

---

**EFFECTIVE MARCH 30, 2022**

# **AssetMark** Disclosure Brochure

Form ADV – Part 2A

SEC File Number – 801 56323

IA Firm CRD Number - 109018

## **ITEM 1 – COVER PAGE**

---

### **AssetMark, Inc.**

Advisor Compliance  
1655 Grant Street, 10th Floor  
Concord, CA 94520-2445  
800-664-5345  
[assetmark.com](http://assetmark.com)

This AssetMark Disclosure Brochure provides information about the qualifications and business practices of AssetMark ("AssetMark"). If you have any questions about the contents of this Brochure, please contact AssetMark using the above information. 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. AssetMark is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about AssetMark also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**ITEM 2 – MATERIAL CHANGES**

This section provides a summary of material changes that were made to this brochure since the last update. It includes changes to AssetMark's Platform and is intended to help Clients determine if they want to review this brochure in its entirety, or contact their Financial Advisor with questions about the changes.

AssetMark may make interim updates to this brochure throughout the year. However, you will receive notice of any material changes, which must also be filed with the SEC. To request a copy of the most recent disclosure brochure, write to:

**AssetMark, Inc.**  
**Attention: Adviser Compliance**  
**1655 Grant Street, 10th Floor**  
**Concord, CA 94520**  
**800-664-5345**  
**assetmark.com**  
**advisorcompliance@assetmark.com**

The following are changes since the last Form ADV Part 2A annual update in March 2021.

- Item 4: Advisory Business
  - It reflects the combining of the Savos and Aris Investment divisions under the new AssetMark Investment Management ("AIM") division.
- Item 10: Other Financial Industry Activities and Affiliates
  - Removal of OBS Financial Services, Inc.

**ITEM 3 – TABLE OF CONTENTS**

<b>ITEM 1</b>	<b>– COVER PAGE</b>	<b>i</b>
<b>ITEM 2</b>	<b>– MATERIAL CHANGES</b>	<b>ii</b>
<b>ITEM 3</b>	<b>– TABLE OF CONTENTS</b>	<b>1</b>
<b>ITEM 4</b>	<b>– ADVISORY BUSINESS</b>	<b>2</b>
<b>ITEM 5</b>	<b>– FEES AND COMPENSATION</b>	<b>4</b>
<b>ITEM 6</b>	<b>– PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT</b>	<b>4</b>
<b>ITEM 7</b>	<b>– TYPES OF CLIENTS</b>	<b>4</b>
<b>ITEM 8</b>	<b>– METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS</b>	<b>4</b>
<b>ITEM 9</b>	<b>– DISCIPLINARY INFORMATION</b>	<b>4</b>
<b>ITEM 10</b>	<b>– OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS</b>	<b>5</b>
<b>ITEM 11</b>	<b>– CODE OF ETHICS</b>	<b>5</b>
<b>ITEM 12</b>	<b>– BROKERAGE PRACTICES</b>	<b>6</b>
<b>ITEM 13</b>	<b>– REVIEW OF ACCOUNTS</b>	<b>7</b>
<b>ITEM 14</b>	<b>– CLIENT REFERRALS AND OTHER COMPENSATION</b>	<b>7</b>
<b>ITEM 15</b>	<b>– CUSTODY</b>	<b>9</b>
<b>ITEM 16</b>	<b>– INVESTMENT DISCRETION</b>	<b>9</b>
<b>ITEM 17</b>	<b>– VOTING CLIENT SECURITIES</b>	<b>9</b>
<b>ITEM 18</b>	<b>– FINANCIAL INFORMATION</b>	<b>10</b>
<b>APPENDIX 1</b>	<b>– INFORMATION</b>	<b>10</b>

## ITEM 4 – ADVISORY BUSINESS

AssetMark and AssetMark Trust Company (“AssetMark Trust”) are wholly-owned subsidiaries of AssetMark Financial Holdings, Inc. AssetMark Financial Holdings, Inc is an indirect subsidiary of Huatai Securities, Co., Ltd. (“HTSC”). HTSC is a financial services and securities brokerage firm, Incorporated in China and listed on the Shanghai and Hong Kong stock exchanges.

AssetMark is the sponsor of the AssetMark Platform (the “Platform”) through which it offers its advisory services to its clients. AssetMark is an investment adviser registered with the U.S. Securities and Exchange Commission providing various investment supervisory services to a variety of clients. The investment division of AssetMark is known as AssetMark Investment Management (“AIM”).

AssetMark serves as the Portfolio Strategist and Investment Manager for the Guided Portfolios, which includes the GPS Fund Strategies and GPS Select. GPS Fund Strategies shall invest in pre-determined allocations of the GuidePath Funds. GPS Select will invest in pre-determined allocations to various Investment Approaches as well as additional investment options within each Investment Approach, and will make allocations to various Portfolio Strategists and Investment Managers.

AssetMark serves as the investment adviser for the following registered investment companies that are available in certain Solution Types under the Platform:

- 1) GPS I, a series of sub-advised no-load mutual funds that include the GuideMark Funds;
- 2) GPS II, a series of no-load mutual funds that include GuideMark Funds as well as GuidePath funds of funds; and
- 3) The Savos Dynamic Hedging Fund, a registered investment company used by Savos to provide risk mitigation in some Solution Types.

AssetMark is not registered with the Commodity Futures Trading Commission (“CFTC”) as a commodity trading advisor, based on its determination that it may rely on certain exemptions from registration provided by the Commodity Exchange Act and the rules thereunder. The CFTC has not passed upon the availability of these exemptions to AssetMark. Additionally, solely with respect to the GuidePath Managed Futures Strategy Fund and the Savos Dynamic Hedging fund, AssetMark is registered as a “commodity pool operator” under the Commodity Exchange Act (“CEA”) and the rules of the CFTC.

### DESCRIPTION OF ADVISORY SERVICES

AssetMark offers these various Platform options (“Solution Types”) for the client’s investment objectives and financial condition. Each of the Solution Types can be implemented with a number of options, such as a selection of an Investment Approach, a group of available “Portfolio Strategists,” a variety of account “Mandates” and a range of “Risk/Return Profiles,” so that the client can customize a strategy by which each of the client’s accounts under the Platform will be managed or maintained. The specific Solution Type and the components of the strategy selected for a client’s account as the culmination of this process are referred to as the client’s investment “Strategy.” A client may establish one or more investment accounts (each an “Account”) through the Platform, and the client’s Accounts are collectively referred to as the client’s “Portfolio.”

AssetMark offers the following advisory services or Solution Types to Clients.

#### I. Guided Portfolios

- GPS Fund Strategies
- GPS Select

#### II. Single Strategy Solution Types

- Mutual Fund Accounts (Including Market Blend and Individual Mutual Fund Solution Types)
- Exchange-Traded Fund (“ETF”) Accounts (including Market Blend)
- Mutual Fund/ETF Blend Accounts

#### III. Privately Managed Accounts (“PMA”) or Separately Managed Accounts (SMA), including:

- Individually Managed (“IMA”) Accounts, (Equity Balanced, Fixed-Income, and Custom High-Net Worth)
- Savos Fixed Income Accounts, and

#### IV. Savos Solution Types:

- Savos Preservation Strategy
- Savos GMS (“GMS”) Accounts,
- Savos Privately Managed Portfolios (“PMP”) Accounts
- Savos US Risk Controlled Strategy
- Savos Personal Portfolios

#### V. Multiple Strategy Accounts

AssetMark provides investment supervisory services to clients through the Platform, as well as providing advisor consulting and administrative services to third party independent investment advisors with clients investing through the Platform. An Administrative/Non-Managed Account can also be provided as an administrative convenience for the Client. Assets in an Administrative/Non-Managed Account are not managed or advised by AssetMark, and AssetMark is not responsible for their investment or management. Detailed information about AssetMark and the services and products it provides to clients are set forth in the specific Disclosure Brochures for each of its services. These Disclosure Brochures are attached to this Form ADV Part 2A Appendix A as Disclosure Brochures, respectively, and are incorporated by reference. See Appendix I.

**Solutions No Longer Offered.** AssetMark manages other solution types which are no longer offered to new clients. These solutions continue to be managed in accordance with the respective client agreement. Clients with these services may contact AssetMark for more information.

### INVESTMENT SUPERVISORY SERVICES – REFERRAL MODEL PLATFORM

AssetMark provides investment supervisory services to clients as described in AssetMark’s “Referral Disclosure Brochure” to fulfill the requirements of Form ADV Part 2A Appendix 1.

AssetMark receives client referrals through representatives of broker dealer firms and investment advisory firms (these firms are referred to as “Financial Advisory Firms”). AssetMark manages each client Account according to the client’s selected Solution Types under the terms of the AssetMark Investment Management Services Agreement (“IMSA”).

As of 12/31/2021, AssetMark had \$60.1 billion in assets under management in the Referral model platform. This includes assets held in proprietary mutual funds.

### INVESTMENT SUPERVISORY SERVICES – MUTUAL FUNDS

In addition to providing the foregoing investment supervisory services, AssetMark is also the investment adviser for:

- 1) the GuideMark Funds and the GuidePath Funds two series of sub-advised no-load mutual funds that are available in certain Investment Solutions offered under the Platform; and
- 2) the Savos Dynamic Hedging Fund ("Savos DHF"), another no-load mutual fund used in certain Solution Types

AssetMark charges the following Advisory Fees for the funds described above, which include fees paid by AssetMark to the respective Subadvisors(s) for each Funds.

#### GuideMark Funds

GuideMark Large Cap Core Fund 0.45%

GuideMark Emerging Markets Fund 0.59%

GuideMark Small/Mid Cap Core Fund 0.57%

GuideMark World ex.-US Fund 0.50%

GuideMark Core Fixed Income Fund 0.40%

#### GuidePath Funds

GuidePath Growth Allocation Fund 0.25%

GuidePath Conservative Allocation Fund 0.25%

GuidePath Tactical Allocation Fund 0.35%

GuidePath Absolute Return Allocation Fund 0.35%

GuidePath Multi-Asset Income Allocation Fund 0.35%

GuidePath Flexible Income Allocation Fund 0.25%

GuidePath Managed Futures Strategy Fund 1.05%

GuidePath Conservative Income Fund 0.35%

GuidePath Income Fund 0.45%

GuidePath Growth and Income Fund 0.45%

#### Savos Investments Trust

Savos Dynamic Hedging Fund 1.20%

Further information concerning the GuideMark Funds, the GuidePath Funds, and the Savos Dynamic Hedging Fund and can be obtained by requesting a Prospectus from AssetMark.

As of 12/31/2021, AssetMark had \$2.6 billion in mutual fund assets under management.

### OTHER SERVICES – ADVISOR MODEL PLATFORM

In addition to the investment supervisory services offered clients directly by AssetMark upon referral by Financial Advisory Firms, the Platform Solution Types are offered by Financial Advisory Firms serving as the investment advisor for their clients with accounts invested through the Platform. For these Financial Advisory Firms and their clients, AssetMark serves as the Platform sponsor and provides the Financial Advisory Firms with administrative and consulting services.

These services are described in more detail in the wrap-program Platform Disclosure Brochure attached as Appendix 1 of this Form ADV Part 2A as AssetMark's "Platform Disclosure Brochure."

As of 12/31/2021, AssetMark had \$44.1 billion in assets under administration on the Advisor Model Platform. This includes assets invested in proprietary mutual funds.

### OTHER SERVICES – EFFICIENT EDGE

The Efficient Edge Advisory Service is offered by AssetMark exclusively to owners of variable annuity and variable life insurance contracts ("Variable Contracts") issued by Genworth Life and Annuity Insurance Company ("GLAIC") and Genworth Life Insurance Company of New York ("GLICNY"), both former affiliates of AssetMark. The Efficient Edge Advisory Service is an asset allocation service through which owners of Variable Contracts have the value in their Variable Contract sub-accounts allocated pursuant to the investment objective, or "Model," they select. There is no separate, additional charge to Variable Contract owners for the Efficient Edge service. A description of these services is outlined in more detail in the Disclosure Brochure attached to Appendix 1 of this Form ADV Part 2A, as AssetMark's "Efficient Edge Disclosure Brochure."

AssetMark does not charge separate fees for its services under the Efficient Edge program, but Variable Contract owners do pay charges and fees in connection with their ownership of the Variable Contracts and these fees may increase in connection with use of the Efficient Edge Advisory Service. For example, transfer fees may apply on re-allocations of value among sub-accounts of the Variable Contract.

As of 12/31/2021, the Efficient Edge advisory service had \$805.5 million in assets.

### OTHER SERVICES - RETIREMENT CONNECTIONS

Through its Retirement Connections service, AssetMark offers Model Portfolios to retirement plan custodial platforms such as Mid-Atlantic Trust Company's ("MATC") and uses MATC's operational service called ModelXChange to deliver and utilize the AssetMark strategies ("Models Portfolios"). These Model Portfolios are accessed by retirement plans through Third Party Administrators ("TPAs").

AssetMark offers investment advisory services to defined contribution retirement plan sponsors that are used by retirement plan sponsors and their participants. The sponsors of these Plans typically retain the services of a Financial Advisor or consultant that will recommend various investments for participant use within the Plan. If AssetMark Model Portfolios are ultimately selected by the Plan Sponsor, separate accounts are established for each Plan at the custodian. The custodian's system allows AssetMark to provide Model Portfolios and submit any changes to those models.

A description of these services is outlined in more detail in the Disclosure Brochure attached to this Form ADV Part 2A, as AssetMark's "Retirement Connections - Custom Disclosure Brochure."

Important Note: the Retirement Connections service will be discontinued on or after May 13, 2022.

As of 12/31/2021, the Retirement Connections advisory service had \$3.8 million in assets.

**OTHER SERVICES - ASSETMARK RETIREMENT SERVICES**

Through its Retirement Services, AssetMark offers Model Portfolios to retirement plan custodial platforms such as Mid-Atlantic Trust Company, Matrix Trust Company and National Financial Services (Fidelity Investments) and uses model portfolios to deliver and utilize the AssetMark strategies (“Model Portfolios”). These Model Portfolios are accessed by retirement plans through Third Party Administrators (“TPAs”).

A description of these services is outlined in more detail in the Disclosure Brochure attached to this Form ADV Part 2A, as AssetMark Retirement Services.

As of 12/31/2021, the AssetMark Retirement Services had \$1.4 billion in assets.

**OTHER SERVICES – MODEL PORTFOLIOS**

AssetMark offers the AssetMark strategies (“Model Portfolios”) through third party platforms for investment advisors to use for their end client accounts. A description of these services is outlined in more detail in the Platform Disclosure Brochure attached to this Form ADV Part 2A, as Platform Disclosure Brochure – Appendix 1.

As of 12/31/2021, the Model Portfolios advisor service had \$336.6 million in assets.

**ITEM 5 – FEES AND COMPENSATION**

All fees are subject to negotiation.

Please refer to each Disclosure Brochure for complete details on the fees for each service.

**ITEM 6 – PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT**

AssetMark 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) and therefore does not participate in any side-by-side management. Side-by-side management refers to managing accounts which pay performance fees while at the same time managing accounts that do not pay performance fees.

**ITEM 7 – TYPES OF CLIENTS**

AssetMark provides various investment supervisory services to registered investment companies and a variety of Clients, including but not limited to individuals, high net worth individuals, investment companies, pension and profit-sharing plans, corporations, partnerships, trusts, insurance companies and other investment managers.

If a Client is an Individual Retirement Account (IRA) or subject to ERISA, the Client and/or their Financial Advisor must inform AssetMark in writing, and the Client agrees to be bound by the terms of the “ERISA and IRA Supplement to AssetMark Investment Management Services Agreement.” AssetMark does not serve as a trustee or plan

administrator for any ERISA plan, and does not advise such plans on issues such as funding, diversification or distribution of plan assets.

**CONDITIONS OF MANAGING ACCOUNTS**

AssetMark imposes a minimum dollar value of assets as a condition to a number of the Solution Types available on the Platform. See the Disclosure Brochures for the minimum account sizes for specific Solution Types. Account minimums are reviewed periodically, and are subject to change. Exceptions to the minimum initial investment must be approved by an authorized officer of AssetMark. An account whose value falls below the minimum can be closed by AssetMark upon written notice to the client.

**ITEM 8 – METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS**

In the analysis of individual securities and in seeking out sources of information in the performance of the services described herein, AssetMark relies on a number of external sources, research service providers and unaffiliated third-party Portfolio Strategists and Investment Management Firms, as more fully described in each Disclosure Brochure.

AssetMark offers a wide array of investment products, and hence the investment strategies used to implement these products vary. In general, AssetMark offers a variety of risk profiles for each of its investment products, in which the levels of risk seek to accommodate a wide spectrum of clients. The strategy for varying the level of risk taken in each product is to offer greater levels of risk management for products that seek higher levels of protection. Risk management tools include, but would not be limited to fixed income instruments, mutual funds, derivatives and active asset allocation strategies. AssetMark also allows third-party Investment Managers to advise or implement its programs and as such allows these third-party managers to pursue their investment strategies as well. AssetMark also seeks the advice of unaffiliated third-party Portfolio Strategists and other consultants on the asset allocation decisions appropriate for each product.

**ITEM 9 – DISCIPLINARY INFORMATION**

On August 25, 2016, the SEC announced a settlement with AssetMark in an order containing findings, which AssetMark neither admitted nor denied, that AssetMark violated Section 206(4) of the Advisers Act and Rule 206(4)-1(a)(5) by allowing its staff, from July 2012 through October 2013, to circulate to prospective clients who were considering an F-Squared managed account service offered by AssetMark, performance advertisements created by F-Squared relating to a different separately managed account service not offered by AssetMark and that misleadingly described that different service’s performance between 2001 and 2008, and that AssetMark violated Section 204(a) of the Advisers Act and Rule 204-2(a)(16) by failing to maintain records substantiating the performance in the advertisements created by F-Squared.

There are no disciplinary items to report for the management of AssetMark.

## ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

### AFFILIATED COMPANIES

The following companies are under common control with AssetMark. AssetMark does not consider such affiliations to create a material conflict of interest for AssetMark or its clients. For those affiliated companies you may interact with in connection with your AssetMark relationship, their industry activities are described in further detail below:

- AssetMark Brokerage, LLC
- AssetMark Retirement Services, Inc.
- AssetMark Trust Company

#### AssetMark Brokerage, LLC

AssetMark Brokerage, LLC (“AssetMark Brokerage”) is a broker-dealer registered with the SEC and is a member of FINRA. AssetMark Brokerage is affiliated with AssetMark by common ownership and it is the Distributor for the Funds.

#### AssetMark Retirement Services, Inc.

AssetMark Retirement Services, Inc. is a Pennsylvania corporation that provides recordkeeping and administrative services to retirement plans. AssetMark Retirement Services, Inc. is affiliated with AssetMark by common ownership.

#### AssetMark Trust Company

AssetMark Trust Company (“AssetMark Trust”) is an Arizona chartered trust company that serves as the custodian for certain Accounts on the AssetMark Platform.

### AFFILIATE CONFLICTS OF INTEREST

#### Banking Institution - AssetMark Trust

With the input from their Financial Advisors, Clients choose a Custodian from among those offered through the Platform. AssetMark Trust, an affiliate of AssetMark, is among the available Platform Custodians. If Clients choose AssetMark Trust as their Platform Custodian the Clients pay AssetMark Trust for custodial and brokerage services provided pursuant to their Custody Agreement with AssetMark Trust through the Platform Fee charged their Account and, where applicable, through additional fees. Pursuant to a contract between AssetMark and AssetMark Trust, AssetMark pays AssetMark Trust for services AssetMark Trust provides its custodial Clients, especially with regard to Savos IMAs. Additionally, AssetMark Trust receives payments from mutual funds, mutual fund service providers and other financial institutions for certain services AssetMark Trust provides related to investments held in Client Accounts. AssetMark Trust handles transfer agency functions, shareholder servicing, sub-accounting and tax reporting functions that these financial institutions would otherwise have to perform. Such payments are made to AssetMark Trust by these financial institutions based on the amount of assets invested in Client Accounts. Any such payments to the Custodian will not reduce the Platform Fee. Some mutual funds, or their service providers, provide compensation in connection with the purchase of shares of the funds, unless prohibited by law or regulation.

#### Investment Companies - GuideMark Funds, GuidePath Funds and Savos Dynamic Hedging Fund

AssetMark receives compensation as the investment adviser of the GuideMark and GuidePath Funds, which are utilized within certain Solution Types. AssetMark is compensated only pursuant to

its Investment Advisory Agreement with the GuideMark and GuidePath Funds.

The GuidePath Fund of Funds is directly managed by AssetMark Investment Management (“AIM”) and is invested in shares of the GuideMark Funds, unaffiliated mutual funds and ETFs. AIM manages the GuidePath Funds based on research provided by current Portfolio Strategists in each of the Investment Approaches. In addition to the responsibility of managing the GuidePath Funds, AIM has ongoing oversight over the performance of the Sub-Advisers in the GuideMark Funds and the Portfolio Strategists on the Platform. Because of the conflict between AIM managing the GuidePath Funds, and thereby controlling the allocations to affiliated mutual funds, and potentially receiving the GuideMark Funds’ profitability information as a participant in the Fund board meetings, AssetMark has created information barriers to shield AIM personnel from those discussions.

AssetMark serves as the investment adviser to the Savos Dynamic Hedging Fund, a registered investment company used by AssetMark Investment Management, a division of AssetMark in risk mitigation strategies in some Solution Types. When the Savos Dynamic Hedging Fund is used in an AssetMark solution, AssetMark receives an advisory fee from client assets for its management of a Solution Type as well as an additional fee through the Savos Dynamic Hedging Fund for that portion of a client’s account that is invested in that Fund, effectively receiving two fees, under two different management agreements, on the same assets.

## ITEM 11 – CODE OF ETHICS AND PERSONAL TRADING; PARTICIPATION IN CLIENT TRANSACTIONS

AssetMark has adopted a Code of Ethics (the “Code”) that is intended to comply with the provisions of Rule 204A-1 under the Investment Advisers Act of 1940 (“Advisers Act”), which requires each registered investment adviser to adopt a code of ethics setting forth standards of conduct and requiring compliance with federal securities laws. Additionally, the Code is designed to comply with Section 204A of the Advisers Act, which requires investment advisers to establish, maintain and enforce written policies and procedures reasonably designed, taking into consideration the nature of such investment adviser’s business, to prevent the misuse of material, non-public information by any person associated with such investment adviser. AssetMark’s Code requires that all “Supervised Persons” (including officers and certain affiliated persons and employees of AssetMark) in carrying out the operations of AssetMark, adhere to certain standards of business conduct. Specifically, the Code requires that these persons: (i) comply with all applicable laws, rules and regulations, (ii) avoid any conflict of interest with regard to AssetMark and its Clients, (iii) avoid serving their personal interests ahead of the interests of AssetMark and its Clients, (iv) avoid taking inappropriate advantage of their position with AssetMark or benefiting personally from any investment decision made, (v) avoid misusing corporate assets, (vi) conduct all of their personal securities transactions in compliance with the Code, and (vii) maintain, as appropriate, the confidentiality of information regarding AssetMark’s operations.

The Code contains a number of prohibitions and restrictions on personal securities transactions and trading practices that are designed to protect the interests of AssetMark and its Clients. First, the Code prohibits trading practices that have the potential to harm AssetMark and/or its Clients, including excessive trading or market timing activities in any account that AssetMark manages, trading on

the basis of material non-public information, and trading in any “Reportable Security” when they have knowledge the security is being purchased or sold, or is being considered for purchase or sale by the Accounts managed by AssetMark or any AssetMark-advised mutual funds. Second, the Code mandates the pre-clearance of certain personal securities transactions, including transactions in securities sold in initial public offerings or private placements. The Code also requires the pre-clearance of Reportable Security transactions for certain Access Persons (Access Persons is a segment of the Supervised Persons group that has access to AssetMark information). Finally, the Code requires Access Persons to submit, and the Chief Compliance Officer (the “CCO”) to review, initial and annual holdings, and quarterly transaction reports.

AssetMark utilizes StarCompliance to provide enhanced tracking of employee transactions and gives AssetMark the ability to analyze employee trading against certain parameters and transactions in its managed Accounts or any AssetMark-advised funds. Access Persons also utilize this system to annually certify their receipt of, and compliance with, the Code and pre-clear their Reportable Security transactions, if they are required to do so by the Code.

All Supervised Persons under the Code are responsible for reporting any violations of the Code to the CCO. The Code directs the CCO to submit reports to the Board of Trustees of any AssetMark-advised mutual funds regarding compliance with the Code, and to impose sanctions on violators, as warranted.

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

AssetMark Trust, an affiliated trust company, effects securities transactions on behalf of AssetMark clients whose accounts are held in custody by AssetMark Trust. AssetMark Trust is not paid any transaction based compensation for effecting transactions, but is paid shareholder servicing or administration fees by mutual fund families or others in connection with the transactions in such custodial accounts. AssetMark Trust exercises no discretion over such accounts, but effects transactions only at the direction of AssetMark, clients or their third party investment advisors. AssetMark does not anticipate any potential conflicts of interest in the execution of transactions, but AssetMark’s role with respect to the execution of transactions will be subject to the Code of Ethics described above.

## ITEM 12 – BROKERAGE PRACTICES

AssetMark has full discretionary authority under the respective client agreements to select the securities to be bought or sold and the amount of securities to be bought or sold for those client Accounts on the Platform for which it serves as the primary investment adviser. AssetMark’s authority is limited by the parameters of the Investment Solution and Strategy identified for each client Account for which it acts as primary investment advisor. For more detailed information, see the Disclosure Brochure included in the Form ADV Part 2A and Appendix 1 and referred to as AssetMark’s “Referral Disclosure Brochure.”

AssetMark does not have such authority to determine the securities and amounts to be bought or sold for client Accounts on the Platform for which third party Financial Advisory Firms act as the clients’ primary investment advisor. For more detailed information, see the Platform Disclosure Document included in Appendix 1 to this Form ADV Part 2A as AssetMark’s “Platform Disclosure Brochure.”

As Adviser of the GuideMark and GuidePath Funds, AssetMark has delegated to the Fund Sub Advisors the authority to determine securities and amounts of securities to be bought or sold by the Funds. In each case, the authority is to be exercised within the disclosed investment objectives of each Fund. For more information, refer to the Funds’ Prospectus, available from AssetMark on request.

When AIM selects mutual funds used in the Savos solutions, it generally selects mutual funds that are “no transaction fee” funds or “NTF”, or institutional funds, when available. Generally, NTF funds pay Custodians Administrative Service Fees (“ASF”) for services provided.

As investment adviser for Referral model Accounts, AssetMark directs trades to the Clients’ selected custodian with the exception of Savos investment solutions available only at AssetMark Trust. To the extent that AssetMark Trust is designated as custodian, trades within its authority, and such execution services are compensated according to AssetMark Trust’s standard rates for custodial services. AssetMark also has the authority to select brokers other than AssetMark Trust.

For Platform Accounts managed by third party Financial Advisory Firms, the Financial Advisory Firms and/or the clients have the authority to select the broker/custodians to be used, though the pool of custodians made available for use on the Platform for mutual fund and ETF accounts is determined by AssetMark. Platform custodians charge for their services according to established custodial fee schedules.

As Advisor of the GuideMark and GuidePath Funds, AssetMark has delegated to the Fund Sub Advisors the authority to select brokers and dealers to be used and the commission rates to be paid, subject to AssetMark’s supervision.

AssetMark or the Discretionary Manager, if applicable, will generally direct most, if not all transactions to the Account Custodian selected by the client. In certain circumstances, better execution is available from broker-dealers other than the broker-dealer(s) generally used by the Client’s Custodian. AssetMark, or other Discretionary Manager in the instance of IMA Accounts, can trade outside the selected broker-dealer(s). Although ETFs are priced intra-day in the same manner as other equity securities, AssetMark directs trades for ETFs to the Custodian selected by the Client and the Financial Advisory Firm once daily. The actual timing of trade order execution will vary, depending upon trade volume, systems limitations and issues beyond AssetMark’s control. In any case, all ETF trades for a given day are placed at the same time in order to provide the most feasibly equivalent execution for all participating clients. With respect to ETF Accounts which may include ETFs for which it may be impracticable to execute transactions in a single day in response to a Portfolio Strategist’s adjustments and rebalancing of its ETF asset allocation model, the Client instructs, authorizes and directs that such Accounts be traded in accordance with instructions on timing and price levels given by AssetMark to the Custodian, which AssetMark will obtain from the Portfolio Strategist to the extent practicable or, in the case of exceptionally high volume requests, in accordance with instructions provided by AssetMark to an alternate broker or “authorized participant” liquidity provider selected by AssetMark with the instruction to provide liquidity on a net fee basis.

As Overlay Manager for a Separately Managed Accounts Investment Solution, AssetMark intends to invest the Account consistent with the models provided by the Portfolio Strategist, unless circumstances indicate that modified allocations or investments are appropriate. The Client may specify the initial Portfolio Strategist for the Account and will be given notice of any change to that Portfolio Strategist. AssetMark may remove or replace the Portfolio Strategists on the Account in its

discretion. The Overlay Manager will have limited discretionary authority to execute transactions in each Account necessary to (i) track any reallocations, rebalance or other adjustments to the SMA asset allocations constructed by the Portfolio Strategists; (ii) implement changes recommended by the Portfolio Strategists; (iii) effect sale transactions of specified securities as directed by the Client and purchases of replacement securities; and (iv) implement any individual securities restrictions imposed on the Account by the Client.

All security transactions created for accounts in Savos solution types are sent to the Custodian selected by the client for execution at approximately market open. ETF security transactions for non-Savos products are sent to the custodian selected by the client for execution. Trades are bundled and submitted for execution on a random basis by the Trade Operations Group and AIM in accordance with established procedures. Security transactions submitted by PSG and AIM will be placed in accordance established procedures.

AssetMark has negotiated rates with, and encouraged Subadvisors to use a specific brokerage firm. For more information, refer to the Funds' Prospectus, available from AssetMark on request. AssetMark has established an electronic interface with certain brokerage and custodial firms with whom clients can establish accounts by executing a separate agreement with such broker or custodian. The electronic interfaces established between AssetMark and such firms allow AssetMark to receive and transmit account data electronically to the firms to effectively provide account administration, trading and reporting for client accounts. A list of such firms will be provided by AssetMark upon request. The trading and custodial expenses incurred by the client are set forth in the separate agreement executed by the client and the broker or custodian. Said charges may be more or less than those of other brokers providing similar services. AssetMark does not receive any research or other services from any broker or custodian except as specifically discussed below.

With respect to its role as the Adviser of the GuideMark and GuidePath Funds, AssetMark has negotiated an institutional commission schedule with one specific brokerage firm, Abel Noser, Inc., to execute transactions on behalf of certain of the GuideMark and GuidePath Funds for a commission cost of .60 cents per share based on the total volume of trades executed, and has encouraged the Subadvisors to use their best efforts to direct trades to Abel Noser when such direction satisfies their internal "best execution" guidelines. Neither AssetMark nor any of the Subadvisors receive any "soft dollar" benefits from Abel Noser for the direction of trades pursuant to the above arrangement. Able Noser does, however, provide detailed transaction reporting to the GuideMark and GuidePath Funds, and Platform accounts, which analyzes the commission and execution cost of all trades executed in the Fund portfolios and client portfolios on the Platform (with the exception of the Savos UMAs), including both trades executed by Abel Noser and those executed by other brokers independently selected by the Subadvisors.

## RECEIPT OF EXECUTION REPORTS

AssetMark does not utilize soft dollars by directing trades to broker-dealers and accumulating soft dollar credits. AssetMark receives Abel Noser execution reports and Fidelity execution reports which it uses to review best execution of trades on the platform. AssetMark does not pay directly for these reports. The client's asset based custody fee does not vary depending on whether AssetMark receives these execution reports or not.

## ITEM 13 – REVIEW OF ACCOUNTS

AssetMark does not assign client accounts directly to specific individuals for investment supervision, and hence there is not a single individual or class of individuals within the organization that can be identified as being solely responsible for implementing a full set of review criteria on any one client account. Instead, AssetMark offers a platform of Solution Types to its clients, each of which is a model portfolio to which the client's account is linked. A variety of teams within the organization then have responsibility for reviewing the application of the appropriate investment guidelines to each account. At the model level, two groups are responsible for ensuring that the investment models to which client accounts are linked are consistent with guidelines: AssetMark Investment Management ("AIM") reviews those model recommendations provided by the third-party investment strategists offering solution types on the AssetMark platform. AIM creates and monitors the model recommendations offered to clients within the Savos investment strategies available on the AssetMark platform. Other groups within the organization monitor the degree to which individual client accounts adhere to the investment models monitored by ISG or created and monitored by AIM. These groups include Trade Operations, which monitors account adherence to models provided by third-party strategists and, adherence to models created and maintained by AIM. Finally, a group known as the Adviser Services Group (ASG) deals directly with the Financial Adviser to resolve any issues that might arise in the client's own review (or the adviser's review) of the account.

## ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION

### ADDITIONAL COMPENSATION

The Account Custodians for Platform clients typically receive a Shareholder Servicing Fee from each mutual fund family included in the client Accounts. This fee generally ranges from 0.25% to 0.35% per annum of the amount invested through the Platform in the mutual funds of each fund family.

Additionally, AssetMark provides the Custodians certain services with respect to the custody arrangements. In addition, AssetMark receives, and in the future can receive, marketing expense reimbursements from certain Portfolio Strategists and mutual fund companies, which reimbursements are intended to offset a portion of AssetMark's costs incurred in marketing the Platform. AssetMark refers clients to other registered investment advisors and can receive referral fees based on a portion of the fees paid by the clients to these advisors. The full terms of such referral arrangements will be disclosed to such clients in writing at the time they execute an agreement with the advisors.

AssetMark receives compensation as the Advisor to the GuideMark and GuidePath Funds, which are utilized with certain Solution Types on the Platform. When the GuideMark and GuidePath Funds are used in AssetMark's Solution Types, AssetMark waives its AssetMark Platform Fee on the assets in those accounts.

AssetMark makes cash payments to Financial Advisory Firms who solicit clients for AssetMark. Each such solicitor firm enters into a written agreement with AssetMark which specifies the terms of the relationship. The solicitor is required to provide each prospective client with a copy of AssetMark's Referral Disclosure together with a separate Solicitor's Written Disclosure Statement. See Referral Disclosure Brochure for the Financial Advisory Firm fee schedule and a more detailed description of the solicitation arrangement.

**This must remain with the Client**

The Platform Fee paid by the Financial Advisory Firm to AssetMark for related accounts of any Client in the Platform are negotiable, as are Platform Fees paid by any Financial Advisory Firm, with the approval of a senior executive officer.

## OTHER RELATIONSHIPS AND COMPENSATION

Under the Referral Model, AssetMark receives Client referrals through representatives of broker-dealer firms and investment adviser firms (these firms are referred to in this brochure as “Financial Advisory Firms” and their representatives are referred to as the “Financial Advisors”). The Financial Advisors consult with Clients to assess their financial situation and identify their investment objectives in order to implement Solution Types and Strategies designed to meet the Client’s financial needs. A Financial Advisor referring a Client to AssetMark for advisory services interviews the Client and makes a determination that an Solution Type is suitable for the Client before making the referral to AssetMark. Working with the Financial Advisor, a Client selects an Solution Type for the Client’s Account, and the components of the Client’s Strategy, including the Client’s desired and appropriate Risk/Return Profile. Financial Advisors are required to contact Clients at least annually regarding the suitability of the Client’s chosen Solution Type(s). AssetMark manages each Client Account according to the Client’s selected Solution Type under the terms of the AssetMark IMSA.

Financial Advisory Firms receive fees for their services and compensation from AssetMark for referrals of Clients, as described previously in the Fees section under Initial Consulting Fee and Financial Advisor Fee.

In addition to the compensation payable under the IMSA, AssetMark enters into other fee arrangements with certain Financial Advisory Firms and/or Financial Advisors in the manner set forth below. Such arrangements will not increase the fees payable under the IMSA by the Client.

### *Advisor Benefits Program for Financial Advisors*

Under AssetMark’s Advisor Benefits Program, Financial Advisors are encouraged to utilize AssetMark’s advisor-directed tools, templates and best practices, or to engage with AssetMark to provide education and guidance in implementing a growth plan for their businesses. Certain Financial Advisors can receive an allowance or “growth support” for reimbursement of qualified expenses incurred by the Financial Advisor based on their participation in AssetMark sponsored events, marketing initiatives, or use of technology resources and tools. This program creates a financial incentive for Financial Advisors to recommend that Clients invest assets through the AssetMark Platform.

### *Business Development Allowance Program for Financial Advisors - Discontinued*

Under AssetMark’s formerly available Business Development Allowance program, certain Financial Advisors receive a business development allowance for reimbursement of qualified marketing and practice development expenses incurred by the Financial Advisor. These allowances are earned based upon initial assets introduced to the AssetMark Platform, if a specific asset minimum is met and/or if the asset minimum is met within the first 12 months of an Advisor’s use of the Platform. Additionally, certain Financial Advisors earn quarterly allowances depending on the value of the assets on the AssetMark Platform held by Clients of the Financial Advisor. For the 2021 calendar year, participating Financial Advisors were reimbursed an average of \$3,405. This program creates a financial incentive for

Financial Advisors to recommend that Clients invest assets through the AssetMark Platform.

### *Marketing Support for Financial Advisory Firms*

Additionally, certain Financial Advisory Firms enter into marketing arrangements with AssetMark whereby the Firms receive compensation and/or allowances in amounts based either upon a percentage of the value of new or existing Account assets of Clients referred to AssetMark by Financial Advisors, or a flat dollar amount. These arrangements provide for the communication of AssetMark’s service capabilities to Financial Advisors and their Clients in various venues including participation in meetings, conferences and workshops. AssetMark also provides the Financial Advisory Firm or its representatives with organizational consulting, education, training and marketing support.

### *Direct and Indirect support for Financial Advisors*

AssetMark sponsors annual conferences for participating Financial Advisory Firms and/or Financial Advisors designed to facilitate and promote the success of the Financial Advisory Firm and/or Financial Advisor and/or AssetMark advisory services. AssetMark offers Portfolio Strategists, Investment Managers and Investment Management Firms, who are also Sub-Advisors for the GuideMark and GuidePath Funds, the opportunity to contribute to the costs of AssetMark’s annual conferences and be identified as a sponsor. AssetMark also covers travel-related expenses for certain Financial Advisors to attend AssetMark’s annual conferences, quarterly meetings, or to conduct due diligence visits. In addition and outside of the Business Development Allowance, AssetMark contributes to the costs incurred by certain Financial Advisors in connection with conferences or other Client events conducted by the Financial Advisor or the Financial Advisory Firm.

### *Discounted Fees for Financial Advisors*

Certain financial Advisors receive discounted pricing from AssetMark for practice management and marketing related tools and services.

### *Negotiated Fees*

AssetMark will, in its discretion, negotiate the AssetMark Fee for clients of certain Financial Advisors. Certain Financial Advisors with higher aggregate levels of assets on the Platform are eligible for negotiated fees which are passed through to the client. The Financial Advisor does not earn additional compensation as a result of these negotiated fees.

### *Community Inspiration Award*

In order to promote community involvement, AssetMark created the Community Inspiration Award to honor selected Financial Advisors across the US who have inspired others by supporting charitable organizations in their communities. AssetMark will make a cash donation, subject to the published rules governing the program, to the Financial Advisor’s nominated charity in accordance with the following: 1) the charitable organization is not a client or prospective client of the Financial Advisor, 2) the Financial Advisor will not receive a monetary award and 3) the charitable organization must not have the ability to contribute funds or services to a candidate for public office or to a Political Action Committee. There is no direct compensation paid to an honored Financial Advisor. However, the Financial Advisor may be inclined to place, or retain client assets on the Platform as a result of AssetMark’s contribution to their supported charitable organization.

**ITEM 15 – CUSTODY**

AssetMark does not provide custodial services to its clients. Client assets are held with banks, financial institutions or registered broker-dealers that are “qualified custodians.” Clients will receive statements directly from the qualified custodians at least quarterly. We urge clients to carefully review those statements and compare the custodial records to the reports that we provide them. The information in our reports varies from custodial statements based on accounting procedures, reporting dates or valuation methodologies of certain securities. Custodial fees are also outlined in the respective custodial agreement executed between the Client and the custodian.

Each Disclosure Brochure reflects the custodians available for each platform. Among others, AssetMark provides access to the following qualified custodians:

- AssetMark Trust Company (“AssetMark Trust”), an Arizona trust company and affiliate of AssetMark, 3200 North Central Avenue, Seventh Floor, Phoenix, Arizona 85012. Its mailing address is P.O. Box 80007, Phoenix, Arizona 85060.
- Pershing Advisor Solutions (“PAS”). One Pershing Plaza, Jersey City, NJ 07399
- TD Ameritrade (“TDA”). 1005 North Ameritrade Place, Bellevue, NE 68005
- Fidelity Brokerage Services, LLC (“Fidelity”). 200 Seaport, Boulevard, Boston, MA 02210

**CLIENT REPORTS**

The Custodian selected by the Client shall send periodic account statements detailing the Client’s individual Account(s), including portfolio holdings and market prices, all transactions (such as trades, cash contributions and withdrawals, in kind transfers of securities, interest and dividend or capital gains payments) for each individual Client Account, and fee deductions. Additionally, Clients are able to inquire about their current holdings and the value of their Accounts on a daily basis by electronic or web-based access. The Custodian may also send a Transaction Acknowledgement to the Client for all cash contributions, withdrawals and in kind transfers as they occur. Although the standard form of IMSA provides that the receipt of individual transaction confirmations is waived by the Client, a Client may elect, by written request to AssetMark or AssetMark Trust, to receive a confirmation of each security transaction and such confirmations will thereafter be provided.

The Custodians will mail a letter of acknowledgement confirming the establishment of an Account and receipt of assets, separately to the Account’s address of record. Clients are strongly encouraged to review all statements, acknowledgements and correspondence sent by the Custodian.

A Quarterly Performance Review (“QPR”) may also be generated for clients on the Platform. The QPR shows current allocations of the client’s selected models as well as performance information.

**ITEM 16 – INVESTMENT DISCRETION**

AssetMark accepts discretionary authority to manage the assets in the client’s account under the Referral platform. We observe investment limitations and restrictions when notified of such by the Client.

**ITEM 17 – VOTING CLIENT SECURITIES**

Clients may obtain a copy of AssetMark’s complete proxy voting policies and procedures upon request. Clients may also obtain information from AssetMark about how AssetMark voted any proxies on behalf of their account(s).

A copy of our proxy voting policies and procedures and/or information regarding the votes cast by AssetMark with regard to a client’s securities is available upon request mailed to:

**AssetMark, Inc.**  
**Attention: Adviser Compliance**  
**1655 Grant Street, 10th Floor**  
**Concord, CA 94520-2445**

The Client designates the applicable Discretionary Manager as its agent to vote proxies on securities in the Account and make all elections in connection with any mergers, acquisitions and tender offers, or similar occurrences that affect the assets in the Account. Client acknowledges that as a result of this voting designation it is also designating the Discretionary Manager as its agent to receive proxies, proxy solicitation materials, annual reports provided in connection with proxy solicitations and other materials provided in connection with the above actions relating to the assets in the Account. However, the Client retains the right to vote proxies and may do so by notifying AssetMark in writing of the desire to vote future proxies. Additionally, this designation of the Discretionary Manager to vote proxies and the Client’s right to vote proxies may not apply to securities that may have been loaned pursuant to a securities lending arrangement despite efforts by AssetMark to retrieve loaned securities for purposes of voting material matters.

If shares of the Savos Dynamic Hedging Fund, or Proprietary/Affiliated Funds are held in an Account for which AssetMark acts as Discretionary Manager, AssetMark will vote 100% of the shares over which it has voting authority according to instructions it receives from its Clients, which are the Fund’s beneficial shareholders. AssetMark will vote shares with respect to which it does not receive executed proxies in the same proportion as those shares for which it does receive executed proxies. This is known as “mirror voting” or “echo voting.”

***Mutual Fund, ETFs, and other Accounts***

Under the Referral Model, the Client waives the right to vote proxies if the Account is invested in a Mutual Fund or ETF Investment Solution, unless a third party custodian is used, in which case, the client retains the right to vote proxies. This waiver can be rescinded at any time by written notice to AssetMark. The Client retains the right to vote proxies if the Account is an Administrative/Non-Managed Account, including a General Securities Account or Cash Alternative Account. The Proxy Voting Policy for Referral model clients is described in detail in the “Referral Disclosure Brochure.”

***Class Actions and similar actions***

In all instances the Client shall make any and all elections with regard to participation in class actions, notices regarding bankruptcies and similar elections.

**ITEM 18 – FINANCIAL INFORMATION**

In certain circumstances, registered investment advisers are required to provide you with financial information or disclosures about their financial condition in this Item. AssetMark has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has never been the subject of a bankruptcy proceeding.

**APPENDIX 1 INFORMATION**

Attached to this Form ADV Part 2A are Disclosure Brochures for the following programs.

- Referral Disclosure Brochure – Part 2A and Appendix 1
- Platform Disclosure Brochure – Appendix 1
- Efficient Edge Advisory Service – Appendix 1
- Efficient Edge Advisory Service (RetireReady) – Appendix 1
- Retirement Connection Services - Custom - Part 2A
- AssetMark Retirement Services - Part 2A