

Item 1 Cover Page

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This brochure provides information about the qualifications and business practices of Eagles Coast Wealth Management, LLC (“ECWM”). If you have any questions about the contents of this brochure, please contact us at 843-800-0491 or igor.falkovich@eaglescoast.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.

Additional information about ECWM also is available on the SEC’s website at www.adviserinfo.sec.gov. Registration does not imply a certain level of skill or training.

Item 2 Material Changes

Since our last annual amendment filing on March 30, 2022, we have made the following material changes to our business:

- Eagles Coast Wealth Management is a registered investment adviser with the Securities and Exchange Commission.
- Eagles Coast Wealth Management has updated the Fee Schedule – See Item 5- Fees and Compensation.

We will provide you with a new Brochure as necessary based on changes or new information, at any time, without charge. Our Brochure may be requested by contacting us at our main number above.

Additional information about ECWM is also available via the SEC's web site www.adviserinfo.sec.gov. The SEC's website provides information about any persons affiliated with ECWM who are registered, or are required to be registered, as investment adviser representatives of ECWM.

Item 3 - Table of Contents

Item 1 Cover Page.....	i
Item 2 Material Changes	ii
Item 3 - Table of Contents	iii
Item 4 – Advisory Business	1
Item 5 – Fees and Compensation	2
Item 6 – Performance-Based Fees and Side-By-Side Management	5
Item 7 – Types of Clients.....	5
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss	5
Item 9 – Disciplinary Information	7
Item 10 – Other Financial Industry Activities and Affiliations	7
Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading .	9
Item 12 – Brokerage Practices	11
Item 13 – Review of Accounts.....	12
Item 14 – Client Referrals and Other Compensation.....	12
Item 15 – Custody.....	12
Item 16 – Investment Discretion.....	13
Item 17 – Voting Client Securities.....	13
Item 18 – Financial Information	13

Item 4 – Advisory Business

Eagles Coast Wealth Management, LLC (“ECWM”) was established in 2018 and applied for registration as a Registered Investment Adviser in 2018. Paul S. Martin and Ilya Falkovich are the principal owners of ECWM through their ownership of Eagles Nest Holdings, LLC and Eagles Coast Holdings, LLC.

Types of Advisory Services

ECWM provides advisory services, giving continuous advice based on the client’s individual needs. Through personal discussions in which goals and objectives based upon the client’s personal objectives are established, the ECWM will develop a personal investment policy based upon an investment objective questionnaire and manage the portfolio according to the criteria. ECWM will appraise and review, at least quarterly the account, as initially accepted by IA, together with all additions, substitutions and alterations thereto; and to render to Client at least quarterly a written statement of the investments of the account. This statement will come directly from a Custodian.

Each client has the ability to impose reasonable restrictions on the management of his/her account, including the designation of particular securities or types of securities that should not be purchased for the account, or that should be sold if held in the account. If a client’s instructions are unreasonable or an Investment Advisor Representative believes that the instructions are inappropriate for the client, ECWM will notify the client that, unless the instructions are modified, it will cancel the instructions in the client’s account. A client will not be able to provide instructions that prohibit or restrict the Investment Adviser of an open-end or closed-end mutual fund or ETF with respect to the purchase or sale of specific securities or types of securities within the fund.

ECWM does not offer a wrap fee program. ECWM may manage assets on a non-discretionary or discretionary basis as authorized in writing in the advisory agreement. As of December 31, 2022, we managed 161 accounts with \$ 25375254 in discretionary assets and 5 accounts with \$239,415.19 in non-discretionary assets.

We may also recommend to appropriate advisory clients:

- Investments in private placement offerings and/or limited investment partnerships (i.e., hedge funds and venture capital funds); and/or

Other pooled investment vehicles including those organized and sponsored by ECWM, the EC Capital Partners, LP.

Investments in these types of private investment vehicles:

- Are not registered with or regulated by the SEC.
- Are available only to clients that are deemed to be an “accredited investor” in accordance with the requirements set forth in applicable laws, rules and regulations.
- Typically require investors to lock-up their assets for a period of time.
- Can have limited or no liquidity.
- Involve different risks than investing in registered funds and other publicly offered and traded securities.

- Are only recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity and suitability.
- Additional information about the fees related to such investments is included in the private offering documents provided to prospective investors.
- We rely on the evaluation and performance data provided directly from the private investment vehicles. Private investment vehicles are often delayed in providing us with this information, which will delay us in reporting this information to clients.

Investments in the EC Capital Partners, LP is now closed and no new subscribers are being accepted.

Item 5 – Fees and Compensation

The specific manner in which fees are charged by the ECWM is established in a client's written agreement. Fees are billed in advance on a monthly basis and based on a percentage of assets under management. Fees are based on the assets in the account per the schedule below and in some instances, may be negotiated.

FEE SCHEDULE

Account Value	Maximum Annual Fee
Up to \$1,000,000	2.00%
\$1,000,001 to \$2,999,999	1.75%
\$3,000,000+	1.50%

The initial fee is due in full one business day after the client's account is accepted and opened and will be based on the asset value of the account on that date. The initial fee will be prorated according to the number of days remaining in the calendar month. Thereafter, the fee will be calculated by multiplying the annual fee by the value of the account on the last business day of the previous month and then dividing that result by twelve. Upon termination of an account, any prepaid, asset-based fees will be prorated according to the days the account was open during the calendar month and excess fees will be refunded to the client less a termination fee of \$100.00 to cover administrative costs.

Our Investment Adviser Representatives may trade on margin for client's accounts, when consistent with the client's suitability profile and risk tolerance or at the client's directive. This could result in a high portfolio turnover ratio and higher transaction charges in accounts with such charges. Additionally, the use of margin results in interest charges as well as all other fees and expenses associated with the security or account involved. Margin interest can be as high as 10%.

The Client agrees to authorize the Custodian to pay directly to ECWM upon receipt of notice, the Account's investment advisory services fee. Fee withdrawals will occur no more frequently than monthly from the Client's Account, unless specifically instructed otherwise by the Client.

The Custodian will send to the Client a statement, at least quarterly, indicating all amounts disbursed from the Account, including the fee paid directly to ECWM. ECWM's access to the Assets of the Account will be limited to trading and the withdrawals authorized above Fees are debited directly from client accounts and are calculated using the total assets in the account as shown on the client custodial

statement, including any assets purchased on margin. If there is a net debit cash balance in the account as a result of using margin, the cash balance will be excluded from the fee calculation. Net positive cash balances in type 1 (cash account) and type 2 (margin account) are included in the fee calculation.

Accordingly, a client may pay an effective rate greater than the rate specified in the fee schedule shown above. ECWM, in its sole discretion, charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

Private Fund Fees: EC Capital Partners, LP Fees: The Management Fee is 2% (annualized) of the total Stated Value of the Fund's investments in Fund Assets as determined by the Manager. The Management Fee will be calculated, prorated, and paid on the first business day of each calendar quarter, regardless of the Fund's performance or whether there will be any cash available for distribution to the Partners after payment of the fees. The Manager or certain Affiliates of the Manager may also be entitled to receive certain asset level fees, guarantee fees, and other fees and amounts associated with the Fund's investment activities, as set forth in greater detail in the Partnership Agreement. The Fund is closed to new investors.

Please see Item 10 -Other Financial Industry Activities and Affiliations for additional information regarding the Private Funds

Fee Notice

In all instances above, lower fees for comparable services may be available from other sources.

Other Charges

The advisory fees and transaction charges do not cover charges imposed by third parties for investments held in the account, such as contingent deferred sales charges or 12(b)-1 trail fees on mutual funds. In addition, each mutual fund charges asset management fees, which are in addition to the advisory fees charged by ECWM. The fees charged by such funds are disclosed in each fund's prospectus. The Management Fee also does not cover fees and charges in connection with: debit balances; margin interest; odd-lot differentials; IRA fees; transfer taxes; exchange fees; wire transfers; extensions; non-sufficient funds; mailgrams; legal transfers; bank wires; postage; costs associated with exchanging foreign currencies; and SEC fees or other fees or taxes required by law.

Although ECWM believes its fees are reasonable in light of the services provided, clients should be aware that transaction fees may be higher than those otherwise available if advisory services and brokerage services were provided separately for a discrete fee or if an investment Advisor were to select brokerage and negotiate commissions in the absence of the extra consulting service provided. The comparison is dependent upon a number of factors, including the frequency of brokerage activity in the client's account, the size of the account under management, and any negotiated fee arrangements with respect to the account. An investor should consider these factors prior to opening an Advisory Account with ECWM. Clients should consider the value of the additional consulting services when making such comparisons. The combination of custodial, consulting, and brokerage services may not be available separately or may require multiple accounts, documentation, and fees. All fees described herein are subject to negotiation depending on a range of factors including, but not limited to, account size and overall range of services requested.

Account Termination

Client and/or the ECWM may initiate termination of the contract at any time by sending written notice to the contra party and will be deemed to be accepted the day that it is received by the contra party. A termination fee of \$100 will apply if the account is terminated by the client; however, if the client terminates the contract within five business days, there will be no termination fee charged and the client will receive a full refund of any fees paid.

Upon written receipt of notice to terminate its client agreement and unless specific transfer instructions are received, ECWM and its agent will cease advisory services. Should the client provide specific instructions to liquidate, ECWM will proceed with liquidation of the client's account in an orderly and efficient manner. There will not be a charge by us for such redemption; however, the client should be aware that certain mutual funds impose redemption fees as stated in each company's fund prospectus in certain circumstances. Clients must keep in mind that the decision to liquidate security issues or mutual funds may result in tax consequences that should be discussed with the client's tax advisor. Factors that could affect the orderly and efficient manner would be size and types of issues, liquidity of the markets, and market makers' abilities. Should the necessary securities' markets be unavailable and trading suspended, efforts to trade will be done as soon as possible following their reopening. Due to the administrative processing time needed to terminate client's investment advisory service and communicate the instructions to client's Investment Advisor, termination orders received from clients are not market orders; it may take several business days under normal market conditions to process the client's request. During this time, the client's account is subject to market risk. ECWM and its agent are not responsible for market fluctuations of the client's account from time of written notice until complete liquidation. All efforts will be made to process the termination in an efficient and timely manner.

Other Compensation

Our IARs may recommend and sell life, disability, health, and long-term care insurance and will receive the usual and customary commissions in addition to any agreed upon advisory fee.

Some of our IARs are registered representatives of our affiliated broker-dealer, Eagles Coast Capital, LLC. Acting as registered representatives of a broker-dealer, these persons can recommend and place transactions for Advisory Clients. In so doing, these individuals will earn separate compensation in the form of concessions, commissions, and/or 12b-1 fees (trail fees earned from the sale of mutual funds and/or ETFs). While Advisors may be entitled to 12b-1 fees, they will not receive these payments in advisory accounts. The Firm will receive and retain these fees for the broker-dealer. While these individuals endeavor at all times to put the interest of Clients first as part of ECWM's fiduciary duty, Clients should be aware that the receipt of additional compensation itself creates a conflict of interest and can affect the judgment of these individuals when making recommendations.

Clients, however, are not under any obligation to engage these individuals when considering the implementation of advisory recommendations. Recognizing that these types of compensation create a conflict of interest when calculating the asset-based advisory fee for a Client, ECWM will not include any commission-based products in the Client's asset total. Therefore, Clients will not be charged both a brokerage fee and an advisory fee on the same product.

In addition, Eagles Coast Capital, LLC, the broker-dealer, sets the mark ups charged by the Custodian, Interactive Brokers in connection with advisory accounts held at Interactive Brokers. Eagles

Coast Capital, LLC therefore determines the fee that the Custodian charges the clients and receives that mark up as additional compensation from the Custodian. All advisory accounts held at Interactive Brokers will pay the marked up fees set by the broker dealer.

Eagles Coast Capital, LLC and ECWM are under common ownership. Therefore, the owners of these two entities will receive fees from both the advisory fees and the markups they charge to advisory Clients on the broker dealer side. The broker dealer also receives a portion of the commission paid to registered representatives for all product sales through the broker-dealer. It is therefore a conflict of interest since the owners of both firms have a monetary incentive to sell both advisory services and broker dealer services. ECWM has a fiduciary obligation to inform Clients of this conflict and must supervise Client accounts to make certain the recommendations and transactions are in the Clients' best interests.

We also require IARs to disclose to clients that they may purchase recommended products from other representatives not affiliated with us. Our Code of Ethics requires our IARs do what is in the client's best interests at all times. Our CCO monitors all transactions to ensure that representatives put their clients first, not the commission they may receive. The broker-dealer also monitors all transaction to make certain they are suitable for the client.

While our IARs endeavors at all times to put the interest of our clients first as part of our fiduciary duty, the possibility of receiving additional compensation creates a conflict of interest and may affect IAR's judgment when making recommendations. We require that all IARs disclose this conflict of interest when such recommendations are made. Also, we require IARs to disclose that Clients may purchase recommended securities from other registered representatives not affiliated with us.

Item 6 – Performance-Based Fees and Side-By-Side Management

ECWM does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 – Types of Clients

ECWM provides portfolio management services to individuals, corporations and business entities, pension and profit-sharing plans, charitable institutions, foundations, endowments, estates, trusts, pooled investment vehicles, and other U.S. institutions. ECWM does not impose a minimum account balance for the opening of an account with the Adviser.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

Our investment strategy begins with an understanding of a client's financial goals. Advisors use demographic and financial information provided by the client to assess the client's risk profile and investment objectives in determining an appropriate plan for the client's assets. Investment strategies ordinarily include long- or short-term purchases of stock portfolios, mutual funds and fixed income securities.

Investment recommendations are based on an analysis of the client's individual needs and are drawn from research and analysis. Security analysis methods include the following:

- Fundamental analysis: We attempt to measure the intrinsic value of a security by looking at economic and financial factors to determine if the company is underpriced or overpriced. Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.
- Technical analysis and charting: We attempt to determine the trend of a security by studying past market data, including price and volume. This presents a potential risk, as the price of a security can change directions at any time and past performance is not a guarantee of future performance.
- Cyclical analysis: We attempt to identify the industry cycle of a company to determine whether the company is in a market introduction phase, growth phase or maturity phase. Generally projected revenues, growth potential and business risk may fluctuate based on the company's cycle stage.

Information for this analysis is drawn from financial websites and magazines, research materials prepared by others, annual reports, corporate filings, prospectuses, company press releases and corporate ratings services.

It is important to note that investing in securities involves a risk that clients must be prepared to bear. For any risks associated with Investment Company products, please refer to the prospectuses for additional details about these risks. Our investment approach constantly keeps the risk of loss in mind. These risks include, but are not limited to:

- Interest-rate Risk: Fluctuations in interest rates cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- Market Risk: The price of a security, bond, or mutual fund can drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- 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.
- Reinvestment Risk: This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- Business Risk: These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- Liquidity Risk: Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.

- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations could result in bankruptcy and/or a declining market value.
- **Alternative Investment Risk:** Investing in alternative investments is speculative, not suitable for all clients, and intended for experienced and sophisticated investors who are willing to bear the high economic risks of the investment, which can include: loss of all or a substantial portion of the investment due to leveraging, short-selling or other speculative investment practices, lack of liquidity in that there may be no secondary market for the fund and none expected to develop, volatility of returns, absence of information regarding valuations and pricing, delays in tax reporting, less regulation and higher fees than mutual funds.
- **Pooled Investment Vehicles:** Only eligible clients can invest in alternative investments in pooled investment vehicles such as private equity or hedge funds. These types of investments generally have a higher level of risk due to their concentrated nature, lack of liquidity, and other reasons. Before investing in a pooled investment vehicle for a client, ECWM will require the client to provide representations establishing that the client is an "accredited investor". ECWM will rely on the accuracy of a client's representations in making corresponding representations about the client. The client is responsible for promptly informing ECWM should its representations become inaccurate.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to a client's evaluation of ECWM or the integrity of ECWM's management. We have the following information that we need to disclose:

Disciplinary Event by FINRA - Without admitting or denying the findings. Cheryl Blakey consented to the sanctions and the entry of findings that she paid \$1,019.05 to a customer to settle the customer's verbal complaint made to Blakey, regarding an annuity surrender charge she previously had said the customer would not incur. The findings stated that Blakey failed to notify her member firm, Santander Securities, of the customer's claim and did not seek to receive authorization from the firm to resolve the customer's complaint. The above disciplinary event took place at her previous employer Santander Securities.

None of our Registered Investment Adviser Representatives have been the subject of a bankruptcy petition.

Item 10 – Other Financial Industry Activities and Affiliations

ECWM is affiliated with Eagles Coast Capital, LLC ("ECC"), a broker dealer, member of FINRA. ECC is under common ownership with ECWM. Advisors of ECWM may become registered representatives of ECC. They may recommend products or securities in their capacity as a registered representative of ECC in which they would receive commissions. However, ECWM and its personnel are constrained by fiduciary principles to act in the client's best interest. In addition, periodic reviews are done to ensure that investments are suitable for a client's objectives and risk tolerance and that investments continue to meet ECWM's investment criteria. Client is under no obligation to implement brokerage service

transactions through ECC and may implement ECWM's recommendations through other brokers, dealers, or agents.

Some Representatives and Management Persons of Eagles Coast Wealth Management (ECWM) are also Registered Representatives of Eagles Coast Capital, LLC ("ECC") an affiliated broker-dealer. In addition, neither ECWM nor its management and/or supervised persons are affiliated with any investment company or other pooled investment vehicle including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund), other investment adviser or financial planner, futures commission merchant, commodity pool operator, or commodity trading advisor, banking or thrift institution, accountant or accounting firm, lawyer or law firm, insurance company or agency, pension consultant, real estate broker or dealer, and/or sponsor or syndicator of limited partnerships. IARs of ECWM may recommend insurance products and may also, as independent insurance agents, sell those recommended insurance products to clients. When such recommendations or sales are made, a conflict of interest exists as the insurance licensed IARs earn insurance commissions for the sale of those products, which may create an incentive to recommend such products. We require that all IARs disclose this conflict of interest when such recommendations are made. Also, we require IARs to disclose that clients may purchase recommended insurance products from other insurance agents not affiliated with us.

As discussed above, Firm Clients will pay certain fees (such as transaction fees and service fees among others) to Eagles Coast Capital, LLC ("ECC") (the broker-dealer) if the Client or Advisor is using its services, and those fees are marked up and higher than such fees if that Client had used the services of another broker-dealer (or went directly to a broker-dealer or custodian). See the Item 12: "Brokerage Practices" for more details. ECWM does not share any fees it receives with the Firm at any time. However, the fact that ECC charges mark-ups on these accounts creates a conflict of interest because those mark-ups constitute additional revenue to an affiliate of ECWM. The owners of both firms do receive the compensation for fees and markups.

ECWM recommends that clients establish brokerage accounts with either TD Ameritrade Institutional or Interactive Brokers, LLC, both FINRA registered broker-dealers, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. Although ECWM recommends that clients establish accounts at TD Ameritrade Institutional or Interactive Brokers, LLC, it is the client's decision to custody assets with TD Ameritrade Institutional or Interactive Brokers, LLC. ECWM is independently owned and operated and not affiliated with TD Ameritrade Institutional or Interactive Brokers, LLC.

Eagles Coast PE Partners, a Delaware limited liability company that serves as sole general partner of the Partnership (in such capacity, the "General Partner") LLC, is under common ownership with ECWM.

EC Capital Partners, LP, a Delaware limited partnership (the "Fund"), is under common ownership with ECWM.

Eagles Coast PE Fund Management, LLC, a South Carolina limited liability company serves as the manager of the Private Fund and is an Exempt Reporting Adviser ("ERA") registered with the SEC. The ERA is under common ownership with ECWM.

ECWM's employees may also be members of the Private Funds.

As appropriate, eligible clients may be solicited to invest in such Private Funds. Related persons of

ECWM do not receive investment advisory compensation in relation to these investments.

Because investment in these types of entities can involve certain additional degrees of risk, they will only be recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity and suitability.

Related persons of ECWM may spend as much as 25% of their time on these related Activities.

No client is obligated to invest in the Private Funds, or any other Private Funds sponsored or owned by an employee of ECWM.

The information contained in this Brochure does not constitute an offer to sell or the solicitation of an offer to invest in the Private Fund. Such an offer can be made only by means of the respective Private Fund's offering documents and only in those jurisdictions where permitted by law. Such offering documents contain information specific to the respective Private Funds, risks, fees and expenses, and among other things.

Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

ECWM has adopted a Code of Ethics for all supervised persons of the ECWM describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at ECWM must acknowledge the terms of the Code of Ethics annually, or as amended.

Advisors of ECWM may buy or sell securities that are recommended to clients. ECWM's employees and persons associated with ECWM are required to follow the Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of ECWM and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for ECWM's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of ECWM will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would not materially interfere with the best interest of ECWM's clients. In addition, the Code requires pre-approval of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client. Employee trading is continually monitored under the Code of Ethics to reasonably prevent conflicts of interest between ECWM and its clients.

Advisors may buy or sell securities, at or around the same time as those securities are recommended to clients. Access persons may not purchase or sell a security in their personal account(s), or controlled accounts of family members or affiliates, prior to immediately trading the same securities for clients

(i.e., front-running), and thereby receiving better prices; rather, when investing in the same securities, clients' trades will be given precedence. Any other exceptions are to be approved on a case-by-case basis. This practice creates a conflict of interest in that ECWM or its Representatives are in a position to benefit from the sale or purchase of those securities. ECWM's Code of Ethics provides a policy to monitor the personal trading activities and securities holdings of each of the ECWM's Representatives or other Access Persons. The Code of Ethics' personal trading policies include procedures for limitations on personal securities transactions of associated persons, reporting and review of such trading. These policies are designed to discourage and prohibit personal trading that would disadvantage clients.

Aggregated trades (employees and client trades)

Trades may be done on an aggregated basis when consistent with ECWM's obligation of best execution. In such circumstances, the Advisor (or related account) and client accounts will share commission costs equally and receive securities at a total average price. ECWM will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the order.

ECWM's clients or prospective clients may request a copy of the ECWM's Code of Ethics by contacting the Compliance Department at our main number.

ECWM and EC Capital Partners, LP, a Delaware limited partnership (the "Partnership"), Eagles Coast PE Partners, LLC, a Delaware limited liability company that serves as sole general partner of the Partnership (in such capacity, the "General Partner"); and Eagles Coast PE Fund Management, LLC, a South Carolina limited liability company (the "Manager") are under common ownership.

EC Capital Partners, LP has designated Eagles Coast PE Fund Management, LLC as having primary responsibility for investment management and administrative matters pertaining to the Private Funds, such as accounting, tax, and periodic reporting. Eagles Coast PE Fund Management, LLC and its employees will devote to the Private Funds as much time as it deems necessary and appropriate to manage the Private Funds' business. Eagles Coast PE Fund Management, LLC is not restricted from forming additional investment vehicles, entering into other investment advisory relationships, or engaging in other business activities, even though such activities may be in competition with the Private Funds and/or may involve substantial time and resources of Eagles Coast PE Fund Management, LLC.

Potentially, such activities can be viewed as creating a conflict of interest in that the time and effort of our investment personnel and employees will not be devoted exclusively to the business of our advisory accounts, but also, can be allocated between the businesses of the Private Funds.

The Private Funds are not required to register as an investment company under the Investment Company Act of 1940 in reliance upon an exemption available to funds whose securities are not publicly offered.

Eagles Coast PE Fund Management, LLC manages the Private Fund on a discretionary basis in accordance with the terms and conditions of the Private Fund's offering and organizational documents.

Item 12 – Brokerage Practices

We recommend the brokerage and custodial services of TD Ameritrade Institutional or Interactive Brokers, LLC. TD Ameritrade Institutional or Interactive Brokers, LLC, are registered broker-dealers that charge brokerage commissions or transaction fees for effecting securities transactions. As the custodian holding an account, TD Ameritrade Institutional or Interactive Brokers, LLC do not generally charge separately for custody services. They are compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed. When selecting a custodian to recommend, a number of factors were considered, including their historical relationship with ECWM, financial strength, reputation, execution capabilities, pricing and services offered.

In recommending TD Ameritrade Institutional and Interactive Brokers, we endeavor to fulfill our duty to obtain “best execution” for the transactions in our clients’ accounts. When we seek best execution, the determinative factor is not necessarily the lowest possible transactional cost, but whether the transaction is executed in the most advantageous manner in terms of quality. To assess quality, we evaluate many factors, including competitiveness of price spreads, timeliness of execution and reporting, frequency and correction of trading errors, back office and trade settlement capabilities, and responsiveness to our orders and needs.

We do not receive any soft dollars from broker-dealers, custodians or third-party money managers.

ECWM recommends that clients direct TD Ameritrade Institutional or Interactive Brokers, LLC as the sole and exclusive broker-dealer to execute transactions in the account. TD Ameritrade Institutional or Interactive Brokers, LLC are registered broker-dealers and are compensated by account holders through administrative fees, custody fees, commissions and other transaction-related or asset-based fees for securities trades that are executed. Clients should understand that not all advisors require their clients to direct brokerage. By directing brokerage to TD Ameritrade Institutional or Interactive Brokers, LLC, clients may be unable to achieve the most favorable execution of client transactions. Therefore, directed brokerage may cost clients more money.

Trade Aggregation

Clients can benefit when we aggregate trades to obtain volume discounts on execution costs. Trade aggregation refers to the practice of combining orders for execution.

When consistent with our duty to obtain best execution, we will aggregate multiple client transactions into a single order in order to obtain the best price for our clients. In such circumstances, the accounts will share commission costs equally and receive securities at a total average price. ECWM will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the order.

ECWM’s fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients could incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in the fund’s prospectus. Such charges, fees and commissions are exclusive of and in addition to ECWM’s fee, and ECWM shall not receive any portion of these commissions, fees, and costs.

Although the brokerage and/or transaction fees paid by clients shall comply with the ECWM's duty to obtain best execution, a client may incur costs that are higher than another qualified broker-dealer might charge to affect the same transaction. In seeking best execution, the determinative factor is not necessarily the lowest possible cost, but whether the transaction is executed in the most advantageous manner in terms of quality. To assess quality, we evaluate many factors, including full range of a broker-dealer's services, competitiveness of price spreads, timeliness of execution and reporting, frequency and correction of trading errors, back office and trade settlement capabilities, and responsiveness to our orders and needs.

Item 13 – Review of Accounts

Account reviews are conducted by the Advisors who are responsible for performing periodic reviews and consulting with the respective client. Following these reviews, reports are prepared to assist principals in supervising and monitoring the accounts. Factors that are considered include, but are not limited to the following: investment objectives, targeted allocation, current allocation, suitability, performance, number of trades, monthly distributions, concentrated positions, diversification, and outside holdings. At least annually, the ECWM will contact the client and request current information to determine whether there have been any changes in the information provided in the client's investment questionnaire.

The client agrees to inform the ECWM in writing of any material changes to the information included in the questionnaire or any other change in the client's financial circumstances that might affect the manner in which client's assets should be invested. Clients may contact the ECWM during normal business hours to consult with the ECWM concerning the management of the client's account(s).

All managed accounts are delivered quarterly reports from the account custodian.

Item 14 – Client Referrals and Other Compensation

ECWM does not receive an economic benefit by anyone other than the client for providing investment advice and other advisory services.

ECWM does not compensate for client referrals.

ECWM is paid compensation by Curran and Company (CPA firm) for referral of business to them.

Item 15 – Custody

Clients should receive statements at least quarterly from CUSTODIAN or other selected qualified custodian that holds and maintains client's investment assets. ECWM urges clients to carefully review such statements and compare the official custodial records to the account statements that we provide. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

We do not debit the client fees directly from your advisory account. We send information to your custodian to debit your fees and to pay them to us. You authorized the custodian to pay us directly at the onset of the relationship.

Item 16 – Investment Discretion

ECWM may act in a discretionary or non-discretionary capacity. If discretionary authority is granted to select the identity and amount of securities to be bought or sold, clients must authorize such discretion in writing in the advisory agreement. In all cases, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account. When selecting securities and determining amounts, ECWM observes the investment policies, limitations and restrictions of the clients for which it advises. Investment guidelines and restrictions must be provided to ECWM in writing.

Item 17 – Voting Client Securities

As a matter of ECWM policy and practice, ECWM does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Clients should contact their financial advisor if they have any questions and/or to obtain this information. Clients will receive their proxies directly from their custodian or transfer agent.

Item 18 – Financial Information

Registered Investment Advisers are required to provide clients with certain financial information or disclosures about ECWM's financial condition. ECWM has no material conflicts of interest to disclose regarding the investment adviser, its representatives or any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

ECWM has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of any bankruptcy proceeding.

In no event shall we charge advisory fees that are both in excess of twelve hundred dollars and more than six months in advance of advisory services rendered.