



Contour Wrap Fee Program Brochure March 31, 2023

155 E. Shaw Ave, Suite 102
Fresno, CA 93710
800-955-2517
www.scfsecurities.com

This Wrap Fee Program Brochure provides information about the qualifications and business practices of SCF Investment Advisors, Inc. ("SCFIA"). If you have any questions about the contents of this Brochure, please contact us at 800-955-2517. 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. SCFIA is a registered investment adviser. Registration as an investment adviser does not imply any level of skill or training.

Additional information about SCFIA is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

None. SCFIA created this Contour Wrap Fee Program Brochure on March 31, 2023.

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Item 4 – Services, Fees and Compensation

Introductory Information

SCF Investment Advisors, Inc. (“SCFIA,” “we” or “us”) was formed in 2003, is an Arizona corporation, and is a wholly owned subsidiary of SCF Holdings, Inc., a Delaware corporation. SCF Holdings, Inc. is wholly owned by AWS 9, Inc., a Delaware corporation, which is wholly owned by Atria Wealth Solutions, Inc., a Delaware corporation, which is in turn wholly owned by Atria Wealth Solutions Holdings LLC, a Delaware limited liability company, which is privately owned.

SCFIA is registered as an investment adviser with the Securities and Exchange Commission (“SEC”). SCFIA is affiliated with SCF Securities, Inc. (“SCFS”), a registered securities broker-dealer, and SCF Marketing, Inc. (“SCFM”), an insurance agency.

As of December 31, 2022, SCFIA had regulatory assets under management of \$1,771,389,008. Of that amount, \$173,679,929 was managed on a non-discretionary basis and \$1,597,709,079 was managed on a discretionary basis.

Our investment advisory services (“Advisory Services”) are made available to clients through individuals associated with SCFIA as investment adviser representatives (“IARs”). Many IARs are dually licensed (i.e., they are licensed both as IARs of SCFIA and as registered representatives of SCFS and offer both investment advisory and brokerage services), which, in addition to Advisory Services, allows them to offer commission-based products. Your IAR will disclose to you whether he or she is dually registered and if there are any limitations on services offered due to registrations and qualifications.

SCFIA offers clients a variety of advisory programs, including the Contour wrap fee advisory platform (“Contour”). This Wrap Fee Brochure describes the Contour platform. For more information about SCFIA’s advisory services and programs other than Contour, please contact your IAR for a copy of our Form ADV Part 2A brochure that describes our other services and programs or go to www.adviserinfo.sec.gov.

SCFIA is not a custodian of any accounts. Contour accounts are custodied with an unaffiliated custodian designated by a client after consultation with an IAR. Custodial options include National Financial Services, LLC (“NFS”), Pershing Advisor Solutions (“PAS”), TD Ameritrade Institutional (“TD Ameritrade”), Charles Schwab & Co., Inc. (“Schwab”), Fidelity Institutional Wealth Services (“IWS”), and any other custodian SCFIA chooses to make available (hereinafter referred to as “Custodian”).

Services

Contour is a discretionary wrap fee platform (“Platform”) sponsored by SCFIA. SCFIA has entered into an agreement with Envestnet Asset Management, Inc. (“Envestnet”), a registered investment adviser, to provide administrative services for the Platform and Contour accounts. SCFIA has designated Custodians to execute and clear transactions, custody assets, and deliver statements and confirmations to you, as applicable. Neither Envestnet nor Custodians are affiliated with SCFIA.

Additionally, Envestnet provides an electronic performance reporting system which permits an IAR to create performance reports on demand in addition to preparing quarterly performance reports that will be provided to you.

Contour is comprised of four wrap fee program options:

Wrap Fee Program Options	Program Description	Discretionary Authority	Minimum Account Size	Allowable Assets
Advisor as Portfolio Manager (“APM”)	Traditional discretionary IAR directed program	IAR	\$25,000	Mutual funds, ETFs, options (limited to covered calls and purchases), fee based UITs, equities, bonds, structured notes, and fee-based annuities
Fund Strategist Portfolios (“FSP”)	Discretionary advisory program comprised of ETF and/or Mutual Fund Models	Envestnet	As low as \$2,000 (manager dependent)	ETFs, mutual funds, and money market funds
Separately Managed Accounts (“SMA”)	Separately managed account program using third-party investment advisers	SMA Manager or Envestnet	\$100,000	ETFs, exchange traded notes and exchange traded vehicles, mutual funds, equities, and bonds
Unified Managed Accounts (“UMA”)	Unified managed account program with Model Providers, Sub-Managers and Other Investments	Envestnet as Overlay Manager and IAR for Other Investments and allocation to model providers and Sub-Managers, if applicable	\$100,000	ETFs, exchange traded notes and exchange traded vehicles, mutual funds, fee-based UITs, annuities, equities, and bonds

Your IAR will confer with you to determine your financial needs and objectives and gather your client profile and risk tolerance information to complete a Statement of Investment Selection (“SIS”). The information gathered from the risk tolerance questionnaire (“RTQ”), or an approved financial planning tool, assists in determining a recommended allocation of your assets into an asset allocation model fitting one of seven investment profiles: Capital Preservation, Conservative, Conservative Growth, Moderate, Moderate Growth, Growth, or Aggressive. Your IAR will obtain your written consent to change your investment profile risk tolerance. Your IAR will assist you in selecting one of the four program options to implement the portfolio. Your IAR will create a proposal (“Proposal”) including your investment profile questionnaire responses, selected program option(s) and applicable fees. You, your IAR, and SCFIA will enter into a Contour Platform Account Agreement (“Contour Agreement”) outlining your participation in the Platform.

Advisor as Portfolio Manager (“APM”)

APM is a program within the Platform designed to provide investment advice through an IAR for a fee based on the value of your Platform assets. Acting under the Contour Agreement, your IAR establishes an account at a Custodian for the purpose of creating a portfolio to be managed by your IAR on a discretionary basis. Envestnet has no discretion over assets managed in the APM and is not providing investment advice to you.

At the inception of the relationship, your IAR uses the investment profile based on your RTQ or a firm approved financial planning tool to select portfolio securities based on an asset allocation model. Your IAR will enter transaction orders consistent with your investment profile, risk tolerance and objectives. Currently, the list of approved investments for the APM includes mutual funds, exchange traded funds (“ETFs”), options (limited to covered calls and purchases), fee-based unit investment trusts (“UITs”), equities, bonds, structured products, and other securities.

If your IAR is dually licensed with SCFS, your IAR’s selection of investments in APM will be limited by the FINRA registrations held by your IAR. If your IAR only holds the Series 6, Investment Company and Variable Contracts Products registration, your IAR will implement the IAR-directed model portfolio strategy using only mutual funds and/or fee-based annuities.

Because of the account’s discretionary nature, your IAR has full judgment over the selection and amount of investments to be purchased or sold in the account, without obtaining your prior consent or approval. Once a portfolio is constructed, your IAR monitors the account and rebalances the portfolio as changes in market conditions and client circumstances warrant.

Fund Strategist Portfolios (“FSP”)

FSP is designed to provide discretionary investment advice through a roster of third-party strategists, managed ETF and/or mutual fund models. The model portfolios are managed for a fee based on the value of your Platform assets. Acting under the Contour Agreement, your IAR establishes an account at a Custodian to be invested in one of the ETF or mutual fund models available in the program. Your responses to the RTQ or financial plan will assist in determining which of the models is appropriate based on your investment objectives, time horizon and risk tolerance.

Once an asset allocation model has been selected, you will grant Envestnet discretionary authority to:

- Invest the assets in the Program account in accordance with the selected ETF or mutual fund model strategies;
- Make changes to the asset allocations, as deemed appropriate; and
- Rebalance the assets when needed.

Changes in the asset allocation model, which include adding, removing, or replacing securities, are made based on a variety of factors as dictated by the strategist, including but not limited to, changes in economic, financial, market and/or political conditions.

At the inception of an account, FSP assets are invested in ETF and/or mutual fund models determined in accordance with set target percentages of the total assets in the account. Thereafter, as markets fluctuate and values change, amounts originally allocated to an ETF and/or mutual fund model will either exceed or fall below the original target allocations. Envestnet will periodically adjust model allocations back to the original asset targets, or “rebalance” the account. However, models are not rebalanced constantly, and asset allocations will drift away from their original target percentages before Envestnet, within its authority and judgment, brings those allocations back in line with the original percentages.

The selected strategist is responsible for monitoring the models and rebalancing each model as changes in market conditions warrant. Envestnet trades and rebalances FSP accounts based solely on strategist models and directives.

The tax consequences of ETF ownership differ from those of mutual funds. Held in taxable accounts, ETFs can be more tax efficient compared to traditional mutual funds. Generally, holding an ETF in a taxable account will generate less tax liabilities than if you held a similarly structured mutual fund in the same account. If you are concerned with tax efficiency, you should discuss this with your IAR or with your tax advisor.

Separately Managed Accounts (“SMA”)

SMA is a program designed to provide investment advice through other investment advisers (“SMA Managers”) for a fee based on the value of your Platform assets. SMA Managers have been selected by SCFIA to provide portfolio investment management services and have entered into a participation agreement with Envestnet. The selected SMA Manager has discretion to invest the assets in exchange traded products such as ETFs, exchange traded notes and exchange traded vehicles, mutual funds, equities, bonds, and other securities.

At the inception of the relationship, the IAR uses the information from your RTQ or financial plan to recommend an SMA Manager whose strategies are appropriate for you based on your objectives and profile. Acting under the Contour Agreement, the IAR establishes an account at a Custodian for the purpose of creating a portfolio to be managed by an SMA Manager on a discretionary basis. The SMA Manager manages the account according to the SMA Manager’s strategies and your reasonable restrictions, if any. The SMA Manager can, in its sole discretion, decline to accept a client for any reason.

Because of the account’s discretionary nature, the SMA Manager has full authority over the selection and amount of investments to be purchased or sold in the account, without obtaining your prior consent or approval. Once a model portfolio is constructed, the SMA Manager monitors the account and rebalances the portfolio as changes in market conditions and client circumstances warrant.

For additional information about an SMA Manager please see their Form ADV Part 2A Brochure.

Unified Managed Accounts (“UMA”)

UMA is designed to provide you with access to various investment strategies, including model strategies provided by one or more model providers (“Model Providers”) and other available investments, such as ETFs, stocks, and mutual funds (“Other Investments”) via a single Unified Managed Account (“UMA”). Individual Sub-Managers who manage and place trades for the sleeves (portion of an account) allocated to the Sub-Manager are an available option for certain strategies if selected and designated in the SIS. Model Providers and Sub-Managers are selected for UMA participation in Contour by SCFIA and enter into a contractual relationship with Envestnet. Your IAR is granted authority to select and allocate assets among the Model Providers and Sub-Managers according to your risk tolerance. Your IAR is also granted limited discretionary authority to invest, reinvest and otherwise deal with assets allocated to Other Investments in your UMA according to your investment objectives, risk tolerance, and time horizon determined by the RTQ or financial plan.

SCFIA has entered into an agreement with Envestnet to act as the overlay manager for UMA by implementing trade orders and periodically updating and rebalancing each Model Portfolio pursuant to the direction of the Model Provider and IAR. Envestnet is granted limited discretionary trading authority with respect to assets in your UMA based on the selected models; to implement model changes; and to rebalance accounts pursuant to target allocations and program trading parameters established by SCFIA. Envestnet will allocate assets across the investment choices available in UMA, in a manner consistent with your instructions, or in the

case of Other Investments, your IAR's instructions, without regard to Envestnet's own assessment of such investment choices in circumstances where Envestnet has the authority to recommend or select them. No allocation of your assets to a particular model strategy or Other Investment should be considered an approval or endorsement by Envestnet of such model strategy or Other Investment.

When a Model Provider makes a change to a model strategy, Envestnet will implement changes to the UMA accounts at its sole discretion. Except as described below, with respect to such changes, Envestnet's sole authority with respect to individual security selection is to carry out the client's or IAR's directions through implementation of the model portfolios provided by the model providers ("Model Portfolios"). Envestnet does not make any individual security decision on a client's behalf other than such decisions necessary to implement changes to the Model Portfolios, or if applicable to reject any or all changes to a model strategy. Envestnet and SCFIA retain the authority to terminate or change Model Providers and to remove or replace Other Investments from the UMA. Assets from a removed or modified model strategy can be automatically reallocated for investment among the other models currently held within a UMA. Envestnet is authorized to allocate assets from an unavailable Other Investment to cash except as otherwise directed by your IAR. This replacement process will be subject to the usual and customary settlement procedures and can have tax consequences.

For additional information about an SMA Manager, Model Provider, or Sub-Manager, please refer to their Form ADV Part 2A Brochure.

Envestnet also provides optional overlay services for an additional fee related to specific client objectives that could include tax management, ESG or socially responsible screening, or other portfolio customization to be outlined on the SIS.

Envestnet's Portfolio Consulting Group, Envestnet PMC[™], is a Model Provider for the UMA. Envestnet PMC acts in the same capacity as other Model Providers and creates Model Portfolios based on its proprietary research.

SCFIA and your IAR are responsible for gathering client information; selecting Model Providers and Sub-Managers, Model Portfolios, and Other Investments; and determining if one or more Model Portfolio(s) or Other Investments selected are suitable for the client. Envestnet can choose not to accept a UMA client in its sole discretion.

IRA Rollover Considerations

If you decide to roll assets out of a retirement plan into a Contour individual retirement account ("IRA"), SCFIA and your IAR have a financial incentive to recommend that you invest those assets in one of our programs, because SCFIA and your IAR will be paid on those assets, for example, through advisory fees. You should be aware that such fees likely will be higher than those you pay through your plan, and there can be custodial and other maintenance fees.

The following fiduciary acknowledgement applies only when our IAR (i) provides investment advice to participants in or the fiduciaries of ERISA-covered retirement plans and to owners of IRAs, and (ii) recommends to participants in ERISA-covered retirement plans or owners of IRAs to make a rollover to an IRA.

When we provide investment advice to you regarding your retirement plan account or IRA, we are fiduciaries

within the meaning of Title I of ERISA and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. Fiduciary status for this purpose does not necessarily mean we are acting as fiduciaries for purposes of other applicable laws. This acknowledgement of fiduciary status does not confer contractual rights or obligations on you, SCFIA, or your IAR.

Fees

Contour is a wrap fee program where no transaction charges apply, and a single fee is paid for all advisory services and transactions. The fees for participation in Contour are based on an annual percentage of your Platform assets. The Total Fee is comprised of three components: (a) the Program Fee, (b) the Advisory Fee, and (c) if applicable, the Manager(s) Fee. The Manager Fee applies in the FSP, SMA and UMA programs, but no Manager Fee is included in the APM program.

The Total Fee is billed and collected monthly or quarterly in advance as noted on the SIS. For accounts billed quarterly, the Total Fee is calculated at the beginning of each calendar quarter based on the fair market value of your Platform assets, including money market funds, interest, and reinvested dividends in the account, on the last business day of the prior calendar quarter. For accounts billed monthly, the Total Fee is calculated at the beginning of each month based on the fair market value of your Platform assets, including money market funds, interest, and reinvested dividends in the account, on the last business day of the prior calendar month. The Custodian determines fair market value for fee calculation purposes.

APM Fee Schedule

Total Fee = Advisory Fee + Program Fee

Platform Assets	Maximum Allowable Advisory Fee*	APM Program Fee
First \$250,000	2.25%	0.20%
Next \$250,000	2.25%	0.17%
Next \$250,000	2.25%	0.15%
Next \$250,000	2.25%	0.13%
Next \$1,000,000	2.00%	0.10%
Next \$3,000,000	1.75%	0.090%
Assets above \$5,000,000	1.50%	0.070%

*The maximum allowable advisory fee for annuity subaccount management in APM is 1%.

FSP, SMA, UMA Fee Schedule

Total Fee = Advisory Fee + Program Fee + Manager Fee (if applicable)

Platform Assets	Maximum Allowable Advisory Fee	Program Fee		
		FSP	SMA	UMA
First \$250,000	2.00%	0.24%	0.26% - 0.28%	0.30%
Next \$250,000	2.00%	0.22%	0.24% - 0.26%	0.28%
Next \$250,000	2.00%	0.19%	0.19% - 0.23%	0.25%
Next \$250,000	2.00%	0.17%	0.17% - 0.21%	0.23%
Next \$1,000,000	1.75%	0.13%	0.13% - 0.16%	0.19%
Next \$3,000,000	1.50%	0.10%	0.10%	0.14%
Assets above \$5,000,000	1.25%	0.08%	0.08%	0.10%
Manager Fee		0.00% - 0.50%	0.00% - 0.75%	0.00% - 0.75%

Fees are automatically deducted from your account, or from another billable account as directed by you. The first payment is prorated based on the number of calendar days in the billing period. If you invest or withdraw \$10,000 or more in the account after the first day of a billing period, a prorated fee or rebate is calculated on each eligible deposit or withdrawal with adjustments applied the subsequent month. If the account is terminated prior to the end of the billing period, a pro rata portion of the Total Fee will be credited (refunded) to you. The fees deducted, including the dates and amounts, are reflected on the statements sent by Custodian. You should review those statements and the fees deducted. Any questions on the fees deducted from your account should be directed to your IAR, or you may contact us at the number on the cover page of this Brochure.

If you have more than one Platform accounts, your account can be “householded”, aggregating your accounts for fee calculation purposes, which can help you qualify for a lower fee. A “household” is generally a group of accounts having the same address of record or same Social Security number. Individual Retirement Accounts (“IRAs”), SIMPLE IRAs and other personal retirement accounts generally can be combined for householding purposes; however, other retirement plan accounts subject to ERISA and charitable remainder trusts cannot be aggregated. Households are established through the IAR and must be requested by the client. Neither SCFIA nor our IARs are responsible for identifying eligible accounts. A client is responsible for determining if they have eligible accounts and ensuring those accounts remain eligible. SCFIA and our IARs earn higher fees if clients elect not to household eligible accounts where available. Clients should discuss the program fee and any potential fee reduction available through householding with their IAR.

The Advisory Fee compensates your IAR for assisting in the design, implementation, and ongoing monitoring of your investment plan. The Advisory Fee is negotiated between you and your IAR but will not exceed 2.25% in

APM and 2.00% in FSP, SMA and UMA, except that in connection with annuity subaccount management in APM, the Advisory Fee will not exceed 1%. The Advisory Fee charged depends upon a number of factors including the amount of the assets under management, the nature and extent of other account relationships between you and your IAR, the nature and complexity of the model portfolios, and other factors that the IAR deems relevant. The Advisory Fee you negotiate will be different than the fees your IAR negotiates with other clients or the fees other IARs negotiate with other clients for similar services.

The Program Fee includes execution, clearing, custody, and SCFIA, Envestnet and Custodian fees. The Program Fee is assessed in each of the program options and is non-negotiable.

Manager Fees apply in the FSP, SMA and UMA. The Manager Fee in the SMA and UMA varies by the selected SMA Manager, Sub-Manager or Model Provider and ranges between 0.00% and 0.75% of your Platform Assets. In the UMA, if your account has more than one Model Provider or Sub-Manager, the effective Manager Fee will be a blend of all Model Providers' and/or Sub-Managers' fees weighted by the dollar amount invested in each Model Portfolio. SMA Managers or Model Providers who charge no, or a nominal fee are typically compensated by advisory fees from the propriety funds the SMA Managers or Model Providers include in their models. In the FSP, the Manager Fee ranges from 0% to 0.50% depending on the portfolio selected. Manager Fees are non-negotiable.

An additional charge of up to 10 basis points (0.10%) is added to your Program Fee if you elect certain tax management services, ESG or socially responsible screening, or other portfolio customization described in the SIS. This charge is paid to the investment manager or the "overlay manager" that applies the tax screening to your investments.

The above Fee Schedules are based on the amount of assets you invest in the Platform and is not dependent on the amount of trading in the account or the advice given in any particular time period. Transactions in accounts are executed for a single wrap fee, which reduces the conflict of interest associated with executing orders for accounts and earning transaction-based compensation in connection with each order. You should be aware that lower fees for comparable services could be available from other sources.

A \$10 mutual fund surcharge applies to purchases and redemptions of certain mutual funds that do not otherwise compensate Custodian for administration and operational accounting related to fund ownership. A list of applicable funds is available upon request.

Changes to Fees

The Advisory Fee component of the Total Fee can only be increased with your written consent. Advisory Fee changes after the first day of the billing period will be effective on the next billing cycle and will not be prorated. Your IAR cannot negotiate or change the Program Fee or the Manager Fee. SCFIA can change the Program Fee schedule at any time by giving prior written notice to you. Following the 30-day notice period, the new fee schedule will become effective unless you terminate the Contour Agreement. Your continued acceptance of services will constitute consent to changes in the Total Fee, including an increase in the amount charged, if any.

Other Fees and Expenses

In addition to the wrap fee, you will pay individual retirement account ("IRA") annual maintenance fees, tax-qualified plan trustee fees, certain custodial fees, and other ancillary charges within a Contour account, as

applicable. You are charged for specific account services, such as account transfer fees, electronic fund and wire transfer charges, checking fees, paper statements and confirmations, and for other optional services elected by you on a per event basis. These fees are subject to the pricing schedule set by a Custodian and SCFS and/or SCFIA. SCFS receives a portion of certain of these fees for accounts in custody with NFS, including where SCFS marks up the fee charged by NFS, which can be substantial. Please review Brokerage Practices of this Brochure for additional information.

SCFS's receipt of custodial fees, including where SCFS marks up a fee, creates a conflict of interest for SCFS and SCFIA because the fees constitute additional revenue to SCFS and/or us, and the amount can be substantial. To mitigate this conflict, neither SCFS nor us share custodial fee revenues with your IAR, and we do not require or incentivize IARs to recommend advisory programs be custodied with any custodian. Brokerage and other transaction costs and certain administrative fees incurred in Contour accounts are included in the wrap fee.

You can elect to receive communications and documents from a Custodian, including confirmations and statements, electronically by enrolling, or registering online, pursuant to Custodian's instructions for electronic delivery. Unless you authorize electronic delivery, the Custodian will deliver communications and documents to you via U.S. mail. Some Custodians assess a paper surcharge.

Interest on all cash account delinquencies (Cash Due Interest) in your account is charged directly to your account at the then current rate. Transfer agent servicing fees, if any, are passed through to you and can vary based upon the transfer agent and position.

Brokerage and other transaction costs incurred in Contour accounts are included in the wrap fee except as described below under "Additional Fees for Trades Executed at Other Broker-Dealers", and where mutual fund surcharges apply to certain funds designated by Custodian.

Additional Fees for Collective Investment Vehicles

For accounts that contain collective investment vehicles ("Collective Investment Vehicles"), such as mutual funds, closed-end funds, UITs, ETFs, annuities, structured products, or publicly traded real estate investment trusts, each Collective Investment Vehicle bears its own internal fees and expenses, such as fund operating expenses, management fees, deferred sales charges, redemption fees, other fees and expenses or other regulatory fees, charges assessed by annuity issuers such as contract charges, contract maintenance charges, transfer charges, optional rider fees, subaccount management fees and administrative expenses, short-term trading redemption fees, and other fees imposed by law. Collective Investment Vehicle fees and expenses are disclosed in the applicable prospectus, statement of additional information, or product description. None of these fees are shared with SCFIA or your IAR. This compensation is in addition to the Total Fee resulting in increased costs to you.

Some mutual funds assess redemption fees to investors upon the short-term sale of its funds. Depending on the mutual fund, this can include sales for rebalancing purposes. Please see the prospectus for the specific mutual fund for detailed information regarding such fees. In addition, you can incur redemption fees, when the portfolio manager to an investment strategy determines that it is in your overall interest, in conjunction with the stated goals of the investment strategy, to divest from certain Collective Investment Vehicles prior to the expiration of the collective investment vehicle's minimum holding period. Depending on the length of the redemption period, the particular investment strategy and/or market conditions, a portfolio manager may be able to minimize any redemption fees when, in the portfolio manager's discretion, it is reasonable to allow you to remain invested in a Collective Investment Vehicle until expiration of the minimum holding period.

Compensation Related to Mutual Funds and Other Investments

Your IAR, in his/her separate capacity as a registered representative of SCFS (i.e., as a broker), earns commissions from the sale of mutual funds, variable annuities, ETFs, and other securities. This results in a conflict of interest because SCFIA and our IARs have an incentive to recommend investment products based on the compensation received rather than on a client's needs. You are under no obligation to purchase investment products through SCFIA or your IAR and you have the option to purchase the products we recommend through other financial services firms that are not affiliated with us.

After considering your overall needs and objectives along with your preferences, your IAR can recommend that you convert from a commission-based account to a fee-based advisory account. We maintain policies and procedures to ensure a conversion from a commission-based account to fee-based advisory account is in your best interest. Among other things, we employ the following policies:

- When Class A, B, or C shares of mutual funds are transferred into your Contour account, additional mutual fund purchases within the advisory account will be made at net asset value (NAV) or in adviser or institutional share classes, which do not include 12b-1 fees. Such purchases will not result in your payment of a commission in addition to the annual advisory fee.
- SCFIA will attempt to convert Class A, B, and C share mutual fund holdings in an advisory account to adviser or institutional class shares where available. In the event a tax-free conversion is not available or does not occur, 12b-1 fees received in fee-based accounts will be credited to your account.
- Your IAR can agree, upon your written request and for your convenience, to hold certain assets in your Contour account such as previously acquired concentrated positions in a stock or bond that you wish to hold for an unspecified period of time. Such assets are unmanaged, unmonitored, and are excluded from billing.
- Your IAR can agree, at your request, to hold certain assets in the Contour account such as previously acquired concentrated positions in a stock or bond, that you wish to liquidate over a period of time or hold to maturity. Such assets are being monitored but are excluded from billing.

Mutual funds generally offer multiple share classes available for investment based upon certain eligibility and/or purchase requirements. For instance, in addition to retail share classes (typically referred to as class A, B, and C shares), mutual funds can also offer institutional share classes or other share classes that are specifically designed for purchase by investors who meet certain specified eligibility criteria, including, for example, whether an account meets certain minimum dollar amount thresholds or is enrolled in an eligible fee-based investment advisory program. Institutional share classes usually have a lower expense ratio than other share classes. SCFIA and our IARs have a financial incentive to recommend or select share classes that have higher expense ratios because such share classes generally result in higher compensation. SCFIA seeks to minimize this conflict of interest, by providing our IARs with training and guidance on this issue, as well as by conducting periodic reviews of client holdings in mutual fund investments to ensure the appropriateness of mutual fund share class selections and whether alternative mutual fund share class selections are available that might be more appropriate given a client's particular investment objectives and any other appropriate considerations relevant to mutual fund share class selection. Regardless of such considerations, clients should not assume that they will be invested in the share class with the lowest possible expense ratio.

The appropriateness of a particular mutual fund share class selection is dependent upon a number of considerations, including: the asset-based advisory fee that is charged, whether transaction charges are applied to the purchase or sale of mutual funds, the overall cost structure of the advisory program, operational considerations associated with accessing or offering particular share classes (including the presence of selling agreements with the mutual fund sponsors and SCFIA's ability to access particular share classes through the custodian), share class eligibility requirements, and the revenue sharing, distribution fees, shareholder servicing fees, or other compensation associated with offering a particular class of shares.

Further information regarding fees and charges assessed by a mutual fund is available in the mutual fund prospectus.

Additional Fees for Trades Executed at Other Broker-Dealers

SMA Managers, Sub-Managers or Envestnet can elect to execute trades at broker-dealers other than the Custodian for some or all of their transactions or investment styles. This is frequently referred to as "trading away" or "step out trades." Clients who select such managers or participate in the SMA or UMA are subject to any transaction charges or other charges, including commissions, mark-ups, mark-downs, or other additional trading costs that can be imposed by the executing broker-dealer in addition to the Program Fee and the other fees described herein.

Fee Information Applicable to Wrap Fee Accounts

A wrap fee program is defined as an advisory program in which a client pays a single, specified fee for portfolio management services and trade execution. We receive a portion of the investment advisory fee you pay when you participate in any of the wrap fee programs we offer. Wrap fee programs are not suitable for all investments needs and any decision to participate in a wrap fee program should be based on your financial situation, investment objectives, tolerance for risk, and investment time horizon. The benefit of a wrap fee program depends, in part, upon the size of an account, the types of securities in the account, and the expected size and number of transactions likely to be generated. Generally, wrap fee accounts are less expensive for actively traded accounts. For accounts with little or no trading activity, a wrap fee program may not be suitable because the wrap fee could be higher than fees in a traditional brokerage or non-wrap fee advisory account where you pay a fee for advisory services plus a commission or transaction charges for each transaction in the account. You should evaluate the total cost for a wrap fee account against the cost of participating in another program or account.

General Information Concerning Fees

Fees vary between IARs, and clients can pay more or less than the fees charged by another IAR for similar services. The advisory fee charged can be more or less than what SCFIA and your IAR might earn from other programs available in the financial services industry or if the services were purchased separately or on a commission basis. To this end, clients have the option to purchase investment products that an IAR recommends through other financial services firms that are not affiliated with SPF.

Item 5 – Account Requirements and Types of Clients

Account Requirements

The initial minimum account size for Contour program options is listed below.

Program	Minimum
Advisor as Portfolio Manager Program	\$25,000
Fund Strategist Portfolios	As low as \$2,000
Separately Managed Accounts	\$100,000
Unified Managed Accounts	\$100,000

The initial account minimum can, however, be waived at SCFIA's discretion, considering various factors. Such factors include, but are not limited to, length of client relationship or combined values of other household/family member accounts.

In the SMA, should the SMA Manager require a higher minimum, the higher minimum will apply. In the UMA, the minimum account size for each model style is determined by the Model Provider or Sub-Manager. For additional information regarding any restrictions imposed by a SMA Manager, Model Provider, or Sub-Manager, please ask your IAR for their Form ADV Part 2A Brochure.

Types of Clients

SCFIA, through its IARs, offers investment advisory services to individuals, high net worth individuals, pension and profit-sharing plans, charitable organizations and corporations or other businesses. Our clients can have both fee-based advisory accounts, and commission-based brokerage accounts through our affiliate broker-dealer SCF. Our IARs can offer clients advisory services, brokerage services if in their capacity as registered representatives of SCF, or both, depending on an IAR's registrations and qualifications, and on a client's preferences and needs.

Item 6 – Portfolio Manager Selection and Evaluation

SCFIA does not utilize the services of any third-party money manager in the APM. In the APM, your IAR acts as portfolio manager and selects specific investments to implement an asset allocation model consistent with your investor profile, risk tolerance and investment objectives. IARs acting as portfolio managers generally do not have documented performance histories against which to measure. Therefore, IARs of SCFIA are not subject to the same selection and review process that we use for SMA Managers, Sub-Managers, Strategists or Model Providers.

SMA Managers, Sub-Managers, Strategists and Model Providers

In the SMA and UMA, Envestnet makes available to SCFIA, investment managers with whom Envestnet has entered into agreements to act as SMA Managers or Sub-Managers with respect to the investment of clients'

Platform Assets in managed securities portfolios, mutual fund portfolios, and exchange-traded fund portfolios. For certain investment advisors, including Strategists in FSP, Envestnet has entered into a licensing agreement with the investment adviser whereby Envestnet performs administrative and/or trading duties pursuant to the direction of the investment adviser. In this scenario, the investment adviser is acting in the role of a “Model Provider.”

Envestnet has developed a program to collect and report data on investment style and philosophy, past performance, and personnel of SMA Managers, Sub-Managers, and Model Providers that are designated as “approved.” Envestnet’s process for selecting, evaluating, and monitoring approved SMA Managers, Sub-Managers and Model Providers is more fully described in Envestnet’s Form ADV Brochure. SCFIA leverages this process in selecting SMA Managers, Sub-Managers, and Model Providers it makes available in Contour accounts. Envestnet also makes available other managers for which Envestnet has not performed due diligence; SCFIA makes those managers available based on due diligence conducted by the Managed Account Product Review Committee, a sub-committee of the Atria New Product Committee. This includes review of investment style and philosophy, past performance, and personnel.

The Managed Account Product Review Committee is responsible for reviewing, selecting, and monitoring SMA Managers, Sub-Managers and Model Providers. SMA Managers, Sub-Managers and Model Providers selected for participation are also subject to an annual review to determine if there are any material changes or disclosure events that will impact the quality of the SMA Manager’s, Sub-Manager’s, or Model Provider’s performance of the services contemplated in the Program. In addition, the Managed Account Product Review Committee conducts periodic reviews of Envestnet.

Your IAR is responsible for initial SMA Manager and/or Model Provider selection based on the information you provide at the inception of the account along with your investor profile and results of your RTQ or risk assessment from an approved financial planning tool. Your IAR is also responsible for monitoring the appropriateness of the selected SMA Manager(s), Sub-Manager(s), and/or Model Provider(s) in light of any changes in your financial condition, risk tolerance and investment objectives reported by you from time to time.

Performance Calculation

SCFIA has engaged Envestnet to calculate investment performance and to provide reports to clients, subject to a minimum account value. Neither SCFIA, nor any third party, reviews or verifies the accuracy of performance or its compliance with any presentation standards.

A custodial statement containing a description of all account activity is provided to you not less than quarterly. Your IAR reviews overall performance of each account on a periodic basis in order to ensure that transactions are suitable based on your investment objectives, meet your quality expectations and comply with any investment restrictions requested by you.

Performance-Based Fees and Side-by-Side Management

Fees based on a share of capital gains or capital appreciation of assets of an advisory client are commonly referred to as “performance-based fees.” SCFIA does not charge performance-based fees. We also do not engage in side-by-side management.

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis and Investment Strategies

Your IAR will incorporate your needs and investment objectives as well as time horizon and risk tolerance when developing and selecting investment strategies. Your IAR is not bound by any specific methods of analysis or investment strategies for the management of model portfolios in the APM, but rather as previously stated, your IAR will consider your unique situation and all information gathered at the account inception, your RTQ or financial plan, as well as changes to your financial picture over time.

The primary sources of information used to conduct these types of analysis are reputable financial publications, research prepared by others, ratings services, press releases, annual reports, prospectuses, and other filings with the SEC. The implementation of your IAR's strategies varies based upon the individual client. Prior to investing, you should ensure that you understand and agree with the investment strategy used by the IAR.

Each client's account is managed based on the client's financial situation, investment objectives and instructions. The IAR works with the client to obtain sufficient information to provide individualized investment advice and is reasonably available to consult with the client on an ongoing basis. Clients are permitted to impose reasonable restrictions on the management of the account.

However, there is a possibility that by imposing restrictions, you may receive an asset allocation proposal that differs from the allocation your IAR would otherwise consider appropriate. Clients who do not impose any restrictions are likely to receive asset allocation proposals that are similar to proposals presented to other clients with similar investment profiles.

Tax Consequences

Tax consequences are a critical component of any investment strategy. Therefore, depending on the strategy you choose to implement, it is possible that any trading activity could result in a taxable event and lower investment returns. Certain SMA Managers in SMA and Model Providers in UMA and FSP employ tactical strategies that do not consider taxes, including the avoidance of wash sales, in the management of portfolios. Since investments could have tax or legal consequences, you should contact your tax professionals and attorneys to help answer questions about specific situations or needs.

Risk of Loss

Investing in any type of securities involves risk of loss that you should be prepared to bear. SCFIA does not guarantee the performance of an account or any specific level of performance. Market values of the securities in the account will fluctuate with market conditions. When the account is liquidated, it could be worth more or less than the amount invested.

There is no guarantee that a client's investment goals or objectives will be achieved. All securities are subject to some level of risk which could cause the value of your securities to decrease in value, and in some cases, could result in a loss of your entire investment. The following are some types of risk that could affect the value of your portfolio:

- **Market risk:** The risk that changes in the overall market will have an adverse effect on individual securities,

- regardless of the issuer's circumstances.
- Business risk: Whether because of management or adverse circumstances, some businesses will inevitably fail. This is especially true during economic recessions. For example, a company stock can become worthless in the event of a bankruptcy, which would result in a loss of principal to shareholders.
- Interest rate risk: If the Federal Reserve raises interest rates, the market prices of bonds can be affected. When interest rates rise, the market prices of bonds typically fall.
- Regulatory risk: Legislative, regulatory and/or judicial changes that impact businesses can drastically change entire industries.
- Industry/company risk: These risks are associated with a particular industry or a specific company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, which is a lengthy process before they can generate a profit. They carry a higher risk of fluctuations in profitability than an electric company, which generates its income from a steady stream of clients who buy electricity no matter what the economic environment is like.
- Liquidity risk: Certain investments lack liquidity or the ability to access their principal quickly, without incurring substantial penalties, or the inability to sell the investment until sometime in the future.
- Inflation risk: When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- Opportunity risk: A client or an IAR can choose a conservative product to invest in, which could cause the client to miss out on market upswings which potentially could have increased the value of securities with higher risk. The opposite is also true; market downturns could cause a client to lose a significant amount of principal invested in higher risk securities, when his or her funds could have been invested in lower risk options.
- Reinvestment risk: There is a possibility you will be unable to make additional purchases of a security already in your portfolio at the same rate at which the original purchase was made.
- Currency or exchange rate risk: Foreign securities face the uncertainty that the value of either the foreign currency or the domestic currency will increase or decrease; either of which will cause the value of the client's portfolio to fluctuate.
- Exchange-Traded Funds: ETFs face market trading risks, including the potential lack of an active market for fund shares, losses from trading in the secondary markets, and disruption in the creation and redemption process of the ETF. Any of these factors can lead to liquidity risk and/or the fund's shares trading at a premium or discount to its "net asset value."
- Leveraged and inverse ETFs: ETFs that offer leverage or that are designed to perform inversely to the index or benchmark they track—or both—are growing in number and popularity. While such products may be useful in some sophisticated trading strategies, they are highly complex financial instruments that are typically designed to achieve their stated objectives on a daily basis. Due to the effects of compounding, their performance over longer periods of time can differ significantly from their stated daily objective. Therefore, inverse and leveraged ETFs that are reset daily typically are unsuitable for clients who plan to hold them for longer than one trading session, particularly in volatile markets.
- Interval Funds: Interval funds provide limited liquidity to shareholders by offering to repurchase a limited number of shares on a periodic basis, but there is no guarantee that a client will be able to sell all of their shares in any particular repurchase offer. The repurchase offer program may be

suspended under certain circumstances.

- Environmental, Social, and Governance (“ESG”) strategies: The implementation of ESG strategies could cause an account to perform differently compared to accounts that do not use such strategies. The criteria related to certain ESG strategies can result in an account foregoing opportunities to buy certain securities when it might otherwise be advantageous to do so, or selling securities to comply with ESG guidelines when it might be otherwise disadvantageous to do so. In addition, an increased focus on ESG or sustainability investing in recent years may have led to increased valuations of certain issuers with higher ESG profiles. A reversal of that trend could result in losses with respect to investments in such issuers. There can be no assurance that an ESG strategy directly correlates with a client’s ESG goals, and ESG data is not available with respect to all issuers, sectors or industries and is often based upon estimates, comparisons or projections that may prove to be incorrect. As a result, a client account with ESG guidelines could nonetheless be invested in issuers that are inconsistent with the client’s ESG goals.
- Structured Products: A structured product is an unsecured obligation of an issuer with a return, generally paid at maturity, that is linked to the performance of an underlying asset, such as a security, basket of securities, an index, a commodity, a debt issuance, or a foreign currency. Structured products are senior unsecured debt of the issuing bank and subject to the credit risk associated with that issuer. This credit risk exists whether or not the investment held in the account offers principal protection. Some structured products offer full protection of the principal invested, others offer only partial or no protection. Investors may be sacrificing a higher yield to obtain the principal guarantee. In addition, the principal guarantee relates to nominal principal and does not offer inflation protection. An investor in a structured product never has a claim on the underlying investment. There may be little or no secondary market for the securities and information regarding independent market pricing for the securities may be limited. A structured product may contain a call feature that can result in the investment being redeemed earlier than the stated maturity date. If a structured product is called prior to maturity, the payment you receive will depend upon the stated terms of the investment. If a structured product is called, you may not be able to reinvest the proceeds in a similar investment with similar risk and return characteristics.
- Money Market Mutual Funds: While money market mutual funds seek to preserve a net asset value of \$1.00, during periods of severe market stress, a money market mutual fund could fail to preserve a net asset value of \$1.00 and/or could no longer be a viable business for the fund sponsor, which would force the sponsor to liquidate. It is possible to lose money by investing in a money market mutual fund.
- Credit risk: The risk that an issuer of a fixed income security may fail to pay interest and/or principal in a timely manner, or that negative perceptions of the issuer’s ability to make such payments will cause the price of the security to decline. These risks are greater for securities that are rated below investment grade (junk bonds), which may be considered speculative and are more volatile than investment grade securities.
- Options: Holding options for long-term periods could weaken and/or reduce the value of the underlying stock or create the possibility of a worthless position.
- Global risk: International investing involves a greater degree of risk and increased volatility. Changes in currency exchange rates and differences in accounting and taxation policies outside the U.S. can raise or lower returns. Also, some overseas markets are not as politically and economically stable as the United States and other nations.
- Cybersecurity risk: SCFIA relies on the use and operation of different computer hardware, software, and online systems. The following risks are inherent in such programs and are enhanced

for online systems: unauthorized access to or corruption, deletion, theft, or misuse of confidential data relating to SCFIA and its clients; and compromises or failures of systems, networks, devices, or applications used by SCFIA or its vendors to support its operations.

You should understand and be willing to accept these and other types of risks before choosing to invest in securities or receive investment advisory services.

Voting Client Securities

You authorize SMA Managers, Sub-Managers, or Envestnet in writing to exercise discretion in voting or otherwise acting on all matters for which a security holder vote, consent, election, or similar action is solicited by, or with respect to, issuers of securities beneficially held as part of the Platform Assets in SMA or UMA accounts. For assets held in APM or FSP accounts, neither SCFIA nor your IAR will exercise such authority and you expressly retain the authority. You can revoke proxy voting authority at any time by providing written instruction.

Item 7 – Client Information Provided to Portfolio Managers

Information regarding your financial situation, investment objectives, risk tolerance, time horizon and other relevant factors as described by you, is gathered prior to opening an account and assists your IAR when recommending the most appropriate asset allocation model(s) and strategies for you. You should notify your IAR promptly when changes to your financial situation, objectives, or other personal information occur, so that your IAR can adjust his or her management of your portfolio, if necessary. You can impose any reasonable restrictions on the management of the account. Each client is contacted at least annually to determine if any changes have occurred that will affect the ongoing suitability of the portfolio selected and to determine if any new restrictions should be imposed on the account.

Item 8 – Client Contact with Portfolio Managers

You are generally free to contact SCFIA and your IAR at any time during normal business hours via telephone, facsimile, video conference, mail, or email. In-person meetings should be scheduled in advance to ensure that your IAR is available. SMA Managers, Sub-Managers, Model Providers, and third-party strategists are not generally available to discuss specific investment issues.

Item 9 – Additional Information

Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to the client's evaluation of SCFIA or the integrity of SCFIA's management.

On August 13, 2020, SCFIA entered into a settlement ("Order") with the Securities and Exchange Commission ("SEC"). Without admitting or denying the findings, SCFIA consented to the findings that, as a result of the conduct described below, SCFIA violated Section 206(2) of the Advisers Act, which makes it unlawful for any investment adviser, directly or indirectly, to "engage in any transaction, practice or course of business which operates as a fraud or deceit upon any client or prospective client," and Section 206(4) of the Advisers Act and Rule 206(4)-7 thereunder, which require a registered investment adviser to adopt and implement written compliance policies and procedures reasonably designed to prevent violations of the

Advisers Act and the rules thereunder.

The Order finds that the violations resulted from the following conduct of SCFIA: 1) Breaches of fiduciary duties by SCFIA in connection with its mutual fund share class selection practices and receipt of compensation pursuant to Rule 12b-1 under the Investment Company Act of 1940 (“12b-1 fees”) and revenue sharing agreements. 2) Violated its duty to seek best execution for such transactions. 3) Failed to adopt and implement written compliance policies and procedures reasonably designed to prevent violations of the Advisers Act and the rules thereunder in connection with its mutual fund share class selection practices. 4) Although eligible to do so, did not self-report to the SEC pursuant to the Division of Enforcement’s Share Class Selection Disclosure Initiative.

The Order requires SCFIA to cease and desist from committing or causing any violations and any future violations of Sections 206(2) and 206(4) of the Advisers Act and Rule 206(4)-7 promulgated thereunder; censures SCFIA; and requires SCFIA to pay disgorgement of \$544,446.34 and prejudgment interest of \$22,746.63 to compensate advisory clients who were affected by certain conduct detailed in the Order. Lastly, SCFIA will pay a civil monetary penalty in the amount of \$200,000.

SCFIA or IAR information is available on the SEC’s website at www.advisorinfo.sec.gov or www.finra.org/brokercheck. SCFIA’s CRD number is 123608.

Other Financial Industry Activities and Affiliations

SCFIA is registered as an investment adviser with the SEC. SCFIA is affiliated with SCFS, a broker-dealer and a member of the Financial Industry Regulatory Authority, Inc. (“FINRA”) and the Securities Investor Protection Corporation (“SIPC”), and SCFM, an insurance agency.

SCFIA is an indirect wholly owned subsidiary of Atria Wealth Solutions, Inc. (Atria), a privately-owned company. SCFIA has the following affiliates.

Cadaret Grant & Co., Inc.	Broker Dealer, Registered Investment Adviser, and Insurance Agency
Cadaret, Grant Agency	Insurance Agency
CFS Insurance and Technology Services, LLC	Insurance Agency
CUSO Financial Services, LP	Broker Dealer & Registered Investment Adviser
NEXT Financial Group, Inc.	Broker Dealer, Registered Investment Adviser, and Insurance Agency
NEXT Financial Insurance Services Company (NFISCO)	Insurance Agency
Ovest Insurance Services LLC	Insurance Agency
SCF Marketing, Inc.	Insurance Agency
SCF Securities, Inc.	Broker Dealer
Sorrento Pacific Financial, LLC	Broker Dealer, Registered Investment Adviser, and Insurance Agency
Western International Securities, Inc.	Broker Dealer, Registered Investment Adviser, and Insurance Agency

Conflicts of Interest with Broker-Dealer Affiliate

SCFIA is under common ownership with SCFS. SCFS introduces brokerage accounts on a fully disclosed basis to NFS. Most of our IARs are registered with SCFS as a registered representative, which allows them to perform brokerage services for you by executing securities transactions. In their capacity as registered representatives, IARs offer securities and receive commissions as a result of such transactions. There is a conflict of interest when an IAR is able to choose between offering a client fee-based programs and services (as is typical of an advisory relationship) and/or commission-based products and services (as is typical of a brokerage relationship). There is a difference in how SCFIA and/or SCFS and your IAR are compensated for advisory accounts and brokerage accounts or insurance products. While a client pays a fee to their IAR on an

advisory account based on the value of account assets and not the number of transactions, in their capacities as registered representatives, an IAR can offer securities and receive a commission, markup, or markdown on each transaction. To mitigate this conflict, we review our client accounts and transactions to ensure that we have a reasonable basis to believe the recommended services and transactions are consistent with a client's stated goals, objectives, preferences, and needs.

SCFS's registration as a broker-dealer is material to our advisory business because advisory accounts are custodied with NFS, a third-party custodian, where SCFS (our affiliate) acts in its capacity as an introducing broker-dealer. This results in additional forms of compensation to SCFS which are discussed in this brochure. See Brokerage Practices – NFS Clearing Relationship, and Client Referrals and Other Compensation – Indirect Compensation and Revenue Sharing.

Many of our IARs are also licensed insurance agents appointed with various insurance companies. An IAR can be contracted and appointed as an independent insurance agent or as an insurance agent with SCFM. Acting in the capacity of an insurance agent, IARs can sell annuities and insurance products to advisory clients and earn commissions for these transactions.

Clients are under no obligation to purchase products or services recommended by an IAR or through an IAR or otherwise through SCFIA or its affiliates. Clients are free to implement recommendations through any broker-dealer or advisory firm. If you request that an IAR recommend a broker-dealer, the IAR will recommend SCFS; however, you are under no obligation to effect transactions through us.

An IAR's Outside Business Activities

Our IARs are independent contractors and can engage in certain approved outside business activities other than providing brokerage and advisory services through SCFS and SCFIA, and in certain cases, an IAR receives more compensation, benefits, and non-cash compensation through an outside business activity than through SCFIA. Some of our IARs are accountants, real estate agents, insurance agents, tax preparers, or lawyers, and some refer clients to other service providers and receive referral fees. As an example, an IAR could provide advisory or financial planning services through an unaffiliated investment advisory firm, sell insurance through a separate business, or provide third-party administration to retirement plans through a separate firm. If an IAR provides investment services to a retirement plan as our representative and also provides administration services to the plan through a separate firm, this typically means the IAR is compensated from the plan for the two services. In addition, an IAR can sell insurance through an insurance agency not affiliated with SCFIA. In those circumstances, the IAR is subject to the policies and procedures of the third-party insurance agency related to the sale of insurance products and would have different conflicts of interest than when acting on behalf of SCFIA. When an IAR receives compensation, benefits, and non-cash compensation through the third-party insurance agency, the IAR has an incentive to recommend you purchase insurance products away from SCFIA. If you contract with an IAR for services separate or away from SCFIA, you should discuss with them any questions you have about the compensation they receive from the engagement. Additional information about a IAR's outside business activities is available on FINRA's website at brokercheck.finra.org.

Conflicts of Interest with Affiliated Insurance Agency

SCFIA is affiliated with SCFM, a licensed insurance agency. An IAR can offer through SCFM or through an independent insurance agency. When acting in the capacity of an insurance agent, IARs can effect transactions in insurance products for clients and earn commissions for these activities.

The fees paid to SCFIA for advisory services are separate and distinct from the insurance commissions

earned by SCFM and/or its insurance agents. You are under no obligation to use SCFM or its insurance agents for insurance services and can use the insurance firm and agent of your choosing.

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

SCFIA expects its employees and IARs to maintain high standards of ethical and business conduct. SCFIA is dedicated to supporting an ethical culture. Because of the high importance that SCFIA places on ethical conduct, SCFIA has adopted a Code of Ethics that all IARs and other supervised persons of SCFIA are expected to adhere to. This Code of Ethics reflects SCFIA and its IARs' fiduciary obligations and requires, among other things, compliance with applicable federal and other securities laws. SCFIA's Code of Ethics also establishes standards for its IARs' personal securities transactions and prohibits the use of material non-public information. A copy of

SCFIA's complete Code of Ethics may be obtained from your IAR upon request by Clients or prospective Clients.

SCFIA does not act as a principal in any fee-based account for which it is also an investment advisor. SCFIA is not a market maker in any security, nor does SCFIA carry positions in securities for resale. SCFIA does not hold any client funds or securities.

SCFIA or IARs may invest in securities identical to those recommended to clients for their personal accounts but may do so only after trades have been placed for clients. In addition, any related person(s) may have a pre-existing interest or position in securities that may be recommended to a client. It is the expressed policy of SCFIA that IARs and other associated persons may not purchase or sell any security for their own account immediately prior to a transaction being implemented in the same or related security for an advisory account.

SCFIA or IARs may buy or sell securities identical to those recommended to clients for their personal accounts but may do so only after trades have been placed for clients. In addition, any related person(s) may have a pre-existing interest or position in securities that may be recommended to a client. It is the expressed policy of SCFIA that IARs and other associated persons may not purchase or sell any security for their own account immediately prior to a transaction being implemented in the same or related security for an advisory account.

SCFIA, its IARs, or its affiliates receive, directly or indirectly, payments including 12b-1 fees, incentives, gifts or other compensation in conjunction with the implementation of investment advice given to clients. Disclosure is required for such compensation received by SCFIA, its IAR's, control persons or affiliates, related to client purchases and the payment of referral fees as the payments constitute a conflict of interest when investment recommendation are made to clients where a lower cost non 12b-1 fee paying share class of the same investment class is available but not recommended. As previously mentioned, SCFIA mitigates conflicts related to 12b-1 fees by rebating the fee back to the client account. However, we cannot guarantee that any transaction effected will result in the lowest overall cost or 12b-1 fee.

The Firm and its affiliates will not be responsible for reviewing existing account holdings and positions that are transferred or deposited from other financial institutions to determine if a lower cost share class alternative of the same investment is available to the client following the transfer. The Firm makes no guarantee that any transaction effected will result in the lowest overall cost or 12b-1 fee.

When appropriate, IARs may recommend an illiquid or limited liquidity product to clients. These are commonly known and referred to as "alternative investments" and may include Real Estate Investment Trusts, Business Development Companies, Hedge Funds, Private Equity Funds, Partnerships, Interval Funds,

and non-traded preferred stocks. Product fees and liquidity provisions will be detailed in the product's prospectus or offering documents. Because advisory accounts are typically subject to ongoing investment advisory or management fees, the cost of owning illiquid assets in an advisory account may be greater than if the same asset were purchased on a commission basis in a non-advisory account. Additionally, SCFIA, SCFS, and IAR may receive more overall compensation in certain instances.

Brokerage Practices

SCFIA has no brokerage soft dollar arrangements and receives no benefits or research in exchange for executions.

Contour accounts are custodied with an unaffiliated custodian designated by a client. Custodial options in Contour include, but are not limited to, NFS, PAS, TD Ameritrade, Schwab, and IWS.

In the AMP and FSP, you authorize us to direct all transactions through a designated broker-dealer. You cannot request that your orders be executed through another broker-dealer. When directing execution of all transactions through a particular broker-dealer, there is no assurance that most favorable execution will be obtained, which could cost you more money. Not all advisers require clients to direct transaction executions to specified broker-dealers, as we do. This creates a conflict of interest for accounts custodied at NFS because of the economic benefits SCFS receives. We periodically review the execution quality of available broker-dealers to confirm that the quality we receive is comparable to what could be obtained through other qualified broker-dealers.

For accounts held at the custodians, WIS relies in part on the custodian's review of execution quality, the details of which are made available to us for our review. In addition, to assist in evaluating the quality of equity executions, WIS engages the services of a third-party consultant who monitors equity executions for quality and helps us identify transactions that are eligible for price improvement.

In SMA and UMA, SMA Managers, Sub-Managers, or Envestnet, as Overlay Manager, can elect to execute trades at broker-dealers other than Custodian for some or all of their transactions or investment styles. This is frequently referred to as "trading away" or "step out trades." Clients who select such managers in the SMA or UMA will be subject to transaction charges or other charges, including commissions, mark-ups, mark-downs, or other additional trading costs that can be imposed by the executing broker-dealer. You should refer to the applicable SMA Manager's, Sub-Manager's, or Envestnet's Form ADV Part 2A for additional information.

Certain Contour accounts are managed based on model portfolio strategies. One or more clients can have the same model portfolio, based on their investment objective and risk profile. We typically aggregate orders into block trades when models are rebalanced or if one or more securities are added or removed from a model. Transactions can, however, be executed independent of transactions for other clients. An IAR must reasonably believe that a block order is consistent with SCFIA's duty to seek best execution and will benefit each client participating in the aggregated order.

When we aggregate orders, we do so in a manner reasonably designed to ensure that no participating client obtains a more favorable execution price than another. Transactions are typically aggregated pro rata to the participating client accounts in proportion to the size of the order placed for each account. If we are unable to fully execute an aggregated order and we determine that it would be impractical to allocate a smaller number of securities among the participating accounts on a pro rata basis, we will seek to allocate the securities in a manner that does not disadvantage particular client accounts.

NFS Clearing Relationship

NFS is the clearing firm for, our affiliate broker-dealer, SCFS's brokerage business and is also a custodial option for Contour accounts.

NFS charges SCFS for certain account services for accounts custodied with NFS (including advisory accounts), including clearing and executing transactions, outgoing transfers, wired funds, direct registration of securities, paper statements and confirms, margin extensions, ticket charges, and IRA custodial maintenance and termination. SCFS sets its own price for its services, which are designed to cover its costs of doing business (including overhead and other costs) as well as provide for a profit to SCFS. SCFS charges clients more for certain services than it pays NFS, which is sometimes called a "markup," and the markups vary by product and the type of service and can be substantial. SCFS keeps the difference between the fees and charges our clients pay and the amount paid to NFS to cover the costs associated with processing transactions and providing other services.

The economic arrangements between SCFS and NFS (including the fees charged by NFS) can be renegotiated and change from time to time, including in circumstances where SCFS realizes net savings or increased profits from the changed arrangements and SCFS does pass on any net savings or increased profits in the form of reduced fees and charges to clients. This practice creates a conflict of interest for us since we have a financial incentive to recommend NFS since we receive substantial compensation for the services we provide. IARs do not receive a portion of these fees.

SCFS's clearing relationship with NFS provides us with certain economic benefits and compensation by using SCFS as the broker-dealer for our advisory programs that would not be received if we used an unaffiliated, third-party broker-dealer for our advisory programs. For example, we add a markup to certain other brokerage-related account charges and fees that are assessed to all client accounts at NFS. The additional compensation we receive creates a significant conflict of interest with our clients because we have a substantial economic incentive to use NFS as the clearing firm for trade execution and custody over other firms that do not share compensation with us. The revenue and compensation we receive from NFS is related to both advisory and brokerage accounts custodied on the NFS platform. Our IARs do not receive any portion of this compensation.

For assets in the Contour program, SCFS pays a recurring fee to NFS based on a percentage of the aggregate assets invested by advisory clients, excluding certain investments, such as alternative investments. When the assets in the Contour program custodied at NFS increase, the fee we pay decreases. This creates a conflict of interest for SCFIA as we have an incentive to recommend advisory clients use NFS as a custodian over other custodians and to recommend that you increase the amount you have invested in your Contour account.

NFS pays or shares with SCFS and/or SCFIA the following items:

- For accounts in custody with NFS with cash balances automatically transferred (swept) into the Bank Deposit Sweep Program (BDSP) or Bank Deposit Sweep Program FDIC Eligible (SPFEQ), a portion of the fees paid by each participating bank receiving swept funds (each a "Program Bank") equal to a percentage of the average daily deposits at the Program Banks. The combined fee paid to SCFS and NFS will not exceed more than a maximum of the Federal Funds Target Rate plus 0.25% as determined by the total deposit balances at all of the Program Banks over a 12-month rolling period. SCFS sets the amount of the fee it charges and retains, which may exceed the amount of interest paid to clients;
- For IRA accounts in custody with NFS with cash balances automatically transferred (swept) into the

Insured Sweep Program (ISP), a level monthly fee for each IRA that participates in the ISP program. The amount of this fee is determined based on a fee schedule indexed to the Federal Fund Target Rate published by the Federal Reserve System as detailed in the NFS Sweep Program Disclosure Document and SCFS Sweep Program General Terms and Conditions at scfsecurities.com/disclosures. The per account monthly fee will be no less than \$0.25 and no more than \$43.25. It is generally anticipated that the fee SCFS charges will be offset by the total amounts paid to SCFS by Program Banks. If SCFS does not receive sufficient payments each month from Program Banks, SCFS reserves the right to debit each IRA account for the amount of any shortfall;

- For brokerage accounts in custody with NFS that have not been converted to either the Bank Deposit Sweep Program (BDSP), Bank Deposit Sweep Program FDIC Eligible (SPFEQ), or Insured Sweep Program (ISP), a portion of the revenue NFS receives from uninvested client cash balances in such accounts automatically swept into money market funds and FDIC insured bank deposit products of up to 0.50% of the value of cash balances. These payments vary based on the bank deposit account or money market fund a client has selected;
- For brokerage accounts in custody with NFS where a client has elected to opt out of the automatic sweep programs described above, interest and income revenue on free credit balances. For ERISA advisory accounts where SCFS receives revenue, it donates the revenue to charity;
- Transition assistance in the form of (a) reimbursement of IRA termination fees for retirement accounts transferred to NFS, and reimbursement of account transfer fees for other retail accounts transferred to NFS, (b) a payment based on the value of the assets transitioned, or (c) some combination of fee reimbursements and a payment on the value of assets transitioned;
- A growth assistance credit to support, service, and grow brokerage assets on the NFS platform;
- A portion of certain brokerage account services and custodial fees charged to client accounts that exceeds the amount that SCFS is required to pay NFS for such services, including account transfer fees, IRA custodial and termination fees, paper confirm and statement fees, inactive (custodial) account fees, retirement account maintenance fees, and margin interest and/or fees; and
- A portion of shareholder servicing fees from certain mutual fund sponsors as part of their no transaction fee mutual fund program as described below.

NFS offers our affiliate broker-dealer SCFS access to its No Transaction Fee Program (“NTF Program”). As part of the NTF Program, NFS waives transaction fees it and SCFS would otherwise charge for purchases of certain mutual funds available on its platform. NFS shares certain revenues it receives from these NTF Program mutual funds with SCFS based on aggregate client balances invested in mutual funds subject to the NTF Program. The level of revenue sharing increases as client balances in the NTF program funds increases. These revenue sharing payments create a financial incentive for SCFIA to favor and recommend mutual funds in the NTF Program over other investments when providing investment advice to clients which creates a conflict of interest. Mutual funds in the NTF Program generally contain higher internal fees and expenses than other share classes of the same mutual fund that is not part of the NTF Program.

Account custodians will charge interest to Client for Client’s use of margin. For accounts using margin that are held and cleared through NFS, NFS will credit SCFIA’s affiliate broker-dealer SCFS with 100% of margin interest Clients pay in excess of NFS’ base lending rate plus 50 basis points. Clients will be charged on their margin debits as defined in NFS’ Customer Disclosure of Credit Terms on Transactions. SCFIA does not offset Client advisory fees by this additional compensation received by its affiliate SCFS. SCFIA manages this

conflict by not requiring or recommending the use of any particular custodian for accounts.

Margin Accounts

Account custodians will charge interest to Client for Client's use of margin. For accounts using margin that are held and cleared through NFS, NFS will credit SCFIA's affiliate broker-dealer SCFS with 100% of margin interest Clients pay in excess of NFS' base lending rate plus 50 basis points. Clients will be charged on their margin debits as defined in NFS' Customer Disclosure of Credit Terms on Transactions. SCFIA does not offset Client advisory fees by this additional compensation received by its affiliate SCFS. SCFIA manages this conflict by not requiring or recommending the use of any particular custodian for accounts.

Securities Lending

We offer NFS's Fully Paid Securities Lending program, which enables qualified clients to lend fully paid - for securities to NFS. NFS earns revenue from lending these securities and a portion of that revenue is shared with you, SCFS and your IAR. SCFS and your IAR share in 43% of the revenue received. The receipt of this extra compensation creates a conflict in certain advisory programs in which your IAR acts as the portfolio manager. The conflict surrounds whether this extra compensation would cause your IAR to hold a security in your account that would have otherwise been liquidated but not for receipt of additional compensation. This conflict is mitigated by our requirement that investment decisions made by your IAR must be in your best interest, as well as the fact that if an account holds these positions, your IAR's compensation will increase nominally, but the security will also generate income for your account. Not all accounts or clients qualify for this program.

Cash Sweep Options

All advisory accounts have a cash deposit sweep vehicle ("Vehicle") which is used to hold uninvested cash balances. SCFIA's affiliate SCFS, through NFS, offers a cash sweep program to automatically move (sweep) uninvested cash balances held in brokerage accounts into either an interest-bearing Federal Deposit Insurance Corporation ("FDIC") insured deposit account through an insured bank deposit program or a money market mutual fund, depending on the account type. Generally, each account is eligible for a single sweep product chosen specifically for that account type. The primary core account investment vehicle available to accountholders: (a) for available cash balances held in retail brokerage accounts (including IRAs) and investment advisory accounts (non-retirement) is the Bank Deposit Sweep Program ("BDSP"); (b) for cash balances held in advisory individual retirement accounts ("Advisory IRA") is the Insured Sweep Program ("ISP"); (c) for cash balances held in business advisory or brokerage accounts is the Bank Deposit Sweep Program FDIC Eligible ("SPFEQ"); and (d) for cash balances held in ERISA Title I accounts is the Fidelity Government Cash Reserve ("FDRXX") money market mutual fund.

For deposit accounts in the BDSP and SPFEQ programs, SCFS and NFS receive a fee from each participating bank receiving swept funds (each a "Program Bank") equal to a percentage of the average daily deposits at the Program Banks. Amounts vary, but in no event will the total fees be more than a maximum of the Federal Funds Target Rate plus 0.25% as determined by the total deposit balances at all of the program banks over a 12-month rolling period. SCFS has discretion to reduce all or a portion of its fee and reserves the right to modify the fees it receives from Program Banks.

SCFS receives a level monthly fee for each Advisory IRA that participates in the ISP. The amount of this fee is determined based on a fee schedule indexed to the Federal Fund Target Rate published by the Federal Reserve System. The per account monthly fee will be no less than \$0.25 and no more than \$43.25. It is

generally anticipated that the fee we charge will be offset by the total amounts paid to us by the Program Banks. If SCFS does not receive sufficient payments each month from the Program Banks, we reserve the right to debit your Advisory IRA account for the amount of any shortfall.

Your deposits at each Program Bank are limited to \$246,500, or \$493,000 for a joint account (98.5% of the deposit insurance limit). Once this amount is reached at each Program Bank, any additional cash will be deposited in an Excess Deposit Bank. If cash deposits in all the Program Banks and the Excess Deposit Bank reach the maximum amount of FDIC insurance coverage of \$2.5 million for an individual account or \$5 million for joint accounts, any balance that cannot be placed or maintained at Program Banks will be swept into a Fidelity money market mutual fund and will not be covered by FDIC insurance.

For additional information on the BDSP, SPFEQ, and ISP programs, please see the disclosure statement and terms and conditions booklets available on scfsecurities.com/disclosures.

The FDRXX money market mutual fund is eligible for protection by the Securities Investor Protection Corporation ("SIPC"). SIPC does not protect against the rise and fall in the value of investments.

You may elect to turn off (i.e., opt out of) the automatic sweep feature by contacting your IAR. If you opt out, any cash balances in your account will remain as free credit balances and will not earn interest or be eligible for FDIC insurance but will remain eligible for SIPC coverage if maintained for the purpose of purchasing securities.

Depending on interest rates and other market factors, the yields on the BDSP, SPFEQ, and ISP will be higher or lower than the aggregate fees received by SCFS for your participation in the sweep programs. When yields are lower, this results in a negative overall return with respect to cash balances in a sweep program. Interest rates applicable to BDSP, SPFEQ, and ISP are often lower than the interest rates available if you were to make deposits directly with a bank or other depository institution outside of NFS's brokerage platform or invest in a money market mutual fund or other cash equivalent.

SCFS receives more revenue when cash is swept into BDSP, SPFEQ, and ISP than if your cash was invested in other products, including money market mutual funds. Therefore, SCFIA and SCFS have an incentive to place and maintain your assets in the BDSP, SPFEQ, and ISP programs to earn more income, which creates a conflict of interest. A further conflict of interest arises as a result of the financial incentive for SCFIA and SCFS to recommend and offer the BDSP and SPFEQ due to SCFS's control of certain functions. SCFS sets the amount of the fee it receives for the BDSP and SPFEQ, which generates additional compensation for SCFS. The compensation SCFS receives for BDSP, SPFEQ, and ISP is in addition to any remuneration SCFS, SCFIA and your IAR receive in connection with other transactions executed within your account for which advisory fees or other charges apply. We mitigate these types of conflicts by ensuring that your IAR does not receive any compensation from these sweep payments, and by maintaining policies and procedures to ensure that any recommendations made to you are in your best interest. You should compare the terms, interest rates, required minimum amounts, and other features of the sweep program with other types of accounts and investments for cash. The sweep products have limited purpose and are not meant as a long-term investment or a cash alternative.

The BDSP, SPFEQ, and ISP programs are available only to clients of broker-dealers such as SCFS that clear through NFS. NFS is wholly owned by Fidelity Global Brokerage Group, Inc. and is affiliated with Leader Bank, N.A., which participates as a Program Bank in BDSP, SPFEQ, and ISP, and Fidelity Management & Research Company LLC, the investment manager of the Fidelity money market mutual fund made available to accounts not eligible for BDSP, SPFEQ, or ISP.

Review of Accounts

IARs review Client accounts on an ongoing basis to provide management services. IARs review monthly or quarterly accounts statements provided by the custodian. In addition, SCFIA reviews accounts using risk-based criteria such as performance, trading activity, and concentration. SCFIA compliance department supervisors review a sample of accounts on at least a quarterly basis.

SCFIA or IAR may review Client account on other than a periodic basis due to factors such as material market, economic or political events, changes in financial or personal situation, performance of the account in general or Client inquiry. Additionally, compliance department supervisors may periodically review accounts to identify situations that may call for a more detailed review or specific action to be taken on the account.

Custodian written account reports and statements include, but not limited to, performance, transactions, balances, and any other content that the custodian constitute as relevant to the account. These written account reports and statements are provided monthly and/or at least quarterly to Client.

Client Referrals and Other Compensation

IAR Compensation

Your IAR receives compensation from SCFIA. SCFIA compensates our IARs pursuant to an independent contractor agreement, and not as an employee. This compensation includes a portion of the advisory fee, which may be more or less than what your IAR would receive at another advisory firm. An IAR who earns over a threshold amount is eligible for a percentage payout increase, which is not retroactive. In addition, we offer financial incentives, in the form of cash bonuses or compensatory loans, to reward IARs for increasing their assets under management or annual revenue. Certain IARs are employed by another financial professional who pays them a salary or bonus for their services. When compensation is based on the level of production or assets, an IAR has a financial incentive to meet those production or asset levels.

In some cases, we pay a portion of a IAR's compensation to the IAR's designated supervisor or another financial professional for supervision and/or administrative or sales support. There is a conflict of interest because the compensation affects the designated supervisor's ability to provide objective supervision of the IAR. SCFIA and our designated supervisors have an obligation to supervise IARs and may decide to terminate an IAR's association with SCFIA based on performance, a disciplinary event, or other factors. The amount of revenue generated by an IAR creates a conflict of interest when considering whether to terminate an IAR.

Other Benefits

IARs that meet internal criteria (which includes, but is not limited to, revenue generated from sales of products and services) are eligible to receive other benefits pursuant to special incentive programs. These benefits present a conflict of interest because an IAR has an incentive to recommend investment products and services in general and to remain with SCFIA to maintain these benefits. These benefits include eligibility for practice management support and enhanced service support levels that confer a variety of benefits, conferences (e.g., for education, networking, training, and personal and professional development), and other non-cash compensation. These benefits also include free or reduced cost marketing materials, reimbursement or credits of fees that IARs pay to SCFIA for items such as administrative services or technology, and payments that can be in the form of repayable or compensatory loans (e.g., for retention purposes or to assist

an IAR grow his or her advisory practice). If we make a loan to a new or current IAR, there is also a conflict of interest because SCFIA's interest in collecting on the loan affects our ability to objectively supervise the IAR.

Recruitment Compensation and Operational Assistance

When an IAR associates with SCFIA after working with another financial services firm, the IAR can receive recruitment compensation from SCFIA in connection with the transition. This transition assistance includes payments that are intended to assist an IAR with costs associated with the transition; however, we do not verify that any payments made are used for transition costs. These payments can be in the form of repayable or compensatory loans, and are subject to favorable interest rate terms, as compared to other lenders. In the case of compensatory loans, the loans are subject to repayment if an IAR leaves SCFIA before a certain period of time or if other conditions are not met and can include a requirement to maintain a certain level or revenue or assets serviced. Funds advanced by SCFIA to an IAR under a compensatory loan are not taxable to the IAR when received but represent taxable income as the principal and interest is forgiven by SCFIA or the IAR is paid additional compensation to cover the principal and interest on the note.

Transition assistance payments can be used for a variety of purposes such as providing working capital to assist in funding an IAR's business, offsetting account transfer fees payable to the custodian as a result of the clients transitioning to SCFIA's platforms, technology set-up fees, marketing, mailing and stationery costs, registration and licensing fees, moving and office space expenses, staffing support, and termination fees associated with moving accounts.

The amount of recruitment compensation is often significant in relation to the overall revenue earned or compensation received by an IAR at his or her prior firm. Such recruitment compensation is typically based on a percentage of the IAR's business established at their prior firm, for example, a percentage of the revenue earned, or assets serviced at the prior firm, or on the size of the assets that transition to SCFIA.

Growth Incentives

SCFIA provides financial incentives to reward IARs for increasing their assets under management or annual production by specific amounts in the form of cash bonuses or compensatory loans that are subject to repayment if an IAR leaves SCFIA before a certain period of time or if other conditions are not met and can include a requirement to maintain a certain level or production or assets under management.

Conflicts of Interest

Providing compensation to IARs for moving assets to SCFIA or increasing their assets under management or revenue creates a conflict of interest in that an IAR has a financial incentive to recommend switching investment products or services where a client's current investment options are not available through SCFIA, in order to receive the benefit or payment. SCFIA and our IARs attempt to mitigate these conflicts of interest by assessing and recommending that clients use SCFIA's services based on the benefits that such services provide to clients, rather than the recruitment compensation earned by an IAR. However, you should be aware of this conflict and take it into consideration in deciding whether to establish or maintain a relationship with SCFIA and your IAR.

Other Firm Compensation

As discussed below and elsewhere in this brochure, SCFS and/or SCFIA receives compensation, which can be substantial, from various parties in connection with providing services to clients. In many cases, this compensation is in addition to any advisory fees that clients pay and is not passed on or credited to clients

unless otherwise noted. When evaluating the reasonability of SCFS and/or SCFIA's fees, a client should not consider just the advisory fees SCFIA charges, but also the other compensation SCFS and/or SCFIA receives.

Indirect Compensation and Revenue Sharing

SCFIA and/or SCFS receives compensation and/or fees (also referred to as revenue sharing or marketing support) from certain mutual fund sponsors (including money market funds), insurance (fixed and variable product) issuers, UIT, ETF, alternative investments, and structured product sponsors, and unaffiliated investment advisers that sponsor, manage, and/or promote the sale of certain products that are available to our clients. Product sponsors and third-party money managers ("Partners") pay this compensation to SCFIA and/or SCFS in what we call our Partners Program.

Partners pay different amounts of revenue sharing and receive different levels of benefits for their payments. These payments can be substantial and, as such, create a conflict of interest for SCFIA and/or SCFS because the payments constitute additional revenue to SCFIA and/or SCFS and can influence the selection of investments and services SCFIA and/or SCFS and/or our IARs offer or recommend to clients. SCFIA and/or SCFS seeks to mitigate this conflict of interest by not sharing revenue sharing payments with our IARs. An IAR's compensation is the same regardless of whether a sale involves a Partners Program product or service. In some cases, Partners pay additional marketing payments to SCFIA and/or SCFS to cover fees to attend conferences or reimburse expenses for workshops or seminars. The payments made under the Partners Program are based either on gross sales or assets under management, or on a flat fee arrangement, and vary by Partner. When Partners pay a flat fee (or marketing allowance) it is negotiated annually. This payment assists with costs related to education, training, conference attendance, reimbursement for workshops or seminars and marketing materials for our IARs. We do not share any marketing allowance with our IARs.

The benefits Partners receive include IAR contact lists, business metrics, preferred placement on our website, participation in product training initiatives and marketing and sales campaigns, and the ability to participate in our conferences.

We use the revenue from our Partners to support certain marketing, training, and educational initiatives including our conferences and events. The conferences and events provide a venue to communicate new products and services to our registered representatives and IARs, to offer training to them and their support staff, and keep them abreast of regulatory requirements. The revenue is also used to pay for annual awards for our registered representatives and IARs who generate the most revenue overall and to pay for our general marketing expenses. A SCFS registered representative or an SCFIA IAR who earns total compensation over a threshold amount receives an award, in the form of a trophy, medal, or plaque, and is invited to attend our top producer conference. Revenue from the Partners helps to pay for the top producer conference costs. Top producing SCFS registered representatives and SCFIA IARs receive an award based on total revenues, including but not limited to sales of Partner's mutual funds, annuities, structured products, and ETFs.

We prepare and make available to our IARs a quarterly list of Partners' mutual funds and ETFs that have been screened for investment performance against other Partners' funds with similar objectives and asset classes (the "Select Fund List" or "List"). SCFIA and our IARs have a conflict of interest when an IAR chooses or recommends an investment from the Select Fund List for your portfolio because SCFIA and/or SCFS receives payments from the mutual fund or ETF sponsor. Our receipt of such payments influences our selection of mutual funds and ETFs, as our IARs are likely to recommend a fund or ETF whose sponsor pays us revenue sharing fees over a fund or ETF whose sponsor does not pay us.

You do not pay more to purchase funds from the List through SCFS than you would pay to purchase these funds through another broker-dealer, and your IAR does not receive additional compensation for selecting a fund from the List. IARs are not required to choose or recommend investments from the Select Fund List.

SCFIA and/or SCFS also receives compensation from certain TPIAs to assist in paying for ongoing marketing and sales support activities including training, educational meetings, due diligence reviews, and day-to-day marketing and/or promotional activities. Not all TPIAs pay such compensation and participating TPIAs change over time.

The compensation arrangements vary and are generally structured as a fixed dollar amount or as a percentage of sales or assets under management with the adviser.

A conflict of interest exists where SCFIA receives such compensation because there is an incentive to recommend these TPIAs over other investment advisers to generate additional revenue for the firm. However, our IARs are not required to recommend any TPIA providing additional compensation, nor do they directly share in any of this compensation.

Our IARs receive additional compensation from product sponsors. However, such compensation is not tied to the sales of any products. Compensation includes such items as gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational meetings or marketing or advertising initiatives, including services for identifying prospects. Product sponsors sometimes pay for or reimburse us for the costs associated with education or training events that are attended by our IARs and for our sponsored conferences and events. We also receive reimbursement from product sponsors for technology-related costs associated with investment proposal tools they make available to our IARs for use with clients. Therefore, a conflict of interest exists to the extent their products may be approved by SCFIA or its affiliates and recommended to clients.

To see our Third-Party Fee Disclosure, which identifies the participants in the Partners Program along with revenue sharing arrangements by product type, please visit the Disclosure section of our website at scfsecurities.com/disclosures.

Solicitation Activities

From time to time, SCFIA enters into solicitation agreements with individuals or entities whereby investment advisory accounts are solicited by SCFIA and referred to another state-registered or SEC-registered investment adviser. In these situations, we are compensated for the referral activity.

SCFIA also has solicitation arrangements with persons or entities who are not our IARs. If a solicitor will receive any portion of the advisory fee paid by the client, the client will receive a written disclosure statement describing the arrangement between SCFIA and the solicitor, including the compensation to be received by the solicitor from SCFIA.

Custody

SCFIA does not have any arrangements whereby it accepts or holds client funds or securities. SCFIA has existing relationships with several Qualified Custodians that are solely responsible for accepting and holding all client funds and securities.

However, SCFIA is deemed to have custody of client assets by virtue of standing authorization to deduct

advisory fees from client accounts pursuant to a written, executed agreement between SCFIA, its IAR, and Client. SCFIA is also deemed to have custody of client assets by allowing clients to maintain certain first, and third-party standing letters of authorization for client funds and/or securities movement.

SCFIA intends to comply with SEC no-action relief conditions, thereby exempting it from an annual surprise audit. Qualified Custodians assist SCFIA in its compliance with the SEC no-action relief conditions by performing appropriate verification of client cashiering instructions. All cashiering requests and standing instructions must be provided and authorized by the client in writing. Client maintains the ability to terminate or change any instruction given. SCFIA, its IARs, and associates have no authority or ability to designate or otherwise change any portion of the client's request. All changes must be made by the client in writing via a signed request.

Client's qualified custodian will send the client in writing, an initial notice confirming instructions received, and an annual notice reconfirming the instruction. SCFIA will maintain records showing that the contra-party to any cashiering request is not a related party of SCFIA, or located at the same address of SCFIA, or any of its affiliates or IARs.

Financial Information

SCFIA is not required to include a balance sheet in this Brochure because we do not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance.

There is no financial condition that is reasonably likely to impair SCFIA's ability to meet its contractual commitments to its clients. SCFIA has never been the subject of a bankruptcy proceeding.