

Allen Capital Group, LLC

A Registered Investment Adviser Firm

IARD/CRD Number: 135879

SEC Number: 801-64514

Wrap Fee Program Brochure

March 18, 2021

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This Wrap Fee Program Brochure provides information about **Allen Capital Group, LLC's** qualifications and Wrap Fee Program business practices. If you have any questions about the contents of this brochure, please contact us at: Phone: 308-385-1500 or E-mail: info@allencapgroup.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority.

"Registration does not imply a certain level of skill or training."

Additional information about **Allen Capital Group, LLC** also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Material Changes

Allen Capital Group, LLC's last annual Form ADV Part 2A Disclosure Brochure amendment was in March 2020. The following are the material changes to Allen Capital Group, LLC's Form ADV Part 2A Disclosure Brochure:

- ACG can provide trust services to clients through an affiliation with National Advisors Trust Company, FSB. See Item 4 on page 7.
- ACG updated its Investment Strategies disclosures. See Item 4 on page 9.
- Mark Allen is no longer licensed as registered representative with Purshe Kaplan Sterling Investments, a registered broker-dealer and no other IAR or employee of ACG is licensed with or affiliated with a registered broker-dealer. In addition, Mark Allen is no longer an owner-member of Veritas Professional Group, LLC (Veritas), a CPA Accounting firm. See Item 9 on page 11.
- ACG Solutions now also provides tax, accounting, and bookkeeping services on behalf of ACG to ACG clients. ACG Solutions, Inc. also provides tax, bookkeeping and accounting services in collaboration with Veritas Professional Group, LLC. ACG Solutions, Inc. is solely owned by ACG. See Item 4 on page 3, and Item 9 on page 12.

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Item 4 Services, Fees and Compensation

Allen Capital Group, LLC (ACG) is registered as an investment adviser with the Securities and Exchange Commission (SEC) since July 2005. ACG is notice filed in all states where it conducts business and is required to be notice filed. ACG is a limited liability corporation. Eric “Rick” Allen and Mark Allen are the principal owners and managing members of ACG. Investment Adviser Representatives (IAR) of ACG that are responsible for giving investment advice must have a FINRA Series 7 License and NASAA Series 66, NASAA Series 65 License or an investment adviser representative’s licensing equivalent, such as a CFP designation.

ACG Fiduciary Statement - ACG is a “fiduciary” under ERISA or section 4975 of the Code (to the extent applicable) with respect to any investment advice that ACG provides in connection with Retirement Accounts and holdings. When providing any such fiduciary advice to a client ACG adheres to the standards of care of “Impartial Conduct Standards”. ACG also provides investment advice that is in the client’s “Best Interest.” Advice meeting the “Best Interest” standard is advice that reflects the care, skill, prudence, and diligence under the circumstances then prevailing that a prudent person acting in a like capacity and familiar with such matters would use in the conduct of an enterprise of a like character and with like aims, based on your investment objectives, risk tolerance, financial circumstances, and needs, without regard to the financial or other interests of ACG. The compensation that ACG receives for their services is not excessive or unreasonable within the meaning of ERISA section 408(b)(2) or section 4975(d)(2). Statements by ACG to you about services subject to this Disclosure will not be materially misleading at the time they are made.

ACG offers a number of other investment advisory and financial industry services in addition to this Wrap Fee Program. For information on these other investment advisory and financial industry services please review ACG’s Form ADV Part 2A Disclosure Brochure.

ACG now utilizes the back-office, portfolio management platform and client account services of Orion Advisor Services LLC, a leading securities industry back office and technology service provider. ACG Solutions, Inc., was established by ACG for administrative, marketing and client relations purposes in January 2019. ACG Solutions, Inc. is solely owned by ACG. ACG Solutions now also provides tax, accounting, and bookkeeping services on behalf of ACG to ACG clients. ACG Solutions, Inc. also provides tax, bookkeeping and accounting services in collaboration with Veritas Professional Group, LLC

ACG has \$ \$56,814,596 of assets under discretionary management in its Wrap Fee Program as of December 31, 2020. ACG does not manage assets on a non-discretionary basis in its Wrap Fee Program.

A. Wrap Fee Program Services

Investment Management Programs - ACG provides investment management program services, defined as giving continuous advice to clients based on their individual needs through ACG’s Investment Management Program accounts. ACG obtains financial information on the ACG Client

Investment Profile Questionnaire and other new account documents from prospective clients to determine the suitability of establishing Investment Management Program accounts and to determine the appropriate investment management strategies that are specific for each client account that is established with ACG. Clients may impose restrictions on the type of investments that may be included in their Investment Management Program accounts.

Flat Fee- Outside Account Advice – Clients that are being provided Investment Management Services under an ACG Investment Management agreement may also have ACG provide them Flat Fee- Outside Account Advice on other accounts. These outside accounts may or may not be ERISA accounts. ACG may have the ability to trade these accounts on a discretionary basis.

Selection of Other Advisors - In some instances, the management of client accounts are delegated to other investment advisors that have sub-advisor agreements with ACG or separate agreements with clients. In such instances, the other investment advisors will have discretionary authority to manage client accounts. A complete description of each of these other investment advisor's' services is described in their Form ADV Part 2A Disclosure Brochures. When another investment advisor is used in a client account the client will be provided the other investment advisor's Form ADV Part 2A Disclosure Brochure. A client may always place limitations on the use of other investment advisors by ACG.

Broker-Dealer/Custodian - ACG has Wrap Fee Program Broker-Dealer/Custodian arrangements with Charles Schwab & Co. (Schwab), a SEC registered broker/dealer, member FINRA and SIPC and TD Ameritrade, Inc. (TDA), a SEC registered broker/dealer, member FINRA, SIPC.

ACG considers a number of factors including, without limitation, best execution, the overall direct net economic impact on account assets (including commissions/fees which may not be the lowest available, but which will not be higher than the generally prevailing competitive range), the financial stability of Schwab and TDA, the efficiency with which the transaction is effected, the ability to effect the transaction where complicating factors are involved, the availability of Schwab and TDA to stand ready to execute possible difficult transactions in the future, and other matters involved in the receipt of brokerage and research services.

There is no direct link between ACG, Schwab, TDA and the investment advice ACG gives to our clients. However, ACG receives economic benefits through its participation in these Wrap Fee accounts that are typically not available to retail investors. These benefits include the following products and services (provided without cost or at a discount):

- Duplicate client statements and confirmations;
- Research related products and tools;
- Planning services;
- Access to a trading desk serving advisor participants;
- Access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts);
- The ability to have advisory fees deducted directly from client accounts;
- Access to an electronic communications network for client order entry and account information;

- Access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to ACG by third party vendors; and
- Other client account and marketing services.

ACG has an agreement with Schwab for compensation for specific services that are paid directly to third party vendors by Schwab; ACG generally utilized this compensation for client marketing events or advisor development. ACG also has an agreement with TDA for compensation of specific services that are generally utilized for advisor development as well.

TDA has an agreement with Orion where TDA will offset Orion administrative fees for new clients for one year.

Some of the products and services made available by Schwab and TDA may benefit ACG but may not directly benefit client accounts. These products or services may assist ACG in managing and administering client accounts, including accounts not maintained at Schwab or TDA. Other services made available by Schwab and TDA are intended to help ACG manage and further develop its business enterprise. Clients should be aware, however, that the receipt of economic benefits by ACG or its IARs creates a conflict of interest and may indirectly influence ACG's choice or recommendation of Schwab and TDA for custody and brokerage services.

Trading – ACG allocates trades to clients in a fair and equitable manner that will be applied consistently to all clients. Personal accounts of ACG, its IARs and family members will not be treated more favorably than any other client account. ACG will make every attempt to completely fill all block order trades.

Discretionary Trading Authority - ACG uses discretionary trading authority to buy, sell and direct investments within the client accounts, including reinvestment of proceeds from assets sold and income attributable to client accounts in cash, cash equivalents, bonds, shares of common or preferred stock, unit investment trusts, ETF's, mutual funds, options, or other alternative securities selected by ACG for client accounts.

Trading Error Corrections - It is ACG's policy to ensure clients are made whole following a trade error. Specifically, when a trade error occurs in a client account that results in a loss, ACG will reimburse the client. If the trade error was made in a client account resulting in a gain, the client will keep the gain unless the Custodian/Broker-Dealer keeps the gain. If the trade error was made in a block trading account and client funds were not at risk and the trade results in a gain, the Broker-Dealer/Custodian keeps the gain.

Reports and Statements- Clients may receive periodic performance reports from ACG describing account performance and holdings. Clients will receive a monthly account statement from the Custodian/Broker-Dealer showing the account activity as well as positions held in the account at month's end, when there is activity in the account. No less than on a quarterly basis, client will receive a statement from the Custodian/Broker-Dealer for transactions and holdings.

Wrap Fee - Clients compensate ACG for all services furnished under the Investment Management Program by the payment of fees (Wrap Fees) that is based on a percentage of the assets under management. ACG charges an annualized Wrap Fee that ranges up to 1.75%, depending on a

number of factors including the size and complexity of the client account. ACG may receive up to 100% of the Management Fee paid by the Client within the Wrap Fee. Wrap Fees are negotiable.

Wrap Fees will be calculated at the beginning of each month and be based on the Period Ending Balance of the Client's Account assets under management at the end of the previous month. Management Fees may be charged in arrears or in advance depending on the client agreement. Wrap Fees do not take into account securities that are not priced. Wrap Fees will be deducted from the account. A client account that is opened mid-period will be charged an initial Management Fee that includes a portion of the fee that is pro-rated for the number of days that the account is open in the first month. Wrap Fees will be noted on client's monthly Custodian/Broker-Dealer statements.

ACG's Wrap Fee covers both ACG's investment management program service fees and Schwab's and TDA's brokerage services. Clients authorize ACG to pay Schwab and TDA for the brokerage services provided to the client accounts, ACG pays Schwab and TDA commissions and other transaction-based fees or asset-based fees in lieu of commissions and other transaction-based fees, and in either case, certain other fees, including prime broker and trade away fees, exchange process fees, and certain mutual fund short-term redemption fees.

Clients that are being provided Investment Management Services under an ACG Investment Management agreement and have ACG provide them Flat Fee- Outside Account Advice on other accounts may have ACG assess their client Investment Management Services accounts an annual flat fee of \$150 per outside account; this annual flat fee is negotiable at the discretion of ACG.

In instances where the management of client accounts are delegated to other investment advisors that have subadvisor agreements with ACG or separate agreements with clients the fees for these services will range up to 100 basis points (bps). Some of these other investment advisors are paid from ACG's Management Fees. Other investment advisors may charge their fees separately from ACG's Management Fees. If other investment advisor fees are deducted separately from ACG Management Fees those other fees will be noted separately from ACG Management Fees. The use of other investment advisors in the management of a client account may increase the fees that the client pays for their advisory services. A complete description of these other investment advisors' fees is described in their Form ADV Part 2A Disclosure Brochures.

ACG's Wrap Fee does not cover certain fees and costs which may apply to client account, including those listed below or others that are listed in the Schwab and TDA Pricing Guides.

- Other Broker-Dealers' Fees.
- Mutual Fund Fees.
- Markups and Markdown, Bid-Ask Spreads, Markups and markdowns, bid-ask spreads, selling concessions
- Margin Interest.
- Account Activity Fees
- Alternative Investment Fees.

A complete list of the Schwab and TDA charges and fees are contained in their Pricing Guides.

Custody - ACG does not act as a qualified custodian. All ACG Wrap Fee client accounts are maintained at Schwab and TDA, which are qualified custodians. However, under SEC rules ACG has custody of client assets due to our ability to deduct fees from client accounts. Schwab and TDA send account statements directly to clients. Clients should carefully review those statements.

Investment adviser representatives of ACG are trustees and contingent trustees on certain client accounts. ACG may be deemed to have custody of client securities due to the possible receipt of securities certificates. In addition, ACG may be deemed to have custody of client funds and securities due to ACG's online access to certain client qualified retirement plan accounts. Consequently, ACG is subject to an annual surprise examination conducted by an independent certified public accountant.

Trust Services - ACG can provide trust services to its clients through an affiliation with National Advisors Trust Company, FSB ("NATC"). NATC is a federally chartered trust company regulated by the Office of the Comptroller of the Currency ("OCC") and is a member of the Federal Deposit Insurance Corporation ("FDIC"). ACG offers trust services as a Trust Representative Office of NATC. By law, ACG's client assets are segregated from the capital assets of NATC and are not subject to potential NATC creditor claims. ACG and NATC are not related entities. The terms and conditions of a client's engagement of NATC, including the fee payable by the client to NATC, are outlined in a separate agreement between the client and NATC. ACG may recommend the services of other trust companies, chartered in different states. The client is under no obligation to engage the services of any recommended trust company. The client retains absolute discretion over all implementation decisions and is free to accept or reject any recommendation from ACG and its representatives. ACG does not receive any compensation (direct or indirect) from any trust company for these referrals. The terms and conditions of a client's engagement with the trust company, including the fee payable by the client, are outlined in a separate agreement between the client and the trust company.

Account Termination - Investment Management Program accounts may be terminated by ACG or client effective upon receipt of written notice to the other party. Upon termination, client shall receive a refund of any Wrap Fee not already earned by the ACG. ACG will advise Schwab or TDA to deliver securities and funds they hold as instructed by client unless client requests that the securities and funds be liquidated. If an account is liquidated, proceeds will be payable to client upon settlement of all transactions in the account. Termination of an Investment Management Program account will not affect the liabilities or obligations of the parties arising out of transactions initiated prior to termination.

B. General Advisory Fee Disclosure

Fees paid by clients in ACG's Wrap Fee Program may be more than or less the cost of purchasing the same services through ACG's other Investment Management Programs, separately or similar services elsewhere. ACG's Wrap Fees are negotiable.

c. Other Fees, Expenses and Charges

Clients may incur certain charges imposed by third parties other than ACG in connection with investments placed in the account, including but not limited to:

- IRA and Qualified Retirement Plan Fees, and other custodial fees; and

- Mutual fund internal expenses, commissions, sales loads, 12(b)-1 fees, trail fees and some surrender charges.
- Broker-Dealer and Custodian fees, expenses, and commission charges are separate and distinct from the fee charged by ACG.

D. Referral Advisor Relationships

ACG may enter into Referral Advisor Agreements with outside Referral Advisors who refer clients to ACG. If a referred client enters into an investment advisory agreement with ACG, a cash referral fee will be paid to the Referring Advisor, which will be based on a percentage of the advisory fees that are paid by the client to ACG. The Referral Advisor Agreement entered into between ACG and Referral Advisor will at all times be in compliance with the rules and regulations under 17 CFR Section 275.206(4)-3 and corresponding state rules and regulations on investment adviser referral activities. If a client account is referred from a Referral Advisor, the Referral Advisor may receive up to 50% of ACG's Wrap Fee. Therefore, a Referral Advisor may have an incentive to recommend ACG Investment Management Programs over other programs and services. This Referral Fee may increase the Wrap Fee a client is charged by ACG. All Referral Fees paid by a client to a Referral Advisor will be fully disclosed to the client.

Item 5 Account Requirements and Types of Clients

ACG generally provides Wrap Fee Program advice to the following:

- Individuals
- Profit sharing plans and participants
- Pensions and other retirement plans
- Corporations or other business entities
- Trust, estates, or other charitable organizations

Account Minimums - ACG's recommended minimum investment amount for establishing and maintaining an Investment Management Program account with ACG is \$50,000. Exceptions may be granted to this minimum at the discretion of ACG.

Item 6 Portfolio Manager Selection and Evaluation

A. Selection and Review of Portfolio Managers

ACG IARs may be investment management program portfolio managers. Travis Portwood, CFP®, CFA®; Mark Allen, CFP®; Eric Allen, CFP®; Randal R. Korth, CPA; and Shane T. Wissmann, CFP®, are the members of ACG's Investment Committee for all ACG Investment Management Programs.

Mark Allen, Chief Compliance Officer (CCO) of ACG, and his designees are responsible for supervising ACG Investment Management Program accounts and planning activities. The reports and documents the CCO reviews to supervise/review these activities may include Client Investment Profile Questionnaire, risk reports, new account documents, trade tickets,

confirmations, brokerage statements, performance reports, daily activity reports and planning documents. The CCO may delegate certain advisory compliance responsibilities to a designee that will report to him.

Methods of Analysis - ACG will obtain financial information from prospective clients on a Client Investment Profile Questionnaire and other new account documents to determine the suitability of ACG's Investment Management Program and to determine the appropriate investment objectives that are specific for each client account which is established with ACG.

Investment Strategies – We implement an investment strategy which we believe is appropriate and suitable for each client's unique investment objectives and tolerance for risk. Generally, we take a long-term approach (over a year) when providing and implementing our investment advice. However, there are times when a short-term considerations and needs are warranted for a client. At such time, we will utilize a short-term strategy, with some investments being held for less than a year.

We will use what we determine to be the most effective investment vehicle for the client's situation, whether it be individual stocks & bonds, actively managed or passive indexed-based mutual funds, and exchange-traded funds (ETF's).

When evaluating individual positions, we primarily rely on fundamental analysis in determining which securities to include in your portfolio. Fundamental analysis involves a detailed investigation into a company's business operations and its financial statements. The goal is to assess its prospects, understand the risks associated with its securities, and estimate the return potential that may be possible given its prospects and its current valuation in the market.

When evaluating mutual funds and ETF's we look at the experience, track record of the manager, and track record of the parent organization in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We also look at the underlying assets in a mutual fund or ETF in an attempt to determine if there is significant overlap in the underlying investments held in other fund(s) within the client's portfolio. We also monitor the funds or ETFs in an attempt to determine if they are continuing to follow their stated investment strategy.

In August 2018, ACG started using SP Financial Group (SPFG) of Arkadios Capital for bond portfolio management in ACG managed accounts. SPFG provides registered investment advisors with comprehensive fixed income support – from personalized advice and analytics to portfolio construction, implementation, and ongoing monitoring of accounts and holdings, with primary focuses on individual bond portfolios and closed-end funds.

Where appropriate, we will use options for clients. We use "covered calls", in which we sell an option on security you own. In this strategy, you receive a fee for making the option available, and the person purchasing the option has the right to buy the security from you at an agreed upon price. We will also use put options to "hedge" or in other words, to help limit the potential downside of a security we have purchased for your portfolio.

Reviews are conducted for all accounts on an ongoing basis. We review investment performance, suitability, appropriate asset allocation, and monitor each account for any changes or updates

that are needed (among other things). Clients establishing and maintaining discretionary investment accounts may receive periodic performance reports from ACG showing the investment performance of their accounts.

Risk of Loss - Investing in securities involves a risk of loss that you should be prepared to bear, including loss of your original principal. Past performance is not indicative of future results and you should not assume that future performance of any specific investment or investment strategy will be profitable. We do not provide guarantee that your goals will be achieved. There are varying degrees of risk, depending on your investment.

- **Market Risk** – Either the market as a whole, or the value of an individual company, goes down, resulting in a decrease in the value of client investments. This is referred to as systematic risk.
- **Equity Risk** – Stocks are susceptible to market fluctuations and to volatility which results in increases and decreases in value depending on the markets confidence in or perceptions of the market change. Investors holding common stock of any issuer are generally exposed to greater risk than if they hold preferred stock or debt obligations of the issuer.
- **Company Risk** – There is generally a level of company or industry specific risk when investing in stock positions. This is referred to as unsystematic risk and can be reduced through appropriate diversification. There is the risk that a company will perform poorly or that its value will be reduced based on factors specific to it or its industry.
- **Options Risk** – Options on securities can be subject to greater fluctuations in value than investing in the underlying securities. Purchasing and writing put or call options are highly specialized activities and involve greater investment risk. Puts and calls are the right to sell or buy a specified amount of an underlying asset at a set price within a set time.
- **Fixed Income Risk** – Investing in bonds involves the risk that the issuer will default on the bond and be unable to make payments. In addition, individuals depending on set amounts of periodically paid income face the risk that inflation will erode their spending power. Fixed-income investors receive set, regular payments that face the same inflation risk.
- **ETF and Mutual Fund Risk** – ETF and mutual fund investments bear additional expenses based on a prorata share of operating expenses, including potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities held by the ETF or mutual fund. Clients also incur brokerage costs when purchasing ETFs.
- **Alternative Investment Risk** – Alternative investments encompass a broad array of investment strategies. These investments are susceptible to many of the same risks as other securities while also having their own unique return and risk characteristics that must be considered on a case-specific basis.
- **Management Risk** – Investments also vary with the success and failure of the investment strategies, research, analysis and determination of portfolio securities. If our strategies do not produce the expected returns, the value of your investments will decrease.

Selection of other Advisors - The management of client accounts that are delegated to other investment advisors that implement investment strategies that are different from ACG's investment strategies may create different investment risks. A complete description of each sub-advisor's investment strategies and risks are described in the sub-advisor's Form ADV Part 2A Disclosure Brochure.

Voting Client Securities - ACG will not exercise proxy-voting authority over the securities held in client accounts where ACG provides investment management services. The obligation to vote client proxies shall at all times rest with the clients. However, clients may contact ACG for advice or information about a particular proxy vote. ACG shall not be deemed to have proxy-voting authority solely as a result of providing such advice to a client. Should ACG inadvertently receive proxy information for a security held in an account, such information shall be immediately forwarded to client.

Item 7 Client Information Provided to Portfolio Managers

ACG will obtain financial information from prospective clients on a Client Investment Profile Questionnaire and other new account documents to determine the suitability of ACG's Investment Management Program and to determine the appropriate investment objectives that are specific for each client account which is established with ACG. Clients may impose restrictions on investing in certain securities or types of securities.

Item 8 Client Contact with Portfolio Managers

ACG Portfolio Managers, IARs and support staff are available to talk to and meet with Clients during regular business hours.

Item 9 Additional Information

Disciplinary Information

ACG has no current disciplinary information to report to the public, clients or prospective clients. ACG Advisers have no current disciplinary information to report to the public, clients or prospective clients.

Broker-Dealer and other Financial Industry Activities and Affiliations

ACG is not registered as a broker-dealer, futures commission merchant, commodity pool operator or commodity trading advisor and will not become registered in any of these capacities. ACG's IARs are not associates of a futures commission merchant, commodity pool operator or commodity trading advisor. ACG's IARs will not become registered or associated in any of these capacities.

As of March 2021, Mark Allen is no longer licensed as registered representative with Purshe Kaplan Sterling Investments (PKS), a registered broker-dealer with the SEC and the FINRA, and

a member of the SIPC. In addition, no other IAR or employee of ACG is licensed with or affiliated with a registered broker-dealer. ACG's IARs will not become registered or associated in any of these capacities.

Insurance Activities and Affiliations

ACG is now a licensed insurance agency as of February 2016. IARs may also be licensed as insurance agents and can provide insurance products and services to clients. As insurance agents they will earn insurance commissions and fees while selling and servicing insurance products and services.

Tax Planning and Accounting Services

As of March 2021, Mark Allen is no longer an owner-member of Veritas Professional Group, LLC, (Veritas), a Certified Public Accounting (CPA) firm, that provides tax planning, accounting, and bookkeeping services. ACG's subsidiary, ACG Solutions, Inc. now provides tax planning, accounting, and bookkeeping services on behalf of ACG to ACG clients. ACG Solutions, Inc. also provides tax, bookkeeping and accounting services in collaboration with Veritas Professional Group, LLC. Fees for these accounting services are separate from ACG advisory fees or insurance commissions.

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

ACG has established a Code of Ethics to comply with the requirements of Section 204A-1 of the Investment Advisers Act of 1940 that reflects ACG's fiduciary obligations and those of its supervised persons and requires compliance with federal securities laws. ACG's Code of Ethics covers all individuals that are classified as "supervised persons." All ACG owners and IARs are classified as supervised persons. ACG requires its supervised persons to consistently act in the ACG clients' best interest in all advisory activities. ACG imposes certain requirements on supervised persons to ensure that they meet ACG's fiduciary responsibilities to ACG clients. This standard of conduct requirement is higher than what is ordinarily required and encountered in business.

- ACG and ACG's supervised persons may buy, sell and hold securities for their personal accounts, which ACG may also recommend to clients, or buy and sell on a discretionary basis for clients. As these situations may present a conflict of interest, it is the policy of ACG that no supervised person shall prefer their own interest over the interest of ACG clients.
- No supervised person employed by ACG may buy or sell any security prior to a transaction being implemented for an advisory account.
- No supervised person employed by ACG may buy or sell securities for their personal accounts where their decision is derived from information obtained through their employment with ACG unless the information is also available to the investing public upon reasonable inquiry.
- ACG maintains a list of all securities holdings for all supervised persons, which is reviewed on a regular basis by a principal of the Adviser.

Conflicts of Interest – ACG must disclose any conflicts of interest when dealing with clients.

ACG Obligations – ACG and its IARs are subject to the following specific obligations when dealing with clients:

- The duty to have a reasonable, independent basis for its investment advice;
- The duty to ensure that investment advice is suitable to meeting the client's individual objectives, needs, and circumstances; and
- A duty to be loyal to clients.

This Code of Ethics response is only intended to provide clients and potential clients with a summary description of ACG's Code of Ethics. If current clients or potential clients want to review ACG's entire Code of Ethics, they may obtain a copy of it by calling ACG at 308-385-1500, or writing to Mark Allen at 3032 West Stolley Park Road, Suite E, Grand Island NE, 68801.

Broker-Dealer and Insurance Compensation

ACG is not affiliated with any registered broker-dealer, and no ACG IAR is currently licensed as a registered representative of a registered broker-dealer.

ACG is a licensed insurance agency as of February 2016. IARs of ACG may also be licensed as insurance agents under ACG. In this capacity, the IARs will be paid commission for the sales of fixed insurance products. This presents a conflict of interest as it gives the IARs an incentive to recommend insurance products based on the compensation received, rather than on your needs. You always have the option to purchase insurance products that IAR recommends through other unaffiliated insurance agencies or companies.

Financial Information

ACG has no financial information to report at this time and has no financial situations which may impair our ability to conduct business.

Allen Capital Group, LLC

March 18, 2021

**PRIVACY POLICY NOTICE
Our Promise to You**

As a client of ACG, you share both personal and financial information with us. Your privacy is important to us, and we are dedicated to safeguarding your personal and financial information.

Information Provided by Clients

In the normal course of doing business, we typically obtain the following non-public personal information about our clients:

- Personal information regarding our clients' identity such as name, address and social security number;
- Information regarding securities transactions effected by us; and
- Client financial information such as net-worth, assets, income, bank account information and account balances.

How We Manage and Protect Your Personal Information

We do not sell information about current or former clients to third parties, nor is it our practice to disclose such information to third parties unless requested to do so by a client or client representative or, if necessary, in order to process a transaction, service an account or as permitted by law. Additionally, we may share information with outside companies that perform administrative services for us. However, our contractual arrangements with these service providers require them to treat your information as confidential.

In order to protect your personal information, we maintain physical, electronic and procedural safeguards to protect your personal information. Our Privacy Policy restricts the use of client information and requires that it be held in strict confidence.

Client Notifications

We are required by law to annually provide a notice describing our privacy policy. In addition, we will inform you promptly if there are changes to our policy. Please do not hesitate to contact us with questions about this notice by calling ACG at 308-385-1500, e-mailing ACG at: info@allencapgroup.com, or writing to Mark Allen at 3032 West Stolley Park Road, Suite E, Grand Island NE, 68801.