COPPER FINANCIAL
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Sweep Program Disclosure Document

Pershing, LLC

INTRODUCTION

Osaic, Inc., through its affiliated Broker-Dealer Osaic Institutions Inc. (referred to as "Broker-Dealer, "we", "our", or "us"), offers a cash sweep program ("Sweep Program") for accounts introduced by Copper Financial Network, LLC, through us to our clearing firm, Pershing, LLC ("Pershing"). By participating in the Sweep Program, cash balances in your Brokerage Account(s) will be transferred to a bank deposit sweep product, which allocates swept balances to participant banks whose deposits are insured by the Federal Deposit Insurance Corporation ("FDIC") up to allowable limits and subject to certain conditions or, for certain accounts as described below, to a money market mutual fund.

This document is meant to provide you with information related to the Sweep Program and the sweep products available to you. **You agree that you will read through this Disclosure document carefully and that you will consult with your Financial Professional if you have any questions or concerns related to the Sweep Program.**

The information in this document applies to each eligible Brokerage Account for which you are an owner, whether as an individual, a joint tenant, a corporation, trustee, executor, or custodian, or in any other capacity. If there is any conflict between the descriptions in this document and the terms of your Customer Agreement, solely as it relates to the subject matter of this Disclosure Document, this document will control.

Over time, your Brokerage Account will accumulate cash from interest or dividend payments on investments you own, from the proceeds of sales transactions, or from deposits you may make to your account. Maintaining a cash balance pending further investment in your Brokerage Accounts offers certain benefits, including:

- Having cash in your account to pay for securities transactions reduces the risk of not having "good funds" at settlement
- SIPC protection for cash held as a free credit balance in your Brokerage Account, up to $250,000 per account, as described below
- FDIC insurance when your account participates in our FDIC Insured Deposit Program. Your free credit balance is moved or "swept" to an insured deposit program offering up to $2.5 million for individual accounts ($5 million for joint accounts) as described below
- The ability to access your cash via debit card or checks written against your account
- For tax-qualified accounts, you can maintain the tax-qualified status of your cash balance instead of transferring cash to or from a tax-qualified bank account to obtain FDIC coverage or pay for your securities trades or account fees

Regardless of how you maintain a cash balance in your Brokerage Account(s), you agree that you will not maintain such balances solely for the purpose of obtaining FDIC or SIPC coverage. In addition, because we make available to you other investment products, including non-sweep money market mutual funds, treasury bills, and brokered certificates of deposit to manage cash in your brokerage account, you agree that obtaining an investment return is not the primary objective for maintaining a cash balance in your Brokerage Accounts.

The Sweep Program should not be viewed as a long-term investment option for cash in your Brokerage account. If you desire, as part of an investment strategy or otherwise, to maintain a cash position in your Brokerage Account for other than a short period of time and/or are seeking the highest yields currently available in the market for your cash balances, please contact your Financial Professional to discuss investment options available outside of the Sweep Program that may be better suited to your

WHAT ARE "FREE CREDIT BALANCES"?

The term "Free Credit Balance" refers to the credit balance that remains in a client's brokerage account after all purchases are made and are free from withdrawal restrictions. A customer's free credit balance generally originates from dividends, interest payments, and/ or security sales and may be used at any time to purchase more securities. Clients with a free credit balance may elect to receive the money each month or they may direct the brokerage firm to invest and/or deposit the money into eligible sweep products in order to maximize the potential to earn an additional return while the cash sits idle. Advisor Group offers its customers a "Sweep Program" pursuant to which you may automatically transfer free credit balances to a deposit account at one or more banks whose deposits are insured by the FDIC, or, in limited cases, a money market mutual fund product.

Upon opening a new account with us, you will be provided with an Account Application and a Customer Agreement (hereafter, "Customer Agreement"), and will be asked to acknowledge your receipt and understanding of the Customer Agreement and this Sweep Program Disclosure document by entering your signature on the Customer Agreement. By executing the Customer Agreement (electronically or otherwise), you are consenting to having your account, and all subsequent and future account(s) opened for you by us, be automatically included in the Sweep Program. Your account(s) will automatically default to the corresponding sweep product indicated in the tables below. Upon executing the Customer Agreement, you appoint our clearing firm, Pershing, LLC ("Pershing") as your authorized agent to establish and maintain your sweep accounts.

You may contact your Financial Professional at any time to opt out of participating in the Cash Sweep Program. Once opted out, any cash deposits will remain in "Free Credit Balances" and will not earn interest nor be protected with FDIC insurance.

OUR "SWEEP PROGRAM"—ELIGIBLE PRODUCTS

There are two types of products that are offered within the Sweep Program:

1. FDIC Eligible Bank Deposit Sweep Program
    - Bank Deposit Sweep Program (BDSP)
    - Insured Cash Account Program (ICAP)
2. Money Market Mutual Fund

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1. FDIC ELIGIBLE BANK DEPOSIT SWEEP PROGRAM

Upon establishment of your new account, and all subsequent and future account(s) opened for you by us, free credit balances in
(i) all retail brokerage accounts, and (ii) Individual Retirement Accounts (IRAs) held with Pershing, LLC ("Pershing") will be automatically swept to the FDIC Insured Deposit Program via deposit accounts at multiple FDIC member depository institutions in a manner intended to secure from each depository institution pass-through FDIC insurance coverage on your Program Balance. By executing the Customer Agreement, you appoint our clearing firm, Pershing, as your authorized agent to establish and maintain on your behalf a Deposit Account with one or more banks participating in the program ("Program Banks"), and to effect deposits to and withdrawals from such Program Banks pursuant to the terms and conditions set forth herein. To view a list of Program Banks and current program interest rates, please visit the website identified below.. There are different third-party service providers, or administrators, and different Program Bank Lists for BDSP and for ICAP. You may also contact your Financial Professional to obtain this information. We have identified certain sweep

products as the “default sweep product” for certain account types in our Sweep Program. This means that if the account you are opening falls under one of the account types described in the tables below, your account will automatically be assigned the default sweep product.

Note: The FDIC Eligible Bank Deposit Sweep Program is not available for ERISA Title 1 plans, 403(b)(7) plans, or Keogh plans.

FEES RECEIVED BY BROKER-DEALER—BDSP

Each Program Bank will pay to us, Pershing and the third-party administrator for the BDSP a fee equal to a percentage of the average daily deposit balance in your deposit account(s) at the Program Banks. The fee paid to us will not exceed 600 basis points (6.00%) per year (the “Maximum Program Fee”) on the average daily balances held in the BDSP Deposit Accounts. We may waive any portion of the fee, or the fee in its entirety, received from the Program Banks. **We determine the rate of interest you receive on your Deposit Accounts, and the amount of fees received by Pershing, us, and the third-party administrator for your balances in the BDSP will affect the interest rate paid on your deposit account(s).** Other than applicable fees imposed by us on your brokerage account (including fees charged on your Pershing, LLC IRAs) there will be no additional charges, fees, or commissions imposed on your account with respect to the FDIC Insured Deposit Program.

As described more fully below, the income we earn from Program Banks based on your balances in the BDSP and ICAP will in almost all circumstances be substantially greater than the amount of interest you earn from the same balances. The amount of Program Fees that we retain will in almost all circumstances be substantially greater than the portion of the Program Fees paid to Pershing or the third-party administrator. As such, we receive a substantially higher percentage of the interest generated by deposit balances in the BDSP than the interest credited to your accounts. When evaluating whether to utilize the Sweep Program and the extent to which our fee exceeds the interest rate you receive, you should assume that we are receiving the Maximum Program Fee described above.

FEES RECEIVED BY BROKER-DEALER—ICAP

For Advisory IRA Accounts (those in which an advisory fee is charged as per the terms of the contract you executed with us or our affiliated investment adviser), the default FDIC Insured Deposit Program is ICAP. Interest earned on cash sweep balances in Advisory IRA Accounts will be calculated and paid based on a level fee structure. We will receive as our compensation a monthly per-account sweep fee on each account participating in ICAP. Under the ICAP Program, each Program Bank will pay fees equal to a percentage of the average daily collective omnibus deposit balance. We will receive a fee from the Program Banks in connection with Deposit Accounts. The fee paid by each Program Bank may differ. You will have no rights to the amounts paid by the Program Banks, except for interest actually credited to your account, as described above. However, amounts collected from the Program Banks during each period, less interest credited to you, will be allocated on a per capita basis and used to offset the monthly account sweep fee, as discussed more fully below, for providing the sweep services. Excess amounts will be retained as compensation by the third-party administrator for ICAP for its services.

For its services, the third-party administrator for ICAP will retain a monthly asset-based fee targeted to approximate an agreed-upon percentage of the average aggregate account assets over time. This fee may vary from period to period from the target based on changes in prevailing interest rates, how assets are allocated amongst the Program Banks during the period, and the average daily balance of accounts participating in the Program during the period. Moreover, the third-party administrator’s fee may from time to time be adjusted during certain periods, such as when necessary to help ensure that the interest rates paid by the Program Banks during the period equal the applicable disclosed rate for the period. Under such circumstances, the administrator is authorized to adjust its fee to obtain its targeted compensation rate in future periods.

Other than these stated fees and the fees you agree to pay for investment advisory services, there will be no charges, fees, or commissions imposed on your account with respect to the Program. You authorize and direct the third-party administrator to deduct its fees for its services from the amounts paid by the Program Banks. Based on the calculation method set forth below, the third-party administrator will calculate the fees due to us. Your Financial Professional will not receive any portion of the fees paid by the Program Banks. Because participation in the ICAP is limited to Advisory IRA Accounts, the fees that we receive from the Program Banks are in addition to the advisory fee that you pay to our affiliated investment adviser and to your Financial Professional. This means that we earn two layers of fees on the same cash balances in your IRA Advisory Account. Therefore, we have an incentive to encourage you to participate in the ICAP.

The maximum monthly per account sweep fee we receive for services we provide in connection with maintaining and administering the ICAP, including making the platform available, is indexed to the current Federal Funds Target ("FFT") Rate and is displayed on Appendix A. Our compensation under ICAP does not depend on or vary with, and is not affected by, the actual amounts held in the Deposit Accounts or your account. As provided for below, the ICAP Monthly Per-Account Fee Schedule will be indexed to the current Federal Funds Target ("FFT") Rate. The FFT rate is the rate or the range of rates as expressed in percentages announced from time to time by the Federal Open Market Committee of the Federal Reserve System that is the Committee's target for the rate charged by banks on unsecured loans of the banks' reserve balances at Federal Reserve Banks. Under the fee schedule, increases in the FFT Rate will result in increased compensation for us. We can change the applicable fee schedule upon 30 days' advance notice to you. Although it is generally anticipated that our fees under the ICAP will be offset by the amounts paid by the Program Banks, as discussed above, and you hereby direct the administrator to collect such fees from the Program Banks and remit such amounts over to us, we reserve the right to withdraw or debit the monthly account fee, or a portion thereof, from your account in the event or to the extent that the amount received from the Program Banks and paid over to us by the administrator for the period is less than our applicable fee for the same period.

Our monthly per account sweep fee for ICAP will not be shown on your account statement due to the manner in which we recoup our fee from payments by the Program Banks, as discussed above, at your direction. In the event that we debit all or a portion of the monthly account fee from your account, each such amount will be reflected on your account statement.

In a lower interest rate environment, our fee will be reduced based on the FFT Rate, which increases the likelihood of ICAP customers receiving a positive interest rate. The fees paid to us may be reduced to as low as $0.65 per account per month.

The per account fee under the ICAP that we receive each month is a fixed dollar amount and does not vary by the actual amount of cash in a particular account. This creates a conflict of interest between clients with larger cash balances and clients with smaller cash balances. Because of this, clients with larger cash balances effectively subsidize the per account fee for clients with smaller cash balances.

The types of fees and expenses of the BDSP and ICAP are different from the fees and expenses that are incurred in money market funds. Yields payable on money market funds will likely exceed the interest clients receive from the BDSP and ICAP. Further, although participants in the BDSP and ICAP do not pay management fees, distribution/services (12b-1) fees, or other expenses typically assessed in money market funds, the interest paid on client balances in the BDSP and ICAP is net of, and reduced by, the total amount of fees paid to us, Pershing, and the third-party administrators for BDSP and ICAP. For ICAP, we will be paid a maximum Monthly Per Account Sweep Fee as displayed on Appendix A. For BDSP, we will retain a higher percentage of the fee paid by the Program Banks than the interest credited to client accounts.

BANK DEPOSITS

The two FDIC-eligible bank deposit sweep products supported in the FDIC Insured Deposit Program (BDSP and ICAP) automatically sweep the free credit balance in your Brokerage Account(s) to interest-bearing Deposit Accounts at up to 12 participating Program Banks, providing eligibility for up to $2.5 million in deposit insurance coverage ($5 million for joint accounts of two or more), subject to applicable limitations. The insurance limit applicable to each insurable capacity will be referred to as the "Maximum Applicable Deposit Insurance Amount." Pershing, as your agent, will deposit the available cash in your account into Deposit Accounts in each Program Bank on the applicable Program Bank List up to the deposit limit of $246,500 ($493,000 for joint accounts of two or more) (the "Deposit Limit") in order to permit your funds to be eligible for the greatest possible FDIC insurance coverage.

Once $246,500 ($493,000 for joint accounts of two or more) has been deposited in each Program Bank on the Program Bank List, and you have reached the Program limit of $2.5 million ($5 million for joint account of two or more), any additional funds will be deposited in designated "Excess Banks" without limit and without regard to maximum available FDIC insurance coverage. The list of "Excess Banks" can be found at the bottom of the Program Bank List, which can be obtained by visiting the websites listed below.

FDIC INSURANCE

As described above, your funds will be deposited into Deposit Accounts at the Program Banks in a manner intended to provide you with eligibility of up to $2.5 million ($5 million for joint account of two or more) of FDIC insurance coverage on your Program Deposits. We are not an FDIC-insured bank, and FDIC insurance only protects your Program Deposits in the event of the failure of a participating bank. However, any cash you hold at a Program Bank outside of the Program itself may impact the insurance coverage available, as neither we, Pershing, nor your Financial Professional monitors or takes any responsibility for cash you may have at a Program Bank outside of the Sweep Program (such as in the form of a certificate of deposit, for example). **You are responsible for monitoring the total amount of deposits that you have with each Program Bank, including Excess Banks, in order to determine the extent of FDIC deposit insurance coverage available to you**.

Each deposit account constitutes a direct obligation of the Program Bank and is not directly or indirectly an obligation of the Broker-Dealer, Pershing, your Financial Professional, or any other person or entity not affiliated with the Program Bank itself. The Securities Investor Protection Corporation ("SIPC") offers some protection to customer assets held at broker-dealers in the event of failure of the broker-dealer. **The deposits made through this Program are not insured by SIPC**. Note that SIPC does not insure against the loss of value of any investment or product. SIPC coverage applies to securities and cash in client brokerage accounts, which are protected up to $500,000 (including a maximum of $250,000 for claims for un-invested cash awaiting reinvestment).

INTEREST TO BE PAID

Free credit balances swept to the FDIC Insured Deposit Program (BDSP and ICAP) will be deposited to Deposit Accounts and will earn interest at the rates described at the websites listed below. Interest on balances swept to a deposit account is compounded daily and credited to your account monthly. Interest begins to accrue on the date of deposit within the Program Bank(s), through the day preceding the date of withdrawal from the deposit account. The daily rate is 1/365 (or 1/366 on a leap year) of the interest rate. For BDSP, the interest rate applied to your Deposit Accounts will be based on your assignment to a tier, as determined by us, based upon the value of your Program Deposits. The interest rate tiers are listed in Appendix A.

The amount of interest paid on Deposit Accounts will be determined by the amount of interest paid by Program Banks minus the amount of fees charged by us, Pershing and the third-party administrators for BDSP and ICAP. Interest rates paid on the Deposit Accounts may be higher or lower than interest rates available to depositors making deposits directly with Program Banks or other depository institutions in comparable accounts. Interest rates may change as frequently as daily. The effective date of any change to interest rates will be posted on the websites listed below. To determine the current interest rate offered at each deposit tier, contact your Financial Professional or access the website listed below.

For BDSP, we determine the rate of interest you receive on your Deposit Accounts. Our Cash Review Committee meets periodically to review the interest rates paid to clients and determine whether and when the rates will change. Factors considered include the rates paid by Program Banks, expected changes in interest rates, interest rates paid by market competitors, and program expenses. Program Banks pay a rate that is higher than the rate received by you, and the difference is the fee collected for administering the program and related services. The broker-dealer will retain a higher percentage of the interest than is what is credited to client accounts.

You may always obtain information on the current Interest Rates offered by the Bank Deposit Sweep Program by accessing the website listed below. For your review, we publish a quarterly description of the percentage of interest that we retain as our fee for

administration of the Sweep Program that can be found at the same website. This percentage is the amount of interest we retained in the prior quarter and is not the amount we will retain in the current quarter. As such, it should be used for historical reference only.

DEPOSIT PROCEDURES

Your participation in the FDIC Eligible Bank Deposit Sweep Program will ensure that the free credit balances in your brokerage account(s) will be swept daily to deposit account(s) at the Program Banks. Although each deposit account constitutes a direct obligation of the Program Bank to you, you will not have a direct account relationship with the Program Banks, and you will not be able to instruct the Program Bank to process deposits or withdrawals from your deposit account. Initial and subsequent deposits can only be made on your behalf by Pershing and through us. Your interest in a deposit account is not transferable.

STATEMENTS

You will not receive confirmations for each deposit to or withdrawal from your deposit account(s). All transactions in your deposit account(s) will be listed on your periodic brokerage account statement. Statements will be mailed monthly if there is qualifying activity in your account; otherwise, your statements will be mailed on a quarterly basis. It is recommended that you retain copies of your account statements for your records.

PROGRAM BANK LIST

Program Banks are organized into regional bank lists. For BDSP and ICAP, your Brokerage Account is assigned to a Program Bank List based upon the state reflected in the mailing address on your Brokerage Account. Please contact your Financial Professional or go to the website listed below for the most current Program Bank List applicable to your FDIC Eligible Bank Deposit Sweep Program product (BDSP and/or ICAP). All changes to the Program Bank Lists will be maintained on the website, along with the date on which the most recent update was made.

For BDSP, funds will be swept into Deposit Accounts at a Program Bank up to the Maximum Deposit Amount. The BDSP is intended to operate on a nondiscretionary allocation methodology. Your deposits are generally allocated to the first Program Bank on the Program Bank List; once the Maximum Deposit Amount has been reached at that bank no further deposits will be made to that Program Bank, and your cash will be deposited at the next bank on the Program Bank List. This process will continue until all Program Banks on the Program Bank List have received funds up to the Applicable Deposit Limit. Funds in excess of the Maximum Deposit Amount will be swept into an alternate Program Bank. Once the Maximum Deposit Amount have been reached in all Banks on the Program Bank List, additional funds will be swept into the Excess Deposit Bank.

For ICAP, A “pro rata” nondiscretionary methodology determines the sequence of allocating deposits and withdrawals by the percentage that each Program Bank omnibus account balance is away from the bank target balance. In general, Program Banks with smaller percentages of their targets are allocated deposits before Program Banks with higher percentages of their target are allocated deposits.

Certain “Priority Bank(s)” on the applicable Program Bank List receive preferential ordering in the deposit/withdrawal allocation sequence ahead of other Program Banks. This is because the “Priority Banks” have agreed to accept program deposits from our clients up to specified amounts for a specific period of time, or because the “Priority Bank” has agreed to pay additional compensation to us to receive preferential ordering in the allocation sequence ahead of other Program Banks.

You may not change the applicable Program Bank List. However, you may at any time designate a Program Bank as ineligible to receive your funds. This will result in your funds being deposited into Deposit Accounts at another Program Bank on the applicable Program Bank List, per the applicable allocation methodology. In addition, you may at any time instruct us to remove your funds from a Program Bank, close your deposit account with the Program Bank and designate the Program Bank as ineligible to receive future deposits. You may not designate all of the Excess Banks as ineligible to receive your funds. If you wish to designate a Program Bank as ineligible to receive your funds, please contact your Financial Professional.

The Program Bank List applicable to each product in our FDIC Eligible Bank Deposit Sweep Program (BDSP and ICAP) will include one or more Excess Banks that will accept your funds without limit and without regard to the Maximum Applicable Deposit Insurance Amount if all Program Banks on the applicable Program Bank List have received funds up to the Applicable Deposit Limit. The Program Bank Lists will also be available on the website listed below. You may also contact your Financial Professional to obtain this information.

CHANGES TO THE PROGRAM BANK LIST

One or more of the Program Banks included on the applicable Program Bank List may be replaced with a Bank not previously included on the Program Bank List. A Program Bank may be deleted from the Program Bank List or the order of Program Banks on the Program Bank List may change at any time. Please visit the website listed below, or contact your Financial Professional for information regarding the current applicable Program Bank List. The most current Program Bank List with participating Program Banks will always be maintained on the websites listed below, in the section referred to above. Regulations adopted by the U.S. Securities and Exchange Commission ("SEC") require us to provide you with written notice at least 30 calendar days before making certain changes to the products available in a Sweep Program. By participating in our Sweep Program, you agree that the sweep option in your account may be changed, including changing between money market funds and bank deposit sweep products, with prior written notification to you.

BENEFITS TO THE BROKER-DEALER

Our FDIC Eligible Bank Deposit Sweep Program (BDSP and ICAP) creates financial benefits for us, Pershing, the Program Banks, and the third-party administrators associated with delivering and servicing the Program. Should we add a Program Bank that is affiliated with us, we will disclose it as such, as we will receive additional benefits under the Program. Program Banks do not have a duty to provide the highest rates available and instead generally seek to pay a low rate. Banks generally profit from paying depositors lower rates of interest, and by investing or lending those deposits to their borrowers at higher rates. By comparison, a Money Fund generally seeks to achieve the highest rate of return (less fees and expenses) consistent with its investment objective, which can be found in the fund's prospectus.

The deposits we make available to Program Banks via the FDIC Eligible Bank Deposit Sweep Program represent a significant amount of cash (generally in the billions of dollars) that is a relatively stable source of deposits for the Program Banks. The Program Banks in turn use these cash deposits for their investment or lending activities to generate revenue for the Program Banks. The Program Banks thus have an incentive to pay a higher rate for Program Deposits. For the BDSP, the difference between the rate paid by a Program Bank and the rate you receive as interest is the total fee that we, Pershing, and the third-party administrator collect for administering the BDSP and related services. Note that for the ICAP our compensation is limited to the monthly per account sweep fee.

As previously described, the interest rate payable to you is based on the amounts paid by the Program Banks to obtain the deposits, less a fee retained by us, Pershing and the third-party administrator. The fee we receive for the BDSP will not exceed 600 basis points (6.00%) per year on the average daily balances held in these Deposit Accounts. We may waive any portion of our fee, or the fee in its entirety, received from the Program Banks.

The fees paid to us, Pershing, and the third-party administrators will affect the interest income you receive on your Deposit Accounts because the fee received by us, Pershing, and the third-party administrator reduce the amount of interest available to be paid to you on your cash deposits. The fee paid by the Program Banks to Pershing and the third-party administrator (collectively, "Program Fees") is for record keeping and other services with respect to amounts deposited in the BDSP and ICAP. At no time will the Program Fees associated with the BDSP or ICAP, or any alternative products made available to you within the Sweep Program (i.e., Money Funds), be paid to your Financial Professional. **We will receive more revenue with respect to cash in the BDSP and ICAP than if your cash was invested in other sweep products, including Money Funds.** Therefore, we have an incentive for you to place and maintain your assets in the BDSP and ICAP to earn more income. We use this revenue to defray the cost of operating the Sweep Program and the expense of providing other services to our clients, as well as for general operating expenses and to provide net earnings to the Broker-Dealer. In the absence of this revenue, we or Pershing would likely charge higher fees or impose other charges to clients for the services Pershing and the Broker-Dealer provide.

Regardless of how you maintain a cash balance in your Brokerage Account(s), you agree that you will not maintain such balances solely for the purpose of obtaining FDIC or SIPC coverage. In addition, because we make available to you a wide range of investment products, including among others non-sweep money market mutual funds, treasury bills, and brokered certificates of deposit to invest cash in your brokerage account, you agree that obtaining an investment return is not the primary objective for maintaining a cash balance in your Brokerage Account(s).

The Sweep Program is offered as a convenience to allow you to maintain and accumulate cash pending future investment in your Brokerage Account while earning modest interest income that would not be earned if your cash were to remain as a free credit balance, and to obtain up to $2.5 million (or $5 million for joint accounts) in FDIC insurance for such funds. If you are seeking to invest your Brokerage Account cash balances for potential returns or you seek yields greater than those offered by the Sweep Program, do not desire FDIC insurance for such funds, and you do not anticipate the need for immediate access to your cash balances for future investments or withdrawals, please contact your Financial Professional to discuss available investment options. Investment options outside of the Sweep Program will have different characteristics, such as potentially more limited liquidity that would limit your ability to liquidate such investments to pay for investments in your Brokerage Account or to withdraw from your Brokerage Account, potential costs and fees, and in most cases no FDIC insurance.

The income we earn from Program Banks based on your balances in the BDSP and ICAP will in almost all circumstances be substantially greater than the amount of interest you earn from the same balances. The amount of Program Fees that we retain will in almost all circumstances be substantially greater than the portion of the Program Fees paid to Pershing or the third-party administrator. As such, we receive a substantially higher percentage of the interest generated by deposit balances in the BDSP than the interest credited to customer accounts. As a result of the fees and benefits described above, the Program is significantly more profitable to us than other available sweep options, if any.

Refer to the interest rates described on the website listed below for the applicable rates you will earn on Program Deposits. For your review, we publish a quarterly description of the percentage of interest that we retain as our fee for administration of the Sweep Program, which can be found at the website listed below. This percentage is the amount of interest we retained in the prior quarter and is not the amount we will retain in the current quarter. As such, it should be used for historical reference only.

ADDITIONAL INFORMATION ABOUT PROGRAM BANKS

You will not have a direct account relationship with the Program Banks. However, each deposit account constitutes an obligation of a Program Bank and is not directly or indirectly an obligation of the Broker-Dealer, Pershing, or your Financial Professional. If you or we terminate your use of the Program, or if one or more Program Banks with which you have deposits in the Program cease to participate in the Program, you may establish a direct depository relationship with each such Bank, subject to its rules with respect to maintaining Deposit Accounts.

ESTABLISHING A DIRECT DEPOSITORY RELATIONSHIP IN YOUR NAME AT A BANK WILL SEPARATE THE DEPOSIT ACCOUNTS FROM YOUR BROKERAGE ACCOUNT. IF YOU ESTABLISH A DIRECT DEPOSITORY RELATIONSHIP WITH A PROGRAM BANK, THE DEPOSIT ACCOUNTS WILL NO LONGER BE PART OF YOUR BROKERAGE ACCOUNT AND WE WILL HAVE NO FURTHER RESPONSIBILITY CONCERNING THE DEPOSIT ACCOUNTS.

Information concerning Program Banks may also be obtained by visiting the National Information Center (NIC), which provides comprehensive information on banks and other institutions for which the Federal Reserve has a supervisory, regulatory, or research interest. For your convenience, the following website address will take you to the NIC: **ffiec.gov/NPW**. You may also contact the Federal Deposit Insurance Corporation (FDIC) Public Information Center by mail at 801 Seventeenth Street, N.W. Room 100, Washington, D.C. 20434, or by phone at 1-877-ASKFDIC. We do not guarantee in any way the financial condition of any of the Program Banks or the accuracy of any publicly available financial information concerning the Program Banks. Notification of unauthorized activity and any complaints regarding the Program will be accepted by us.

INQUIRIES

Any inquiries regarding the deposit of free credit balances to the FDIC Insured Deposit Program should be directed to your Financial Professional.

2. MONEY MARKET MUTUAL FUNDS ("MONEY FUNDS")

The second type of sweep product made available to you in the Sweep Program is a Money Market Mutual Fund. Upon establishment of your new account, and similar subsequent and future account(s) opened for you by us, free credit balances in the following brokerage account types will be automatically swept into the Federated Hermes Government Reserves Fund ("Fund") (GRFXX): All ERISA Title 1 plans (e.g., Profit sharing plans, 401(k) plans, Roth 401(k) plans, Simple 401(k) plans, Individual 401(k) plans, Qualified Deferred Compensation Plans, Defined Benefit Plans, Target Benefit Plans, and Money Purchase Pension Plans); as well as 403(b)(7) plans and Keogh plans. This Fund is managed by Federated Investors ("Federated").

NOTE: Investments in Money Market Funds are not guaranteed or insured by the Federal Deposit Insurance Corporation (FDIC) or any other government agency. Although Money Market Funds seek to preserve a net asset value of $1.00 per share, there is no guarantee that this will occur; it is possible to lose money by investing in a Money Market Fund, including loss of principal. Fund shares are not guaranteed by the U.S. government. The sponsor of a Money Market Fund has no legal obligation to provide financial support to the Money Market Fund, and you should not expect that the sponsor will provide financial support to the Money Market Fund at any time. Although the boards of Money Market Funds have no current intention to impose a fee upon the sale of shares or to temporarily suspend redemptions, if the liquidity of the Money Market Fund falls below certain levels the board reserves the ability to do so after providing at least 60 days prior written notice to shareholders. Investors should carefully consider the investment objectives, risks, charges, and expenses of Money Market Funds before investing. The Fund's prospectus contains important information on the Fund. Please contact your Financial Professional for further details and additional information, including a free prospectus.

FEES RECEIVED BY BROKER-DEALER FROM MONEY MARKET FUNDS

We do not receive any compensation, in the form of distribution assistance or otherwise, from the Federated Hermes Government Reserves Fund. In an effort to maintain a positive yield to a customer, a Fund company such as Federated Hermes may reduce or waive a portion or all of its internal management and/ or distribution fees. Please consult the Fund's prospectus or your Financial Professional, for additional information on such fee waivers.

WITHDRAWALS FROM THE PROGRAM

All withdrawals necessary to satisfy debits in your brokerage account(s) will be made by Pershing as your agent through us. If your brokerage account includes the Pershing Resource Checking or Corestone features, a debit is made to the deposit account to satisfy a withdrawal of funds from your brokerage account when you write a check on your brokerage account or withdraw funds using your debit card; the presentment of that transaction will create a debit in your brokerage account. Each debit will automatically generate a withdrawal from the FDIC Insured Deposit Program, causing a reduction of your balance in the applicable Deposit Accounts to satisfy the debit in your brokerage account. If your sweep product is the Money Market Mutual Fund, shares of the Fund will be liquidated to satisfy the debit in your brokerage account. Checks written on the brokerage account are not drawn directly on the Deposit Accounts established for you at the Program Banks. If there are insufficient funds on deposit in your Deposit Accounts, Pershing will withdraw funds from other available sources as described in your brokerage account agreement or Pershing, LLC IRA Adoption Agreement.

OBLIGATIONS

For all accounts that participate in the Sweep Program, we are obligated to provide you: (i) the disclosures and notices regarding the Sweep Program required by each self-regulatory organization of which we are a member; (ii) Pershing is obligated to provide quarterly account statements notifying you that the balance in your FDIC Insured Deposit Program, or the shares of any Money Market Mutual Fund in which you have a beneficial interest, can be liquidated upon your order and the proceeds returned to your securities account or remitted directly to you; and (iii) we will provide you written notice at least 30 calendar days before changing the terms and conditions of the Sweep Program; changing the terms and conditions of a product currently available through the Sweep Program; changing, adding or deleting products available through the Sweep Program; or changing your investment in the Sweep Program from one product to another. If we are required to provide such notice to you, the notice will describe the new terms and conditions of the Sweep Program, product(s), or new product(s), as applicable, and the options available to you if you do not accept the new terms and conditions or product(s).

INSUFFICIENT PROGRAM BANK CAPACITY

The ability to sweep the uninvested cash in your brokerage account to the products supported in our FDIC Eligible Bank Deposit Sweep Program (BDSP and ICAP) depends on the capacity of the Program Banks to accept additional deposits. If the Program Banks have insufficient capacity to accept additional deposits, or otherwise reduce their current capacity levels, and we believe that sweeping additional deposits to the Program Banks is unfeasible, cash balances in your account will automatically be invested in shares of a money market mutual fund (MMF) that we make available. Share purchases will be made within one business day after new cash balances are in your brokerage account at the then current net asset value of the MMF. Your cash balances will be held as shares of the MMF, as opposed to Bank deposits, until such time as we determine that there exists sufficient aggregate Program Bank capacity under the Bank Sweep Programs to (i) accept all of the then current MMF investments swept under the effected program(s) and all free credit balances as discussed above, and (ii) anticipated future cash balances, so that the effected Program(s) can be expected to resume normal operations. At such time, new cash deposits into the Program will be allocated to the Banks on the Program Bank List as detailed above and, with advance notice to you, shares of the MMF will be liquidated and the proceeds swept to the Banks on the applicable Bank List (BDSP or ICAP) as detailed above.

If neither the Banks nor the MMF are able to provide sufficient capacity for additional cash deposits or investments, cash in your account will be held uninvested as a free credit balance (see further discussion about free credit balances above). Your cash balances will be reallocated to Banks on the Program Bank List as detailed above when Bank capacity is sufficiently restored for the effected program(s) to resume normal operations.

During times that you maintain (a) investments in the MMF made through the Program or (b) free credit balances, and debits are created in your account, such debits will be settled by cash first deducted from any free credit balances, then redeemed from your MMF investments, and finally withdrawn from your Bank Deposit Account balances, as applicable.

FOR MORE INFORMATION

You may always obtain information on the current Program Bank Lists and Interest Rates for the products we offer in our FDIC Eligible Bank Deposit Sweep Program, as well as information, including the most current yield, offered on the Money Fund made available within the Sweep Program by visiting the following website: https://osaic.com/disclosures/cash-sweep-program.

Securities and investment advisory services are offered through the firms: Osaic Wealth, Inc. and Osaic Institutions, Inc., broker-dealers, registered investment advisers, and members of FINRA and SIPC. Securities are offered through Osaic Services, Inc. and Ladenburg Thalmann & Co., broker-dealers and members of FINRA and SIPC. Advisory services are offered through Ladenburg Thalmann Asset Management, Inc., Osaic Advisory Services, LLC. and CW Advisors, LLC., registered investment advisers. Advisory programs offered by Osaic Wealth, Inc. are sponsored by VISION2020 Wealth Management Corp., an affiliated registered investment adviser.

Securities and advisory services offered through Copper Financial Network, LLC (“Copper Financial”), Member **FINRA**/**SIPC**. Copper Financial is a SEC registered investment adviser. Products offered through Copper Financial: **are not NCUA/NCUSIF or otherwise federally insured, are not guarantees or obligations of the credit union, and may involve investment risk including possible loss of principal.** Copper Financial is a wholly-owned subsidiary of CommunityAmerica Federal Credit Union.

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Sweep Program Disclosure Document

Appendix A

You can always obtain information on the current Program Bank List, interest rates offered, and the **quarterly description of the percentage of interest that we retain as our fee for administration of the Sweep Program**, as well as information, including the most current yield offered on the Money Fund made available within the Sweep Program, by visiting https://osaic.com/disclosures/cash-sweep-program

BDSP Interest Rate Tiers:

Interest Rate Tier	Deposit Level
Tier 1	$0 – 24,999
Tier 2	$25,000 – 49,999
Tier 3	$50,000 – 99,999
Tier 4	$100,000 – 249,999
Tier 5	$250,000 – 499,999
Tier 6	$500,000 – 749,999
Tier 7	$750,000 – 999,999
Tier 8	$1M – 1,499,999
Tier 9	$1.5M – 4,999,999
Tier 10	$5M +

ICAP MONTHLY PER-ACCOUNT FEE SCHEDULE

Our per account monthly fee will be no less than $0.95 and no more than $30.25.

The current Federal Funds Target (FFT) Rate can be found at: http://www.federalreserve.gov/monetarypolicy/openmarket.htm

FFT Rate	Monthly Per Account Fee
0 to 25	$0.95
25 to 50	$2.30
50 to 75	$3.65
75 to 100	$5.00
100 to 125	$6.35
125 to 150	$7.70
150 to 175	$9.05
175 to 200	$10.40
200 to 225	$11.75
225 to 250	$13.10
250 to 275	$14.45
275 to 300	$15.80
300 to 325	$17.15
325 to 350	$18.50
350 to 375	$19.75
375 to 400	$21.00
400 to 425	$22.25
425 to 450	$23.50
450 to 475	$24.50
475 to 500	$25.50
500 to 525	$26.50
525 to 550	$27.50
550 to 575	$28.50
575 to 600	$29.00
600 +	$30.25

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BANK DEPOSIT SWEEP PROGRAM (BDSP)	
All advisory and commission-based retail account types	
Sweep Indicator on your statement	AIGI
Type of Product	Multi-Bank FDIC Insured Deposit Accounts
Brief Description: Your funds will be deposited into a deposit account at one or more participating Program Banks in a manner designed to provide you with eligibility for up to $2,500,000 of FDIC Insurance protection ($5 million for joint accounts of two or more).	
All commission-based IRAs	
Sweep Indicator on your statement	IDPR
Type of Product	Multi-Bank FDIC Insured Deposit Accounts
Brief Description: Your funds will be deposited into a deposit account at one or more participating Program Banks in a manner designed to provide you with eligibility for up to $2,500,000 of FDIC Insurance protection.	

INSURED CASH ACCOUNT PROGRAM (ICAP)	
All advisory IRAs	
Sweep Indicator on your statement	BDSL
Type of Product	Multi-Bank FDIC Insured Deposit Accounts
Brief Description: Your funds will be deposited into a deposit account at one or more participating Program Banks in a manner designed to provide you with eligibility for up to $2,500,000 of FDIC Insurance protection.	

MONEY MARKET MUTUAL FUND	
All ERISA Title 1 Plans, 403(b)(7) Plans, & Keogh Plans	
Default Sweep Product Name	**Federated Hermes Government Reserves Fund**
Registered Ticker Symbol	GRFXX
Registered CUSIP	608919205
Type of Product	Money Market Mutual Fund
Brief Description: Seeks current income consistent with stability of principal and liquidity by investing in a portfolio of U.S. Treasury and government securities maturing in 397 days or less and repurchase agreements collateralized fully by U.S. Treasury and government securities.	