses on a national basis through several non-bank subsidiaries. Additionally, Wintrust offers an array of wealth management services. The Company conducts its businesses through three segments: community banking, specialty finance and wealth management. The Company provides community-oriented, personal and commercial banking services to customers located in the greater Chicago, Illinois and southern Wisconsin metropolitan areas through its 15 wholly owned banking subsidiaries (collectively, the Banks).

Affiliated companies related by common ownership or control include:

- **Wealth Management**
 - Great Lakes Advisors, LLC ("GLA") – SEC Registered Investment Advisor based in Chicago, IL. A wholly owned subsidiary of Wintrust Financial Corporation. Offers individuals and institutions investment management services including but not limited to separately managed accounts and

unified managed accounts. GLA is one of the portfolio managers WTI recommends for our clients who open investment advisory accounts, and we receive a portion of the advisory fee GLA charges, which creates a conflict of interest.

GLA acts as an investment adviser to the Managed Portfolio Securities Trust for the management of the Great Lakes Small Cap Opportunity Fund, Great Lakes International Smaller Company Fund, Great Lakes Bond Fund, Great Lakes Large Cap Value Fund and Great Lakes Disciplined Equity Fund. When appropriate, recommendations may be given directing wrap account assets into these or other investment companies. This creates a conflict of interest because we have an incentive to recommend GLA funds, which charge management fees that benefit GLA and a portion of which are passed on to us.

- The Chicago Trust Company, N.A. (“TCTC”) – A federally-chartered trust bank that offers individuals and institutions throughout the Chicago area a wide range of trust products and services, including corporate trustee services, personal trust administration, estate settlement, land trusts, 1031 exchanges, guardianships, and special needs trusts. Our Adviser Representatives may refer potential clients to TCTC whom they believe would benefit from the products and services it provides.
- Chicago Deferred Exchange Company (“CDEC”) - Chicago Deferred Exchange Company provides Qualified Intermediary and Exchange Accommodation Titleholder services to investors seeking to defer gain under IRC Section 1031. From time to time, we might refer a potential client to CDEC who indicates an appropriate need for its service.

Where appropriate, WTI and our employees may recommend the various investment and investment-related services of WTI affiliates to our advisory clients. These WTI affiliates may also recommend the advisory services of WTI to their clients. The services provided by the WTI affiliates are separate and distinct from our advisory services, and are provided for separate and additional compensation. There are also arrangements between WTI and its affiliates through which WTI and/or its affiliates and their employees receive payment in exchange for client referrals to each other. No WTI client is obligated to use the services of any WTI affiliate.

- **Wintrust Community Banks**

Fifteen separately-chartered national banks that each offer traditional banking services such as savings and checking accounts, mortgages, personal loans, debit/credit cards and certificates of deposit. From time to time we might refer a client for banking services. In addition, each of the banks participates in Wintrust’s Federal Deposit Insurance Corporation (“FDIC”) insured bank deposit “sweep program” called Insured Bank Deposits Program (“IBD”) (collectively the “Program Banks”).

All Accounts that are under the custody of WFCS typically will participate in IBD for the automatic purchase and redemption of cash balances in connection with free credit balances and to satisfy debit balances in the custodial brokerage accounts (net of free credit balances). Through IBD, available cash balances in a WTI account are automatically deposited into one or more interest-bearing, bank deposit accounts established at our Program Banks, listed below.

The advisory fees charged on Account values will apply to uninvested cash balances and balances in the IBD Program, to the extent permitted by law. The fees for the Program will exceed the return

you earn on uninvested cash and, in most instances, on the vehicle in the IBD Program. We and our affiliates benefit financially from cash balances held in the IBD Program. For additional information about the IBD Program, including information about how we and our affiliates benefit from it, see the IBD Program Disclosure Statement, which we provided to you when you opened your Account.

Charter Banks include:

- Lake Forest Bank & Trust Company, N.A.
- Hinsdale Bank & Trust Company, N.A.
- Wintrust Bank, N.A.
- Libertyville Bank & Trust Company, N.A.
- Barrington Bank & Trust Company, N.A.
- Crystal Lake Bank & Trust Company, N.A.
- Northbrook Bank & Trust Company, N.A.
- Schaumburg Bank & Trust Company, N.A.
- Village Bank & Trust, N.A.
- Beverly Bank & Trust Company, N.A.
- Town Bank, N.A.
- Wheaton Bank & Trust Company, N.A.
- State Bank of The Lakes, N.A.
- Old Plank Trail Community Bank, N.A.
- St. Charles Bank & Trust Company, N.A.

- **Specialty Finance**

- First Insurance Funding
- Tricom

Benefits to WTI, our affiliated Program Banks, and WFCS

WTI and its affiliates receive fees and benefits for services provided in connection with the IBD program, and therefore have a conflict of interest when we make available sweep vehicles that are more profitable to us than other unaffiliated bank deposit accounts or money market funds. WTI will receive a fee directly from the Program Banks for each Account that has funds swept to a Program Bank as part of the sweep arrangement. The fee is currently \$25 per account per Program Bank. This fee is subject to change to a maximum of \$40 per Account. This fee is not passed on to the client. WTI may waive all or part of this fee. A portion of this fee may go to WFCS for 1099 reporting, statement issuance and other services provided in connection with IBD. Other than applicable fees imposed by WTI on an Account, there will be no charge, fee, or commission imposed on your Account with respect to IBD. Your Adviser Representative does not receive any portion of the fee. However, when you have an advisory Account with us, your Adviser Representative is compensated based on total assets in your account(s), including any cash held in a bank deposit account through the IBD program.

Because the Program Banks provide our default cash sweep option, the IBD Program, they benefit financially from cash balances held in IBD. As with other depository institutions, the Banks' profitability is determined in large part by the difference or "spread" between the interest they pay on deposit accounts, such as IBD, and the interest or other income they earn on loans, investments and other assets. The Banks' participation in IBD increases their respective deposits and, accordingly, may increase their overall profits. You may be able to earn higher rates by investing your un-invested cash balances in other, non-affiliated, sweep options. The IBD Program should not be viewed as a long-term investment

option. It is your responsibility to monitor your balances in the IBD Program, and determine whether you prefer to invest cash balances in products offered outside the IBD Program. Your Adviser Representative can tell you more about other available alternatives. For more information regarding the Wintrust IBD program, go to wintrustwealth.com/disclosures.

Where cash is not swept into the IBD program, WTI also receives service fees and other compensation as a result of any sweep investment in WFCS' bank deposit program. WFCS may also receive distribution (12b-1), service fees and other compensation for Wintrust client deposits in their sweep programs.

Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Wintrust Wealth Management has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons must acknowledge the terms of the Code of Ethics annually, or as amended.

WTI's employees and persons associated with the Adviser are required to follow the Code of Ethics. Compliance with the Code of Ethics is a condition of employment. Subject to satisfying this policy and applicable laws, officers, directors and employees of the Adviser and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for WTI's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of the Adviser will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of the Adviser's clients. In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between WTI and its clients.

WTI anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which the Adviser has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which the directors, officers, employees and registered persons of the Adviser and its affiliated broker-dealer, WTI, may purchase or hold securities that are recommended for purchase or sale to clients. Personal securities transactions by persons associated with the Adviser and WTI are subject to the firm's Code of Ethics, which includes various reporting, disclosure and approval requirements, described in summary below, in order to prevent actual or potential conflicts of interest with transactions recommended to clients. The Code of Ethics applies not only to transactions by the individual, but also to transactions for accounts in which such person has an interest individually, jointly or as guardian, executor, or trustee or in which such person or the person's spouse, minor children or other dependents residing in the same household have an interest.

In accord with SEC rules relating to recordkeeping by investment advisers and Rule 17j-1 promulgated under the Investment Company Act of 1940, the Adviser and WTI require prompt reports of all covered transactions. Each entity further requires that all brokerage account relationships be disclosed, that the entities receive duplicate confirmations of transactions and custodial account statements, and annual certifications of compliance with the Code of Ethics from all covered persons. Transactions in government securities, bank certificates of deposit, and shares of unaffiliated open-end mutual funds are excluded from the reporting requirements.

In addition to reporting and recordkeeping requirements, the Code of Ethics imposes various substantive and procedural restrictions on covered transactions. For purposes of this policy, the "Ethics Committee" shall be the Compliance Department Staff.

These include the following:

1. Certain securities transactions must be submitted by "Investment Personnel" (generally, a person who makes decisions regarding the purchase or sale of securities by or on behalf of an advisory client) for pre-approval by the Adviser's Ethics Committee.
2. Purchases or sales by Investment Personnel of securities (other than de minimis trades) are prohibited for a period of seven days before and after an account of an advisory client that the Investment Personnel manages trades in that security.
3. Subscriptions by Investment Personnel to any initial public offering are prohibited.
4. Certain short-term trades of Investment Personnel are subject to review by the Adviser's Ethics Committee, which may require disgorgement of profits. Purchases of certain private placement securities require approval of the Ethics Committee.

As part of its responsibilities, the Ethics Committee monitors and verifies compliance of covered persons with the requirement of the Code of Ethics, and reports apparent violations to the Adviser's senior management. Under the Code of Ethics, the Ethics Committee has the authority to require reversal or adjustment of a personal transaction, or the disgorgement of a profit realized on a transaction in personal investment activities and those carried out for clients. The Ethics Committee also may recommend to management the imposition of more severe sanctions, including suspension of personal investing privileges, or termination of employment, in the case of certain types of violations.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with WTI's obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. WTI will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the Order.

WTI's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting the WTI Compliance Department at 800-621-4477.

Review of Accounts

Account reviews are carried out on a regular basis throughout the year. Account reviews include the monitoring of equity, fixed income, and cash levels for each account by investment objective (asset

allocation), the concentration of any security in an account, the security selection, and the investment rating of any bond held in the account.

Clients receive an account statement from WFCS on no less than a quarterly basis showing all transactions, receipt of sale proceeds, dividend and interest income, and payments for security purchases and other disbursements. Clients may also request a portfolio performance review at any time. The review consists of performance reports that reflect assets held, income for the period, and increases or decreases in the market value of the account. Other information may be provided which lists each of the holdings in an account priced at the close of a specified date, the market value, unit and aggregate cost of each holding, the interest/dividends paid, and yield.

Your Adviser Representative will also provide the client with a performance report and review no less than annually showing the allocation of assets in the Accounts as well as the performance of the client's Accounts during the previous year. In addition, the review should monitor and identify changes in client objective, risk tolerance, or financial status that may require a re-evaluation of the investment portfolio.

Client Referrals and Other Compensation

From time to time WTI enters into agreements, which comply with Rule 206(4)-3 and other requirements of the Investment Advisers Act of 1940, providing for the payment of a portion of the advisory fee to employees of the Adviser or Adviser Affiliates who secure clients for the Adviser. Additionally, the Adviser may enter into agreements with independent contractors or firms not affiliated with the Adviser ("Solicitors") for the promotion of investment advisory services to qualified prospects. These solicitors may receive a retainer payment and/or a percentage of the fee to be paid to the Adviser as disclosed in the Solicitor's Agreement. Solicitor payments will not increase the overall fee charged to clients.

Because affiliates and non-affiliated Solicitors will in certain circumstances be compensated for referring clients, there is an inherent conflict of interest. This conflict arises because, among other things, individuals may refer potential clients for the sole purpose of earning the referral fee. Just because a referral was made does not imply that an investment or advisory account is appropriate for you. The conflict is mitigated by disclosing it to you, and we review all new accounts for appropriateness and suitability before they are opened.

Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about the Adviser's financial condition. WTI has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding. Under no circumstances does WTI require or solicit payment of fees in excess of \$1,200 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement with this Brochure.