

Signature Estate Securities  
Broker Dealer Firm Brochure  
Version: August 1, 2022

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SECTION 1: INTRODUCTION

On behalf of Signature Estate Securities ("SES" or the "Firm"), we would like to thank you for taking time to learn more about our firm, our people, and our services. While we hope that both the terms used and the subjects included in this brochure ("BD Firm Brochure" or "Brochure ") are familiar to you, in some cases they may not be. To assist you in better understanding the topics discussed in this Brochure, a brief explanation of several terms that are used throughout may be of benefit.

SES is a broker-dealer. What that means is that we are a company that is in the business of buying and selling securities and certain other investment products-on behalf of our customers. Individuals who are associated with broker-dealers and serve as representatives for retail customers, buying and selling investment products, the personnel whom many people call brokers or registered representatives, are referred to by SES as Financial Professionals ("Financial Professional(s) ", "FP" or "FPs" or "Registered Representatives", "RR", or "RRs"), and that is how they are described in this Brochure. Knowing who we and our Financial Professionals are should make it easier for you to navigate this Brochure, but if you have questions, or would like clarification regarding anything discussed in this Brochure, please ask your Financial Professional to assist you.

Regulation Best Interest ("Reg BI") requires broker-dealers and their Financial Professionals to act in the best interest of a retail customer<sup>1</sup> ("you") and place your interests ahead of all others when making a recommendation of any securities transaction or investment strategy involving securities, including account recommendations and rollover /transfer of assets. Reg BI also requires that broker-dealers disclose the material facts relating to the scope of the terms of your relationship with your broker-dealer and FP.

The purpose of this Brochure is to foster your understanding of your relationship with SES and your FP, and to help you evaluate any recommendations you receive. When your FP makes a recommendation to you regarding any securities transaction or investment strategy involving securities (including account recommendations and rollover/transfer of assets), your FP should be providing the recommendation in your best interests at that specific time, without placing your FP's financial or other interest ahead of your interests. This Brochure is designed to help you obtain the facts needed when deciding the type of account(s), securities, or services to help you obtain your investment objectives.

<sup>1</sup> For Financial Professionals and retail customers located in Massachusetts, the retail customers covered by this Brochure include all current and prospective customers (including those outside the scope of a "retail customer" as defined by Regulation Best Interest) , but shall not include a bank , savings and loan association, insurance company, trust company, registered investment company, broker-dealer registered with a state securities commission, a State- or SEC-registered investment adviser, or any other institutional buyer, as defined in 950 CMR 12.205(1)(a)6. and 950 CMR 14.401.

## SECTION 2: INVESTMENT PHILOSOPHY

The process by which SES and its Financial Professionals develop their investment recommendations to retail customers is of fundamental importance to your understanding of what services are being provided, and whether those services are appropriate to your needs and goals. SES's philosophy is to provide its Financial Professionals with access to a diverse array of investments to support retail customer risk profiles, including, but not limited to, mutual funds, variable insurance products, fixed insurance products, 529 plans, and retirement plans (collectively "Packaged Product" or "Packaged Products "). Packaged Products have sponsors (a "Packaged Product Sponsor ") which distribute the Packaged Products and manage the Packaged Product's underlying investments. We review our Packaged Product Sponsors to ensure the investments they offer are managed by experienced, cost conscious, and financially and organizationally strong companies. An important component of our investment philosophy involves performing due diligence on Packaged Product Sponsors. Our due diligence includes, but is not limited to, the following:

- Financial and organizational strength (years in the business, assets under management, depth of management, any recent or near future major organizational changes);
- Key personnel and their backgrounds, qualifications, experience, track records, tenure, and reliance on specific key employee(s);
- Market research performed in-house and the strength and experience of research staff;

- Investment methodology (for example, with respect to mutual fund sponsors, we review portfolio turnover rates, risk tolerance levels, models used/indicators tracked, how buy/sell decisions are made, as well as the performance of the investments net of fees); and,
- Compliance with securities laws as well as a review of litigation and /or criminal convictions involving the Packaged Product Sponsor, their principals and portfolio managers.

Your FP will analyze the available investments and account types and provide you a recommendation based on your investment profile including, but not limited to, your personal investment objectives and goals, time horizon, risk tolerance, financial situation, needs and personal circumstances.

If there are elements of your FP's investment philosophy that are not addressed in this Brochure, your FP will provide you with information detailing your FP's own investment approach.

### SECTION 3: FINANCIAL PROFESSIONAL

Your FP is a registered representative of SES, a broker-dealer, and is registered through the Financial Industry Regulatory Authority ("FINRA") to sell and service investment products. Your FP is licensed as either a Series 6 or Series 7 Financial Professional.

- Series 6 is a securities license entitling a registered representative of a broker-dealer to sell mutual funds, UITs, 529 savings plans, variable annuities and variable life insurance. For providing this service the registered representative receives compensation in the form of a commission. Holders of the Series 6 license are not permitted to sell corporate or municipal securities, alternative investment programs, life insurance and options without additional licenses.
- Series 7 is a securities license entitling a registered representative of a broker-dealer to sell all types of securities products and investments (i.e., stocks, Exchange Traded Funds ("ETF"), options, bonds and other individual fixed income investments, annuities, mutual funds). For providing this service, the registered representative receives compensation in the form of a commission. Holders of the Series 7 license are not permitted to sell commodities, futures and life insurance without additional licenses.

Since your FP is a registered representative of a broker-dealer, your FP must comply with Regulation Best Interest and will take into consideration all types of accounts that could be offered when making the recommendation of an account that is in your best interest. Account recommendations include recommendations of securities account types generally, as well as recommendations to roll over or transfer assets from one type of account to another. In making recommendations to you associated with the services described in this Brochure, your FP is acting in the capacity of a registered representative of a broker-dealer. If this capacity changes at any point during the course of a recommendation, it will be disclosed to you at that time.

In your FP's capacity as a registered representative of a broker-dealer, your FP will not monitor your portfolio or investments on an ongoing basis. However, your FP may voluntarily, and without any agreement with you, review the holdings in your account for the purposes of determining whether to provide you with a recommendation. This voluntary review is not considered to be "account monitoring," and does not create an implied agreement with you to monitor the account.

In addition, your FP is registered as an investment adviser representative ("IAR") of Signature Estate & Investment Advisors, LLC, registered investment adviser ("RIA") firm. Your FP as an IAR, would also be able to provide advisory services as well as the products and services mentioned above. When an FP is acting in their capacity as an IAR they are held to a fiduciary standard to their clients. The SEC interpretation of fiduciary duty defines investment advisers' fiduciary duties under the Advisers Act to comprise both the duty of care and the duty of loyalty. The duty of full disclosure also forms a part of the fiduciary duties of an investment adviser, due to the requirement of a loyal agent to disclose any potential conflicts of interest that the agent may have. When a FP is acting in an advisory capacity, you will receive the SEIA Form ADV brochure.

In your FP's capacity, as either a Registered Representative or IAR, when supporting a retirement plan account or individual retirement account, they will be providing investment advice within the meaning of Title 1 of the Employee Retirement Income Security Act and/or the Internal Revenue Code ("Retirement Laws") as it relates to investments and/or asset transfers from one account to another. In this capacity, your FP's advice will be fiduciary in nature as described by the US Department of Labor's ("DOL") Prohibited Transaction Exemption 2020-02.

Lastly, your FP could be registered as an insurance agent. If your FP is registered as an insurance agent, the FP would be able to sell insurance products as well as the products and services mentioned above. Your FP will explain what products he/she is able to sell, and you can log onto FINRA's BrokerCheck at <https://brokercheck.finra.org/>, to review your FP's licenses, insurance business under Outside Business Activities, and financial industry background as well.

Please also refer to SES's Form CRS to learn more about the Firm.

## SECTION 4: SERVICES

Your relationship begins with your FP working with you to identify your investment profile (investment goals and objectives, as well as risk tolerance). Your FP will then develop a recommendation or recommendations designed to complement your financial situation, needs and personal circumstances, and the recommendation will be in your best interest.

Depending on your needs and investment objectives, your FP will provide services through a broker-dealer relationship, investment advisory relationship, insurance relationship or a combination of the proceeding options. There are important differences between these relationships as it relates to types of services and accounts, such as the following:

- Broker-dealer services are when your FP and SES (as a broker-dealer) facilitates investment transactions for a commission, through an account held directly at a Packaged Product Sponsor, based on your instructions. Your FP will be licensed as a Series 6 or Series 7 Financial Professional. Additional services your FP offers are investment education, research, financial tools, and personalized guidance such as recommendations. These recommendations, which will be based on your investment goals, objectives, and risk tolerance, are focused on items such as whether to buy, sell or hold a security or securities, what type of an account to open (taxable, qualified), and if you should transfer/rollover assets from another account, such as a retirement plan account. Your FP will not be providing ongoing monitoring of your account(s) portfolio, so it is important for you to review your account(s) regularly and communicate with

your FP whenever you have questions, or if your financial situation, needs or personal circumstances change.

- Advisory services are when your FP and SEIA (as an SEC registered investment adviser and as a fiduciary) provides ongoing investment advice and monitoring service of your account(s) for a fee. This service may be on a discretionary basis, which means that your FP can place trades, rebalance your portfolio or make other investment decisions for your account without first discussing with you and obtaining your approval. Other services your FP can provide are financial planning, non-discretionary consultation, and advice on the selection of professional asset managers. To provide these advisory services, your FP is required to obtain a specific license (Series 65 or 66) or obtain an equivalent professional industry designation (depending on the state your FP is in) and be listed as an IAR under SEIA.
- In your FP's capacity, as either a Registered Representative providing broker dealer services or an IAR providing advisory services, if they provide advice related to taking a distribution and/or investing of the assets from an ERISA Title I Retirement Plan account to an IRA or from one IRA to another, then your FP will be an Investment Advice Fiduciary under ERISA. That means the advice is required to be for the exclusive benefit of you and your beneficiary(ies).

This Brochure is focused on describing a brokerage service relationship to you. However, when evaluating which type of relationship is best for you, consider the following:

<b>Broker-Dealer vs Registered Investment Advisory Services</b>		
<b>Category</b>	<b>Broker-Dealer</b>	<b>Registered Investment Advisory</b>
<b>Relationship Manager</b>	Registered Representative ("RR")	Investment Advisory Representative ("IAR")
<b>Contact</b>	Less frequent, often initiated by retail customer	As needed, usually initiated by the IAR
<b>Compensation</b>	Commission	Fee
<b>Payment Timing</b>	Pay when you transact	Pay a fee, usually ongoing and based on percentage of the value of your assets under management

Below are some questions you might want to think about and ask your FP:

- Do you want or need someone to manage your account(s)?
- Or do you want to make all your investment decisions and only receive advice when you ask for it?
- Do you want someone to monitor your account(s) and provide ongoing investment advice?
- Or do you just want someone there if you have a question about your account or an investment?
- Do you have an active investment strategy of wanting to buy/sell when any type of financial or economic situation or opportunity presents itself?

- Or do you have a passive investment strategy of buy-and-hold for a long period of time and not influenced by financial or economics swings?
- Do you mind paying an ongoing fee for your FP's services?
- Or would you rather pay your FP for each transaction he/she helps you with?

In addition to the questions above, SES's Form CRS contains several "Conversation Starters" that you can use as discussion points with your FP in determining what services are right for you. It is our goal for you to be as informed as possible regarding your investment options. Your FP is available to explain our services in greater detail should you need any further information.

## SECTION 5: DIRECT SPONSOR BUSINESS

SES offers services through Direct Sponsor Business, with the following key features and characteristics:

Direct Sponsor Business is where your financial account and the assets inside are held directly with a Packaged Product Sponsor. The investments you can purchase and hold in that account are the investments the specific sponsor offers. The specific sponsor dictates the types of accounts you can set up, the investments you can purchase, the fees associated, etc. Direct Sponsor Business is available for mutual funds, annuities, variable insurance, 529 Plans and retirement plans. Please see the material provided by the each of the Direct Sponsor Businesses for details and commissions on each offering.

## SECTION 6: RISKS

You should carefully consider your risk tolerance, time horizon, and financial objectives before making investment decisions. By investing, you are assuming the possibility of losing money or losing purchasing power (when your money does not grow as fast as the cost of living). Risk can be classified into many different categories, and by knowing the various risk categories you can better manage your own expectations and potentially avoid or reduce certain kinds of risk.

Any investment discussion should include the individual and market risks that you ought to know in order to make informed decisions about your money. Our goal is to supply you with information so that you can make an educated decision regarding your investments. Before you choose to invest with us, we suggest you consider the following steps put forward by the SEC:

**Draw a personal financial roadmap.** Before you make any investing decision, sit down and take an honest look at your entire financial situation.

**Evaluate your comfort zone in taking on risk.** All investments involve some degree of risk. If you intend to purchase securities, it is important that you understand before you invest that you could lose some or all your money. Unlike deposits at FDIC-insured banks and NCUA-insured credit unions, the money you invest in securities typically is not federally insured. You could lose your principal, which is the amount you have invested. That is true even if you purchase your investments through a bank.

The reward for taking on risk is the potential for a greater investment return. If you have a financial goal with a long-time horizon, you are likely to make more money by carefully investing in asset categories with greater risk, like stocks or bonds, rather than restricting your investments to assets with less risk, like cash equivalents. On the other hand, investing solely in cash investments may be appropriate for short-term financial goals. The principal concern for individuals investing in cash equivalents is inflation risk, which is the risk that inflation will outpace and erode returns over time.

**Consider an appropriate mix of investments.** By including asset categories with investment returns that move up and down under different market conditions within a portfolio, an investor can help protect against significant losses. Market conditions that cause one asset category to do well may cause another asset category to have average or poor returns. By investing in more than one asset category, you may reduce the risk that you'll lose money and your portfolio's overall investment returns might be more consistent.

In addition, asset allocation is important because it has major impact on whether you will meet your financial goal(s). If you don't include enough risk in your portfolio, your investments may not earn a large enough return to meet your goal(s). For example, if you are saving for a long-term goal, such as retirement or college, most financial experts agree that you will likely need to include at least some stock or stock mutual funds in your portfolio. Please note that diversification does not assure a gain, nor does it protect against a loss of your principal.

**Be careful if investing heavily in shares of employer's stock or any individual stock.** One of the most important ways to lessen the risks of investing is to diversify your investments. It's common sense: don't put all your eggs in one basket. By picking the right group of investments within an asset category, you may be able to limit your losses and reduce the fluctuations of investment returns without sacrificing too much potential gain.

**Consider dollar-cost averaging.** Through the investment strategy known as "dollar-cost averaging," you can protect yourself from the risk of investing all your money at the wrong time by following a consistent pattern of adding new money to your investment over a long period of time. By making regular investments with the same amount of money each time, you will buy more of an investment when its price is low and less of the investment when its price is high. Individuals that typically make a lump-sum contribution to an individual retirement account either at the end of the calendar year or in early April may want to consider "dollar-cost averaging" as an investment strategy, especially in a volatile market.

**Consider rebalancing your portfolio occasionally.** "Rebalancing" means bringing your portfolio back to your original asset allocation mix. By rebalancing, you'll ensure that your portfolio does not overemphasize one or more asset categories, and you'll return your portfolio to a comfortable level of risk.

If you would like additional information, a more in-depth discussion of these and other risk considerations when making an investment decision can be found on the SEC's Information for Investors website at <https://www.sec.gov/investor/pubs/tenthingstoconsider.htm>.

## General Investment Risks

In addition to the personal risk considerations discussed above, it is important for you to understand the risks associated with each recommendation and investment type available. The following is a summary of some of the

general risks associated with investing. Please note that this list is not exhaustive, and is provided as an indication of some of the factors that can impact the value of your investments:

#### Business Risk

This is the risk that the strength of the company used as product sponsor, you are buying a piece of ownership in (a stock, for example) or are loaning money to (a bond, for example) affects your potential returns. Your returns from the stock purchase or bond purchase are influenced by factors like the company going out of business, or going into bankruptcy, or having a viable and strong revenue stream from the products or services it sells that is not over-shadowed by expenses. If a company goes bankrupt and its assets are liquidated, common stockholders are the last in line to share in the proceeds.

#### Call Risk

This is the risk that your bond or other fixed-income investment will be called or purchased back from you when conditions are favorable to the product issuer and unfavorable to you.

#### Concentration Risk

This is the risk of loss because your money is concentrated in one investment or type of investment. When you diversify your investments, you spread the risk over different types of investments, industries and geographic locations.

#### Credit Risk

This is the risk that the government entity or company that issued the investment will run into financial difficulties and won't be able to pay the interest or repay the principal at maturity. Credit risk applies to debt investments such as bonds. You can evaluate credit risk by looking at the credit rating of the bond or the issuer. For example, long-term U.S. government bonds currently have a credit rating of AAA, which indicates the lowest possible credit risk.

#### Currency Risk

This is the risk of losing money because of a movement in the exchange rate. For example, if the U.S. dollar becomes less valuable relative to the Canadian dollar, your U.S. stocks will be worth less in Canadian dollars. This applies when you own foreign investments.

#### Default Risk

This is the risk that a bond or other fixed-income investment issuer is unable to pay the contractual interest or principal on the product in a timely manner or at all.

#### Financial Risk

This is the risk that the companies you invest in will perform poorly, which affect the price of your investment. You can't eliminate financial risk; however, you may be able to minimize the impact through diversification.

#### Foreign Investment Risk

This is the risk of loss when investing in foreign countries. When you buy foreign investments, such as shares of companies in emerging markets, you face risks that do not exist in the United States (for example, the risk of nationalization).

### Horizon Risk

This is the risk that your investment time horizon may be shortened due to a foreseen or unforeseen event, thus requiring you to sell the investment(s) that you were expecting to hold for a longer term. If you must sell at a time when the markets are down, you may lose money.

### Inflation Risk

Inflation risk, also called purchasing power risk, is the chance that the cash generated by an investment today won't be worth as much in the future. Changes in purchasing power due to inflation may cause inflation risk. There are investments that help minimize inflation risk.

### Interest Rate Risk

This is a risk that can affect the value of bonds or other fixed-income investments you may purchase. When interest rates rise, the market value of bonds fall. When interest rates fall, the market value of bonds rise.

### Liquidity Risk

Liquidity risk arises when an investment can't be bought or sold quickly enough to prevent or minimize a loss. You may be able to minimize this risk by diversifying. A good option is index investing where risk is diversified over the various stocks held in a portfolio tracking a particular index. You can't invest directly in an index.

### Manager Risk

This is the risk that an investment manager will fail to execute its stated investment strategy.

### Market Risk

This is the risk that the stock market will decline, decreasing the value of the securities owned. Stock market bubbles and crashes are good examples of heightened market risk. You can't eliminate market risk; however, you may be able to minimize the impact through diversification.

### Options Risk

This is the risk of the option holder losing the entire amount paid for the option in a relatively short period of time, reflecting the nature of the option as a wasting asset becoming worthless when it expires. If you don't sell an option in the secondary market or exercise it prior to expiration, you will lose your entire investment in the option.

### Political and Government Risk

This is the risk that the value of your investment will be affected by the introduction of new laws or regulations.

### Regulatory Risk

This is the risk that changes in law and regulations from any government can change the value of a given company and its accompanying securities. Certain industries are susceptible to government regulation. Changes in zoning, tax structure or laws impact the return on these investments.

### Reinvestment Risk

This is the risk of loss from reinvesting principal or income at a lower interest rate.

## Specific Investment Risks

SES and your FP offer various types of investments. The different types of investments we offer and their potential risks are described below.

**Mutual Fund:** This is a type of investment vehicle consisting of a portfolio of stocks, bonds, or other securities. Mutual funds give small or individual investors easier access to diversified, professionally managed portfolios. Mutual funds are divided into several kinds of categories, representing the kinds of securities they invest in, their investment objectives, and the type of returns they seek. Mutual funds charge annual fees (called expense ratios) and, in many cases, commissions, which can affect their overall returns. Most mutual funds offer you different types of shares, known as "classes." Each class invests in the same portfolio of securities and has the same investment objectives and policies. But each class has different shareholder services and /or distribution arrangements with different fees and expenses. With an open-end fund, if you want to buy shares, the management company will sell them to you. They will take your money, add it to the portfolio, and create more shares. You always buy or sell shares of an open-end fund with the issuing fund company, never on the secondary market.

**Mutual Fund Share Classes:** Many mutual funds offer more than one class of shares, commonly including Class A or C shares, in order to accommodate different investment needs and time horizon. Each share class represents an interest in the same mutual fund's investment portfolio but with different fees and expenses.

- **Class A Shares:** Class A shares typically assess a front-end sales charge at the time of purchase. However, they have lower annual operating expenses than C shares and generally offer a reduced sales charge based on defined thresholds of dollars invested in the same family of funds. These reduced sales charges may be achieved through the following:
  - **Breakpoint** - Purchases that exceed certain thresholds that qualify you for a reduced front-end sales charge. Breakpoints typically begin at \$25 ,000 and offer increasing discounts as holdings reach higher thresholds.
  - **Rights of Accumulation (ROA)** - Aggregation of holdings from prior purchases within the same fund family can be added to the value of a new purchase for breakpoint purposes. This aggregation may allow for all accounts of your household to qualify for reduced sales charge based on total investments within the fund family and across registrations of the household.
  - **Letter of Intent (LOI)** - This pledge to a fund family allows the investor to receive a reduced sales charge on all purchases if the investor commits to purchasing a breakpoint eligible amount within 13 months.
- **Class C Shares:** Class C shares typically do not assess a front-end sales charge. C shares do, however, assess a contingent deferred sales charge (CDSC) if the shares are sold within 12 months from the purchase date. C shares typically carry higher expenses than A shares of the same fund . The expense ratio varies from fund family to fund family but is typically about .75%greater for C shares than A shares. C shares typically do not convert to A shares upon expiration of the CDSC or thereafter.
- **Other Share Classes:** Some fund families may have other shares classes, but the shares classes noted above are the primary classes of shares. Please consult the prospectus for the fund family you are considering for details about other shares classes, if applicable.
- **Share Class Selection:** There are several factors that can impact your decision on share class selection. Some of those factors include the following:

- While it is common for an investor to diversify their mutual fund holdings among several mutual fund families, you should carefully evaluate the benefits and the costs of doing so. For example, investing in mutual funds offered by multiple fund families may preclude you from being able to take advantage of breakpoints that would otherwise be available had you invested through one fund family. Prior to making any mutual fund investment, you should always carefully review the sales charges associated with that transaction and evaluate how those charges will be affected by mutual fund investments you have previously made or that you intend to make in the future.
- Long-term investors who intend to hold mutual funds within that same fund family for several years generally will find A shares to be a good option particularly for larger breakpoint eligible investment amounts within a fund family.
- An investor that is looking for asset allocation flexibility across fund families will generally find C shares to be a good option. That flexibility generally come with greater expenses if the funds are held long-term which may negatively impact performance.
- Time Horizon: It should be noted that your Time Horizon is the length of time before you plan to withdraw most or all of your funds from the account. You may have a different Time Horizon for a portion of the funds in your account or a Time Horizon for specific investments within the accounts. In other words, a Long Time Horizon does not necessarily translate into use of A shares because while the account level Time Horizon may be long the individual holdings in the account may have the potential for shorter term holding periods.
  - Major risks: Concentration, Currency, Foreign Investment, Inflation, Manager, Market
- Closed-end Fund: This is a type of investment vehicle where, at fund inception, the investment company raises a set amount of money and issues a specific number of shares. No new shares are created after that point. Investors can buy the fund shares only on the secondary market, from someone else who is selling shares. Like stocks, closed-end fund shares can be traded at any time of the day when the market is open. The shares reflect market values rather than the net asset value of the fund itself.
  - Major risks: Concentration, Currency, Foreign Investment, Inflation, Manager, Market

Annuity: This is a long-term investment that is issued by an insurance company designed to help protect the annuitant from the risk of outliving the income generated by their deposits into the contract. Because these are long-term vehicles, annuity contracts include contingent deferred sales charges ("CDSCs") that would result in a forfeiture of a percentage of account value if surrendered prior to their expiration, typically three to 10 years depending on the contract. Annuities have two phases. Phase one of the annuity contract is known as the accumulation phase, where deposits are designed to accumulate on a tax-deferred basis. During the accumulation phase contract holders can choose annuities with any one or, in some cases, a combination of the following accumulation account options.

- Variable Annuity: This is a tax-deferred retirement contract that allows you to choose from a selection of investments called subaccounts. These investments are designed to provide contract holders with a diversified investment portfolio in a specified asset class or general investment strategy. Subaccounts are managed by an investment specialist or a team of specialists who make decisions to manage the subaccount based on the stated objective. Each subaccount will have a unique expense ratio based on the services provided by the investment specialist team. For example, a subaccount designed to follow the return of a stock index, such as the S&P 500 will have a lower expense ratio than a subaccount seeking to actively manage a portfolio based on a stated objective.

- Major risks: Business, Credit, Liquidity
- Investment-only Variable Annuity (IOVA): This is a type of annuity contract that provides you with a simple way to set aside taxable assets in a tax-deferred entity focused on investments only. Unlike most variable annuities which offer living income stream and death benefits (for a cost), IOVAs only offer investments and the ability to access the assets without penalty as early as age 59 ½.
  - Major risks: Business, Liquidity, Market
- Registered Index Linked Annuity (RILA): This is a type of annuity contract that calculates account value adjustments based on the performance of a specified market index, such as the S&P 500. The account value will receive protection against market losses typically through a buffer (carrier accepts the first xx% of losses and the account accepts any additional losses in market value) or a floor (the account accepts the first xx% of losses and the carrier accepts any additional losses in market value). This protection is in exchange for limiting gains in account value to a cap (a maximum account value increase of xx%) or a participation rate (account participates in xx% of the market gains). Fees and caps may limit the potential upside. At the end of the sample period, the account value could increase or decrease.
  - Major risks: Business , Liquidity , Market

Phase two of the annuity contract is known as the annuitization phase. This option converts your purchase payments (what you contribute) and accumulated growth (if any) into periodic payments that can be paid out under various payment options, including a lifetime option. Annuities can provide investors with additional benefits above and beyond tax deferred growth in the form of living benefits or enhanced death benefits including but not limited to the following.

- Guaranteed Minimum Withdrawal Benefit (GMWB): Guarantees investors a stream of lifetime income based on a percentage of the contract's benefit base. Lifetime GMWB payments are available without having to immediately annuitize the contract.
- Guaranteed Minimum Accumulation Benefit (GMAB): Guarantees a certain portion of the investment is returned to the contract owner regardless of the performance of the subaccounts.
- Guaranteed Minimum Death Benefit (GMDB): Guarantees an enhanced benefit to the contract owner's beneficiaries regardless of the account value on the date of death. These benefits can be based on a return of the initial investment, the highest contract value on the contract's anniversary over a specified period of time or increase at a specified percentage over a period of time.

Life Insurance: A life insurance policy is a contract that in exchange for premium payments is designed to pay a sum of money at the death of an insured person, either individually or as a member of a group of insured persons. Death benefit payments under a life insurance policy are typically income tax free to the beneficiary(ies) and are designed to replace income lost due to the death of the insured or for multiple estate planning scenarios. Life insurance is categorized as term (viable for a specific period) or permanent (can be designed to remain in effect for the insured's entire life). Permanent life insurance allows the contract owner to accumulate cash value, and use the accumulated cash value for other purposes, including investing within the life insurance contract, or withdrawing it to meet other financial needs.

- Variable Universal Life: This type of life insurance allows you to choose from a selection of investments called subaccounts. These investments are designed to provide contract holders with a diversified investment portfolio in a specified asset class or general investment strategy. Subaccounts are managed by an investment specialist or a team of specialists who make decisions to manage the subaccount based on the stated objective. Each subaccount will have a unique expense ratio based on the services provided

by the investment specialist team. For example, a subaccount designed to follow a stock index such as the S&P 500 will have a lower expense ratio than a subaccount seeking to actively manage a portfolio based on a stated objective.

- Major risks: Business, Liquidity, Market

**529 Investment:** A 529 plan is a college savings plan that offers tax and financial aid benefits. 529 plans may also be used to save and invest for K-12 tuition in addition to college costs. The investments in 529 plans can include various mutual funds and ETFs and are offered as a single investment as well as in risk-based or enrollment (or age-based) portfolios.

- State-Specific Considerations
  - Depending upon the laws of your home state and /or the home state of the designated beneficiary, favorable state tax treatment or other benefits offered by your home state for investment in a 529 Plan may be available only if you invest in your home state's 529 plan.
  - If you contribute to a 529 Plan offered by a state in which you are not a resident, you should consider whether your, or your designated beneficiary's home state offers any state tax or other benefits, which may include financial aid, scholarship funds and protection from creditors, only available for investments in such state's qualified tuition program.
  - For additional details on the risks, Federal and State tax treatment , share classes, costs and fees of 529 plan investments, refer to the 529 Plan Brochure and the 529 Plan Official Statement/Plan Description, which is located on the 529 plan sponsor 's website, or obtain from your FP.
    - Major risks: Concentration, Currency, Foreign Investment, Horizon, Market

When you are deciding whether to purchase a specific investment, make sure you obtain, review and discuss with your FP the documentation related to the investment which outlines the details of the investment (i.e., annual reports, prospectuses, and offering memorandums that discuss the structure of the investment, fees/costs, management, portfolio, restrictions, contributions, distributions, risks, etc.) The documentation should be provided by your FP or can be obtained directly from the investment sponsor.

## SECTION 7: COMPENSATION AND CONFLICTS OF INTEREST

SES-like every financial services company, has conflicts of interest. For example, both SES and its Financial Professionals are compensated for the products we sell, and this presents an inherent conflict of interest. As you work with your FP to determine the right investments and services to reach your investment goals, it is important for you to (1) understand how SES and your FP are compensated, and (2) have all the material facts related to the scope and terms of SES's and your FP's relationship with you. The information contained in this section describes conflicts of interest associated with compensation received by SES and its Financial Professionals for brokerage services, in addition to some of our other related conflicts of interest, in order to provide you with the material facts related to these conflicts.

SES and your FP make money because we are either compensated directly by you, or indirectly from the investments purchased by you. SES offers a range of investments and services to our retail customers, and when you purchase a product for which SES is acting as a broker-dealer, you will usually pay a sales commission, which may be (1) paid at the time of purchase, (2) built into the expense of the product purchased, or (3) charged to you

when you sell the investment. If we are paid an upfront commission, it means that the greater the dollar value of your transactions, the more we are paid.

As it relates to Packaged Products, the Packaged Product Sponsor or its affiliates, will pay the commission generated by the transaction to SES. SES shares a portion of that payment with your FP based upon an established compensation formula that is uniform regarding similar products. Sales charges, expenses and commissions paid to SES differ with the type of investment and may depend on the amount of money you invest. SES may also receive ongoing or continuing compensation, trailing commissions (or "trails") that are intended to compensate SES for marketing and other services provided to your FP and to you. SES and your FP receives a portion of the commission.

FP Conflicts: This conflict arises from compensation received by your FP. These forms of compensation are in addition to the commissions received by your FP).

- Insurance Products and General Securities: A Financial Professional can offer various types of services and products, and the compensation the Financial Professional earns differs depending on the type of service or product recommended. If a recommendation was made to liquidate certain products in order to purchase other products, a conflict can arise. For example, a Financial Professional can make a recommendation to liquidate an insurance product to purchase general securities that will generate compensation but is not in the client's best interest. Similarly, a Financial Professional can make a recommendation to liquidate general securities to purchase insurance products, and there is a conflict if the recommendation was made solely to generate compensation and was not in the best interest of the retail customer.
- Exchange Traded Funds (ETFs) vs. Mutual Funds: SES offers various mutual funds and ETFs, some of which have similar or identical investment strategies but differing fee structures. For example, a mutual fund that is designed to track an index of securities, such as the S&P 500 Index, may have higher or different types of fees than an ETF that is designed to track the same index. Whether a fund or ETF is more expensive than another fund or ETF with a similar or identical investment strategy may depend on factors such as length of holding, size of the initial investment and other factors. Both SES and the Financial Professional may earn more compensation by selling one fund or ETF over another, giving the Firm and the Financial Professional an incentive to recommend the product that pays more compensation to us.
- Mutual Fund - Share Classes: A Financial Professional can offer various types of mutual funds, some of which offer different types of shares, known as "classes." Each class invests in the same portfolio of securities and has the same investment objectives and policies, but the fees and commissions that you pay generated by mutual fund purchases or sales can vary by the share class of a particular fund. For example, certain mutual fund share classes, often known as Class A shares, charge you an initial sales commission which is deducted from the amount you invest, and an ongoing trail. For other mutual fund share classes, often referred to as Class C shares, you pay an ongoing level trail commission. Depending on the length of the holding period for the mutual fund, and other factors, one share class may be less expensive to the investor than another, and the Financial Professional may earn more or less compensation for one share class than another.
- Mutual Funds -Asset Classes: Asset allocation involves dividing an investment portfolio among different asset categories, such as stocks, bonds, and cash. The process of determining which mix of assets to hold in your portfolio is a very personal one. The asset allocation that works best for you at any given point in

your life will depend largely on your time horizon and your ability to tolerate risk. A Financial Professional can offer various types of mutual funds, across asset classes. The potential to generate higher commissions can lead financial professionals to influence asset allocations recommendations. For example, a Financial Professional can make a recommendation to allocate a higher percentage of your portfolio to stocks due to higher initial commission offered for mutual funds in that asset category compared to bonds.

- **Trading Ahead:** Financial Professionals may recommend securities to you or buy or sell securities for your account at or about the same time they may buy or sell the same securities in their own account. SES maintains policies and procedures to avoid, detect, and correct conflicts of interest that may arise if you and the Financial Professional (including related persons) invest in the same security on the same side of the market on the same day.
- **Outside Business Activities:** Since Financial Professionals are independent contractors of SES, they have the ability to engage in certain other business activities separate from the activities they conduct through SES. SES's affiliated Financial Professionals are employed by, or own, an investment adviser business (SEIA), separate from SES. Although this is not considered a conflict of interest on its own, retail customers should be aware that these situations can exist. For example, a Financial Professional could conduct these activities during normal business hours, which could take away time from servicing retail customers or otherwise affect their obligations to you. Such activities include insurance, and/or real estate services. For more information about your FP's outside business activities and to see if they may present conflicts of interest, please visit FINRA's BrokerCheck and search under "Detailed Report."
- **Rollovers/Transfers:** You can rollover/transfer assets from a qualified retirement accounts, such as a 401(k) plan or IRA, to another IRA. If your FP recommends a rollover/transfer, the U.S. Department of Labor ('DOL') views this as an ERISA Investment Advice Fiduciary activity which creates a conflict of interest since your FP's compensation could vary depending on what they recommend to you. To be in compliance with ERISA, your FP and the Firm will meet the requirements under the DOL's Prohibited Transaction Exemption 2020-02. There may be an increase in the ongoing cost of the assets in the new account and your FPs compensation could increase as a result. There may also be additional products or services available to you. The Firm has established a special process and requirements to assist you and your FP in evaluating a rollover and whether it is in your best interest.
- **SES may provide incentive compensation to certain Financial Professionals based on gross dealer concession up to \$250,000.** These payments create a conflict of interest for the Financial Professional to recommend investment products offered through SES.
- **Other Cash and Non-Cash Compensation:** In addition to reimbursement of training and educational meeting costs. SES and our Financial Professionals may receive promotional items, meals or entertainment or other non-cash compensation from representatives of mutual fund companies, and insurance companies, as permitted by regulation. Additionally, sales of any mutual funds, and variable insurance products, may qualify our Financial Professionals for additional business support and for attendance at seminars, conferences and entertainment events. Further, some of SES management and certain other employees of SES may receive a portion of their employment compensation based on sales and /or certain sponsors of other products. From time to time, non-Strategic Partners may attend the Firm's sponsored meetings for a fee.

**Business Affiliation Conflicts:** This conflict arises from differing compensation received by FP and SES and its affiliates for directing customers to products or services of SES affiliate companies.

- Signature Estate & Investment Advisors, LLC (“SEIA”): Financial Professionals can recommend SEIA, a SEC registered Investment Advisor, to provide Investment Advisory, Financial Planning and consulting services. When making any recommendation, your FP will first consider whether SEIA can adequately service client needs and whether any other efficiencies or benefits will result to the retail customer. Customers are not obligated to follow our recommendations or use SEIA's services. SEIA’s services, fees and other key disclosures are more fully described in its ADV disclosure brochures, which are available to any client or prospective client upon request and will be furnished at or before client receives services from SEIA. FPs can be RRs of SES, IARs of SEIA and Insurance Agents of SEIS. FPs will receive compensation in connection with the business they conduct through the various affiliates. This creates a conflict in that the Firm and its FPs have an incentive to use an affiliate rather than other entities providing similar services. Employees of SEIA may also be affiliated with SES, SIA, SEIS and SIP.
- Signature Investment Advisors, LLC (“SIA”): SIA is a SEC registered investment advisor. It primarily offers Turnkey Asset Management Program (“TAMP”) services to unaffiliated financial services entities. Though SIA does not offer TAMP services to clients of SES affiliated entities directly, FPs can recommend the use SIA’s strategist services through SEIA. Employees of SIA may also be affiliated with SES, SEIA, SEIS and SIP. When making any recommendation, your FP will first consider whether SIA strategist services adequately service client needs and whether any other efficiencies or benefits will result to the retail customer. Customers are not obligated to follow our recommendations or use SEIA's services.
- Signature Intelligent Portfolios, LLC (“SIP”): SIP is a SEC registered investment advisor. It offers discretionary investment management via a robo platform. FPs can recommend the use SIP’s robo platform. Employees of SIP may also be affiliated with SES, SEIA, SIA, and SEIS. When making any recommendation, your FP will first consider whether SIP’s services adequately service client needs and whether any other efficiencies or benefits will result to the retail customer. Customers are not obligated to follow our recommendations or use SIP's services.
- Signature Estate Insurance Services, LLC (“SEIS”): SEIS is an insurance firm that allows licensed insurance agents to offer fixed insurance products, including but not limited to fixed life insurance, term life, long-term care solutions and corporate owned life insurance, to clients. Customers are not obligated to follow our recommendations or use SEIS's services. FPs can be RRs of SES, IARs of SEIA and Insurance Agents of SEIS. FPs will receive compensation in connection with the business they conduct through the various affiliates. This creates a conflict in that the Firm and its FPs have an incentive to use an affiliate rather than other entities providing similar services. Employees of SEIS may also be affiliated with SES, SEIA, SIA, and SIP.

SES maintains policies and procedures to ensure recommendations are in your best interest. The Firm also maintains a supervisory structure to monitor the activities of our Financial Professionals to reduce potential conflicts of interest. You are encouraged to ask the Firm or your FP about any conflict presented. Additionally, for more information about our conflicts, please go read our form CRS, which contains additional conflict-related information.

Please note that not all the conflicts described in this Brochure apply to a particular SES Financial Professional or your FP's services. Also note that the products we sell, and the types and amounts of compensation we receive, change over time. You should ask your FP any questions you have about compensation or conflicts of interest. Understanding the conflicts of interest that SES and your FP have, and how those conflicts of interest may affect

the basis for a particular recommendation, will help you evaluate the potential incentives either we or your FP have in making a recommendation.

## SECTION 8: RETIREMENT OR EMPLOYEE BENEFITS PLAN ACCOUNTS

This Section applies to the Client's Account if it is part of a pension or other employee benefit plan (a "Plan") governed by the Employee Retirement Income Security Act of 1974, as amended ("ERISA"), but only to the extent that all or part of the services being provided to the Plan are deemed fiduciary in nature under applicable law. If the Account is part of a Plan and we accept appointment to provide advisory services to such account, then the following applies:

- SES acknowledges that it is a "fiduciary" within the meaning of Section 3(21)(A) of ERISA (but only with respect to the provision of services described in this Agreement).
- SES represents when supporting a retirement plan account or individual retirement account, the RR will be providing investment advice within the meaning of Title 1 of the Employee Retirement Income Security Act and/or the Internal Revenue Code ("Retirement Laws") as it relates to investments and/or asset transfers from one account to another. In this capacity, your FP's advice will be fiduciary in nature as described by the US Department of Labor's ("DOL") Prohibited Transaction Exemption 2020-02.
- SES agrees to obtain and maintain an ERISA bond (when not otherwise provided by the Plan sponsor) satisfying the requirements of Section 412 of ERISA and include the Firm and its members, agents and employees among those insured under that bond.
- Client acknowledges the following:
  - Client independently made the decision to enter into this Agreement and was not influenced by SES's status as a Plan service provider under any other Agreement
  - SES's appointment and the Services are authorized under the Plan documents.
  - SES shall provide Services only with respect to the selections instructed by client, and shall not: (i) serve as a Plan custodian; (ii) have discretion with respect to the Plan's choice of Third Party Administrator, Record-keeper or other service provider; or (iii) assume the duties of a trustee of the Plan or administrator (as such term is defined in Section 3(16) of ERISA).
  - SES shall have no authority or discretion to: (i) interpret the Plan documents; (ii) handle benefit claims under the Plan; (iii) determine eligibility or participation under the Plan; or (iv) take any other action with respect to the management or administration of the Plan. iv. Client acknowledges that this Agreement contains the disclosures required by ERISA Regulation Section 2550.408b-2(c).
  - Client confirms that the Account is only part of the Plan's assets and as such, SES is not responsible for all Plan investments and Client's consequential compliance with those requirements under ERISA.
  - Investments are subject to various market, political, currency, economic, and business risks, and may not always be profitable; and further that SES does not and cannot guarantee financial or investment results.
- If this Agreement is entered into by Client on behalf of a Plan, then the following also applies:
  - Client represents that client: (i) is independent of and unrelated to SES or any of its affiliates; (ii) is the Named Fiduciary (as defined in ERISA Section 402(a)(2)) or an authorized delegate thereof

with respect to the control or management of the assets of the Plan; (iii) has the power and authority to appoint investment advisers and investment managers under the terms of the Plan and to enter into contractual arrangements with third parties to assist in the discharge of these and related duties in accordance with the requirements of ERISA; and (iv) is authorized to sign on behalf of the Plan in its corporate capacity.

- Unless otherwise agreed to in writing, SES shall not serve as the investment manager for the Plan, as such term is defined in Section 3(38) of ERISA.
- SES shall not, and cannot, provide legal or tax advice to Client and/or the Plan (or any Plan participant or beneficiary), and Client agrees to seek the advice of its own legal and/or tax adviser, as to all matters that might arise relating to the Plan, including, without limitation, the operations and administration of the Plan and the compliance of the Plan with applicable law, including ERISA and the Internal Revenue Code of 1986, as amended (the “Code”).
- Plan sponsor shall be solely responsible for the Plan’s compliance (both in form and operation) with all applicable federal and state laws, rules and regulations, including, but not limited to, ERISA and the Code.
- Plan sponsor shall comply with all applicable federal and state privacy and information security laws governing the use, disclosure and safeguarding of nonpublic personal information.
- Upon request, Plan sponsor shall deliver to SES copies of the Plan documents, including all amendments thereto, and shall provide SES with copies of any subsequent amendments or restatements of those documents.
- The following is a guide to important information about the services SES provides and the compensation received for such services:
  - A description of the services SES provides to Client pursuant to this Agreement can be found in the Investment Policy Statement for Retirement Plans.
  - SES’s status as a fiduciary in connection with the services provided to Client is described herein. Client is urged to read this Section carefully as it imposes limitations on the services SES can provide to Client.
  - A description of the fees SES receives from Client in connection with the services being provided can be found in your SES billing instruction document. A complete description of other compensation received which may create a potential conflict of interest can be found herein and the SES Form CRS. Fees and Expenses relating to Client’s selected investment options will be provided to Client by the custodian, via prospectus delivery.
  - SES does not assess any termination fees or penalties when an account is closed.
- Additional Provisions Regarding Rollovers and Investing Assets Within a Plan or IRA
  - Acknowledgement of Fiduciary Responsibility: When SES and its advisory personnel provide investment advice to Client regarding Client’s retirement plan account or IRA account, SES and its personnel are fiduciaries within the meaning of Title I of the ERISA and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way SES makes money creates some conflicts with your interests, so SES operates 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.
- Documentation Regarding Rollover Transactions: When recommending a rollover to a Client, SES will document the reasons that a rollover recommendation is in the best interest of Client and provide documentation to the Client.

## Section 9: ARBITRATION AGREEMENT

**The Client and SES agree that the following steps will be used to settle any controversy or claim, including, but not limited to, errors and/or omissions arising out of or relating to this Agreement or the breach thereof.**

- a. **Negotiation.** The Client and SES agree that they will attempt to resolve any controversy, claim, or dispute (“Dispute”) relating to this Agreement by prompt, good faith negotiations. Any Dispute which is not settled by the Parties within thirty (30) days after written notice of a Dispute is given by one Party to the other shall be referred to arbitration pursuant to Clause ii. below.
- b. **Arbitration:** This agreement contains a pre-dispute arbitration clause. By signing an arbitration agreement, the parties agree as follows:
  - a. All parties to this Agreement are giving up the right to sue each other in court, including the right to a trial by jury, except as provided by the rules of the arbitration forum in which a claim is filed;
  - b. Arbitration awards are generally final and binding; a parties ability to have a court reverse or modify an arbitration award is very limited;
  - c. The ability of the parties to obtain documents, witness statements and other discovery is generally more limited in arbitration than in court proceedings;
  - d. The arbitrators do not have to explain the reason for their award unless, in an eligible case, a joint request for an explained decision has been submitted by all parties to the panel at least 2 days prior to the first scheduled hearing date;
  - e. The panel of arbitrators will typically include a minority of arbitrators who were or are affiliated with the securities industry;
  - f. The rules of some arbitration forums may impose time limits for bringing a claim in arbitration. In some cases, a claim that is ineligible for arbitration may be brought in court;
  - g. The rules of the arbitration forum in which the claim is filed, and any amendment thereto, shall be incorporated into this agreement.

**All controversies that may arise between you, SEIA, and/or any of our employees, agents or officers (including, but not limited to, controversies concerning any account, order or transaction, or the continuation, performance, interpretation or breach of this or any other agreement between you and us, whether entered into or arising before, on, or after the date this account is opened) shall be determined by arbitration in**

accordance with the rules then prevailing of the Financial Industry Regulatory Authority (“FINRA”), Securities and Exchange Commission (“SEC”) and/or any other securities self-regulatory organization or securities exchange of which the entity against whom the claim is made is a member, as you may designate. If you do not notify us, then you authorize us to make such designation on your behalf. Any arbitration pursuant to this Agreement shall be governed by the rules of the organization convening the arbitration panel. The award of the arbitrators, or of the majority of them, shall be final, and judgment on the award rendered may be entered in any court of competent jurisdiction. A party’s ability to have a court reverse or modify an arbitration award is very limited.

## SECTION 10: PRIVACY POLICY

### NOTICE OF PRIVACY OF CONSUMER FINANCIAL INFORMATION

Respect for clients’ privacy is highly valued at Signature Estate & Investment Advisors, LLC (“we”) and your privacy is important to us. We understand that the trust you have placed in us is conditional upon our proper handling of your personal information. This notice is meant to inform you of how we safeguard your non-public personal information. We restrict access to non-public personal information about you to those employees and supporting organizations that need access to the information to provide our products or services to you. We maintain physical, administrative and procedural safeguards that comply with federal standards to help guard your non-public personal information.

State and Federal law gives you the right to know what information is being collected about you and how the information will be used.

1. Information We Collect: In connection with providing our services, we collect non-public personal information about you which may include:
  - a. Information we receive from you on fact finding and account application documents such as your name, date of birth, social security number, driver’s license number, passport number, or other similar identifiers, phone number, email address, occupation, financial goals, assets, expenses, tax bracket and income.
  - b. Information about your transactions in the accounts managed by SEIA, our affiliates, or other third parties.
  - c. Information that you requested be forwarded to us by your other professional advisors.
2. Use of Personal Information: We use your personal information in connection with providing financial services to you, including:
  - a. To establish or maintain an account with an unaffiliated third party, such as a custodian or broker-dealer.
  - b. To process requests, such as asset movement or purchases and sales.
  - c. To keep you informed about information related to our business and other items of interest to you.
  - d. To comply with Federal, State, Self-Regulatory Organization and other Regulatory requirements

3. Categories of Parties to Whom We Disclose: We will not disclose information regarding you or your accounts except under the following circumstances:
  - a. To your Financial Advisor, their team and the back-office service team, to the extent it is necessary to have access to provide you with our services.
  - b. To companies that perform support services on our behalf as necessary to affect, administer, or process a transaction, or for maintaining and servicing your account. These include custodian, broker-dealer, executing brokers, investment companies or insurance companies.
  - c. To companies that perform support services for us, such as data processors, compliance monitoring technology, consultants, mailing services and information security administrators.
  - d. To your attorney, certified public accountant, trustee or anyone else authorized by you in writing.
  - e. To our attorneys, accountants, consultants or auditors.
  - f. To government entities or other third parties in response to regulatory inquiries, subpoenas or other legal process as required by law.
  - g. SEIA & its affiliates do not sell customer lists or customer information.
  - h. SEIA permits Investment Advisors that terminate their affiliation with SEIA to make copies of all or part of their client files. If you do not want SEIA to disclose your non-public personal information with your Advisors new financial institution please contact Signature Estate & Investment Advisors, LLC, Attn: Compliance Department, 2121 Avenue of the Stars, Suite 1600, Los Angeles, CA 90067. If you reside in a state that requires your affirmative consent before we provide your non-public personal information to certain third-parties, such as in connection with the transfer of your Advisor to another financial institution, we will obtain such consent as required.
  - i. Rights under the California Consumer Privacy Act:
    - i. If you are a California Resident you have the right to:
      1. Request we disclose to you free of charge the following information covering the 12 months preceding your request:
        - a. the categories of Personal Information about you that we collected;
        - b. the categories of sources from which the Personal Information was collected;
        - c. the purpose for collecting Personal Information about you;
        - d. the categories of third parties to whom we disclosed Personal Information about you and the categories of Personal Information that was disclosed (if applicable) and the purpose for disclosing the Personal Information about you; and
        - e. the specific pieces of Personal Information we collected about you;
      2. Request we delete Personal Information we collected from you, unless the CCPA recognizes an exception; and
      3. Be free from unlawful discrimination for exercising your rights under the CCPA.
    - ii. How to Exercise Your Rights

1. Completing the Personal Information Request Form and emailing the completed form to [operations@seia.com](mailto:operations@seia.com). This form is available on our website under the “Legal Disclaimer” section.
  2. Calling (800) 723-5115
4. Changes to Our Privacy Notice
  - a. We reserve the right to amend this privacy at our discretion and at any time. If we make material changes to this privacy notice, we will notify you through a mailing.
5. Question or Concerns:
  - a. You may contact us with questions or concerns about this policy and our practices by:
    - i. Write us at:

Signature Estate & Investment Advisors, LLC – Compliance Department  
2121 Avenue of the Stars, Suite 1600  
Los Angeles, CA 90067
    - ii. Email us at: [operations@seia.com](mailto:operations@seia.com)
    - iii. Call us at: 310-712-2363

## SECTION 11: BUSINESS CONTINUITY POLICY

SES seeks to provide uninterrupted client service. We believe the stability of our business practices, as well as our technology systems, is vital to earning your trust, therefore we make every effort to provide uninterrupted service through a Business Continuity Plan aligned with rigorous SEC and FINRA requirements.

In the event of a natural or unnatural disaster that interrupts our normal business operations at our corporate headquarters at 2121 Avenue of the Stars, in Los Angeles, California; our comprehensive Business Continuity Plans include but are not limited to the following:

Pre-defined alternate worksites and communications systems for all business-critical functions.

- Secure remote work solutions for employees that are critical to maintain service for all existing business. Any internet capable location can serve as a backup work location in an instance where there is limited or no access to any office location.

Multiple layer data backup and recovery systems. Preparing multiple methods of communicating with and providing service to clients via the Internet, physical mail, local offices and automated telephone forwarding services. Annual employee awareness and Business Continuity training.

While no contingency plan can eliminate all risk of service interruption or temporarily impeded access, we continually assess, test, and update our Plan to mitigate all reasonable risk.

If we find it necessary to temporarily move our operations, we will attempt to notify you. Please understand that this may take 48 hours or longer.

Please refer to the Business Continuity Programs of your product sponsors for additional key information. A complete copy of our Business Continuity Plan may be viewed in our office during regular business hours.