

Securities and investment advisory services offered through Steward Partners Investment Solutions, LLC, registered broker/dealer, member FINRA/SIPC, and SEC registered investment adviser. Investment Advisory Services may also be offered through Steward Partners Investment Advisory, LLC, an SEC registered investment adviser. Steward Partners Investment Solutions, LLC, Steward Partners Investment Advisory, LLC, and Steward Partners Global Advisory, LLC are affiliates and separately operated.

Steward Partners Investment Solutions, LLC offers insurance products in conjunction with its licensed insurance agency affiliates.

# **Company Affiliations**

Steward Partners Investment Solutions, LLC is a wholly owned subsidiary of Steward Partners Holdings, LLC, affiliate of Steward Partners Global Advisory, LLC and Steward Partners Investment Advisory, LLC, registered investment advisor. (Collectively known as "Steward Partners" or the "Firm")

## Who do I make my checks payable for deposits into my account?

When making a deposit to your account, please make check payable to your designated Clearing Agent(s) / Custodian(s):

Raymond James or Raymond James & Associates<sup>1</sup>

IMPORTANT: (1) To ensure deposit, please make sure to include your account number on the memo field. (2) Any checks made payable to Steward Partners, Steward Partners Investment Advisory, or Affiliate will be returned, since we are not a qualified custodian.

# Where do I send my checks to be deposited into my account?

	Instructions / Address	
Mail it directly to my clearing agent /	Regular Mail	Raymond James & Associates
custodian	IRAs	FAO: < <client name="">&gt; P.O. Box 23509 St. Petersburg, FL 33742</client>
	Overnight Mail	Raymond James & Associates 880 Carillon Parkway St. Petersburg, FL 33716
Mobile Check Deposit	For Raymond James only via Client Access App	
Mail it to OR drop it off at a local		
Steward Partners branch location		
Mail it to Steward Partners Home Office	Steward Partners	
Operations	15495 SW Sequoia Parkway Suite #150	
	Portland, OR 97224	
Hand delivery check to my Wealth		
Manager		

If you wish to receive further information about our affiliation with Raymond James, please speak with your Wealth Manager.

## **FINRA Public Disclosure Program**

The Financial Industry Regulatory Authority (FINRA) requires that we provide the following information concerning FINRA's Public Disclosure Program:

The FINRA Regulation Public Disclosure Program hotline number is (800) 289-9999. The FINRA Regulation website address is <a href="www.finra.org">www.finra.org</a>. An investor brochure that includes information describing the public disclosure program may be obtained from FINRA.

## MSRB G-10 Investor Education and Protection Notice

In accordance with the Municipal Securities Rulemaking Board ("MSRB") Rule G-10, Steward Partners Investment Solutions is required to provide, once each calendar year, a notification containing the information below.

<sup>&</sup>lt;sup>1</sup> Custody and clearing services offered by Raymond James & Associates, Inc., member New York Stock Exchange / SIPC, and Raymond James Financial Services, Inc., member FINRA / SIPC, are subsidiaries of Raymond James Financial, Inc.

- Steward Partners Investment Solutions, LLC is registered with the U.S. Securities and Exchange Commission ("SEC") and the Municipal Securities Rulemaking Board ("MSRB")
- The MSRB website is http://www.msrb.org/
- The website provides a link to an investor brochure that describes the MSRB rule's protections

# **Complaints**

Written complaints about your account may be addressed to:

Steward Partners Investment Solutions, LLC Attention: Compliance 15495 SW Sequoia Parkway Suite #150 Portland, OR 97224

You may also call (800) 452-1929 and ask to speak with someone in the Compliance Department.

## **Financial Institutions**

Steward Partners Investment Solutions may offer products or services at certain bank locations and its customers. All securities, investment advisory services and insurance products are offered by Steward Partners Investment Solutions and a separate non-affiliated company from the financial institution.

The investments, insurance and annuity products offered through Steward Partners Investment Solutions are not insured bank deposits.

- The products offered are **NOT** FDIC insured
- The products offered are **NOT** obligations of the Bank
- The products offered are **NOT** guaranteed by the Bank
- The value of the investment MAY fluctuate, the return on the investment is NOT guaranteed, and loss of principal is possible.

## **Account Protection**

The Securities Investor Protection Corporation (SIPC) was created in 1970 as a non-profit, non-government membership corporation, funded by member broker-dealers. SIPC provides limited coverage to investors on their brokerage accounts if their brokerage firm becomes insolvent.

All broker-dealer firms that sell stocks or bonds to the investing public, or that clear such transactions, i.e., introducing or clearing firms respectively, are required to be members of SIPC.

## **Steward Partners Investment Solutions Coverage:**

Steward Partners Investment Solutions is a member of SIPC. SIPC protects against the loss of cash and securities - such as stocks and bonds - held by a customer at a financially troubled SIPC-member brokerage firm. The limit of SIPC protection is \$500,000, which includes a \$250,000 limit for cash. For more information, please refer to <a href="https://www.sipc.org/for-investors/what-sipc-protects">https://www.sipc.org/for-investors/what-sipc-protects</a>.

Please note that each Clearing Agent / Custodian will offer their own SIPC coverage. For more information, please contact us at info@stewardpartersis.com.

# Important Information About Procedures for Opening a New Account

**USA PATRIOT Act Notice** 

IMPORTANT INFORMATION ABOUT PROCEDURES FOR OPENING A NEW ACCOUNT OR ESTABLISHING A NEW CUSTOMER RELATIONSHIP

To help the government fight the funding of terrorism and money laundering activities, Federal law requires all U.S. financial institutions to obtain, verify, and record information that identifies each individual or institution that opens an account or establishes a customer relationship with Steward Partners Investment Solutions.

What this means: If you enter into a new customer relationship with Steward Partners Investment Solutions, the Firm will ask for your name, address, date of birth (as applicable) and other identification information. This information will be used to verify your identity. As appropriate, the Firm may, in its discretion, ask for additional documentation or information. If all required documentation or information is not provided, Steward Partners Investment Solutions may be unable to open an account or establish a relationship with you.

# **Business Continuity Plan**

Steward Partners maintains a Business Continuity Plan to address major interruptions to our normal course of business. These plans are reviewed annually and updated as necessary. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. Our plans outline the actions Steward Partners will take in the event of a building, city-wide, or regional incident.

## **Contacting Us:**

During a significant business disruption, Steward Partners will re-establish telephone service with our clients as soon as possible. Our clients should check our website at <a href="https://www.stewardpartners.com">www.stewardpartners.com</a> for our latest information. In an emergency, please call Steward Partners at (800) 452-1929 for

assistance or contact your Wealth Manager directly.

As a client of Steward Partners, we recognize you may need access to your account to sell a position or request funds before we re-establish communications with our clients. During this time our clearing firms, will assist you with sell/liquidation orders and provide access to your accounts if needed. If our firm has declared an emergency and you cannot contact us, please call your specific clearing firm for assistance.

Raymond James: (800) 248-8863

**Our Business Continuity Plan:** We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our clearing firms, regularly backs up its important information in a geographically separate area. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, each of our clearing firms have a thorough Business Continuation Plan in place. Their objective is to restore its own operations in order to complete existing transactions and accept new transactions and payments in a timely manner.

Varying Disruptions: Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business within twelve hours. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area and recover and resume business in a timely manner. In either situation, we plan to continue in business and notify you through our website, <a href="https://www.stewardpartners.com">www.stewardpartners.com</a>, or have emergency information available via our toll-free number, (800) 452-1929 with instructions on how to contact us. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customers' prompt access to their funds and securities.

**For more information:** If you have questions about our business continuity planning, you can contact us at (800) 452-1929 or at www.stewardpartners.com.

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**For more information:** If you have questions about our business continuity planning, you can contact us at (800) 452-1929 or at <a href="https://www.stewardpartners.com">www.stewardpartners.com</a>.

# **Additional Disclosures**

#### Investment Risk

Investors should carefully consider investment objectives, risks, and expenses before investing any money.

Investing involves risks, including the possible loss of principal and fluctuations in account value. Considerations include risks associated to credit, interest rate, market, inflation, call, prepayment, liquidity, foreign country, currency, sector, political, and taxes.

For investment offered through prospectus, such as mutual funds, variable life insurance and variable annuities, please read its accompanying prospectus carefully before investing.

The investments and services listed may not be appropriate for all investors. Steward Partners recommends that investors independently evaluate particular investments, and encourages investors to seek the advice of their Wealth Manager. The appropriateness of a particular investment will depend upon an investor's individual circumstances and objectives.

## Electronic purchase or sale requests

Please do not use e-mail to request, authorize or effect the purchase or sale of any security. Unfortunately, we cannot execute such instructions provided in e-mail.

### Fund transfer instructions sent via email require executed authorized documentation

Steward Partners will only accept fund transfer instructions sent via e-mail that attach or include properly executed authorized fund transfer documentation. For further information, please contact your Wealth Manager.

#### **Electronic communications**

Steward Partners reserves the right, to the extent required and/or permitted by applicable law, to archive and monitor all electronic communications (including, but not limited to, emails, instant messages, text messages and social media posts), and reproduce electronic communications to state, federal or other regulatory agencies.

### Electronic communications are not intended as an official communication

Unless otherwise agreed, an electronic communications related to your account is not intended as an official document or confirmation, and we do not accept responsibility for, or guarantee it to be, accurate, timely, secure, error or virus-free. The information in such communications is provided is for informational purposes only. In the event of a conflict between this communication and official communications (i.e. - statements, confirmations, etc.), the official communication should be relied upon.

### Information may not be secure when transmitted over the Internet

Steward Partners makes no representation or warranty that electronic communications sent will be confidential. Electronic communications may be intercepted or accessed by unauthorized or unintended parties, may not arrive at the intended destination, or may not arrive in the form transmitted. Steward Partners utilizes technology to securely deliver electronic communications.

Electronic communications may be delayed, therefore information contained within may not be up to date. Electronic communications cannot be guaranteed to be timely, secure or error free. Information provided speaks only as of its date. We do not undertake any duty to update the information or otherwise advise you of changes to research or information we make available to you.

### All communications on our websites or on any social media sites are not intended to serve as:

- An offer or solicitation to buy or sell securities or other investment instrument
- Investment advice for your specific situation

#### Tax / Legal Advice

Steward Partners and its Wealth Managers do not provide tax or legal advice. You should consult with your tax advisor for matters involving taxation and tax planning and an attorney for matters involving trust and estate planning and other legal matters.

### **Third Party Data**

Steward Partners, our Associates or our Affiliates, are not responsible for content posted by third parties via internet websites, social media sites and/or its messaging services, nor does it endorse such content. Steward Partners believes such third-party posts are from reliable sources but has not reviewed their contents for accuracy or completeness.

## U.S. Treasury Circular 230 Tax Notice

Steward Partners does not render advice on tax and tax accounting matters to clients. This communication is not intended or written to be used, and it cannot be used by any taxpayer, for the purpose of avoiding penalties that may be imposed on the taxpayer under U.S. federal income tax laws. Investors should consult their own legal or tax advisors, at both the onset of any transaction and on an ongoing basis to determine the laws and analyses applicable to their specific circumstances.

#### Spam

If you receive unwanted electronic communications from our Firm or one of our Associates, please contact the sender to have your contact information removed or contact info@stewardpartnersis.com.

## **ERISA Fiduciary**

When Steward Partners and its Wealth Managers provide "investment advice" regarding a retirement or welfare benefit plan account, an individual retirement account or a Coverdell education savings account. Steward Partners is a "fiduciary" as those terms are defined under the Employee Retirement Income Security Act of 1974, as amended ("ERISA"), and/or the Internal Revenue Code of 1986 (the "Code"), as applicable. When Steward Partners provides investment education, takes orders on an unsolicited basis or otherwise does not provide "investment advice", Steward Partners will not be considered a "fiduciary" under ERISA and/or the Code. Tax laws are complex and subject to change. Steward Partners does not provide tax or legal advice. Individuals are encouraged to consult their tax and legal advisors (a) before establishing a Retirement Account, and (b) regarding any potential tax, ERISA and related consequences of any investments or other transactions made with respect to a Retirement Account.

## Use of Historic Performance Data Risk Disclosure

Unless stated otherwise, any performance data quoted represents past performance. Past performance is not indicative of future returns/losses. No representation or warranty is made that any returns indicated will be achieved. Certain assumptions may have been made in the analysis which have resulted in any returns detailed. Transaction costs (such as commissions) are not included in the calculation of returns. Changes to the assumptions may have a material impact on any returns detailed. Potential investors should be aware that certain legal, accounting and tax restrictions, margin requirements, commissions and other transaction costs and changes to the assumptions set forth may significantly affect the economic consequences of the transactions discussed.

## **Options Risk Disclosure**

Options are not for everyone. Before engaging in the purchasing or writing of options, investors should understand the nature and extent of their rights and obligations and be aware of the risks involved, including the risks pertaining to the business and financial condition of the issuer and the underlying stock. A secondary market may not exist for these securities. For customers of Steward Partners who are purchasing or writing exchange-traded options, your attention is called to the publication "Characteristics and Risks of Standardized Options". That publication, which you should have read and understood prior to investing in options, can be viewed at the following address: <a href="https://www.theocc.com/Company-Information/Documents-and-Archives/Options-Disclosure-Document">https://www.theocc.com/Company-Information/Documents-and-Archives/Options-Disclosure-Document</a>

Clients engaging in the execution structure known as Spreading should understand that Spreading may also entail substantial commissions, because it involves at least twice the number of contracts as a long or short position and because spreads are almost invariably closed out prior to expiration. Potential investors should be advised that the tax treatment applicable to spread transactions should be carefully reviewed prior to entering into any transaction. Also, it should be pointed out that while the investor who engages in spread transactions may be reducing risk, the investor is also reducing their profit potential. The risk/ reward ratio, hence, is an important consideration. The risk of exercise in a spread position is the same as that in a short position. Certain investors may be able to anticipate exercise and execute a "rollover" transaction. However, should exercise occur, it would clearly mark the end of the spread position and thereby change the risk/reward ratio. Due to early assignments of the short side of the spread, what appears to be a limited risk spread may have more risk than initially perceived. An investor with a spread position in index options that is assigned an exercise is at risk for any adverse movement in the current level between the time the settlement value is determined on the date when the exercise notice is filed with OCC and the time when such investor sells or exercises the long leg of the spread. Other multiple-option strategies involving cash settled options, including combinations and straddles, present similar risk.

### ETFs Risk Disclosures and other Important Information

We remind investors that these investments are subject to market risk and will fluctuate in value. Investors may obtain prospectuses for the ETF from the ETF distributor.

### **Margin Disclosure Statement**

Steward Partners Investment Solutions, LLC, acting as introducing broker/dealer, is furnishing this document to provide some basic facts about purchasing securities on margin and to alert you to the risks involved with trading securities in a margin account. Before trading stocks in a margin account, you should carefully review this document and the clearing / custodian firm's margin agreement that we provided to you. If a conflict between this document and any other agreements arises with Steward Partners Investment Solutions, the clearing/ custodian firm margin agreement will govern. If you have any questions or concerns, please contact your Wealth Manager.

When you purchase securities, you may pay for the securities in full or you may borrow part of the purchase price from the clearing / custodian firm. If you choose to borrow funds from the clearing / custodian firm, you will open a margin account with the clearing / custodian firm. The securities purchased are clearing / custodian firm's collateral for the loan to you. If the securities in your account decline in value, so does the value of the collateral supporting your loan, and, as a result, Steward Partners Investment Solutions and clearing /custodian firm ("We" or "Us") can take action, such as issue a margin call and/or sell securities or other assets in any of your accounts held with the clearing/custodian firm, in order to maintain the required equity in the account.

It is important that you understand fully the risks involved in trading securities on margin, which include but are not limited to the following risks:

- You can lose more funds than you deposit in the margin account(s). A decline in the value of securities that are purchased on margin may require you to provide additional funds to the clearing/custodian firm that has made the loan to avoid the forced sale of those securities or other securities or assets in your account(s).
- We can force the sale of securities or other assets in your accounts. If the equity in your account falls below the maintenance margin requirements, or the firm's higher "house" requirements, we can sell the securities or other assets in any of your accounts held at the clearing/custodian firm to cover the margin deficiency. You also will be responsible for any short fall in the account after such a sale.
- We can sell your securities or other assets without contacting you. Some investors mistakenly believe that we must contact them for a margin call to be valid, and that we cannot liquidate securities or other assets in their accounts to meet the call unless we have contacted them first. This is not the case. We will attempt to notify you of margin calls, but we are not required to do so. However, even if we have contacted you and provided a specific date by which you can meet a margin call, we can still take necessary steps to protect its financial interests, including immediately selling the securities without notice to you.
- You are not entitled to choose which securities or other assets in your Account are to be liquidated or sold to meet a margin call. Because the securities are collateral for the margin loan, we have the right to decide which security to sell in order to protect its interests.
- We can increase our "house" margin maintenance requirements at any time and are not required to provide you advance written notice. These changes our policy often take effect immediately and may result in the issuance of a maintenance margin call. Your failure to satisfy the call may cause us to liquidate or sell securities in your account(s).
- You are not entitled to an extension of time on a margin call. While an extension of time to meet margin requirements may be available to you under certain conditions, you will not have a right to the extension.

#### **Legal Disclaimer**

Depending on your specific investment objectives and financial position, the investments discussed or recommended in this website or through electronic communications may or may not be suitable or in the best interest for you. It is up to you to weigh any decision carefully. Past performance is not necessarily a guide to future performance and is no guarantee of future results. Income from investments may fluctuate. The price or value of any investment identified directly or indirectly may fall or rise against your interests and the interests of other investors.

Opinions, where and when expressed, are subject to change without notice. Information was obtained from sources considered reliable, but no representation is made as to its accuracy.

#### **Asset Allocation Disclosure**

Asset allocation or diversification does not assure a profit or protect against loss.

### Gain/(Loss) Information

Gain/(Loss) is provided for informational purposes only. It is not a substitute for Internal Revenue Service (IRS) Form 1099 (on which clearing/custodian firms report cost basis for covered securities) or any other IRS tax form. It is not intended to be, nor should be used for tax preparation. Unrealized Gain/(Loss) values provided on these statements are estimates. Contact your own independent legal or tax advisor to determine the appropriate use of the gain/(loss) information provided on provided statements. Gain/(Loss) information is calculated based upon general methodologies used for calculating Gain/(Loss). The calculations do not account for each individual client's particular circumstances. We may not adjust basis for all events that you are required to take into account for tax reporting purposes and you may need to make additional adjustments to properly complete your tax returns. With respect to estimated gains and losses for listed equity options, we have taken into account option premiums paid or received. With respect to multiple purchases and/or sales, Gain/(Loss) is calculated using an average price for all like positions. Unrealized and Realized Gain/(Loss) calculations may change due to adjustments to cost basis occurring after the date of these statements. We are not responsible for the accuracy of any gain and loss calculations based upon information provided by you or another financial institution. You are responsible for ensuring the accuracy of such information. We report the sale of securities on a First-in First-out (FIFO) basis unless a client notifies us of the specific securities to be sold. Clients wishing to use specific identification when selling securities must provide that information to us at the time of the sale. Gain/(Loss) information may be provided on statements.

## **Pricing of Securities**

The prices of securities displayed are derived from various sources, and do not necessarily represent the prices at which those securities could have been bought or sold. Although we attempt to use reliable sources of information, we can offer no assurance as to their accuracy For exchange traded securities, or those trading continually in an active marketplace, the price reflects the closing price as of the last business day of your statement period; and generally bid prices for securities that are neither exchange traded nor trading continually in an active marketplace. The prices of securities not actively traded may not be available, and are indicated by N/A (not available). The markets for some fixed income and preferred securities may not be liquid, and prices may be approximations or estimates. For these and for securities that trade less frequently, we rely on outside pricing services and / or computerized pricing models, which cannot always give us actual market values. Prices may be based on recent transactions or bids, if available; independent quotation services that use computerized valuation formulae to calculate prices based on institutional quantities; or estimates. As a result, yields to call and/or maturity may be estimates as well. Prices for non-institutional quantities of some fixed income securities are likely to be different than institutional prices. Some annuity values provided by outside sponsors are estimates. The amounts on these statements for limited partnerships are typically obtained from a third party or from the general partners unless we have obtained other such as an independent appraisal. Since many partnership valuations are provided only annually, they do not always represent current values. Furthermore, some securities, such as limited partnerships and non-traded REITs are illiquid and have no public markets, so the amounts shown on these statements may not equal the amounts you would receive if you sold or tendered your investment. The value of mutual fund shares is determined by multiplying the net asset value (NAV) by the number of shares or units held, as reported to us by the correspondent clearing/custodial firm. If we cannot obtain a price or estimate, N/A appears. Speak to your Wealth Manager to obtain current information concerning the prices of positions on your statements.