

# THIRD-PARTY COMPENSATION DISCLOSURE

SCF Securities, Inc ("SCFS") and SCF Investment Advisers, Inc. ("SCFIA") (Collectively, "we") offer a range of investments and services to its clients. SCFS is registered with the Securities and Exchange Commission ("SEC") as a broker-dealer and SCFIA is registered with the SEC as an investment adviser. As you work with your financial professional to determine the right investments and services to achieve your investment goals, it is also important for you to understand the various forms of compensation and/or fees (also referred to as revenue sharing or marketing support) SCFS and/or SCFIA receive from certain mutual fund sponsors, insurance (issuers, unit investment trust (UIT), exchange traded fund (ETF), alternative investment (real estate investment trusts (REITs), business development companies (BDCs), etc.) and structured products sponsors, and unaffiliated investment advisers that sponsor, manage and/or promote the sale of certain products that are available to our clients.

These payments include commissions, trailing commissions, fees and for certain product sponsors, revenue sharing payments made in connection with programs that support our marketing and sales force education and training efforts (the "Partners Program"). These relationships provide additional compensation to SCFS and/or SCFIA that is used to offset a variety of expenses, including marketing, training, educational presentations, and other support. This additional compensation creates a conflict of interest as it influences the selection of investments and services SCFS, SCFIA, and/or our financial professionals offer or recommend to clients. This disclosure is intended to provide you with an overview of the various types of compensation and fees we receive. We encourage you to review this information in the entirety and contact us with any questions.

## **Partners Program**

Our Partners Program participants ("Partners") are listed below. Partners pay SCFS and/or SCFIA different amounts of revenue sharing and receive different levels of benefits for such payments. Revenue sharing fees are not shared with our financial professionals. A financial professional's compensation is the same regardless of whether a sale involves a Partner's product. In some cases, Partners pay additional marketing payments to SCFS and/or SCFIA to cover fees to attend conferences or reimburse expenses for workshops or seminars. The payments made under the Partners Program are calculated based either on gross sales or assets under management or a flat fee arrangement<sup>1</sup> and vary by Partner. The benefits Partners receive include financial professional contact lists, business metrics, preferred placement on our website, participation in product training initiatives and marketing and sales campaigns, and the ability to participate in our conferences.

We use the revenue from our Partners to support certain marketing, training, and educational initiatives including our conferences and events. The conferences and events provide a venue to communicate new products and services to our financial professionals, to offer training to them and their support staff, and to keep them abreast of regulatory requirements. The revenue is also used to pay for annual awards (in the form of a trophy, medal, or plaque) for our financial professionals who generate the most revenue overall and to pay for our general marketing expenses. Revenue from Partners helps to pay for top producer conference costs. Our top producing financial professionals receive an award based on their total revenues.

## **Mutual Fund and ETF Partners**

In addition to receiving sales commissions and other types of compensation, SCFS and/or SCFIA receives a flat fee, asset-based and/or sales-based compensation from mutual fund and ETF Partners. Such payments vary by Partner. We receive payments from certain mutual fund Partners of up to 0.20% annually on sales or 0.03% on an annual basis of client assets invested with certain mutual fund families and 0.03% on ETF assets. The following mutual fund and ETF sponsors currently participate in the Partners Program:

See the section entitled "Marketing Allowance" for a description of flat fee arrangements. Rev. 03/31/2023 Third-Party Compensation 1290 Funds Lord Abbett

Alliance Bernstein MFS Institutional Advisors

Allianz Nationwide
American Funds/Capital Group Nuveen

BlackRock Pacific Life Funds

Franklin Templeton PIMCO Hartford Mutual Funds Putnam

Invesco Voya Select Advantage

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

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

From time to time, we also receive mutual fund and ETF revenue sharing payments from companies that are not in the Partner Program, generally to cover expenses. These firms include Alliance Bernstein.

# **Insurance and Annuity Partners**

In addition to receiving commissions, SCFS and/or SCFIA receives flat fee and/or sales-based compensation from certain insurance and/or variable, fixed and indexed annuity Partners. SCFS and/or SCFIA receives compensation on an annual basis of up to 0.25% on sales of variable annuity products and up to 1.25% on fixed and indexed annuity sales.

The following variable, fixed, and indexed annuity sponsors currently participate the Partners Program:

Corebridge (formerly AIG) Mass Mutual

Allianz Midland National Life/Sammons Financial

American Equity Nationwide American National New York Life Ash OneAmerica Pacific Life Athene **AXA** Equitable Pinnacle Brighthouse Financial Protective **CUNA** Prudential Delaware Life Securian

Eagle Life Security Benefit

Equitable Simplicity
F&G Symetra
Global Atlantic Financial Group Transamerica
Great American/Mass Mutual Ascend United Life
Jackson National VOYA Service

Jackson National VOYA Services
Lincoln National Western & Southern

From time to time, we also receive insurance and annuity revenue sharing payments from companies that are not in the Partner Program, generally to cover expenses. These firms include American Equity and American National.

# **Insurance Marketing Organizations**

Insurance Marketing Organizations ("IMOs") assist our financial professionals with the sale of life insurance and fixed annuity products while providing access to multiple insurance companies. We receive compensation from IMOs based on sales of insurance products from product providers represented by the IMOs. We receive a flat fee and/or compensation of up to 50% of the override paid to an IMO by the product provider which varies by product. This compensation is used to offset a variety of expenses, including but not limited to, marketing, training, educational presentations, and other support. This compensation is not shared with our financial professionals. An IMO may also provide support directly to financial professionals in the form of free marketing services which is not specific to any one product.

#### **Fixed Income and Structured Product Partners**

In addition to receiving commissions, sales credit, volume concessions, or a markup or markdown on the sale of bonds and retail structured products such as certificates of deposit, constant maturity swaps (CMS), and CMS-linked notes, We receive a fixed fee and/or payments of up to 0.25% of sales-based compensation from certain Partners on structured product transactions.

The following bond or structured product dealers currently participate in the Partners Program:

First Trust

### **Alternative Investment Partners**

In addition to receiving commissions, SCFS and/or SCFIA receives a fixed fee and/or payments of up to 1.00% of client assets invested in certain alternative investment products such as non-traded REITs and business development companies (BDCs). For certain alternative investments such as private alternatives (i.e., Delaware Statutory Trusts, private REITs, Qualified Opportunity Zone Funds), we receive compensation directly from the investment sponsor of up to 1.50% of assets. This compensation is not shared with financial professionals.

The following alternative investment sponsors currently participate in the Partners Program:

CIM iCapital

Exchange Right Inland Securities

Griffin Capital/Apollo MCI
Hines Securities PIMCO

# **Unit Investment Trust (UIT) Partners**

SCFS and/or SCFIA receives additional volume compensation based on total assets purchased from UIT sponsors over a given period of time as disclosed in the Unit Investment Trust's prospectus. Certain UIT sponsors compensate SCFS and/or SCFIA for education seminars for our financial professionals, clients, and prospective clients. This includes due diligence meetings, recreational activities, or other non-cash items. Also, marketing representatives of UIT sponsors, often referred to as "wholesalers," work with financial professionals to promote their UITs. The volume concession rate does not exceed 0.0175% per year.

The following UIT sponsors or brokers currently participate in the Partners Program:

First Trust

Invesco

# **Third-Party Investment Advisers**

SCFS and/or SCFIA receives compensation from certain unaffiliated or third-party investment advisers who participate in our sponsored advisory services programs and/or offer their own advisory services programs to our clients. This compensation received assists us in paying for ongoing marketing and sales support activities including training, educational meetings, due diligence reviews, and day-to-day marketing and/or promotional activities. Current participating third-party advisers are:

Advisors Capital Management LLC Lyrical Asset Management

AssetMark Morningstar Investment Services

Beacon Capital Management Orion Portfolio Solutions (formerly FTJ FundChoice)

Donoghue Forlines Redwood Investment Management

Envestnet SE

Eqis Capital Management
Goldman Sachs
Horizon Investments
Howard Capital Management
Sierra Investment Management
State Street Global Advisors
The Pacific Financial Group
Thrivent Investment Management

Integrated Capital Management (ICM)

Toews Asset Management

Liberty One Investment Management

The compensation arrangements vary and are generally structured as a fixed dollar amount or as a stated percentage not exceeding 0.05% of sales or 0.05% on assets under management (AUM) with the adviser, or a combination of a fixed and percentage-based payment.

A conflict of interest exists where SCFS and/or SCFIA receives such compensation because there is an incentive to recommend these third-party investment advisers over other investment opportunities to generate additional revenue for the firm. However, our financial professionals are not required to recommend any third-party investment adviser providing additional compensation, nor do they directly share in any of this compensation.

## **Marketing Allowance**

In lieu of asset- or sales-based revenue sharing, some Partners pay a marketing allowance (flat fee) which is negotiated annually. This payment assists with costs related to education, training, conference attendance, reimbursement for workshops or seminars and marketing materials for our financial professionals. We do not share any marketing allowance with our financial professionals.

#### Other Compensation

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

## **NFS Clearing Relationship**

National Financial Services LLC ("NFS") is the clearing firm for SCFS's brokerage business. As a result of this business relationship, NFS shares with SCFS a portion of certain commissions and fees that clients pay to NFS and/or interest earned.

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

- for accounts in custody with NFS with cash balances automatically transferred (swept) into the Bank Deposit Sweep Program (BDSP) or Bank Deposit Sweep Program FDIC Eligible (SPFEQ), a portion of the fees paid by each participating bank receiving swept funds (each a "Program Bank") equal to a percentage of the average daily deposits at the Program Banks. The combined fee paid to SCFS and NFS will not exceed more than a maximum of the Federal Funds Target Rate plus 0.25% as determined by the total deposit balances at all of the Program Banks over a 12-month rolling period. SCFS sets the amount of the fee it charges and retains, which may exceed the amount of interest paid to clients.
- for IRA accounts in custody with NFS with cash balances automatically transferred (swept) into the Insured Sweep Program (ISP), a level monthly fee for each IRA that participates in the ISP program. The amount of this fee is determined based on a fee schedule indexed to the Federal Fund Target Rate published by the Federal Reserve System as detailed in the NFS Sweep Program Disclosure Document and SCFS Sweep Program General Terms and Conditions at scfsecurities.com/disclosures. The per account monthly fee will be no less than \$0.25 and no more than \$43.25. It is generally anticipated that the fee SCFS charges will be offset by the total amounts paid to SCFS by Program Banks. If SCFS does not receive sufficient payments each month from Program Banks, SCFS reserves the right to debit each IRA account for the amount of any shortfall.
- for brokerage accounts in custody with NFS that have not been converted to either the Bank Deposit Sweep Program (BDSP), Bank Deposit Sweep Program FDIC Eligible (SPFEQ), or Insured Sweep Program (ISP), a portion of the revenue NFS receives from uninvested client cash balances in such accounts automatically swept into money market funds and FDIC insured bank deposit products of up to 0.50% of the value of cash balances. These payments vary based on the bank deposit account or money market fund a client has selected.
- for brokerage accounts in custody with NFS where a client has elected to opt out of the automatic sweep programs described above, interest and income revenue on free credit balances. For ERISA advisory accounts where SCFS receives revenue, it donates the revenue to charity.
- transition assistance in the form of (a) reimbursement of IRA termination fees of up to \$125 per account for a retirement account transferred to NFS and up to \$95 per retail account for retail accounts transferred to NFS, or (b) a payment based on the value of assets transitioned, or (c) some combination of fee reimbursements and a payment based on the value of assets transitioned.
- A growth assistance credit to support, service, and grow brokerage assets on the NFS platform.
- A portion of certain brokerage account services and custodial fees charged to client accounts
  that exceeds the amount that SCFS is required to pay NFS for such services, including
  account transfer fees, IRA custodial and termination fees, paper confirm and statement fees,
  inactive (custodial) account fees, retirement account maintenance fees, and margin interest
  and/or fees.
- A portion of shareholder servicing fees from certain mutual fund sponsors as part of their no transaction fee mutual fund program.

## **Related Disclosures**

For additional information regarding these third-party payments, including revenue sharing and our conflicts of interest, please refer to the SCFS Brokerage Services Disclosure Summary found at scfsecurities.com/disclosures. Please refer to SCFIA's Form ADV, available at <a href="https://www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a> for additional information on SCFIA's conflicts of interest.