

WRAP FEE PROGRAM BROCHURE

(PART 2A APPENDIX OF FORM ADV)



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This wrap brochure provides information about the qualifications and business practices of Granite Financial Group, LLC. Being registered as a registered investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 262-792-1111. 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.

Additional information about Granite Financial Group, LLC (CRD #168675) is available on the SEC's website at www.adviserinfo.sec.gov

FEBRUARY 4, 2021

Item 2: Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

Material Changes since the Last Update

This update is in accordance with the required annual update for Registered Investment Advisors. Since the last filing of this brochure on January 29, 2020, no material changes have been made.

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Item 4: Services, Fees and Compensation

Firm Description

Granite Financial Group, LLC dba Granite Financial Group ("GFG") is an investment advisor registered with the Securities Exchange Commission (SEC). GFG offers investment advice to Clients through the Wrap Fee Program ("Program") based on the individual needs of the Client. GFG is the sponsor of the Program. The firm is owned by Ellen M. Duhamel – 50% and Thomas J. Dornoff – 50%. GFG is responsible for management of the Program accounts.

This disclosure brochure is limited to describing the Program and other information that Client should consider prior to establishing an account in the Program. For a complete description of other programs and services offered by GFG, Clients should refer to GFG's Form ADV Part 2A, a copy of which will be provided by GFG to the Client upon request.

Program Services

GFG provides continuous and regular supervisory services on a discretionary basis. GFG will offer Clients ongoing portfolio management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, assets allocation, portfolio monitoring and the overall investment program will be based on the above factors.

Discretionary: When the Client provides GFG Financial discretionary authority the Client will sign a limited trading authorization or equivalent. GFG Financial will have the authority to execute transactions in the account without seeking Client approval on each transaction.

Through a multiple step discovery process, GFG obtains the necessary financial data from the Client and assists the Client in setting appropriate investment objectives for the Program account. GFG obtains updated information from the Client during regularly scheduled Client performance reviews, as necessary in order to provide personalized investment advice to the Client.

The Client will be required to enter into a written agreement with GFG in order to establish a Program account. The Client will also be required to complete an application with the broker/dealer that will act as custodian for Program account assets.

A Wrap Fee Program is an investment advisory program in which Clients pay one fee for both investment advisory services and the transaction costs in the account(s). The fee is bundled with GFG's costs for executing transactions in the account(s). This may result in a higher advisory fee to the Client. GFG does not charge Clients higher advisory fees based on the trading activity, but Clients should be aware that GFG may have an incentive to limit the trading activities in the account(s) because GFG is charged for executed trades. By participating in a wrap fee program, Clients may end up paying more or less than they would through a non-wrap fee program where a lower advisory fee may be charged, but trade execution costs are passed directly through to the Client by the executing broker.

The Program Fee is not based directly upon the actual transaction or execution costs for the transactions within the account(s). Depending on the underlying investments in the Program and how much trading activity occurs, Clients may pay more or less than if they chose another advisory program that does not have a wrap fee, or if Clients chose to pay separately for all of the transaction costs (e.g., pay the advisory fee plus all transaction charges). GFG offers both a Wrap Fee Program and a Non-Wrap Fee Program, therefore GFG will review your investment options with Clients to determine the best offering for Clients. Similar services to

those offered in the Program may be purchased from another unaffiliated financial services provider.

Program Fees

The annual investment advisory fee ("Annual Fee") schedule for the Program is described below:

ETF Portfolios & Active Management Portfolio Strategy (AMPS)

| Assets Under Management | Annual Fee | Quarterly Fee |
|------------------------------------|------------|---------------|
| \$0 - \$500,000 | 1.00% | 0.2500% |
| The next \$500,001 - \$1, 000,000 | 0.85% | 0.2125% |
| The next \$1,000,001 - \$2,500,000 | 0.70% | 0.1750% |
| The next \$2,500,001 - \$5,000,000 | 0.60% | 0.1500% |
| Amounts over \$5,000,000 | 0.35% | 0.0875% |

Managed Dividend

| Assets Under Management | Annual Fee | Quarterly Fee |
|------------------------------------|------------|---------------|
| \$0 - \$500,000 | 1.20% | 0.30% |
| The next \$500,001 - \$1, 000,000 | 1.00% | 0.25% |
| The next \$1,000,001 - \$2,500,000 | 0.80% | 0.20% |
| The next \$2,500,001 - \$5,000,000 | 0.60% | 0.15% |
| Amounts over \$5,000,000 | 0.40% | 0.10% |

*Multi- Strategy**

| Assets Under Management | Annual Fee | Quarterly Fee |
|------------------------------------|------------|---------------|
| \$0 - \$500,000 | 1.50% | 0.375% |
| The next \$500,001 - \$1, 000,000 | 1.30% | 0.325% |
| The next \$1,000,001 - \$2,500,000 | 1.10% | 0.275% |
| The next \$2,500,001 - \$5,000,000 | 0.90% | 0.225% |
| Amounts over \$5,000,000 | 0.70% | 0.175% |

*When multiple strategies are used.

These are blended fee schedules, the asset management fee is calculated by applying different rates to different portions of the portfolio. GFG may group certain related Client accounts for the purposes of achieving the minimum account size and determining the annualized fee.

For example, a Client with \$1,000,000 under management in an ETF Portfolio would pay \$9,250 on an annual basis.

First \$500,000 x .01= \$5,000

Next \$500,000 x .0085= \$4,250

The annual fee may be negotiable based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with Clients, etc.).

Fees are billed quarterly in advance based on the amount of assets managed as of the close of business on the last business day of the previous quarter. Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement with no obligation and without penalty. Clients may terminate advisory services with thirty (30) days written notice. For accounts opened or closed mid-billing period, fees will be prorated based on the days services are provided during the given period. All unpaid earned fees will be due to GFG. Additionally, all unearned fees will be refunded to the Client. Client shall be given thirty (30) days prior written notice of any increase in fees. Any increase in fees will be acknowledged in writing by both parties before any increase in said fees occurs. Lower fees for comparable services may be available from other sources.

In addition to the Annual Fee, Clients may also incur certain charges imposed by third parties in connection with investments made through Program accounts, including those imposed by the custodian. These may include, but are not limited to, the following: mutual fund or money market 12b-1 fees, sub-transfer agent fees, certain deferred sales charges on previously purchased mutual funds transferred into the account, other transaction charges and service fees, IRA and qualified retirement plan fees, alternative investment administrative fees, administrative servicing fees for trust accounts, creation and development fees or similar fees imposed by unit investment trust sponsors, managed futures investor servicing fees, and other charges required by law. GFG does not receive any portion of these fees. Further information regarding charges and fees assessed by a mutual fund or variable annuity are available in the appropriate prospectus.

Mutual funds may also charge a redemption fee if a redemption is made within a specific time period following the investment. The terms of any redemption fee are disclosed in the fund's prospectus. Transactions in mutual fund shares (e.g., for rebalancing, liquidations, deposits or tax harvesting) may be subject to a fund's frequent trading policy.

Since GFG will receive 100% of the fees paid for management of the wrap program, this may create an incentive to recommend that Clients participate in a wrap fee program rather than a non-wrap fee program (where Clients would pay for trade execution costs) or brokerage account where commissions are charged. This is because, in some cases, GFG may stand to earn more compensation from advisory fees paid through a wrap fee program arrangement if Clients' accounts are not actively traded. As an investment philosophy, GFG practices a nimble trading strategy that seeks to grow Client assets in up trends and protect principal during down trends.

Item 5: Account Requirements and Types of Clients

Account Minimum

GFG requires a minimum of \$25,000 to open a Managed ETF Portfolio account and \$100,000 to open a Managed Dividend Portfolio account. In certain instances, the minimum account size may be lowered or waived.

Types of Clients

GFG generally provides investment advice to individuals, high net worth individuals, trusts, estates, or charitable organizations, corporations or business entities.

Client relationships vary in scope and length of service.

Item 6: Portfolio Manager Selection and Evaluation

Portfolio Manager

Ellen Duhamel and Thomas Dornoff will manage all Program accounts. Since no other persons, affiliated or unaffiliated will manage the wrap program, there are no additional processes for selection or review of managers. Clients make the decision to select GFG as their portfolio manager.

Since all programs are managed by Ellen Duhamel and Thomas Dornoff, there is no conflict of interest regarding portfolio managers.

Conflicts of Interest

The Program may cost the Client more or less than purchasing Program services separately. Factors that bear upon the cost of the Program account in relation to the cost of the same services purchased separately include: the type and size of the account, the historical and/or expected size or number of trades for the account, and the number and range of supplementary advisory and Client related services provided to the account.

The Annual Fee is an ongoing fee for investment advisory services and may cost the Client more than if the assets were held in a traditional brokerage account. In a brokerage account, a Client is charged a commission for each transaction and the representative has no duty to provide ongoing advice with respect to the account. If the Client plans to follow a buy and hold strategy for the account or does not wish to purchase ongoing investment advice or management services, the Client should consider opening a brokerage account rather than a Program account.

GFG receives compensation as a result of the Client's participation in the Program. The amount of this compensation may be more or less than what GFG would receive if the Client participated in other programs or paid separately for investment advice, brokerage and other Client services. Therefore, GFG may have a financial incentive to recommend the Program account over other programs and services. GFG acts as the portfolio manager for the Program and retains the management fee less execution costs. This may create a conflict of interest because GFG may have a disincentive to trade securities in the account to keep the execution costs low therefore retaining a larger portion of the management fee.

Advisory Business

GFG offers Clients an asset management account through the Program in which GFG directs and manages Program assets for Client.

Client provided goals and objectives are documented in individual Client files. Investment strategies are created that reflect the stated goals and objective.

A Client may impose restrictions on a minimum level of cash they want in their account, as well as from which account they want their withdrawals to come. Also, a Client may issue restrictions on what specific securities or security types they do not want GFG to buy or sell in their account.

Recommendations or Selections of Other Investment Advisors and Conflicts of Interest

GFG does not select or recommend other investment advisors.

Sharing of Capital Gains

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

GFG does not use a performance-based fee structure because of the conflict of interest. Performance based compensation may create an incentive for GFG to recommend an investment that may carry a higher degree of risk to the Client.

Client Tailored Services and Client Imposed Restrictions

The goals and objectives for each Client are documented in our Client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without written Client consent.

Methods of Analysis

Security analysis methods may include fundamental analysis, technical analysis, charting, and cyclical analysis. Investing in securities involves risk of loss that Clients should be prepared to bear. Past performance is not a guarantee of future returns.

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

Charting analysis strategy involves using and comparing various charts to predict long and short term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are twofold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

The main sources of information include financial newspapers and magazines, annual reports, prospectuses, and filings with the Securities and Exchange Commission.

General Investment Strategy

The investment strategy for a specific Client is based upon the objectives stated by the Client during consultations. The Client may change these objectives at any time. Each Client executes an Investment Policy Statement, Risk Tolerance or similar form that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases, short-term purchases, and trading.

GFG Portfolios include the following options:

Managed ETF Portfolios

By combining an objective portfolio construction discipline with a sophisticated risk management process, GFG selects each investment product specifically to balance the risk and the return profiles of Exchange Traded Funds (ETFs) in the model portfolios. The ETFs chosen are reviewed on an ongoing basis to ensure that they continue to meet our rigorous research and evaluation standards and to confirm that they remain appropriate for the portfolio.

The firm has established tactical asset allocation models with global perspectives ranging from conservative to aggressive. Portfolio construction of these models is a six (6) step process:

- Investment option research – All ETFs must be researched by Morningstar and approved by LPL Financial for use in client accounts.
- Identify “Best Fit” Managers – GFG seeks to combine core asset class investment options with complimentary satellite asset class ETF options.
- Tactical Manager Evaluation – ETF style characteristics are evaluated in context of current investment trends.
- Evaluate Individual Investment and Portfolio Risk – Evaluate ETF risk characteristics independently and when combined together in a single portfolio.
- Evaluate Portfolio for “Unintended Consequences” – review portfolio for unintended risks that come up when combining multiple ETFs.
- Ongoing Manager and Portfolio Evaluation – Portfolio construction and risk evaluation are continually monitored.

Determining asset allocation model and choosing complimentary investment products across a range of product types with varying fees, risk-return profiles, investment disciplines and holdings can be a complex process. To help investors navigate these issues, GFG leverages LPL Financial’s intellectual capital in asset allocation advice, investment advisor research and portfolio construction to deliver a discretionary suite of model portfolios for the Client’s convenience.

The minimum account size for the Managed ETF Portfolios is \$25,000.

Active Management Portfolio Strategy (AMPS)

GFG’s investment management philosophy is to build and manage portfolios with a focus on risk management and competitive performance. GFG has established four (4) asset allocation models. The models can be used as a complete program or added to an existing portfolio. All models are managed with a long term strategy that adjusts for short term tactical opportunities. We believe this approach will provide better overall results.

The management of these models is separated into several components. The first two, asset allocation and position weighting, are determined by several investment committees. Each position in the model carries a recommended weighting and may be adjusted or liquidated at any time. As the share prices of individual mutual funds fluctuate, weightings within the portfolio will naturally change. GFG trims or adds to the position preserving portfolio balance and maintaining diversification. These two components are reviewed monthly.

GFG's fund selection, which is the third component of the process, begins with the screening of more than 5000 mutual funds that have met prior stringent LPL Financial standards. GFG reviews all funds in the category or sector using GFG's initial criteria:

- Fit in a specific asset class according to Morningstar
- Five (5) years of performance history*
- A positive three (3) year Alpha rating
- Performed in the top 40% of peer group on a three (3) & five (5) year basis according to Morningstar

*Specialty funds only need three (3) years of performance history

Once the fund choices have been filtered additional judgments are made using, but not limited to:

| | | |
|----------------|------------------|----------------|
| Beta | R squared ration | Duration |
| Manager Tenure | Correlation | Credit quality |
| Capture ratio | Alpha | Sharpe ratio |

As part of GFG's fiduciary responsibility GFG monitors all holdings daily. A fund may be replaced at any time, and must be replaced if it fails to meet GFG's initial criteria for two (2) consecutive quarters. This evaluation is performed on a quarterly basis and completes GFG's process.

Managed Dividend Portfolio

The Managed Dividend Portfolio was established for conservative equity investors with a relatively low tolerance for risk. The portfolio is composed of high-quality, dividend paying stocks which over time provide investors a higher total return with lower risk than the S&P 500.

The portfolio consists of 17 to 20 equities with a maximum initial weighting of 5% per position. GFG attempts to further diversify the portfolio by purchasing equities in nine (9) sectors to reflect the current weighting of the S&P 500. GFG also diversifies within each sector by holding more than one equity in each of six (6) sectors. Each month GFG reviews the portfolio weightings and diversification and rebalances as necessary.

When selecting securities for GFG's portfolios, GFG starts with three (3) primary "hard and fast" criteria:

- Overweight and Equal-weight rated stocks by Credit Suisse
- Minimum dividend yield equal to the lesser of the S&P 500 Index average dividend or the stock's average Sector yield
- S&P Investment grade credit rating of "A" or better for the portfolio, with a maximum of 10% of the portfolio below investment grade

Other key metrics considered:

- Dividend history
- ROE performance
- Ability to grow the dividend
- EPS growth
- Free cash flow
- Leverage

The equities in this portfolio may be replaced at any time. If a stock underperforms its benchmark by 25% or more on a Beta-adjusted basis, we will conduct a special review.

The minimum account size for the Managed Dividend Portfolios is \$100,000.

Security Specific Material Risks

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks and should discuss these risks with GFG:

- *Market Risk:* The prices of securities held by mutual funds in which Clients invest may decline in response to certain events taking place around the world, including those directly involving the companies whose securities are owned by a fund; conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations. Investors should have a long-term perspective and be able to tolerate potentially sharp declines in market value.
- *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Inflation Risk:* When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *Reinvestment Risk:* This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Liquidity Risk:* Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- *Management Risk:* The advisor's investment approach may fail to produce the intended results. If the advisor's assumptions regarding the performance of a specific asset class or fund are not realized in the expected time frame, the overall performance of the Client's portfolio may suffer.
- *Equity Risk:* Equity securities tend to be more volatile than other investment choices. The value of an individual mutual fund or ETF can be more volatile than the market as a whole. This volatility affects the value of the Client's overall portfolio. Small and mid-cap companies are subject to additional risks. Smaller companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies. Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.

- *Fixed Income Risk:* The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities held by a fund is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.
- *Investment Companies Risk:* When a Client invests in open end mutual funds or ETFs, the Client indirectly bears their proportionate share of any fees and expenses payable directly by those funds. Therefore, the Client will incur higher expenses, which may be duplicative. In addition, the Client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value or (ii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. Adviser has no control over the risks taken by the underlying funds in which Client invests.
- *Foreign Securities Risk:* Funds in which Clients invest may invest in foreign securities. Foreign securities are subject to additional risks not typically associated with investments in domestic securities. These risks may include, among others, currency risk, country risks (political, diplomatic, regional conflicts, terrorism, war, social and economic instability, currency devaluations and policies that have the effect of limiting or restricting foreign investment or the movement of assets), different trading practices, less government supervision, less publicly available information, limited trading markets and greater volatility. To the extent that underlying funds invest in issuers located in emerging markets, the risk may be heightened by political changes, changes in taxation, or currency controls that could adversely affect the values of these investments. Emerging markets have been more volatile than the markets of developed countries with more mature economies.
- *Long-term purchases:* Long-term investments are those vehicles purchased with the intension of being held for more than one year. Typically the expectation of the investment is to increase in value so that it can eventually be sold for a profit. In addition, there may be an expectation for the investment to provide income. One of the biggest risks associated with long-term investments is volatility, the fluctuations in the financial markets that can cause investments to lose value.
- *Short-term purchases:* Short-term investments are typically held for one year or less. Generally there is not a high expectation for a return or an increase in value. Typically, short-term investments are purchased for the relatively greater degree of principal protection they are designed to provide. Short-term investment vehicles may be subject to purchasing power risk — the risk that your investment's return will not keep up with inflation.
- *Trading risk:* Investing involves risk, including possible loss of principal. There is no assurance that the investment objective of any fund or investment will be achieved.

Proxy Voting

Granite Financial Group, LLC dba Granite Financial Group (“GFG”) will vote proxies on behalf of a client if, in its investment advisory agreement (“IAA”) with GFG, the client has delegated to GFG the authority to vote proxies on its behalf. GFG has adopted and implemented these policies and procedures (“Proxy Voting Procedures”) to ensure that, where it has voting authority, proxy matters are handled in the best interest of clients, in accordance with GFG’s fiduciary duties and SEC rule 206(4)-6 under the Investment Advisers Act of 1940. In addition to SEC requirements governing advisers, its Proxy Voting Procedures reflect the long-standing fiduciary standards and responsibilities for ERISA accounts set out in Department of Labor Bulletin 94-2, 29 C.F.R. 2509.94-2 (July 29, 1994).

GFG utilizes the services of a third party Proxy Voting Service to administer the vote on proxies for those accounts for which GFG has voting authority. The Proxy Voting Service has a copy of GFG’s Proxy Voting Guidelines and votes on each proxy based on GFG’s Proxy Voting Guidelines. GFG generally follows its Proxy Voting Guidelines unless GFG determines that the client’s best interests are served by voting otherwise.

The following policies will apply when voting proxies on behalf of accounts for which GFG has voting authority.

Client’s Best Interest. GFG’s Proxy Voting Procedures are designed and implemented in a way that is reasonably expected to ensure that proxy matters are conducted in the best interest of clients. When considering the best interest of clients, GFG has determined that this means the best investment interest of its clients as shareholders of the issuer. GFG has established its Procedures to assist it in making its proxy voting decisions with a view to enhancing the value of its clients’ interests in an issuer over the period during which it expects its clients to hold their investments. GFG will vote against proposals that it believes could adversely impact the current or potential market value of the issuer’s securities during the expected holding period.

Client Proxy Voting Policies. Rather than delegating proxy voting authority to GFG, a client may (1) retain the authority to vote proxies on securities in its account, (2) delegate voting authority to another party or (3) instruct GFG to vote proxies according to a policy that differs from that of GFG. GFG will honor any of these instructions if the client includes the instruction in writing in its IAA or in a written instruction from a person authorized under the IAA to give such instructions. If GFG incurs additional costs or expenses in following any such instruction, GFG may request payment of such additional costs or expenses from the client.

Stated Policies. These policies identify issues where GFG will (1) generally vote in favor of a proposal – FOR; (2) generally vote against a proposal – AGAINST; (3) specifically consider its vote for or against a proposal – Case By Case (CBC). However, these policies are guidelines and each vote may be cast differently than the stated policy, taking into consideration all relevant facts and circumstances at the time of the vote.

Abstain from Voting. Our policy is to vote on issues and not to abstain from voting on issues presented unless the client’s best interest requires abstention. This may occur from time to time, for example, where the impact of the expected costs involved in voting exceeds the expected benefits of the vote such as where foreign corporations follow share blocking practices or where proxy material is not available in English.

Oversight. All issues presented for shareholder vote will be considered under the oversight of GFG’s Proxy Voting Designee. All non-routine issues will be directly considered by the

Proxy Voting Designee and, when necessary, the equity analyst following the company and/or the portfolio manager of an account holding the security, and will be voted in the best investment interests of the client. All routine for and against issues will be voted according to GFG's policy approved by GFG's Proxy Voting Designee unless special factors require that they be considered by GFG's CCO and, when necessary, the equity analyst following the company and/or the portfolio manager of an account holding the security. GFG's Proxy Voting Designee has established these routine policies in what it believes are the client's best interests.

Availability of Procedures. Upon request, GFG provides clients with a copy of its Proxy Voting Guidelines, as updated from time to time.

Disclosure of Vote. Upon request, a client can obtain information from GFG on how its proxies were voted. Any client interested in obtaining this information can request a copy from their GFG representative.

GFG has established several policies to ensure that proxy votes are voted in its clients' best interest and are not affected by any conflicts of interest. All conflicts are mitigated by the fact that GFG has a fiduciary responsibility to act in the best interest of its clients. Clients are not required to authorize GFG to vote proxies on their behalf.

Item 7: Client Information Provided to Portfolio Managers

Description

GFG obtains the necessary financial data from the Client and assists the Client in setting appropriate investment objectives for the Program account. GFG obtains updated information from the Client as necessary in order to provide personalized investment advice to the Client. It is the Client's responsibility to inform GFG of any changes in their stated objectives, financial situation, life circumstances or risk tolerance.

Client will be required to enter into a written agreement with GFG in order to establish a Program account. Client will also be required to complete an application with the broker/dealer that will act as custodian for Program account assets.

Item 8: Client Contact with Portfolio Managers

Restrictions

There are no restrictions placed on Clients' ability to contact and consult with the portfolio managers since Ellen Duhamel and Thomas Dornoff are the portfolio managers.

Item 9: Additional Information

Disciplinary Information

Criminal or Civil Actions

GFG and its management have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

GFG and its management have not been involved in administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

GFG and its management have not been involved in legal or disciplinary events related to past or present investment Clients.

Other Financial Industry Activities and Affiliations

Broker-Dealer or Representative Registration

GFG is not registered as a broker-dealer, however Ms. Duhamel and Mr. Dornoff are registered representatives of LPL Financial, a FINRA/SIPC broker-dealer.

Futures or Commodity Registration

GFG does not have an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

Material Relationships Maintained by this Advisory Business and Conflicts of Interest

Ms. Duhamel and Mr. Dornoff have financial affiliated business as both a registered representative and insurance agent with LPL Financial. Approximately 15% of their time is spent on these activities. They will offer Clients services from those activities. As a registered representative and/or insurance agent, they may receive separate yet typical compensation.

These practices represent conflicts of interest because it gives an incentive to recommend products based on the commission amount received. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products. Clients have the option to purchase these products through another registered representative or insurance agent of their choosing.

Code of Ethics Description

The employees of GFG have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of GFG employees and addresses conflicts that may arise. The Code defines acceptable behavior for employees of GFG. The Code reflects GFG and its supervised persons' responsibility to act in the best interest of their Client.

One area the Code addresses is when employees buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our Clients. We do not allow any employees to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our Clients.

GFG's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other employee, officer or director of GFG may recommend any transaction in a security or its derivative to advisory Clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

GFG's Code is based on the guiding principle that the interests of the Client are our top priority. GFG's officers, directors, advisors, and other employees have a fiduciary duty to our Clients and must diligently perform that duty to maintain the complete trust and confidence of our Clients. When a conflict arises, it is our obligation to put the Client's interests over the interests of either employees or the company.

The Code applies to "access" persons. "Access" persons are employees who have access to non-public information regarding any Clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in

making securities recommendations to Clients, or who have access to such recommendations that are non-public.

GFG will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflict of Interest

GFG and its employees do not recommend to Clients securities in which we have a material financial interest.

Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

GFG and its affiliated persons may buy or sell securities that are also held by Clients. In order to mitigate conflicts of interest such as trading ahead of Client transactions, affiliated persons are required to disclose all reportable securities transactions as well as provide GFG with copies of their brokerage statements.

The Chief Compliance Officer of GFG is Ellen Duhamel. She reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest

GFG does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended and therefore no conflicts of interest exist. However, affiliated persons may buy or sell securities at the same time they buy or sell securities for Clients. In order to mitigate conflicts of interest such as front running, affiliated persons are required to disclose all reportable securities transactions as well as provide GFG with copies of their brokerage statements.

The Chief Compliance Officer of GFG is Ellen Duhamel. She reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

Review of Accounts**Schedule for Periodic Review of Client Accounts and Advisory Persons Involved**

Account reviews are performed at least quarterly depending on the nature of the account and Client relationship. All reviews are conducted by Ellen Duhamel. Account reviews are performed more frequently when market conditions dictate.

Review of Client Accounts on Non-Periodic Basis

Other conditions that may trigger a review of Clients' accounts are changes in the tax laws, new investment information, and changes in a Client's own situation.

Content of Client Provided Reports and Frequency

Clients receive written account statements usually on a monthly basis, but no less than quarterly for managed accounts. GFG through LPL Financial will also provide Clients with quarterly performance reports.

Client Referrals and Other Compensation**Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest**

Ms. Duhamel and Mr. Dornoff receive external compensation for the sale of securities to Clients as a registered representatives of LPL Financial, a broker-dealer.

Advisory Firm Payments for Client Referrals

GFG does not compensate for Client referrals.

Financial Information**Balance Sheet**

A balance sheet is not required to be provided because GFG does not serve as a custodian for Client funds or securities and GFG does not require prepayment of fees of more than \$1,200 per Client and six months or more in advance.

Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients

GFG has no condition that is reasonably likely to impair our ability to meet contractual commitments to our Clients.

Bankruptcy Petitions during the Past Ten Years

GFG has not had any bankruptcy petitions in the last ten years.