

## Marketing support

Third-party investment advisory platforms

Osaic FA, Inc. ("Osaic FA") offers its clients access to a broad selection of third-party (or turn-key) asset management programs ("TAMPs") from a variety of different TAMP sponsors. Some of the sponsors whose TAMPs are available through Osaic FA directly compensate Osaic FA for marketing their TAMPs. Osaic FA's receipt of this compensation presents a conflict of interest for Osaic FA given Osaic FA's financial incentive to offer TAMPs that make these payments to Osaic FA and to recommend that you use TAMPs that make the highest rate and amount of these payments to Osaic FA, rather than other available TAMPs that make relatively lower or no payments to Osaic FA. Osaic FA is providing you with this marketing support disclosure so that you are informed about our various conflicts of interest associated with our TAMP offerings and recommendations. We encourage you to contact us or your Osaic FA financial professional with any questions you may have regarding these arrangements, and Osaic FA's related conflicts of interest, before utilizing any TAMPs available through Osaic FA.

## Osaic FA's Direct Marketing Support Arrangements with TAMP Sponsors

Osaic FA receives additional compensation, sometimes called "marketing support," directly from certain TAMP sponsors available through Osaic FA. TAMP sponsors make these payments to Osaic FA out of their or their affiliates' assets, not from your advisory account assets or the assets of any investment vehicle held in your advisory account. Therefore, these payments will not appear as a fee or expense deducted from your advisory account, or as an item in the expense table disclosure for any investment vehicle held in your advisory account. The method, timing, rate, and amount of these marketing support payments vary by TAMP sponsor, but marketing support payments are typically paid using one or more of the following methodologies: payment of an annual fee based on a percentage of Osaic FA client assets held with the TAMP sponsor and/or payment of a flat annual fee. Payment rates and amounts vary by TAMP sponsor and/or flat annual fees that do not exceed \$1,700,000 annually. Accordingly, with respect to the arrangements where payments are based on total Osaic FA client assets held with the TAMP sponsor, the payments Osaic FA receives will increase with the amount of client assets placed with the TAMP sponsor.

These marketing support payments subsidize the cost of educational programs and marketing activities that are designed to help facilitate the utilization of these sponsors' TAMPs and make our financial professionals more knowledgeable about their TAMPs. In addition, these payments allow these TAMP sponsors' representatives to attend and participate in Osaic FA conferences where financial professionals are present, one-on-one marketing meetings, and due diligence presentations.

The TAMP sponsors with which Osaic FA has direct marketing support arrangements are:

AssetMark Brinker Capital City National Rochdale, LLC CLS Investments Flexible Plan Investments Morningstar Mount Yale SEI Investments Symmetry Partners You should be aware that there are TAMPs available through Osaic FA that do not pay Osaic FA any marketing support payments and therefore are generally less expensive for you to use than TAMPs that do make such payments to Osaic FA.

The marketing support payments that Osaic FA receives from the above TAMP sponsors create financial incentives for Osaic FA that result in conflicts of interest for Osaic FA. In particular, Osaic FA has a conflict of interest given its financial incentive to offer the TAMPs that make marketing support payments to Osaic FA and to recommend that you use TAMPs that make such payments to Osaic FA, rather than other available TAMPs that do not make such payments to Osaic FA. In addition, Osaic FA has a financial incentive to offer the TAMPs that make the highest rate and amount of marketing support payments to Osaic FA and to recommend that you utilize those TAMPs, rather than other available TAMPs that make relatively lower or no marketing support payments to Osaic FA. Additionally, Certain TAMP sponsors pay Osaic FA more or less depending on the particular asset class or investment strategy utilized. Given this fact, Osaic FA has a conflict of interest given its financial incentive to recommend that you use TAMPs, asset classes, and investment strategies that generate the highest rate and amount of marketing support payments to Osaic FA, rather than other available TAMPs, asset classes, and investment strategies that generate relatively lower or no marketing support payments to Osaic FA. Osaic FA addresses these conflicts of interest by: (i) disclosing them to you; (ii) not sharing any marketing support payments with the Osaic FA financial professionals that recommend TAMP sponsors, TAMPs, asset classes, or investment strategies for your account; and (iii) requiring that there be a review of your account at account opening and periodically to determine whether it is suitable and in your best interest in light of your investment objectives, financial circumstances, and other characteristics.

## Other Marketing Support from TAMP Sponsors

In addition to the marketing support payments that Osaic FA receives through the formal marketing support arrangements described above, TAMP sponsors, including, but not limited to, those that have formal marketing support arrangements with Osaic FA, make flat dollar payments to Osaic FA from time to time. These payments are made for specific activities, including, but not limited to, exhibit booth space, presentation opportunities at Osaic FA meetings or similar events, attendance at conferences, educational events for Osaic FA financial professionals, and participation in other training and educational events. Some TAMP sponsors also reimburse Osaic FA and, indirectly, its financial professionals for certain expenses in connection with due diligence meetings, training and educational events, seminars that offer educational opportunities for clients, and similar events. Some TAMP sponsors also provide Osaic FA and its financial professionals with nominal gifts and gratuities, including, but not limited to, merchandise bearing the brand or logo of the TAMP sponsor. For similar reasons as those noted above, these arrangements create financial incentives for Osaic FA that result in conflicts of interest for Osaic FA addresses these conflicts of interest by adopting measures similar to those noted above and also by requiring every TAMP sponsor, whether or not providing marketing support to Osaic FA through a formal or informal arrangement, including their wholesalers, employees, and agents, to comply with Osaic FA's non-cash compensation policies as they relate to additional payments and compensation, including, but not limited to, marketing support. TAMP sponsors must also provide documents or other information to evidence compliance with these policies upon request.

You should carefully consider the investment objectives, risks, costs, and expenses of a particular TAMP before investing. Read Osaic FA's and the applicable TAMP sponsor's Form ADV, Part 2A and the other information provided by Osaic FA and the TAMP sponsor you select carefully before investing. Investing through TAMPs entails material risks and clients could lose all or a portion of their investment. For additional information on Osaic FA's various compensation arrangements and related conflicts of interest, please see Osaic FA's Form CRS and Forms ADV, Part 2A, as applicable, which are available at <u>www.osaic.com/fa</u> under My accounts—Disclosures.

Securities and investment advisory services are offered through Osaic FA, Inc., broker-dealer, registered investment adviser, and member of FINRA and SIPC. Additionally, investment advisory services may be offered through Sagemark Consulting, a marketing name for Osaic FA, Inc.. Osaic FA, Inc. is separately owned and other entities and/or marketing names, products, or services referenced here are independent.

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