

Part 2A Appendix 1 – Wrap Fee Program Brochure

Item 1 – Cover Page

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This wrap fee program brochure provides information about the qualifications and business practices of Midway Wealth Partners, LLC. If you have any questions about the contents of this brochure, please contact us at (847) 787-1144. 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 Midway Wealth Partners, LLC 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

The material changes in this brochure from the last annual updating amendment to this Wrap Fee Program Brochure on 01/20/2023. Material changes relate to Midway Wealth Partners, LLC's policies, practices or conflicts of interests only.

- Midway Wealth Partners, LLC has updated their Assets Under Management (Item 6).
- Midway Wealth Partners, LLC has updated their primary office address (Cover Page).
- Midway Wealth Partners, LLC has updated their custodian to Charles Schwab & Co., Inc. due to its acquisition/merger with TD Ameritrade. (Item 9)

Additional information about Midway Wealth Partners, LLC is also available via the SEC's web site www.adviserinfo.sec.gov. The SEC's website provides information about our firm and registered investment adviser representatives.

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Item 4 – Services, Wrap Fees, and Compensation

Midway Wealth Partners, LLC (“MWP” or the “Firm”) was established in 2022 and applied for registration as an Registered Investment Adviser in 2022. Richard S. Babjak, Todd Rollins, and Dennis P. Ryan are the principal owners of MWP.

MWP 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 Firm will develop a personal investment policy based upon an investment objective questionnaire and manage the portfolio according to the criteria.

Our advisory process starts with a conversation with a prospective client in order to fully understand their goals. When making your investment plan, the client’s goals are considered, including where they currently are, and where they want to be in the future. A plan is crafted around these goals, their risk tolerance, and their other financial needs. The investment plan is made by looking at the client holistically. Once the client is satisfied with their plan, it is implemented, monitored, and adjusted as needed.

The wrap fee program may use third-party investment managers to manage client assets. Third-party investment managers are granted authority by the client to invest, allocate and rebalance the client’s account in accordance with an investment model created and maintained by the third-party investment manager. When MWP investment adviser representatives (“IARs”) have discretion by the client, they also have the ability to invest, allocate and rebalance the client’s account among the selected third-party investment managers, or to change third-party investment managers.

INDIVIDUALLY MANAGED PROGRAMS

MWP offers asset management services to clients through customized programs. In such customized programs, clients may authorize MWP IARs to purchase and sell mutual funds, exchange traded funds, equities, fixed income securities and other securities authorized by MWP on a discretionary or non-discretionary basis (depending on the authority granted to the IAR) pursuant to the investment objectives chosen by the client.

IRAs and other ERISA Covered Accounts

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours.

Under this special rule’s provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;

- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

Fees and Compensation

The specific manner in which fees are charged by the Firm is established in a client's written agreement. Fees are based on a percentage of assets under management and calculated at an annual rate and billed in advance on a quarterly basis. The total annual wrap fee charged shall not exceed 2.50%, and includes MWP's advisory fee, a platform fee and third-party investment manager fee. Fees are negotiable and varies based on the third-party investment manager(s) selected. Form specific third-party investment manager fees, please see the manager's agreement or Disclosure Brochure.

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 quarter. Thereafter, the fee will be charged quarterly in advance and calculated by using the closing value of the account as of the last trading day of each calendar quarter. Upon termination of an account, any prepaid, asset-based fees will be prorated according to the days the account was opened during the calendar quarter and excess fees will be rebated to the client.

Fees will be debited from the account specified in the advisory agreement. The amount of the fee will be shown on the statement received by the Custodian. MWP urges clients to carefully review such statements. Upon request, MWP will bill a client for advisory services. If requested, billing information must be in writing in the advisory agreement. Advisory fees are due upon receipt.

The wrap fee program may cost the client more or less than the client would pay if the investment advice, transaction fees, and account fees for other services were purchased separately. The combination of services provided may or may not be available separately with other programs. Clients should consider and evaluate the amount of trading activity expected when selecting among different programs and assess the overall cost. Wrap fee programs typically assume a certain amount of trading activity in the client's account. Therefore, prolonged periods of holding cash positions, limited trading activity and inactivity may result in higher fees than if the account paid fees or commissions for each transaction separately.

Investment adviser representatives 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.

Deposits and/or withdrawals made during the calendar quarter will be prorated and charged or rebated, as applicable.

Other Charges

The advisory fees and transaction charges do not cover charges imposed by third-parties for certain investments held in the account, such as contingent deferred sales charges or 12(b)-1 trails on mutual funds. In addition, each mutual fund or third party investment manager charges asset management fees, which are in addition to the advisory fees charged by the Firm. The fees charged by such funds or managers are disclosed in each fund's prospectus or Manager's ADV Part 2A. Accounts may require a minimum advisory fee or quarterly maintenance fee that will be detailed in the applicable advisory

agreement. 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.

MWP receives compensation in connection with cash held in the account. In addition to the advisory fee, MWP receives additional compensation from the custodian based on the value of credit balances in the accounts. If cash is swept into a money market fund, MWP receives compensation based on the value of assets in these funds as broker-dealer. Thus, MWP has an incentive to recommend that client select a money market fund as a sweep vehicle that pays more compensation to MWP than other funds.

Some mutual funds within this program pay 12(b)-1 service fees (normally 0.25% per year) to the Custodian or third-party investment manager. The mutual funds the Firm could purchase or recommend offer a variety of share classes, including some that do not charge 12(b)-1 fees and are, therefore, less expensive. These fee arrangements will be disclosed upon request of a client and are available in the applicable fund's prospectus.

There are instances in which the MWP would recommend a mutual fund that carries a 12(b)-1 fee, even when a lower-cost share class is available for the same fund. For example, a lower-cost class share may not be available to MWP due to investment minimums. In other cases, mutual funds charging 12(b)-1 fees are transferred into MWP. In which case the Firm may recommend the client holds the existing share class, instead of selling the fund and buying a lower-cost share, which could result in a tax liability. When recommending a particular mutual fund share classes, the different available share classes are compared and reviewed along with the anticipated investment timeframe, potential tax consequences, future anticipated transactions and other costs to determine the best selection for the client at that time. MWP does not receive any part of the fees charged by Mutual Funds.

Account Termination

Client and/or the Firm 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. Upon written receipt of notice to terminate its client agreement and unless specific transfer instructions are received, MWP and its agent will cease advisory services. Should the client provide specific instructions to liquidate, MWP will proceed with liquidation of the client's account in an orderly and efficient manner. There will not be a charge by MWP 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. MWP 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.

Item 5 – Account Requirements and Types of Clients

MWP provides portfolio management services to individuals, corporations and business entities, pension and profit-sharing plans, charitable institutions, foundations, endowments, estates, trusts, and other U.S. and international institutions. MWP does not have a minimum account value; however certain managers may have a required minimum as disclosed in the individual manager's Firm Brochure. Under certain circumstances, the minimum may be waived, including related accounts that are combined to meet the minimum.

Item 6 – Portfolio Manager Selection and Evaluation

Third-party money managers are selected based primarily on their specific type of investment model, strategy, risk management discipline, performance, and how the model aligns with other models in the program. Additional considerations on whether to recommend a manager are based on passing due diligence, legal and regulatory background checks, through interviews and meetings with the third-party money manager, and verifying compliance with regulatory standards. MWP reviews manager performance data at least annually.

MWP may provide information to the Client regarding the retention or replacement of a certain third-party money manager if the manager changes its management style or if the Client's financial situation, investment objectives, time horizon and/or risk tolerance changes. MWP may replace managers if the manager's model is changed or MWP believes another manager would be more appropriate for the client.

Neither MWP or any of its IARs assumes responsibility for the unaffiliated third-party money managers, including their performance, performance reporting, or compliance with laws or regulations. Neither MWP, or any third party independently verifies the performance information provided by the third-party money managers to determine its accuracy or compliance with presentation standards. Performance information may not be calculated on a uniform and consistent basis.

When MWP serves as the Portfolio Manager for the Wrap Fee Programs. MWP uses industry standards to measure the performance of its Portfolio Managers; however, it does not use a third-party auditor to review or verify the performance of its Portfolio Managers.

Advisory Business

MWP 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 Firm will develop a personal investment policy based upon an investment objective questionnaire and manage the portfolio according to the criteria.

Our advisory process starts with a conversation with a prospective client in order to fully understand their goals. When making your investment plan, the client's goals are considered, including where they currently are, and where they want to be in the future. A plan is crafted around these goals, their risk tolerance, and their other financial needs. The investment plan is made by looking at the client holistically. Once the client is satisfied with their plan, it is implemented, monitored, and adjusted as needed.

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, MWP 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.

In addition to the wrap fee program described in this brochure, MWP also offers a non-wrap fee program, which is disclosed in separate Disclosure Brochure (Form ADV Part 2A). In a wrap fee program, clients are charged an all-inclusive wrap fee on Program Assets that covers advisory, execution, custodial and reporting services. A portion of these fees will be paid to MWP for advisory services. In a non-wrap fee program, MWP'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 other 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 MWP's fee, and MWP shall not receive any portion of these commissions, fees, and costs.

Performance-Based Fees and Side-By-Side Management

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

Amounts Under Management

As of April 2023 MWP has \$ 203,000,000.00 assets under management. MWP manages all assets on a discretionary basis.

Methods of Analysis, Investment Strategies and Risk of Loss

The 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 includes the following:

- Fundamental analysis: The 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: The 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: The 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. The 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.

Voting Client Securities

As a matter of firm policy and practice, MWP 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 7 – Client Information Provided to Portfolio Managers

MWP outsources its portfolio management by using outside portfolio managers for its Managed Solutions Investment Consulting Services. The third-party manager generally requires clients to

complete an investment profile questionnaire upon account opening. MWP may share your financial information, including information about your income, net worth, and investment objectives, to assist the investment manager in determining an appropriate asset allocation for your investments. Clients should inform MWP and the third-party investment manager (if applicable) in writing of any material changes to their investment objectives that might affect the manner in which investment assets should be managed.

The Client may contact MWP during normal business hours to consult with MWP concerning the management of the their account.

Item 8 – Client Contact with Portfolio Managers

When MWP acts as both your registered investment adviser and Portfolio Manager, you may contact your investment adviser representative directly during normal business hours. When an outside Portfolio Manager is used, you can contact your investment adviser representative who will provide contact information to your Portfolio Manager or schedule a call for you.

Item 9 – Additional Information

Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to a client's evaluation of MWP or the integrity of MWP's management. MWP has no information applicable to this Item.

Other Financial Industry Activities and Affiliations

Individuals associated with MWP as an Investment Adviser Representative are also Registered Representatives of World Equity Group, Inc. (WEG), and are separately registered to sell life insurance. When applicable, these individuals recommend broker-dealer transactions and/or insurance products for advisory clients. All related compensation is separate from advisory services. On average individual Investment Advisor Representatives and the principals of MWP spend 30% of their time on other such activities.

This arrangement poses a conflict of interest to the extent that there is a financial incentive to recommend securities and other insurance products that result in commissions, brokerage fees or other payments. MWP is dedicated to acting in clients' best interests based on fiduciary principles. Clients are under no obligation to purchase any recommended brokerage products or insurance products. MWP and WEG are not affiliated through common ownership or control.

MWP is affiliated with Midway Venture Partners (the "Fund"), a private equity fund, through Richard Babjak, a General Partner of the Fund. A conflict of interest exists because MWP has a financial incentive to recommend the Fund to its advisory clients. In order to mitigate this conflict of interest, MWP does not recommend the Fund to advisory clients.

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

MWP has adopted a Code of Ethics for all supervised persons of the Firm 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 MWP must acknowledge the terms of the Code of Ethics annually, or as amended.

Advisors of MWP may buy or sell securities that are recommended to clients. MWP's employees and persons associated with MWP are required to follow the Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of MWP and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for MWP's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of MWP 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 MWP'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 MWP and its clients.

Advisors may buy or sell securities, at or around the same time as those securities are recommended to clients. This practice creates a conflict of interest in that MWP or its Representatives are in a position to benefit from the sale or purchase of those securities. MWP's Code of Ethics provides a policy to monitor the personal trading activities and securities holdings of each of the Firm's Representatives or other Access Persons. The Code of Ethics's 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.

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

Brokerage Practices

MWP recommends the brokerage and custodial services of Charles Schwab & Co., Inc. ("Schwab"). Schwab is a registered broker-dealer that charges brokerage commissions or transaction fees for effecting securities transactions. As the custodian holding an account, Schwab does 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, which are included when wrap fees are charged. When selecting a custodian to recommend, a number of factors were considered, including their historical relationship with MWP, financial strength, reputation, execution capabilities, pricing and services offered.

Schwab makes products and services available to MWP that benefit MWP but may not directly benefit its clients' accounts. Many of these products and services are used to service all or a substantial number of MWP accounts. Some of these products and services provided includes software and other technology that provides access to client account data (such as trade confirmations and account statements); provides research, pricing and other market data; facilitates payment of fees from clients' accounts; and assists with back-office functions, recordkeeping and client reporting. When client brokerage commissions are used to obtain research or other products or services, MWP receives a

benefit because MWP does not have to produce or pay for the research, products or services. As a result of these services provided, commissions may be higher than those charged by other broker-dealers. Soft dollar benefits are used to service all client accounts; they are not used exclusively for the accounts that generated the soft dollar benefits. There is no effort to allocate soft dollar benefits to clients in proportion to the amount of soft dollar benefits generated by each client. Within the last fiscal year, MWP used client brokerage commissions to acquire the products and services listed above under "Soft Dollar Benefits."

Some registered investment advisers recommend a broker-dealer based on how well the broker-dealer refers clients to the investment adviser. This practice creates an incentive for the investment adviser to recommend a broker-dealer based on its financial interest in receiving client referrals. Whether a broker-dealer refers clients to MWP is not a determining factor in the selection or recommendation of a broker-dealer.

MWP does not routinely recommend, request, or require that clients direct executions through a specified broker-dealer. We will, however, make every effort to accommodate a request to direct brokerage to a client's chosen broker-dealer.

In certain circumstances, MWP will allow clients to select the broker-dealer to execute transactions, or to maintain their account at another custodian, including legacy accounts held through RBC Capital Markets, LLC ("RBC"). In this case, each client selects a broker-dealer based on factors important to them. Clients will negotiate the terms and arrangements with their broker-dealer of choice, and transactions are directed to the specified broker-dealer. MWP will not be in a position to seek better execution services or prices from other broker-dealers. By directing brokerage, MWP may not be able to achieve the most favorable execution of client transactions and this practice may cost clients more money.

Clients can benefit when trades are aggregated to obtain volume discounts on execution costs. Trade aggregation refers to the practice of combining orders for execution. While MWP does not aggregate the trades of clients, third-party investment managers may. Brokerage practices of third party investment managers are disclosed separately in their brochure.

Review of Accounts

Accounts are assigned to Investment 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 Firm 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 Firm 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 Firm during normal business hours to consult with the Firm concerning the management of the client's account(s).

Client Referrals and Other Compensation

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

Financial Information

MWP does not require or solicit prepayment of any fees six months or more in advance. MWP 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.

Privacy Policy

Midway Wealth Partners, LLC ("MWP") views protecting your private information as a top priority. Pursuant to applicable privacy requirements, we have instituted policies and procedures to ensure that we keep your personal information private and secure.

We do not disclose any non-public personal information about you to any non-affiliated third parties, except as permitted by law. In the course of servicing your account, we may share some information with our service providers, such as transfer agents, custodians, broker-dealers, accountants, consultants, and attorneys.

We restrict internal access to non-public personal information about you to employees, who need that information in order to provide products or services to you. We maintain physical and procedural safeguards that comply with regulatory standards to guard your non-public personal information and to ensure our integrity and confidentiality. We will not sell information about you or your accounts to anyone. We do not share your information unless it is required to process a transaction, at your request, or required by law.

If the representative servicing your account leaves us to join another firm, he/she is permitted to retain copies of your information so that he or she can assist with the transfer of your account and continue to serve you at their new firm. Such information includes client name, address, phone number, email address, and account title of the clients that they serviced while at MWP.

"Opting-out" of Third Party Disclosures: If you do not want your account representative to retain copies of your client sensitive information when he or she leaves us to join another firm, you may contact our Compliance Department by calling (425) 318-4360.

You will receive a copy of our privacy notice prior to or at the time you sign an advisory agreement with our firm. Thereafter, we will deliver a copy of the current privacy policy notice to you on an annual basis. Contact us at (425) 318-4360 if you have any questions regarding this policy.