



E6 Portfolios

Wrap Fee Program Brochure

Investment Strategists

(Form ADV Part 2A, Wrap)
08 December, 2023

This brochure provides information about e6 Portfolios' qualifications and business practices. If you have questions about the brochure, please contact us at hello@e6portfolios.com.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Registration as an investment advisor does not imply a certain level of skill or training. Provision of this brochure does not relieve e6 Portfolios of any other disclosure obligations the firm may have under federal or state law. Additional information about e6 Portfolios is available by searching the SEC website at www.adviserinfo.sec.gov by firm name or CRD number (#326617).

6900 S. 900 E. Suite 200, Midvale, UT 84047
hello@e6portfolios.com | 801-545-8706

ITEM 2 – MATERIAL CHANGES

Initial Brochure: This is the first version of the e6 Portfolios Investment Strategists Wrap Brochure so there are no material changes to disclose.

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ITEM 4 – SERVICES, FEES, AND COMPENSATION

Wrap Fee Program

e6 Portfolios, LLC was founded on April 18, 2023 and registered as an RIA on July 13, 2023. The firm is organized as a Limited Liability Company in the state of Utah and is wholly owned by e6 Holding, LLC.

As of November 17, 2023, e6 Portfolios managed \$0 in discretionary assets and \$0 in non-discretionary assets through its Wrap Fee Program.

e6 Portfolios, LLC participates in and sponsors two separate but related Wrap Fee Programs. Wrap fee programs offer clients investment management as well as transaction and clearing services for one inclusive fee. e6 Portfolios Wrap Fee Programs require clients to grant the firm trading discretion over the accounts under management.

e6 Portfolios Investment Strategists Service

e6 Portfolios offers two interdependent Wrap Fee Programs.

The first wrap program, described in a separate brochure, offers Separately Managed Accounts (SMA), Separately Managed Portfolios (SMP), and Unified Managed Portfolio (UMP) services.

The second wrap program, described in this brochure, builds, maintains, and implements securities models for use in Client accounts. These models are called Investment Strategists. Clients can use these models alone or in combination to deliver a balance of risk and opportunity that corresponds to their investment objectives and risk tolerance ranging from very conservative (including cash management) to very aggressive.

Clients must select and use both one of the SMA, SMP, or UMP offerings and one or more of the Investment Strategists described in this brochure. More than one Investment Strategist may not be used in a single account.

e6 Portfolios offers only investment management services. Investment advisory services (sometimes called “Wealth Management”) are not included in e6 Portfolio offerings. Clients may want to receive Wealth Management services and may engage a Registered Investment Advisory firm other than e6 Portfolios for these services. e6 Portfolios will work with third-party Investment Advisors and all the offerings described in this brochure allow the Client to authorize a third-party Investment Advisor to communicate instructions to e6 Portfolios on their behalf. However, not all e6 Portfolios Strategists are available to all third-party advisors and e6 Portfolios reserves the right to vet and elect not to work with any third-party Advisor at its sole discretion.

Clients may work with their third-party advisor to determine an appropriate level of risk for their investments and authorize their advisor to communicate that risk profile to e6 Portfolios



along with their selection of one or more Investment Strategists. Clients who work directly with e6 Portfolios must complete a Risk Profile with the firm and select one or more Investment Strategists. Client may select a Strategist in their initial advisory agreement or by communicating their election to e6 Portfolios directly in writing. The client may also change their investment election or update their risk profile at any time in writing.

e6 Portfolios also provides investment management services to qualified plan sponsors and participants, including acting as a 3(21) or 3(38) fiduciary depending on the needs of the plan. For these engagements, e6 Portfolios works with the plan sponsor and third-party administrator to select a menu of appropriate investments from which plan participants can choose.

e6 Portfolios provides ongoing oversight to client portfolios. An investment committee reviews e6 Portfolios model portfolios to assess performance and determine the best investments to use to meet the portfolios' goals. In some cases, e6 Portfolios personnel directly manage client assets in the e6 Portfolios Investment Strategists. In other cases, e6 Portfolios uses tools offered by Qualified Custodians to automate the implementation of the Investment Strategists. The investment team reviews client accounts on an ongoing basis to ensure the portfolio conforms to model targets, ensure automated investment programs are operating as expected, invest and raise cash in the account as needed, identify tax gain/loss opportunities, determine whether rebalancing is necessary, and then set up and execute any needed trades.

e6 Portfolios relies on the specific capabilities of the qualified custodians used by clients to implement its Strategist offerings. As a result, not all Strategists are available at every custodian. See Brokerage Practices in this section below for more on how e6 Portfolios selects Qualified Custodians to work with.

Wrap Program Fees

e6 Portfolios offers its Investment Management services at the following rates:

Strategist Family	AUM Fee	Wrap Program Availability		
		SMA	SMP	UMP
E6 Cash Reserve	0.00%	X		
E6 Special Needs	0.00%		X	
Educational Savings Plans	0.00%	X		
E6 Efficient Markets	0.28%	X	X	X
E6 Signature	0.38%	X	X	X
Vanguard	0.12%	X		
DFA	0.15%	X		
American Funds	0.22%	X		

Morningstar	0.35%	X	
Blackrock	0.35%	X	
JP Morgan	0.38%	X	
Individual Securities	0.40%	X	
E6 Specialized	0.58%	X	
Insurance	0.20%		X

Pricing for qualified plans is determined based on the specific services needed and is communicated to the plan prior to enrollment.

Fee Calculation and Manner of Payment

Fees are deducted from client accounts monthly in arrears and are calculated based on the average daily balance of the account during the month. Advisory fees are not collected in advance. The client's agreements with e6 Portfolios and with their qualified custodian provide authorization to deduct management fees from the client's account directly and remit that fee to the firm. e6 Portfolios will send a bill to the qualified custodian indicating the amount of the fee to be paid. The custodian will send a statement to the client, at least quarterly, indicating the fee dispersed. Each time the fee is assessed, e6 Portfolios will make a statement available to the client showing the amount of the fee and how the fee was calculated. e6 Portfolios will disclose to clients their responsibility to verify the accuracy of the fee calculation.

The e6 Portfolios Wrap Fee program bears the cost of all transactions that take place in the client account, including trading commissions, mutual fund ticket charges, clearance, and any other transaction costs. Because e6 Portfolios bears transaction costs, the firm may have a financial incentive to trade less frequently in Wrap Fee Program accounts than would be beneficial to the client. Similarly, many custodians offer non-transaction fee funds or do not charge commissions on ETF or equity trades. e6 Portfolios has an incentive to purchase these investments for the client rather than investments that have a trading cost.

e6 Portfolios believes that its Wrap Fee Program fees are reasonable but the firm's fees may be more than the cost of purchasing comparable services separately or through other advisors. Relative cost would depend on many factors including the cost of each service if provided separately, the comparative volume of trading, value provided, and the cost of trading.

Clients bear the cost of management fees and other expenses imposed directly by mutual funds or exchange traded funds held by the client; spreads paid to market makers; and any account maintenance fees agreed to with the Custodian such as custodial, account, or wire fees.

e6 Portfolio fees are not negotiable but in some cases preexisting fee schedules may be grandfathered in. Fees are waived for Employees and affiliates.

Because e6 Portfolios uses a related-person manager, all fees charged, net of expenses, are paid to the portfolio managers.

Individuals recommending the wrap fee program do not receive additional compensation as a result of the client's participation in the program.

Margin Costs

The custodians recommended by e6 Portfolios may make margin borrowing available to clients. e6 Portfolios does not recommend margin borrowing and does not incorporate margin exposure into its strategies, however, e6 Portfolios may facilitate margin borrowing at the client's request. Margin borrowing incurs interest and other costs to the client that vary by custodian and as interest rates change. e6 Portfolios does not bill on margin balances and does not receive revenue from custodians related to margin borrowing and therefore has no incentive to recommend margin.

Investment Discretion

e6 Portfolios clients grant the firm discretionary trading authority in the account(s) so that the firm can implement the agreed-upon Investment Strategist(s). Discretion includes the authority to make all decisions to investigate, buy, sell, or hold securities, cash, or other publicly traded investments on behalf of the client at e6 Portfolios' sole discretion and without first consulting the client. In their agreements with the qualified custodian, the client authorizes the custodian to follow e6 Portfolios' instructions concerning trading and other investment activity in the account on behalf of the client.

In cases where a client grants discretion, accounts that a client places under e6 Portfolios' management will be liquidated and the proceeds reinvested in the Client's chosen strategy.

Relationship with TomiPlan

e6 Portfolios believes that Clients are best served when they have a financial plan. e6 Portfolios works with any qualified, credentialed financial planner selected by the client. Clients who do not already have a financial planner will be referred to TomiPlan if they are in need of Financial Planning services.

TomiPlan is an affiliated company under shared ownership, so e6 Portfolios has an incentive to recommend TomiPlan. e6 Portfolios also provides TomiPlan with investment data aggregation capabilities used by licensed TomiPlan partners to assist their mutual clients with financial planning services. e6 Portfolios mitigates this conflict of interest by prohibiting the sharing to, or receiving of, revenue between e6 Portfolios and TomiPlan.

Relationship with Third-Party Investment Advisors

e6 Portfolios clients may authorize e6 Portfolios to accept instructions from the client's third-party investment advisor. This authorization is granted under a separate agreement. This third-party investment advisor agreement instructs e6 Portfolios to accept instructions regarding Risk Profile selection, changes in risk profile, cash movement, purchase or sale of investments, cash management, and other account issues from the third-party investment advisor.

Communications from the third-party Investment Advisor contain significant decisions about investment strategy, risk profile, e6 Portfolios offering selected (and therefore the fees paid). Client agrees under separate agreement to inform e6 Portfolios of changes to the relationship between Client and the third-party Investment Advisor and to provide e6 Portfolios with accurate contact information and inform the firm of any changes to their contact information.

Termination

e6 Portfolios or the client may end the advisory relationship at any time without penalty or fee by giving written notice to the other party. Clients should review their Advisory Agreement for further details. Clients enter into relationships with the account custodian directly and should review their agreement with the custodian for conditions related to terminating the agreement (such as transfer-out fees).

Brokerage Practices

e6 Portfolios recommends Qualified Custodians to Clients based on quality of execution, reliability, impartiality, service, capabilities, quality of technology, and reasonableness of cost in relation to comparable broker/dealers. e6 Portfolios monitors broker/dealer compensation and evaluates whether it is in the clients' best interest to explore new custody options. e6 Portfolios does not accept direct payments or soft dollar benefits from brokers. However, since e6 Portfolios pays differing transaction fees and platform fees to different custodians, there is an incentive to recommend the custodian that incurs the lowest cost to e6 Portfolios. which may not always be the lowest cost for the client.

Qualified custodians provide e6 Portfolios and its clients access to institutional brokerage services including a range of investment products, execution of securities transactions, and custody of client assets. Some qualified custodians we work with provide automated investing, rebalancing, tax-loss harvesting, and other investing functions. The investment products and services available through institutional platforms include some to which clients might not otherwise have access or that would require higher minimums by clients acting individually. These services directly benefit clients or their account(s) and are made available on an unsolicited basis and at no charge to us or the client.

Qualified custodians also make available other products and services that benefit e6 Portfolios but may not directly benefit the client or their account(s) directly or at all. For example, the custodian may provide research resources that may be used to improve service to all or some client accounts, including accounts not maintained at the custodian providing the research.

Qualified custodians also provide software and other technology; support for third-party service providers; trade aggregation for multiple client accounts; market data; and assistance with back-office functions, recordkeeping, and client reporting.

Other services may help e6 Portfolios develop its business. These services might include educational conferences and events; technology, compliance, legal, and business consulting; publications and conferences on practice management; and access to employee benefits providers, human capital consultants, and insurance providers. Custodians may provide some of these services themselves or may arrange for third-party vendors to provide the services to e6 Portfolios at a discount or at no cost. These services are not contingent on e6 Portfolios committing any specific amount of business to the custodian in trading commissions or assets in custody, nor are they based on e6 Portfolios giving any particular investment advice or buying particular securities for clients. Access to resources that do not directly benefit clients may play a part in e6 Portfolios' choice of custodians. e6 Portfolios addresses this conflict of interest by carefully vetting its custodians based their ability to assist in e6 Portfolios in delivering the best value and experience and providing clients a range of custodial options.

e6 Portfolios does not receive client referrals from its qualified custodians and the firm does not allow directed brokerage.

Clients may request an alternative broker/dealer to custody their assets. However, the alternative custodian may not approve e6 Portfolios on their platform, e6 Portfolios may not be able to implement a specific Investment Strategist on that platform, and e6 Portfolios will consider relationship size before agreeing to work with the additional custodian.

e6 Portfolios aggregates client trades on a best-efforts basis. A significant portion of client assets are invested in mutual funds which are not vulnerable to trading conflicts of interest. Client assets may also be invested in ETFs or individual securities. These transactions are generally small in size relative to the daily volume in the security which minimizes any potential inequities created by sequence of transaction. For Investment Strategists that rely on a Qualified Custodian providing automated investing services, trade aggregation may be done at the Custodial level but be out of e6 Portfolios' control. Other circumstances inherently preclude aggregation, such as client-directed liquidation or distribution of funds, new deposits arriving in only one account, etc. These factors and aggregation practices mean that it is possible that one client may receive less favorable execution than another in some cases.

However, e6 Portfolios does use aggregated trading whenever possible when the same ETF or security is purchased or sold for more than one client at the same time. In cases where aggregated trading is used, a target trade size and allocation among client accounts will be established, the shares will be purchased or sold, an average price established, and the trade allocated among client accounts at the established average price. If it is not possible to buy or sell the planned number of shares, the partial trade will be allocated among clients proportionally according to the planned allocation. In some cases, e6 Portfolios may make use

of aggregated trading for the same security more than once during a single trading day for different groups of clients, resulting in different average prices for different groups of clients.

e6 Portfolios may enroll clients in custodial securities lending or yield enhancement programs when available and shares all the revenue from these programs with the clients to enhance returns. These programs may increase the number of shares available in the market for short-selling. Clients must notify e6 Portfolios if they wish to opt-out of these services.

ITEM 5 – ACCOUNT REQUIREMENTS AND TYPES OF CLIENTS

The e6 Portfolios Investment Strategists Wrap Fee Program is currently offered to clients who use a qualified custodian approved by e6 Portfolios.

e6 Portfolios serves individuals, families, businesses, charitable organizations, and retirement plans. e6 Portfolios' investment management services do not have a formal minimum but we may consider overall relationship size before agreeing to work with a client.

ITEM 6 – PORTFOLIO MANAGER SELECTION AND EVALUATION

e6 Portfolios, LLC is the Sponsor and sole Portfolio Manager for the e6 Portfolios Investment Strategists Wrap Fee Program and will not select or review any outside manager or recommend replacing the manager. Managing its own wrap fee program is a conflict of interest because portfolio management revenue is e6 Portfolios' core business and primary source of revenue. e6 Portfolios counteracts this conflict of interest by fully disclosing the conflict and using an asset-based fee structure in order to align clients' interest in growing their wealth with e6 Portfolios interest in revenue growth.

e6 Portfolios evaluates its related-person manager by assessing the performance of e6Portfolio Strategists against relevant benchmarks. e6 Portfolios selects common industry benchmarks to assess the performance of the investment strategies it offers and calculates the performance of client accounts using industry standard methodologies. Presentations containing performance information are reviewed by e6 Portfolios for accuracy.

e6 Portfolios offers portfolio management services to its Wrap Fee Program participants as described in Item 4 above. e6 Portfolios' Strategist models are limited to mutual funds, ETFs, closed-end funds, and publicly traded securities. Annuities, private placements of securities, non-traded securities, and structured products are offered in limited circumstances where the relationship between the client, the client's financial advisor, and e6 Portfolios is on a fee-only basis.

e6 Portfolios offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client.

Clients may establish reasonable restrictions on the investments in their portfolio (such as restricting the purchase of certain kinds of stocks) if agreed upon in advance with the Advisor. e6 Portfolios will fulfill these requests on a best-efforts basis and also cannot guarantee that mutual funds and ETFs held by the client do not hold the restricted position.

e6 Portfolios does not accept performance-based fees.

Methods of Analysis and Investment Risks

e6 Portfolios constructs portfolios primarily consisting of mutual funds, closed-end funds, ETFs, and individual securities. In doing so, the firm relies on outside experts including Chartered Financial Analysts (CFAs), research firms, publicly available models published by reputable financial institutions, reputable third-party research firms, and Nobel Prize winning economists for advice on asset allocation and security selection methodology.

With this intellectual framework, the investment team relies on tools that include:

- Fundamental analysis of security, sector, and asset class characteristics
- Modern Portfolio Theory (MPT) best practices, including optimal allocation across asset classes and geographies, optimal index constitution, etc.
- Competing or complimentary theories of portfolio construction with an academic basis or verifiable evidence of merit
- Analysis of market and economic trends and conditions (GDP, interest rates, etc.)
- Published third party model portfolios by reputable and vetted institutions
- Investment vehicle characteristics including asset class coverage, performance, cost, etc.

e6 Portfolios Strategists offer a large number of investment approaches that allow clients and their advisors to accomplish a wide range of goals. E6 Efficient Markets act as the foundation. Some of these strategies seek to optimize sources of expected return by tilting index-like portfolios toward companies with “value” characteristics, smaller companies, and companies with higher profitability. e6 Portfolios are also generally global, incorporating more exposure to international and emerging markets than most comparable strategies. e6 Portfolios looks to the fixed income allocation in a portfolio as a source of stability and therefore generally prioritizes lower risk and lower volatility over yield in selecting fixed income investments, although other.

Beyond this foundation, e6 Portfolios offers a range of Strategists that fill in niches in the investment landscape that allow a advisors and clients to accomplish a variety of goals. For example, e6 Portfolios may modify model portfolios from third parties by replacing published allocations with lower-cost or more tax-efficient alternatives, tilting the portfolios to align more with our overarching philosophy of asset allocation, and other modifications e6 Portfolios deems to be in the best interest of the client.

Investing Risks

E6 Portfolios seeks to identify and address all manageable risks, including the risks of inflation and tax inefficiency. E6 Portfolios seeks out instruments that have been effective at preserving capital and offsetting the effects of inflation over long periods of time on an after-tax basis. However, investment success is a partnership, and investors must in turn be patient and willing to tolerate volatility during periods of instability and turmoil, accept that no single investment is free from all risks or discomfort, and make forward-looking decisions based on research, instead of giving too much weight to the recent past (recency bias).

All of e6 Portfolios' services involve some element of risk. Investing in securities of any kind involves risk of loss that clients should be prepared to bear. Securities are not FDIC insured and have no bank guarantee. Stocks may decline in value or may not appreciate enough to meet expectations. The rate of return on low-risk investments may not exceed inflation. The value of a bond portfolio may decline if interest rates rise or credit-worthiness declines. Investments designed to limit risk or reduce volatility may not work as expected. Investments with limited liquidity may limit a client's ability to access capital when it is needed. Investing strategies based on particular investing philosophies ("Growth," "Value") rely on historical data to make assumptions about future market behavior that may not be realized.

Automated Platform Risks

Some Investment Strategists are offered through qualified custodians that provide automated investing, rebalancing, tax-loss harvesting and other investing functions. Reliance on third-party applications for model implementation and tax decisions means that investors are open to the risk that the third party will implement models or tax strategies incorrectly or sub-optimally.

Mutual Fund & ETF Risks

Mutual fund and ETF shareholders are subject to product-specific risks. Individual fund issuers may have operational risks. Clients invested in different funds with similar underlying holdings may reduce the benefits of diversification (fund overlap). Mutual funds realize and distribute capital gains to investors and these gains may not be optimized. Mutual fund trading prices may differ significantly from the fund's net asset value (NAV) during market volatility, which may lead to the fund's shares trading at a premium or discount.

ETFs are listed on securities exchanges and transacted at negotiated prices in the secondary market. Generally, ETF shares trade at or near their most recent NAV but inefficiencies or volatile markets may cause the shares to trade at a premium or discount to their NAV. There is no guarantee that a liquid secondary market for ETF shares will develop or continue to exist, leaving shareholders no way to dispose of such shares.

Micro- and Small-Cap Risk

e6 Efficient Markets Strategists tend to have higher allocations than average to smaller companies and most e6 Strategists have some exposure to this sector of the market. Micro- and Small-Cap companies have specific risks. Small companies may be in an early stage of development or have an untested business model; future business may depend on in-process research and development; they may come into competition with larger companies with greater resources; their business may depend on a single company or industry; their shares may be illiquid or more easily manipulated; or credit may not be as easily available.

Foreign and Emerging Market Risks

e6 Efficient Markets Strategists tend to have higher allocations than average to international and emerging market securities and most e6 Strategists have some exposure to this market segment. Investing in foreign equity markets entails certain risks which increase as a nation's level of development decreases. These may include limits on publicly available information; difficulty in comparing accounting standards; insufficient government supervision of markets; limited liquidity; higher brokerage costs and delays; higher tax and other withholdings; political instability or war; expropriation of assets; social and financial instability; difficulty in obtaining legal judgments in non-US courts; foreign currency risk; and currency conversion costs.

Value Investing Risks

e6 Efficient Markets Strategists take a "Value" investing approach to security selection. Value investing overweights stocks that trade for less than their intrinsic values, with the belief that the market price for a security does not always correspond with the company's long-term fundamentals. Value investors may incorrectly analyzing and overestimating the intrinsic value of a business, incorrectly estimate future cash flows, value strategies may underperform relative to major benchmarks, or the market may never properly value a company.

Downside Protection Strategy Risks

Investments purporting to provide downside risk protection may not be successful in their strategy. Under certain conditions an investor may experience significant losses on the investment, including the loss of the entire investment. Risks may include all those risks associated with options trading, such as counter-party default risk, outcome period risk. Any risks associated with the securities that make up the underlying portfolio (often ETFs) may impact the performance of the downside protection strategy. See the documentation published by the downside protection funds in the strategy for a more complete description of these risks.

ESG Strategy Risks

Investments that consider ESG criteria may include or exclude certain securities for ESG-related reasons when it might otherwise not be advantageous to do so and therefore underperform similar non-ESG investments. ESG factors may systematically over- or under-emphasize certain sectors or investment themes, resulting in a less diversified portfolio or underperformance *vis a vis* other industry sectors. Companies selected for ESG criteria may not address ESG considerations as expected or a company's ESG performance could vary over time, which could cause the strategy to fail to comply with ESG objectives. The ESG criteria and priorities of the underlying funds may vary over time or may be inconsistently applied. The formulation of ESG criteria is inherently qualitative and subjective so the process used by underlying funds may not reflect the values and beliefs of a particular client. ESG decisions are based on data that is gathered from a variety of sources, including the companies themselves, and may be subject to interpretation, restatement, delay, error, or omission.

Real Estate Strategy Risks

Investing in real estate carries unique risks, as do the investment vehicles often used to gain exposure to real estate. Real estate has historically experienced significant cyclical fluctuations in performance. Different kinds of real estate investments (commercial and residential in their many forms) may perform very differently over a given period. Social and cultural changes (COVID-19, for example) may dramatically affect demand for real estate for better or worse. Real estate may decline in value; general and local economic conditions may negatively affect real estate; changes in interest rates and the state of the debt and equity credit markets may have a disproportionate effect on real estate compared to other investment alternatives; rising labor and materials costs may impact performance; changes in tax rates, local and national rules governing real estate, or present or future environmental legislation may impact real estate investments, among other risks.

Real Estate Investment Trusts (REITs) are a common way to access real estate exposure and they involve certain unique risks. REITs are dependent upon management skills, are generally not diversified in terms of real estate sector, and can be subject to fluctuations in cash flow, default by borrowers, excessive use of leverage, and other risks.

Individual Stock Strategy Risks

Individual stock models constructed by third parties (Zacks, ValueLine, etc) are characterized by the same risks as all equity investment strategies. However, these strategies also introduce third-party institutional risk. Investment research processes at the third party may be flawed, assumptions about the way equity markets will generally perform may be incorrect, or internal dynamics at the third party may influence investment recommendations and performance.

Aggressive Income Strategy Risks

High yield debt, whether corporate or municipal, does not qualify for "investment grade" ratings by one or more rating agencies. High yield debt carries greater risk than investment

grade debt. The issuer's financial solvency may deteriorate further and result in a decline in market value or default. High yield issuers may not be able to make interest and principal payments, an investor may receive back less than originally invested.

Variable and Fixed Annuities

Annuities are contracts issued by insurance companies that are designed to meet long-term goals. An annuity is not a life insurance policy. Like other long-term investments, variable annuities are subject to market fluctuation, investment risk, and possible loss of principal. Annuities should be considered illiquid because they generally include surrender penalties for early withdrawal. If a client's financial situation changes funds dedicated to an annuity would be costly to access.

Annuities riders add insurance features but carry costs that reduce the performance of the annuity over time. Insurance companies may impose caps, spreads, and participation rates on annuity performance, which can limit the return for the individual compared to similar investments outside the annuity. There is a risk that inflation will be higher than the annuity's guaranteed rate and that rates earned could be less than the client could earn investing in other instruments. Longevity risk means that there is a risk of death before reaping the full benefits of the contract. Finally, there is a risk that the policy issuer may become insolvent and be unable to fulfil the contractual obligations of the annuity contract.

Fixed annuities generally have fewer risks to principal. However, they are subject to the risk that interest rates may rise in comparison to the fixed return of the annuity; liquidity risk (since they generally also have surrender penalties); and the risk that the issuer will become insolvent and unable to fulfill the terms of the contract.

Private Investments

Investments in private placement offerings, limited investment partnerships, and other pooled investment vehicles carry specific risks unique to the asset category.

Private investment funds are not registered with the Securities and Exchange Commission and generally are not registered with any other regulatory authority. Accordingly, they are not subject to certain regulatory restrictions and oversight to which other issuers are subject. Because private investments do not have the same public reporting requirements there can be a lack of transparency into how the investment is doing. Likewise, such funds often invest in concentrated, illiquid investments so it can be difficult to accurately value the underlying assets until the assets are sold. The funds also do not trade publicly so price discovery in the public marketplace is not possible. As a result of these factors, establishing an accurate valuation of the fund can be difficult.

These investments are typically only available to Clients deemed to be accredited investors, qualified clients, or qualified purchasers. They also often have high investment minimums. As

a result there is a risk that a certain investment opportunity may not be available or practicable for a certain client.

Private investments are not publicly traded. They typically require a lock-up and/or only have specified liquidity windows so there is a risk that assets will not be available when needed by the client. These liquidity restrictions also may make it difficult or impossible to exit the investment at the most advantageous time and price.

Private investments can be complex structures with multiple classes of investor so there is a risk that the AUM-based investor class accessible through e6 Portfolios may not be the most advantageous investor class. Similarly, because the funds can be difficult to value, there is a risk that the asset-based fees are applied to an inaccurate valuation of the investment, potentially making such investments more expensive than the alternatives.

Private investment funds are generally specialized investment vehicles that are focused on a particular kind of asset. As a result, they are subject to concentration risk where adverse events in a particular market niche, region, or economic sector may significantly impact the investment in comparison to a more diversified investment.

Donor Advised Fund and Legacy Trust Risks

The tax benefits of these investment vehicles are based on an irrevocable contribution to the vehicle. There is a risk that a Client's financial situation may change but contributed assets are no longer accessible. Tax law may change and these changes might diminish or eliminate the tax advantages of the vehicle or open up other tax strategies that might have been more advantageous had the donated assets still been available.

Securities Lending Programs

e6 Portfolios may enroll eligible clients in securities lending programs, sometimes referred to as stock yield enhancement programs, when offered by custodians. When enrolled, shares loaned out may not be protected by SIPC. However, SEC rules require custodians to provide clients with U.S. Treasury or cash collateral in the same amount as the value of client shares to protect consumers in the unlikely event of default. When shares are lent out, clients forfeit their right to vote by proxy. Lending programs may increase the number of shares available in the market for short-selling.

Cybersecurity Risk

Investing involves operational and cybersecurity risks. Unintentional events or deliberate attacks on e6 Portfolios, its service providers, or investment issuers may result in a loss of data or the unauthorized release of confidential information. e6 Portfolios has established business continuity plans and risk management systems designed to reduce the risks associated with cybersecurity breaches but there are inherent limitations in these plans and systems: certain

risks may not yet have been identified, unknown threats may emerge in the future, and e6 Portfolios does not control the cybersecurity systems of third-parties.

Disruptive Event Risk

Disruptive social and geopolitical events (pandemics, war, etc.) may result in travel disruptions, quarantines, and reductions in consumer and productive activity. These impacts may cause economic disruption and market volatility. e6 Portfolios has adapted its practices and established a business continuity plan to ensure that client service is not interrupted by disruptive events. The firm monitors third-party vendors to ensure they are prepared to continue uninterrupted service in the face of disruption. Nevertheless, there is no guarantee that future pandemics or other disruptive events will not impact global markets or disrupt business functioning.

e6 Portfolios will not ask for nor accept voting authority for client securities (proxy voting).

ITEM 7 – CLIENT INFORMATION PROVIDED TO PORTFOLIO MANAGERS

e6 Portfolios is the portfolio manager for this wrap fee program and therefore will have immediate access to any client information collected.

ITEM 8 – CLIENT CONTACT WITH PORTFOLIO MANAGERS

Most e6 Portfolios Wrap Fee Program Clients will engage an investment advisor, whether through Everspire (an affiliate of e6 Portfolios) or through another investment advisory or financial planning firm. e6 Portfolios Investment Strategist Wrap Fee Program Clients who have an investment advisor will work through that advisor regarding questions about their investment strategy. e6 Portfolios will work with advisors to educate them about the strategies and answer questions. Clients who work with e6 Portfolios directly and have no investment advisor may reach out to portfolio managers via email and e6 Portfolios will respond on a best-efforts basis.

ITEM 9 – ADDITIONAL INFORMATION

Disciplinary Action and Other Financial Industry Activities

There are no legal or disciplinary disclosures material to a client's consideration of e6 Portfolios.

Registration as a Broker/Dealer or Broker/Dealer Representative

M. H. LeBlang, Inc. (dba "MHL Investments" or "MHL") is a broker-dealer and affiliated with e6 Portfolios. MHL Investments is a member of FINRA and the Securities Investor Protection Corporation (SIPC). Roy Jones and Joshua Jones are Registered Investment Advisors of e6

Portfolios, Registered Representatives and agents of MHL, financial planners of TomiPlan, and owners of all three companies. Dually registered e6 Portfolios associates may receive standard sales commissions from sponsors of alternative investment products through MHL Investments. All sales commissions are paid from the revenues of the product sponsors. MHL is also active as an insurance agency and so Roy Jones and Joshua Jones, as licensed agents, may receive compensation for the sale of insurance products. This compensation through MHL is separate and distinct from e6 Portfolios's investment management revenue, and clients only pay once for services.

Registered Representatives of MHL or any other broker/dealer who works with e6 Portfolios may have an incentive to recommend investment products based on the variable compensation received. e6 Portfolios mitigates this conflict by limiting the offerings on the e6 Platform to publicly traded securities for individuals licensed as a Registered Representative. Registered Representatives of any broker/dealer are prohibited from offering their clients insurance, private placements, interval funds, non-traded securities, and other illiquid investments through e6 Portfolios as a condition to access the e6 Portfolios platform. e6 Portfolios will also not work with third-party Investment Advisors who allow the sale of AUM-based insurance, private placements, and illiquid investments. This means that dually registered individuals who utilize e6 Portfolios should only receive commission revenue for the portion of their portfolio comprised of insurance, private placements, and illiquid investments offered by their broker dealer and agency and they only receive a recurring AUM-based fee for liquid, publicly traded securities portfolios. This policy addresses conflicts of interest under the hybrid model such as recommending a mutual fund for a commission versus a fee-based account or a private placement for a commission versus a fee-based account. It also increases transparency for the client. Clients of dually registered individuals may elect to only pay fees by limiting their relationship with their financial advisor to e6 Portfolios.

"Fee-only" Investment Advisor Representatives who are ineligible to receive commissions may access fee-based alternative investments. However, "fee-only" advisors face limitations in their offerings and have a conflict of interest in that there is an incentive to offer an inferior fee-based solution instead of referring their client to a more competitive solution offered by a third party that would not compensate them.

Conflicts of interest are present in every relationship and every corner of the financial industry. e6 Portfolios encourages clients to openly discuss conflicts of interest in detail with their advisor and select an advisor who is committed to transparency and the fiduciary standard of conduct, and has the professionalism and character to act in their best interest at all times regardless of how they are compensated.

Relationship with Everspire and Synchrony Wealth Management

Aegis Wealth Group LLC /dba Everspire is a Registered Investment Advisor and is affiliated with e6 Portfolios because it is owned by the same individuals. Synchrony Wealth Management provides advisory services through Everspire. Everspire and Synchrony Wealth Management



focus on Wealth Management by providing dedicated financial advisors to help clients implement financial plans. Both firms recommend e6 Portfolios to its clients for investment management services. E6 Portfolios also provides billing and white-label reporting services to Everspire and Synchrony. e6 Portfolios recommends Everspire or Synchrony Wealth Management to its clients who may be in need of a dedicated advisor. This presents a conflict of interest since Everspire benefits from the advisory revenue and Everspire and e6 Portfolios are affiliated. e6 Portfolios mitigates this conflict of interest by disclosing it and prohibiting direct compensation or sharing of revenue between e6 Portfolios and Aegis Wealth Group LLC /dba Everspire or Synchrony Wealth Management.

Relationship with TomiPlan

TomiPlan is an affiliated company under shared ownership with e6 Portfolios and so e6 Portfolios has an incentive to recommend the firm for financial planning. e6 Portfolios mitigates this conflict by prohibiting the sharing of revenue between e6 Portfolios and TomiPlan.

Selection and Compensation of Other Advisors and Managers; Client Referrals

In circumstances when a client needs a highly specialized solution, e6 Portfolios may recommend or select specialized investment advisor partners for clients, with the additional fee offset by a corresponding e6 Portfolios fee reduction of their standard fee arrangement for enhanced tax loss harvesting services, or for an additional fee for defensive derivative overlays that is not shared with e6 Portfolios. Other investment advisors may recommend e6 Portfolios to their clients or engage e6 Portfolios directly to provide investment management services. e6 Portfolios does not compensate advisors for referrals and does not accept compensation for referrals.

Code of Ethics

e6 Portfolios has adopted a Code of Ethics in accordance with SEC rules under the Investment Advisers Act of 1940. The Code of Ethics contains provisions that, among other things:

- Set forth standards of conduct expected of advisory personnel;
- Safeguard material non-public information about clients and client transactions;
- Require access persons to report their personal securities transactions;
- Defines conflicts of interest and describes prohibited activities;
- Requires compliance with the broad antifraud provisions of the Advisers Act; and
- Adheres to the principles outlined in “Real Fiduciary Practices: Professional Conduct Guidance for Advisors,” published by the Institute for the Fiduciary Standard.

e6 Portfolios’ complete Code of Ethics is available upon request by contacting our office at hello@e6 Portfolios.com.

Investing Personal Money in the Same Securities as Clients

e6 Portfolios and its associated persons do not recommend to or buy or sell for clients any securities in which the firm or its associated persons have a material financial interest.

e6 Portfolios related persons often invest in the same or similar securities to those that are held by clients through their chosen Strategist model(s). Many transactions are mutual funds, which do not present trading conflicts of interest. Similarly, fee-only private investments and insurance products do not present trading risks. However, ETF, stock, and bond transactions may present a conflict of interest because client trades in the security may affect the share price and create opportunities for “front running” and other abuses. To mitigate conflicts of interest, related persons are required to link securities accounts to the e6 Portfolios platform for supervision or report their transactions quarterly. Employee trades are reported to the firm and reviewed to ensure that e6 Portfolios clients are not disadvantaged by the trading activity.

Review of Accounts

Client accounts are reviewed on an ongoing basis to ensure that the investments in their account correspond with their stated risk profile and investment goals and rebalanced accordingly. Clients are required to apprise the firm of material changes in their risk profile, investment goals, or investment portfolio election.

e6 Portfolios publishes a written statement for each client which is available online or from the mobile app. This report shows a summary of activity (including fees and performance), allocation information, detailed analytics, and a fee calculation and invoice. Additionally, clients can print a wide variety of custom reports on demand.

Account custodians generate brokerage statements no less than quarterly. These statements are provided by the custodian to the client and list the account positions, activity, and the fees paid to e6 Portfolios. Clients may elect to receive trade confirmations from the account custodian whenever activity occurs and trade confirmations are archived on the custodial portal where they can be accessed at any time.

Compensation to Non-Advisory Personnel for Client Referrals

The firm does not directly or indirectly compensate any person who is not a supervised person, nor receive any economic benefit from anyone other than a client for providing services to the firm’s clients.

Financial Information

e6 Portfolios does not accept prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore does not include a balance sheet with this brochure. e6 Portfolios has never been the subject of a bankruptcy petition.