

# Elevation Point Wealth Partners

## Part 2A of Form ADV

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March 21, 2025

This brochure provides information about the qualifications and business practices of Elevation Point Wealth Partners, LLC ("EPWP"). If you have any questions about the contents of this brochure, please contact Michael Sabre at 888-862-3690 or [AdvisRegA@Elevationpoint.com](mailto:AdvisRegA@Elevationpoint.com). The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Elevation Point Wealth Partners is registered as an investment adviser with the SEC. Registration of an investment adviser does not imply any level of skill or training. Additional information about Elevation Point Wealth Partners also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2. Material Changes**

Elevation Point Wealth Partners, LLC ("EPWP") encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you have with the Advisor. The following material changes have been made to the Brochure since our last filing on October 31, 2024.

Item 4: Advisory Business, EPWP has updated the amount of assets under management as of December 31, 2024 to \$2,434,909,737, comprised of \$1,583,547,108 in discretionary assets under management and \$851,362,629 in non-discretionary assets under management. EPWP has disclosed conflict mitigation with the selection of share class.

Item 5: Fees and Compensation, EPWP updated disclosure regarding methods of calculating advisory fees:

### Daily Average Balance

Fees are based on the average daily market value of the account during the preceding calendar quarter. This average daily market value is then multiplied by the annual rate stated in your Client Agreement. The resulting amount is divided by the number of days in the given year and multiplied by the number of days invested in the billing period to determine your monthly or quarterly fee due. Fees are pro-rated for partial periods of management. Thereafter, fees will be prorated for the number of elapsed days of the billing period before termination.

### Month End Balance

Fees are calculated based on the balance of your account on the last day of the preceding month at the end of each quarter. Like daily average balance, fees are annualized and billed pro rata. Fees are prorated for each addition and withdrawal made during the applicable calendar quarter that exceed \$100,000.

### Payment of Fees

Clients typically authorize EPWP to debit the Advisory and Administrative Fees from the clients' accounts which are held at a qualified custodian. Timing of deductions can vary among custodians. If you authorize EPWP to debit fees from your account, the qualified custodian will send you a statement of your account transactions not less than quarterly. These statements will detail all account transactions, including any amounts paid to EPWP.

### Fee Offset Disclosure

EPWP may, directly or indirectly utilize investment models that utilize funds managed by Princeton Fund Advisors, LLC ("PFA"), an affiliate of EPWP. EPWP may engage PFA as a Sub-Adviser to manage a portions of a Client's portfolio, in which case PFA may utilize funds managed by PFA. This creates a conflict of interest because the EPWP has a financial incentive to utilize such models and the PFA funds therein and to engage PFA as a Sub-Adviser in order to generate additional fees for its affiliates. In order to help mitigate this conflict of interest, EPWP will waive its Advisory Fee (as defined on Exhibit B of the advisory agreement) for any client assets with respect to which PFA is engaged as a Sub-Adviser and/or assets that are allocated to any funds managed by PFA. The Client understands and acknowledges that PFA will receive fees as a Sub-Adviser if it is so engaged, as well as fund-level fees based on the internal expense ratios of each fund it manages, and the fees received by PFA related to the portions of the Client's portfolio allocated to funds managed by PFA may exceed the Advisory Fee waived by the Adviser.

Item 10: Other Financial Industry Activities and Affiliations, EPWP has included disclosure that EPWP's parent company may make strategic minority investments in independent RIA's to accelerate financial growth while benefiting from the resources of the partnership. EPWP had detailed the mitigation implemented regarding this conflict.

Our brochure may be requested free of charge by contacting Michael J. Sabre, Chief Compliance Officer, at 888-862-3690 or [AdvisReqA@elevationpoint.com](mailto:AdvisReqA@elevationpoint.com). Our brochure is also available free of charge on our web site [www.elevationpoint.com](http://www.elevationpoint.com).

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#### **Item 4. Advisory Business**

Elevation Point Wealth Partners, LLC, was formed in 2005 and is owned wholly by Elevation Point, LLC. The Managing Partners of Elevation Point Wealth Partners, LLC are Greg D. Anderson and John L. Sabre. Mr. Sabre's spouse is also an indirect owner.

Elevation Point Wealth Partners ("EPWP") offers advice on discretionary and non-discretionary basis. EPWP works closely with clients and/or through individuals associated with EPWP as Investment Adviser Representatives ("IAR" or "Advisor" or "Solicitor") to identify and recommend suitable asset allocation, investment manager and/or investment product choices attempt to meet return objectives, risk tolerances, liquidity requirements and income preferences. Below are descriptions of the primary advisory services we offer. A written Client Advisory Agreement detailing the exact services and fees will be provided prior to the commencement of any services.

Some Advisors / Solicitors have other business interests, as described in their Brochure Supplement, and may have established their own legal business entities whose trade names and logos are used for marketing purposes. These names may appear on marketing materials or client statements. The investment advisory and financial planning services are provided through EPWP. Advisors / Solicitors may have other business lines, such as brokerage or insurance services and products, are provided through their other business interests, which are unaffiliated with EPWP. As such, these services and products are not part of the investment advisory or financial planning services provided by EPWP and are not covered by the Client Agreement that you enter with EPWP. Clients should understand that these businesses are through the Advisor's / Solicitor's separate legal entities and not EPWP. Please see Item 5.E. for additional information.

#### **Advisory Services:**

EPWP's Advisory Services are offered through four different programs discussed below.

#### **Solicitor's Program**

EPWP offers investment advisory services to clients through individuals as Solicited Investment Adviser Representatives ("Solicitors"). Communication regarding accounts will primarily be with Solicitors. Solicitors are required by applicable rules and policies to obtain licenses to recommend specific investment products and services, investments, or models depending on the licenses obtained; they may transact business or respond to inquiries only in the state(s) in which they are appropriately qualified.

Investment Advisory services are customized to specific investment objectives and financial needs. Solicitors will gather data and document financial circumstances and objectives to determine the scope of services, the appropriate investment strategies and asset allocations that meet your financial objectives. Clients are encouraged to consult their tax, legal and financial professionals before investing in any investment strategy. It remains the client's responsibility to promptly notify their Solicitor if there is ever any change in financial or other personal situation, tax status, or investment objectives.

After the scope of services has been determined with the Solicitor, they may select from predefined investment strategies ("Elevation Point Managed Volatility and Summit Portfolios" or "The Program") or create a custom investment strategy to manage account(s) in a manner that is consistent with investment objectives. For more information regarding Elevation Point Managed Volatility and Summit Portfolios see [Asset Management Services](#) below.

For more information about your Solicitor, refer to their Brochure Supplement, which is a separate document that is provided to the clients along with this Brochure before or at the time you engage them to be your Advisor. If you did not receive a Brochure or the Brochure Supplement from your Advisor, contact EPWP at [AdvisReqA@elevationpoint.com](mailto:AdvisReqA@elevationpoint.com).

### Co-Advisor Program

EPWP provides Co-Advisory Services to investment advisers, banks, broker/dealers, and/or other financial services companies that participate in the program ("Service Providers") and who also provide investment advisory services to their clients utilizing the investment managers in EPWP's programs. Client Agreements are with EPWP and the Service Provider, but the Service Provider will maintain a direct advisory relationship and has suitability responsibility. Service Providers may provide clients with asset allocation services, investment policy development and performance reporting services. EPWP may work with the Service Provider to develop a proposal to provide investment management services, portfolio evaluation and reporting regarding performance of the client's investment portfolio.

### Direct Advisor Program

EPWP offers asset management services to advisory clients and general investment advice to high-net-worth individuals and businesses (the "Separately Managed Accounts"). Clients will sign a client agreement with EPWP granting discretionary or nondiscretionary authority. EPWP will provide ongoing portfolio management services and determine investment goals, time horizons, objectives, and risk tolerance with input from the clients. EPWP will recommend the specific securities, and the amount of securities, to be purchased or sold in the account without prior approval for each transaction. All discretionary trades made by EPWP will be in accordance with each client's investment objectives and goals based on an evaluation of the client's existing portfolio.

### Asset Management Services:

EPWP's Asset Management Services are provided through the programs discussed below.

EPWP manages investment advisory accounts for individuals, pension and profit-sharing plans, trusts, estates, corporations, or other business entities. All investments are maintained in a single, dedicated account with a third-party custodian. Each EPWP Managed Portfolio is subject to investment guidelines agreed to by clients based on their investment objectives and risk tolerances and clients can impose reasonable restrictions on investing in certain securities or types of securities. Any such restrictions will be reflected in writing in the applicable client documentation.

#### Elevation Point Managed Volatility Portfolios ("MVP")

The Elevation Point Managed Volatility Portfolios are individually managed, and tactically oriented portfolios maintained for tax-exempt and taxable clients on a fully discretionary basis. EPWP collects and analyzes client information concerning investment goals, risk tolerance, income requirements, other investments and investment restrictions, and then will recommend one of several MVPs. As appropriate, each portfolio is comprised of various mutual funds, ETFs, and ETNs for the applicable asset class.

If appropriate and consistent with investment objectives and applicable law, EPWP may select mutual funds for which an affiliate of EPWP, Princeton Fund Advisors, LLC ("PFA") is the investment adviser and earns an investment advisory fee for advising such mutual funds (together, "Affiliated Registered Funds"). EPWP will indirectly benefit through fees paid by the Affiliated Registered Fund to PFA for advisory services. EPWP has an incentive to allocate investments to Affiliate Registered Funds to generate additional fees for PFA. EPWP maintains policies and procedures which it believes are reasonably designed to address such conflicts of interest.

You should inform EPWP or your financial advisor if you do not want to invest in an Affiliated Registered Fund. Clients may be able to invest in certain investment products, including Affiliated Registered Funds, outside of the MVPs, without paying any program fees to EPWP.

See Items 8 and 10 below for discussion regarding Affiliated Registered Funds and conflicts of interest.

EPWP purchases and sells securities for a client's account based on EPWP's MVP portfolios, which may be updated from time to time and is subject to a client's reasonable investment limitations and restrictions.

### Elevation Point Summit Portfolios (EPSP)

EPSP Portfolios are predominantly comprised of separately managed accounts, mutual funds, and ETFs to provide transparency and daily liquidity. EPWP collects and analyzes information about client investment goals, risk tolerances, income requirements, other investments, and investment restrictions to create a client profile. Then, EPWP and the client's financial advisor work together to attempt to match the client's profile with an EPSP model.

If appropriate and consistent with investment objectives and applicable law, EPWP may select mutual funds for which an affiliate of EPWP, Princeton Fund Advisors, LLC ("PFA") is the investment adviser and earns an investment advisory fee for advising such mutual funds (together, "Affiliated Registered Funds"). EPWP will indirectly benefit through fees paid by the Affiliated Registered Fund to PFA for advisory services. EPWP has an incentive to allocate investments to Affiliate Registered Funds to generate additional fees for PFA. EPWP maintains policies and procedures which it believes are reasonably designed to address such conflicts of interest.

These portfolios are individually managed and maintained for tax-exempt and taxable clients on a fully discretionary basis. EPWP purchases and sells securities for a client's account based on EPWP's EPSP portfolios, which may be updated from time to time, and is subject to a client's reasonable investment limitations and restrictions.

### Share Class Consideration

In many instances, mutual funds offer various classes of shares, including shares designated as Class A Shares and shares designed for advisory programs, which can be titled, for example, as "Class I," "institutional," "investor," "retail," "service," "administrative." The share class offered for a particular mutual fund in many cases will not be the least expensive share class that the mutual fund makes available, and was selected by EPWP in certain cases because the share class pays the custodian compensation for the administrative and recordkeeping services the custodian provides to the mutual fund. Client should understand that another financial services firm may offer the same mutual fund at a lower overall cost to the investor. In other instances, a mutual fund may offer only Class A Shares, but another similar mutual fund may be available that offers institutional shares. Class A Shares typically pay the custodian a 12b-1 fee for providing shareholder services, distribution, and marketing expenses ("brokerage-related services") to the mutual funds. Institutional shares generally are not subject to 12b-1 fees. As a result of the different expenses of the mutual fund share classes, it is generally more expensive for a client to own Class A Shares than institutional shares because institutional shares pay lower fees over time. Investors keep more of his or her investment returns than an investor who holds Class A Shares of the same fund. Other financial services firms may offer the same mutual fund at a lower overall cost to the investor than is available through the EPWP Programs.

EPWP has a financial incentive to recommend Class A Shares in cases where both Class A and institutional shares are available. This is a conflict of interest which might incline EPWP, consciously or unconsciously, to render advice that is not disinterested. Although the client will not be charged a transaction charge for transactions, Advisor pays the custodian a per transaction charge for mutual fund purchases and sales in the account. EPWP generally does not pay transaction charges for Class A Share mutual fund transactions accounts, but generally does pay transaction charges for institutional share mutual fund transactions. The cost to EPWP of transaction charges may be a factor when deciding which securities to select and whether or not to place transactions in the account.

### IRA Rollover Considerations

As part of our investment advisory services EPWP may recommend a withdrawal of client assets from an employer's retirement plan and rollovers of assets to an individual retirement account ("IRA") that EPWP will manage. If the client elects to roll the assets to an IRA that is subject to our management, EPWP will charge an asset-based fee as set forth in a Client Agreement with respect to such IRA. This practice presents a conflict of interest because EPWP has an incentive to recommend a rollover for the purpose of generating fee-based compensation rather than solely based on needs. Clients are under no obligation, contractually or otherwise, to complete the rollover. Moreover, if

they do complete the rollover, they are under no obligation to have the assets in an IRA managed by EPWP.

It is important to understand the differences between these types of accounts. Prior to proceeding, contact your Advisor or call our main number as listed on the cover page of this brochure with any questions. Advisors must act in accordance with their fiduciary duties, and information regarding IRA consideration information will be made available to them by EPWP.

For purposes of compliance with the Department of Labor's Prohibited Transaction Exemption 2020-02 ("PTE 2020-02") where applicable, we provide the following acknowledgement to you.

Providing investment advice regarding retirement plan accounts or individual retirement accounts deems EPWP fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act ("ERISA") and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way EPWP makes money creates a conflict of interest, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of the client. Under this special rule's provisions, EPWP must:

1. Meet a professional standard of care when making investment recommendations (give prudent advice);
2. Never put our financial interests ahead of client's when making recommendations (give loyal advice);
3. Avoid misleading statements about conflicts of interest, fees, and investments;
4. Follow policies and procedures designed to ensure that we give advice that is in client's best interest;
5. Charge no more than is reasonable for our services; and
6. Provide you with basic information about conflicts of interest.

#### **Nondiscretionary Consulting Services**

EPWP provides investment consulting services for certain clients who desire investment research and advice, while maintaining full investment authority to direct the individual investments made within their account. Brokerage Customers provide EPWP the authorization prior to implementing any investment recommendation. If you select an Individual Non-Discretionary account, you will retain discretion over all such implementation decisions, and you are free to accept or reject any recommendation from us.

#### **Unmanaged Accounts**

EPWP may agree to maintain on its systems and report on certain client account(s) on an unmanaged basis. This type of account is offered as an accommodation to our clients and is referred to as an "Unmanaged Account". Clients with Unmanaged Accounts maintain full investment authority over the account. EPWP does not provide any investment research or advice and must receive your instruction and authorization prior to entering any client directed investment decision. Unmanaged Accounts will not receive portfolio management services, investment monitoring, or investment recommendations or advice for investment holdings of the account. As a result, unmanaged accounts are not charged an advisory fee but are subject to the EPWP administrative fee, and any other custodian transactional and other brokerage related fees (see Item 5, Fees and Compensation).

#### **Assets Under Management**

As of December 31, 2024, EPWP had total firm assets under management of \$2,434,909,737 comprised of \$1,583,547,108 in discretionary assets under management and \$851,362,629 in non-discretionary assets under management. EPWP has investment discretion when it has authority to buy or sell securities within an account without authorization from the client. EPWP includes as its non-discretionary assets in this brochure those accounts for which it provides investment recommendations but does not implement the recommendations.

## **Item 5. Fees and Compensation**

### General Fee Disclosure

All fees charged by EPWP are negotiable and the actual fees charged to any client may vary from the amounts described herein. Fees are detailed in a schedule to the Client Advisory Agreement between EPWP and the client ("Fee Schedule"), and the Product Fees are detailed in the Asset Allocation Form to the Client Advisory Agreement.

EPWP deducts the fees owed to EPWP from the client's custodial account as authorized in the Client Advisory Agreement or is billed directly. The Investment Managers on any Separately Managed Account, Co-Advisers and Custodians, and other Service Providers deduct their own fees pursuant to their arrangements with clients. The timing of the calculation and billing of EPWP's fees will depend upon the receipt of the custodial information and the frequency of the valuation of the client's account. Fees may be higher than those charged by other investment advisers offering similar services and you may pay more or less than other clients invested in similar strategies with other investment advisers.

Further information regarding EPWP fees is set forth.

### **Advisory Services Fees:**

#### Solicitor Program Fees

Clients in the Solicitor Program will pay three types of fees: The first compensates EPWP for running the Program and advising on the investment products included in a client's portfolio ("Program Fees"), the second consists of the fees and costs associated with the various investment products included in a client's account ("Product Fees") and the third consists of fees paid to various third-party service providers ("Other Fees").

The Program Fee charged by EPWP may include a Solicitor's Fee that is payable to the Service Provider that referred the client to EPWP. In other cases, a Service Provider may act as a co- advisor as stated in the Client Advisory Agreement and charge a separate Co-Advisor Fee. The Program Fee, and any Solicitor's Fee or Co-Advisor Fee for each client is described more specifically in the Client Advisory Agreement between EPWP and the client.

The maximum Program Fee charged by EPWP is 2.11%, including any Solicitor's Fee. The Program Fee charged by EPWP is negotiable between the client and EPWP depending on many factors, including the size and nature of the client's portfolio and the client's or its financial advisor's relationship with EPWP. Fees, which are charged separately by the Co-Advisor, are set by the Co-Advisor.

#### Methods of Calculation – Solicitor Program

EPWP assesses and deducts advisory fees in advance on a quarterly calendar basis. EPWP utilizes two methods for assessing fees and the method and fee rates to be charged to a specific client will be set forth in the Client Advisory Agreement.

#### Daily Average Balance

Fees are based on the average daily market value of the account during the preceding calendar quarter. This average daily market value is then multiplied by the annual rate stated in your Client Agreement. The resulting amount is divided by the number of days in the given year and multiplied by the number of days invested in the billing period to determine your monthly or quarterly fee due. Fees are pro-rated for partial periods of management. Thereafter, fees will be prorated for the number of elapsed days of the billing period before termination.

#### Month End Balance

Fees are calculated based on the balance of your account on the last day of the preceding month at the end of each



quarter. Like daily average balance, fees are annualized and billed pro rata. Fees are prorated for each addition and withdrawal made during the applicable calendar quarter that exceed \$100,000.

#### Payment of Fees

Clients typically authorize EPWP to debit the Advisory and Administrative Fees from the clients' accounts which are held at a qualified custodian. Timing of deductions can vary among custodians. If you authorize EPWP to debit fees from your account, the qualified custodian will send you a statement of your account transactions not less than quarterly. These statements will detail all account transactions, including any amounts paid to EPWP.

Clients may elect to be billed separately. EPWP will accommodate clients who prefer to pay fees by check, rather than direct debit. In such cases, EPWP will present an invoice to the client each billing period.

#### Solicitor Program Product Fees:

Product Fees include the following:

The fees of any Investment Manager that has been selected by the client or EPWP to provide advisory services to the client in any Separately Managed Account. The costs for the services of any Investment Manager of a Separately Managed Account are determined by each of those Investment Managers.

If the client's assets are in a Unified Managed Account, EPWP will charge a Product Fee for any Research Provider utilized.

#### Solicitor Program Other Fees:

Other Fees include fees paid to custodian, mutual fund, or other collective investment vehicle fees, and brokerage fees and expenses that are incurred by the Investment Managers and EPWP in executing trades.

#### Co Advisory Program Fees

The fees paid by clients to EPWP for its services are negotiated between the parties on a case-by-case basis. The results of those negotiations are formalized in an agreement between each Service Provider and EPWP.

#### Direct Advisor Program Fees

Flat fees, if applicable, will be charged on a project basis and can range from \$500 to over \$100,000. The flat fee is dependent on the nature and complexity of the services to be provided by EPWP. Flat fees are generally payable one-half in advance, with the remaining half due upon completion of the project. However, under no circumstances will EPWP collect fees for more than six months in advance.

An hourly rate may also be charged for services provided by an EPWP consultant or analyst, ranging from \$65-\$500 per hour. Hourly fees are payable at the end of each month for the services provided in that month. At the discretion of EPWP, the client may instead, pay an annual fee to EPWP, charged quarterly in advance, based on a percentage of the client's total assets under management by EPWP ("Managed Assets"). Fees range from 0.10% - 1.50% of the client's Managed Assets. All fees listed above are negotiable at EPWP's discretion.

#### Asset Management Fees:

##### Elevation Point Managed Volatility and Summit Portfolios

The standard annual management fee is 0.30 – 0.40% per year and is assessed in quarterly installments in advance.

##### Termination and Fees with Respect to All Programs

Upon termination of the Client Advisory Agreement, any fees collected in advance by EPWP in accordance with the Client Advisory Agreement and paid to EPWP, but not yet earned by EPWP, will be refunded to the client as provided in the Client Advisory Agreement between the client and EPWP, subject to a 30-day Client termination notice and \$500 account closing fee. Fees charged under the Client Advisory Agreement are negotiable depending upon many factors including the client's needs and the complexity of the services to be provided. Investment management agreements are typically terminable on thirty days' written notice.

#### Financial Institution Consulting Services

EPWP receives a consulting fee based on the Assets Under Management from Brokerage Customers who have provided written consent to a broker/dealer to receive the investment consulting service from EPWP and have entered into a written advisory contract with EPWP. The consulting fee is calculated from the Assets Under Management as of the end of a calendar quarter period multiplied by the annualized rate of from 4 to 23 basis points. The initial fee is paid only after the completion of one full calendar quarter period following the date of the executed agreement with broker/dealers.

#### Fee Offset Disclosure

Certain Client Advisory Agreements provide for a right of offset to the extent a client owes outstanding Program Fees or a termination fee to EPWP at the effective date of the client's termination of the agreement and the client's account does not hold liquid assets sufficient to pay such outstanding fees. Such right of offset is described further in the applicable agreement.

In some cases, EPWP may, directly or indirectly utilize investment models that utilize funds managed by Princeton Fund Advisors, LLC ("PFA"), an affiliate of EPWP. EPWP may engage PFA as a Sub-Adviser to manage a portions of a Client's portfolio, in which case PFA may utilize funds managed by PFA. This creates a conflict of interest because the EPWP has a financial incentive to utilize such models and the PFA funds therein and to engage PFA as a Sub-Adviser in order to generate additional fees for its affiliates. In order to help mitigate this conflict of interest, EPWP will waive its Advisory Fee (as defined on Exhibit B of the advisory agreement) for any client assets with respect to which PFA is engaged as a Sub-Adviser and/or assets that are allocated to any funds managed by PFA. The Client understands and acknowledges that PFA will receive fees as a Sub-Adviser if it is so engaged, as well as fund-level fees based on the internal expense ratios of each fund it manages, and the fees received by PFA related to the portions of the Client's portfolio allocated to funds managed by PFA may exceed the Advisory Fee waived by the Adviser.

#### Additional Fees and Expenses

EPWP's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which will be incurred by the client in connection with recommendations made by EPWP. Clients will incur certain charges imposed by custodians, brokers, third party investment managers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

To the extent a client account invests in collective investment vehicles such as mutual funds, ETFs, and private funds (which may be limited partnerships or limited liability companies), such account will indirectly pay all the fees and expenses charged by such vehicles to all their shareholders. To the extent PFA is a manager of such collective investment vehicle, such account will directly or indirectly pay such fees to PFA, in addition to fees paid by Client directly to EPWP. These fees and expenses are in addition to the advisory fees charged by EPWP and will result in the client paying Program Fees, Investment Fees and the fees and expenses of the collective investment vehicles. Because of these fees, Clients may be able to obtain similar services elsewhere at lower cost. Client accounts invested in Affiliated Registered Funds present a conflict of interest because EPWP and its affiliates will receive more overall compensation when Affiliated Registered Funds are used.

To help mitigate such conflicts of interest, fees payable to EPWP will be calculated without inclusion of the assets that are invested in Affiliated Registered Funds. Clients should be aware that in certain cases the amount payable by an Affiliated Registered Fund to PFA on invested assets will be greater than that waived by EPWP. Clients should

review their Client Advisory Agreements with EPWP and prospectuses for Affiliated Registered Funds for further information regarding fees.

Please see Item 12 for information about our brokerage practices and Item 10 for information about revenue sharing arrangements involving our affiliates.

**Item 6. Performance-Based Fees and Side-By-Side Management**

EPWP does not charge any performance-based fees. As a result, EPWP has no conflicts of interest between accounts that pay asset-based fees and accounts that pay performance-based fees (known as “side-by-side management”).

**Item 7. Types of Clients**

The types of clients to whom EPWP generally provides services are set forth in the descriptions of our different programs in Item 4, above.

For new individual account clients, EPWP requires a minimum account size of \$100,000. EPWP reserves the right to waive this minimum at its sole discretion.

**Item 8. Methods of Analysis, Investment Strategies and Risk of Loss:**

EPWP’s methods of analysis include independent research on investment managers and managed investment vehicles in addition to informational databases provided by third parties.

The methods of analysis, investment strategies and risk of loss associated with each Investment Manager and Research Provider included in a client’s portfolio are set forth in their separate Form ADV Form 2A Brochures. For Private Funds and Registered Funds, their information will also appear within the private placement memorandum, or prospectus as applicable. Clients should read such brochures, private placement memoranda or prospectuses carefully.

There will be various investment and other risks associated with a client’s investment portfolio. Investing in securities involves risk of loss that clients should be prepared to bear. No person should invest in the financial markets unless he or she is fully able, financially and otherwise, to bear investment losses, and unless he or she has the background and experience to understand thoroughly the risks of their investment.

Certain material risks relating to the advice and recommendations provided by EPWP are set forth below, but this section does not attempt to identify every risk or to describe completely those risks it does identify.

- **Market Risk.** The market values of the securities in which a client invests may decline, at times sharply and unpredictably. Market values of equity securities are affected by a number of different factors, including the historical and prospective earnings of the issuer, the value of its assets, management decisions, decreased demand for an issuer’s products or services, increased production costs, general economic conditions, interest rates, currency exchange rates, investor perceptions and market liquidity.
- **Asset Allocation Risk.** Asset Allocation may have a more significant effect on account value when one of the more heavily weighted asset classes is performing more poorly than the others. Diversification and strategic asset allocation do not assure profit or protect against loss in declining markets.
- **Management Risk.** This is the risk that EPWP’s model portfolios do not perform as intended. This includes the risk that the Investment Managers or Products EPWP analyzes or recommends will not successfully execute a strategy even after applying its investment process. There can be no guarantee that EPWP or such Investment Managers or Products will produce the intended result, and there can be no assurance that its investment strategy will succeed.

- Private Placements. EPWP may research, recommend, or execute investments in privately issued securities. Such securities are subject to legal or contractual resale restrictions. Clients are generally unable to publicly sell these securities. Such securities are also typically difficult to value. For these reasons, disposition of privately issued securities may be difficult and require a lengthy period.

### **Asset Management Services:**

#### **Elevation Point Managed Volatility Portfolios**

EPWP's MVPs are professionally managed and tactically oriented asset allocation portfolios designed for sophisticated investors seeking a global awareness of opportunities. Elevation Point Managed Volatility Portfolio is designed to achieve a specific investment objective and consists of several elements, including the investment strategy, asset class selection, asset class target allocation, and the selection of investment securities. MVPs are predominantly comprised of mutual funds, ETFs, and ETNs and provide transparency and daily liquidity. EPWP will research investment advisory firms whose services may relate to funds that are included in the program (collectively "Products") by means of ongoing quantitative screening combined with qualitative information and analysis. The services of Investment Managers may be accessed by either the client entering into a separate agreement with the Investment Manager to manage a "Separately Managed Account," where the Investment Manager has discretionary authority to select which securities to buy or sell, and executes the securities trades, or through a "Unified Managed Account" managed by EPWP. This may result in similar or substantially similar investment. EPWP engages the services of the Investment Manager in the form of a "Research Provider" to select which securities to buy or sell, while EPWP executes the securities trades in accordance with the Research Provider's instructions. For more information regarding Elevation Point Managed Volatility Portfolios see Item 8: Methods of Analysis, Investment Strategies and Risk of Loss. EPWP collects and analyzes information about client investment goals, risk tolerances, income requirements, other investments and investment restrictions to create a client profile. Then, EPWP and the client's financial advisor work together to attempt to match the client's profile with an Elevation Point Managed Volatility Portfolio model. As appropriate, each model is comprised of various mutual funds, ETFs, and ETNs.

There are seven Elevation Point Managed Volatility Portfolio models, each designed with a different risk, suitability and asset allocation target. The models are:

- Capital Focus – For investors seeking wealth preservation with limited potential drawdown. Targets a 100% allocation to non-equity-oriented assets.
- Conservative – For investors seeking wealth preservation with a lower level of potential drawdown. Targets a 20% allocation to growth-oriented assets and 80% allocation to non-equity-oriented assets.
- Conservative Growth – For investors seeking long-term growth of capital with a modest level of potential drawdown. Targets a 35% allocation to growth-oriented assets and 65% allocation to non-equity-oriented assets.
- Moderate – For investors seeking long-term growth of capital with a moderate level of potential drawdown. Targets a 50% allocation to growth-oriented assets and 50% allocation to non-equity-oriented assets.
- Moderate Growth – For investors seeking long-term growth of capital with a moderate level of potential drawdown. Targets a 65% allocation to growth-oriented assets and 35% allocation to non-equity-oriented assets.
- Growth – For aggressive investors seeking to maximize long-term capital appreciation with a higher level of potential drawdown. Targets an 80% allocation to growth-oriented assets and 20% allocation to non-equity-oriented assets.
- Aggressive – For aggressive investors seeking to maximize long-term capital appreciation with a higher level of potential drawdown. Targets a 100% allocation to growth-oriented assets.

The MVPs seek to go beyond static allocation by managing risk capital exposure between:

- Strategic vs. tactical execution styles;
- Passive vs. active management;
- Domestic vs. non-US strategies; and
- Proactive, market driven rebalancing vs. calendar-based rebalancing.

In advising the MVP, EPWP has access to a growing variety of investment securities and strategies that have dramatically increased in number, liquidity and availability in recent years. Mutual funds, ETFs and ETNs may invest in very similar markets yet have different fees, performance and tax awareness. The investment committee selects funds based on ratings, performance and exposure. If appropriate and consistent with the client's investment objectives and applicable law, EPWP may select mutual funds for which an affiliate of EPWP, Princeton Fund Advisors ("PFA"), is the investment adviser and earns a fee for advising the Affiliated Registered Funds. EPWP may recommend an Affiliated Registered Fund in cases where there is no unaffiliated fund that is consistent with the desired asset allocation. EPWP will indirectly benefit through fees paid by the Affiliated Registered Fund to PFA for advisory services. EPWP will continue to charge its asset management fee for assets invested in an Affiliated Registered Fund and its Program Fee for any advisory client's assets invested in an Affiliated Registered Fund. However, the amount of fees waived by EPWP may be greater or less than the amount of fees earned by PFA on the client's assets invested in the Affiliated Registered Funds.

EPWP has an incentive to allocate investments to Affiliated Registered Funds to generate additional fees for PFA. EPWP maintains policies and procedures which it believes are reasonably designed to address such conflicts of interest.

See Item 10 discussion below regarding Affiliated Registered Funds and conflicts of interest.

#### Elevation Point Summit Portfolios

EPSP Portfolios are predominantly comprised of separately managed accounts, mutual funds, and ETFs to provide transparency and daily liquidity. EPWP collects and analyzes information about client investment goals, risk tolerances, income requirements, other investments, and investment restrictions to create a client profile. Then, EPWP and the client's financial advisor work together to attempt to match the client's profile with an EPSP model.

There are 15 EPSP models, each designed with a different risk, suitability, and asset allocation target. The models are:

#### **Elevation Point Summit Portfolios**

- Capital Focus – The Capital Focus Model targets a 100% allocation to fixed income, based on the investment team's conviction on which asset classes are expected to deliver the best risk-adjusted return. Targeted exposures are tactically reallocated on an off-calendar, quarterly basis with the possibility for additional mid-quarter adjustments to capture market opportunities.
- Conservative – The Conservative Model targets a 20% allocation to equities and 80% allocation to fixed income, based on the investment team's conviction on which asset classes are expected to deliver the best risk-adjusted return. Targeted exposures are tactically reallocated on an off-calendar, quarterly basis with the possibility for additional mid-quarter adjustments to capture market opportunities.
- Conservative Growth – The Conservative Growth Model targets a 35% allocation to equities and 65% allocation to fixed income, based on the investment team's conviction on which asset classes are expected to deliver the best risk-adjusted return. Targeted exposures are tactically reallocated on an off- calendar, quarterly basis with the possibility for additional mid-quarter adjustments to capture market opportunities.

- Moderate – The Moderate Model targets a 50% allocation to equities and 50% allocation to fixed income, based on the investment team’s conviction on which asset classes are expected to deliver the best risk-adjusted return. Targeted exposures are tactically reallocated on an off-calendar, quarterly basis with the possibility for additional mid-quarter adjustments to capture market opportunities.
- Moderate Growth – moderately growth-oriented investors seeking long-term growth of capital with a moderate level of potential drawdown. Targets a 65% allocation to growth-oriented assets and 35% allocation to non-equity-oriented assets.
- Growth – The Growth Model targets an 80% allocation to equities and 20% allocation to fixed income, based on the investment team’s conviction on which asset classes are expected to deliver the best risk-adjusted return. Targeted exposures are tactically reallocated on an off-calendar, quarterly basis with the possibility for additional mid-quarter adjustments to capture market opportunities.
- Aggressive – The Aggressive Model targets a 100% allocation to equities, based on the investment team’s conviction on which asset classes are expected to deliver the best risk-adjusted return. Targeted exposures are tactically reallocated on an off-calendar, quarterly basis with the possibility for additional mid-quarter adjustments to capture market opportunities.
- Alternative Sleeve – The EPWP Diversified Alternative Portfolio targets a 100% allocation to Alternative sectors, based on the investment team’s conviction on which sectors are expected to deliver the best risk-adjusted return. Targeted exposures are tactically reallocated on an off-calendar, quarterly basis with the possibility for additional, mid-quarter adjustments to capture market opportunities.

#### **Elevation Point Summit Plus Portfolios**

- Conservative Growth – The Summit Plus: Conservative Growth Strategy Model targets a 30% allocation to equity sectors, 15% allocation to liquid alternatives, and 55% allocation to fixed income, based on the investment team’s conviction on which sectors are expected to deliver the best risk-adjusted return. Targeted exposures are tactically reallocated on an off-calendar, quarterly basis with the possibility for additional mid-quarter adjustments to capture market opportunities.
- Moderate – The Summit Plus Portfolio: Moderate Model targets a 40% allocation to equity sectors, a 15% allocation to liquid alternatives, and 45% allocation to fixed income, based on the investment team’s conviction on which sectors are expected to deliver the best risk-adjusted return. Targeted exposures are tactically reallocated on an off-calendar, quarterly basis with the possibility for additional mid-quarter adjustments to capture market opportunities.
- Moderate Growth – The Summit Plus Portfolios: Moderate Growth Model targets a 55% allocation to equity sectors, 15% allocation to liquid alternatives, and 30% allocation to fixed income, based on the investment team’s conviction on which sectors are expected to deliver the best risk-adjusted return. Targeted exposures are tactically reallocated on an off-calendar, quarterly basis with the possibility for additional mid-quarter adjustments to capture market opportunities.
- Growth – The Summit Plus Portfolios: Growth Model targets a 70% allocation to equities sectors, 15% allocation to liquid alternatives, and 15% allocation to fixed income, based on the investment team’s conviction on which sectors are expected to deliver the best risk-adjusted return. Targeted exposures are tactically reallocated on an off-calendar, quarterly basis with the possibility for additional mid-quarter adjustments to capture market opportunities.

#### **Elevation Point Summit Select Portfolios**

- Conservative Growth – The EPWP Summit Select: Conservative Growth Strategy Model targets a 30% allocation to equity sectors, 15% allocation to liquid alternatives, and 55% allocation to fixed income, based on the investment team’s conviction on which sectors are expected to deliver the best risk-adjusted return.

Targeted exposures are tactically reallocated on an off-calendar, quarterly basis with the possibility for additional mid-quarter adjustments to capture market opportunities.

- Moderate – The EPWP Summit Select Portfolio: Moderate Model targets a 40% allocation to equity sectors, a 15% allocation to liquid alternatives, and 45% allocation to fixed income, based on the investment team's conviction on which sectors are expected to deliver the best risk-adjusted return. Targeted exposures are tactically reallocated on an off-calendar, quarterly basis with the possibility for additional mid-quarter adjustments to capture market opportunities.
- Moderate Growth – The EPWP Summit Select Portfolios: Moderate Growth Model targets a 55% allocation to equity sectors, 15% allocation to liquid alternatives, and 30% allocation to fixed income, based on the investment team's conviction on which sectors are expected to deliver the best risk-adjusted return. Targeted exposures are tactically reallocated on an off-calendar, quarterly basis with the possibility for additional mid-quarter adjustments to capture market opportunities.
- Growth – The EPWP Summit Select Portfolios: Growth Model targets a 70% allocation to equities sectors, 15% allocation to liquid alternatives, and 15% allocation to fixed income, based on the investment team's conviction on which sectors are expected to deliver the best risk-adjusted return. Targeted exposures are tactically reallocated on an off-calendar, quarterly basis with the possibility for additional mid-quarter adjustments to capture market opportunities.

The **Elevation Point Summit Select Portfolios** go beyond static asset allocation by managing risk capital exposure between:

- Strategic vs. Tactical execution styles
- Passive vs. Active
- Domestic vs. non-US strategies
- Proactive, market driven rebalancing vs. calendar-based rebalancing.
- With or without liquid alternatives investments

In advising the Elevation Point Summit Select Portfolios, EPWP has access to a growing variety of investment securities and strategies that have dramatically increased in number, liquidity, and availability in recent years. Separately Managed Accounts, Mutual Funds, ETFs and ETNs may invest in very similar markets yet have different fees, performance, and tax awareness. If appropriate and consistent with the client's investment objectives and applicable law, EPWP may select mutual funds for which an affiliate of EPWP, PFA, is the investment adviser and earns an investment advisory fee for advising such Affiliated Registered Funds. EPWP may recommend an Affiliated Registered Fund in cases where there is no unaffiliated fund that is consistent with the desired asset allocation. An Affiliated Registered Fund also may be selected in certain instances where the Affiliated Registered Fund has a higher rating, lower fees and expenses, better performance, be better in terms of exposure, or otherwise may be considered preferable to an unaffiliated fund. EPWP will indirectly benefit through fees paid by the Affiliated Registered Fund to PFA for advisory services. EPWP has an incentive to allocate investments to Affiliated Registered Funds to generate additional fees for PFA. EPWP maintains policies and procedures which it believes are reasonably designed to address such conflicts of interest. EPWP will continue to charge its asset management fee for assets invested in an Affiliated Registered Fund and its Program Fee for any advisory client's assets invested in an Affiliated Registered Fund. However, the amount of fees waived by EPWP may be greater or less than the amount of fees earned by PFA on the client's assets invested in the Affiliated Registered Funds.

See Item 10 discussion below regarding Affiliated Registered Funds and conflicts of interest.

## Material Elevation Point Managed Volatility and Summit Portfolios Risks

Investing in securities involves risk of loss that clients should be prepared to bear. No person should invest in MVP unless they are fully able, financially and otherwise, to bear investment losses, and unless they have the background and experience to understand thoroughly the risks of its investment. There is no assurance that an investment will provide positive performance over any period. **Past performance is no guarantee of future results and different periods, and market conditions may result in significantly different outcomes.** The material risks presented by the strategy and its investments are set forth below, but this section does not attempt to identify every risk, or to describe completely those risks it does identify. The risks set forth below generally apply to the extent a specific portfolio is allocated to the asset class or type of security identified.

- **Asset Allocation Risk.** Asset allocation may have a more significant effect on account value when one of the more heavily weighted asset classes is performing more poorly than the others. Diversification and strategic asset allocation do not assure profit or protect against loss in declining markets.
- **Market Risk.** The market values of the securities in which a client invests may decline, at times sharply and unpredictably. Market values of equity securities are affected by a number of different factors, including the historical and prospective earnings of the issuer, the value of its assets, management decisions, decreased demand for an issuer's products or services, increased production costs, general economic conditions, interest rates, currency exchange rates, investor perceptions and market liquidity.
- **Security Selection.** The securities chosen by EPWP, the subadvisor, or the Research Model Providers ("RMPs") may decline in value. Security selection risk may cause the portfolio to underperform other portfolios with a similar investment objectives and investment strategies.
- **Common Stocks.** The value of common stocks will rise and fall in response to the activities of the company that issued the stock, general market conditions and/or economic conditions. If an issuer is liquidated or declares bankruptcy, the claims of owners of bonds will take precedence over the claims of owners of common stocks.
- **Cybersecurity Risk.** Cyber-attacks include unauthorized access to digital systems (such as through "hacking" or malicious software coding) for purposes of misappropriating assets or sensitive information; corrupting data, equipment, or systems; or causing operational disruption. Cyber-attacks may also be carried out in a manner that does not require gaining unauthorized access, such as causing denial of service attacks on websites (making network services unavailable to intended users). Cyber- incidents may cause disruptions and affect business operations, potentially resulting in financial losses, impediments to trading, the inability to transact business, destruction to equipment and systems, violations of applicable privacy and other laws, regulatory fines, penalties, reputational damage, reimbursement or other compensation costs, or additional compliance costs. EPWP follows its security protocol in its Information Security Management System Policies in the event a cybersecurity event occurs.
- **Value Stocks.** Investments in value stocks are subject to the risks of common stocks, as well as the risks that (i) their intrinsic values may never be realized by the market or (ii) such stock may turn out not to have been undervalued.
- **Growth Stocks.** Investments in growth stocks are subject to the risks of common stocks. Growth company stocks generally provide minimal dividends which could otherwise cushion stock prices in a market decline. The value of growth company stocks may rise and fall significantly based, in part, on investors' perceptions of the company, rather than on fundamental analysis of the stocks.
- **Exchange Traded Funds.** ETF shares are shares of exchange traded investment companies that hold a portfolio of common stocks designed to track the performance of a particular index. ETFs and other similar instruments involve risks generally associated with investments in a broadly-based portfolio of common stocks, including the risk that the general level of stock prices, or that the prices of stocks within a particular



sector, may increase or decrease, thereby affecting the value of the shares of the ETF or other instrument. The main risk of investing in index-based investments like an ETF is the same as investing in a portfolio of equity securities comprising the index. As a shareholder of an ETF, a client portfolio would bear its pro rata portion of the ETF's expenses, including advisory fees, in addition to the expenses such ETF bears directly in connection with its own operation. The market prices of index-based investments will fluctuate in accordance with both changes in the market value of their underlying portfolio securities and due to supply and demand for the instruments on the exchanges on which they are traded (which may result in their trading at a discount or premium to their net asset values). ETFs may not replicate exactly the performance of their specific index because of transaction costs and because of the temporary unavailability of certain component securities of the index.

- **Securities of Smaller Capitalization Companies.** Investments in securities of smaller capitalization companies are subject to the risks of common stocks. Investments in smaller capitalization companies may involve greater risks because these companies generally have a more limited track record, narrower markets, more limited managerial and financial resources and a less diversified product offering than larger, more established companies. Smaller capitalization company stocks are also more likely than larger companies to suffer from significant diminished market liquidity. As a result of these factors, the performance of smaller capitalization companies can be more volatile, which may increase the volatility of a portfolio.
- **Active Management Risk.** The portfolios are actively managed, and their performance therefore will reflect in part the EPWP's, the subadvisor's and the Solicitor's ability to make investment decisions which are suited to achieving each portfolio's investment objective. Due to active management, the portfolios could underperform investments with similar investment objectives.
- **Frequent Trading of Securities.** EPWP, the subadvisor or the Solicitor may trade or recommend trades of securities frequently, resulting, from time to time, in an annual portfolio turnover rate of over 100%. Trading of securities may result in a greater or rapid realization of capital gains. Active trading may also increase the amount of commissions or mark-ups to broker-dealers that a client pays.

**International Investing Risk.** Investing in these securities involves risks not typically associated with U.S. investing. These risks include:

- **Currency Risk.** Because foreign securities often trade in currencies other than the U.S. dollar, changes in currency exchange rates will affect a Fund's net asset value, the value of dividends and interest earned, and gains and losses realized on the sale of securities. A strong U.S. dollar relative to these other currencies will adversely affect the value of a portfolio.
- **Foreign Securities Market Risk.** Securities of many non-U.S. companies may be less liquid and their prices more volatile than securities of comparable U.S. companies. Securities of companies traded in many countries outside the U.S., particularly emerging markets countries, may be subject to further risks due to the inexperience of local investment professionals and financial institutions, the possibility of permanent or temporary termination of trading, and greater spreads between bid and asked prices for securities. In addition, non-U.S. stock exchanges and investment professionals are subject to less governmental regulation, and commissions may be higher than in the United States. Also, there may be delays in the settlement of non-U.S. stock exchange transactions.
- **Information Risk.** Non-U.S. companies generally are not subject to uniform accounting, auditing, and financial reporting standards or other regulatory requirements that apply to U.S. companies. As a result, less information may be available to investors concerning non-U.S. issuers. Accounting and financial reporting standards in emerging markets may be especially lacking.
- **Investment Restriction Risk.** Some countries, particularly emerging markets, restrict to varying degrees foreign investment in their securities markets. In some circumstances, these restrictions may limit or preclude investment in certain countries or may increase the cost of investing in securities of companies.

- **Political and Economic Risks.** International investing is subject to the risk of political, social, or economic instability in the country of the issuer of a security, the difficulty of predicting international trade patterns, the possibility of the imposition of exchange controls, expropriation, limits on removal of currency or other assets, and nationalization of assets. Other Risks Related to ADRs. ADRs are U.S. dollar-denominated equity and debt securities of foreign issuers or directly in foreign securities that are offered on U.S. exchanges. Interest or dividend payments on such securities may be subject to foreign withholding taxes.
- **Fixed Income Risks.** Including: *interest rate risk*, which is the chance that bond prices overall will decline because of rising interest rates; *income risk*, which is the chance that a strategy's income will decline because of falling interest rates; *credit risk*, which is the chance that a bond issuer will fail to pay interest and principal in a timely manner, or that negative perceptions of the issuer's ability to make such payments will cause the price of that bond to decline; and *call risk*, which is the chance that during periods of falling interest rates, issuers of callable bonds may call (repay) securities with higher coupons or interest rates before their maturity dates. The strategy would then lose any price appreciation above the bond's call price and would be forced to reinvest the unanticipated proceeds at lower interest rates, resulting in a decline in the strategy's income.
- **Municipal Securities Risks.** To the extent the strategy invests in funds that invest primarily in bonds issued by local governments, such bonds are subject to the fixed income risks described above as well as the following risks: legislative risk- the risk that a change in the tax code could affect the value of tax-exempt interest income; and liquidity risk- the risk that investors may have difficulty finding a buyer when they want to sell and may be forced to sell at a significant discount to market value. Liquidity risk is greater for thinly traded securities such as lower-rated bonds, bonds that were part of a small issue, bonds that have recently had their credit rating downgraded or bonds sold by an infrequent issuer.
- **Liquidity Risk.** Liquidity risk results when particular investments would be difficult to purchase or sell, possibly preventing the sale of such securities at an advantageous time or price, or possibly requiring the investor to dispose of other investments at unfavorable times or prices to fund liquidity needs. Securities of companies with smaller market capitalizations, non-U.S. securities, Rule 144A securities, derivatives, or securities with substantial market or credit risk tend to have the largest exposure to liquidity risk.
- **Re-balancing.** To the extent an account is re-balanced due to market movements or EPWP's discretion, such re-balancing may have tax consequences.
- **Tax Overlay Services.** For clients who select the tax overlay services, a tax-sensitive strategy may provide a lower return before consideration of federal income tax consequences than other strategies that are not tax-sensitive, and at times it may be impossible to implement the tax sensitive strategy. There can be no guarantee that the tax overlay service will eliminate all or most tax consequences related to transactions within the account and none of EPWP, the sub-adviser or the overlay manager provides tax, accounting or related legal advice.

#### Risks Applicable to All Programs.

Disease outbreaks that affect local economies or the global economy may materially and adversely impact our investment funds and portfolios and/or our business. For example, uncertainties regarding the novel Coronavirus (COVID-19) outbreak have resulted in serious economic disruptions across the globe. These types of outbreaks can be expected to cause severe decreases in core business activities such as manufacturing, purchasing, tourism, business conferences and workplace participation, among others. These disruptions lead to instability in the marketplace, including stock market losses and overall volatility, as has occurred in connection with COVID-19. In the face of such instability, governments may take extreme and unpredictable measures to combat the spread of disease and mitigate the resulting market disruptions and losses. We have in place business continuity plans reasonably designed to ensure that we maintain normal business operations, and that our investment portfolios and client assets are protected, and we periodically test those plans. However, in the event of a pandemic or an outbreak, there can be no assurance that we or our investment funds' and portfolios' service providers will be able to maintain normal business operations for an extended period or will not lose the services of key personnel on a temporary or

long-term basis due to illness or other reasons. The full impacts of a pandemic or disease outbreaks are unknown, resulting in a high degree of uncertainty for potentially extended periods of time.

#### **Item 9. Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding certain legal or disciplinary events that would be material to your evaluation of EPWP or the integrity of EPWP's management. EPWP has no legal or disciplinary event applicable to this Item to report.

#### **Item 10. Other Financial Industry Activities and Affiliations**

##### Other Investment Advisor

EPWP is affiliated with Princeton Fund Advisors, LLC ("PFA"), an SEC-registered investment advisor with offices in Denver, Colorado, Evergreen, Colorado, and Minneapolis, Minnesota. PFA has its own disclosure brochure that is available upon request. PFA is the investment advisor to mutual funds ("Affiliated Registered Funds"). EPWP's Managing Members are also PFA's Managing Members and spend a significant amount of time on non-EPWP activities.

When suitable, EPWP recommends its own Asset Management Services as part of an overall asset allocation and portfolio recommendation service. In connection with such recommendations, EPWP clients pay EPWP the Program Fee described in Item 5 to the extent such clients decide to utilize a specific investment strategy offered by EPWP, such clients will pay EPWP a separate asset management fee on that portion of the client's assets allocated to that strategy (See Item 5). Because EPWP's Advisory Services in Programs A, B, C, and D provide high level asset allocation and portfolio recommendation services which are separate and distinct from the more strategy-specific advisory services EPWP provides with its Asset Management Services in Programs E and F, where permitted by applicable laws and regulations, EPWP will continue to charge its total program fee with respect to client assets for which it also provides Asset Management Services for which it charges a separate fee. In effect, the client will pay two levels of fees on such assets, but such fees are for separate and distinct services provided by EPWP.

Elevation Point, LLC, through Elevation Point Investment Partners, LLC may make strategic minority investments in independent RIA's to accelerate financial growth while benefiting from the resources of the partnership. This results in a conflict of interest since affiliated RIA's may utilize EPWP as a third-party manager for clients. When an affiliated RIA places a client in a portfolio managed by EPWP, the principal owners of EPWP benefit. EPWP address this conflict of interest by providing clear and upfront disclosures of fees associated with their respective services. Both EPWP and affiliated RIA's are bound by their fiduciary duty to act in the best interests of its clients at all times. Affiliated RIA's clients are under no obligation to engage EPWP for services. EPWP regularly reviews its policies, disclosures, and practices to ensure continued compliance with regulatory requirements and to address any emerging conflicts of interest.

Elevation Point Investment Partners, LLC currently has a strategic minority interest in Stonebrook, LLC. We are also open to partnering with firms with their own ADVs through making a direct investment in them if the partnership fits values and vision.

##### Financial Institution Consulting Services

EPWP has agreement(s) with broker/dealers to provide investment consulting services to Brokerage Customers. Broker/dealers pay compensation to EPWP for providing investment consulting services to Customers. This consulting arrangement does not include assuming discretionary authority over Brokerage Customers' brokerage accounts or the monitoring of securities. These consulting services offered to Brokerage Customers may include a general review of Brokerage Customers' investment holdings, which may or may not result in EPWP's investment adviser representative making specific securities recommendations or offering general investment advice. Brokerage Customers will execute a written advisory agreement directly with EPWP.

This relationship presents conflicts of interest. Potential conflicts are mitigated by Brokerage Customers consenting to receive investment consulting services from EPWP; by EPWP not accepting or billing for additional compensation on broker/dealers' Assets Under Management beyond the consulting fees disclosed in Item 5 in connection with the investment consulting services; and by EPWP not engaging as, or holding itself out to the public as, a securities broker/dealer. EPWP is not affiliated with any broker/dealer.

#### Affiliated Registered Funds

EPWP's affiliate, Princeton Fund Advisors, LLC ("PFA"), is the investment adviser to which mutual funds and exchanged traded funds ("Affiliated Registered Funds"). EPWP may waive any amount of Program Fees or asset management fees payable in the future to EPWP in its sole discretion. There is no assurance that EPWP will continue to waive such fees. There is a conflict of interest when EPWP recommends that its clients invest in these Funds because each pay PFA for advisory services. Therefore, EPWP has a financial interest in such recommendations. EPWP will continue to charge its asset management fee for assets invested in an Affiliated Registered Fund and its Program Fee for any advisory client's assets invested in an Affiliated Registered Fund. However, the amount of fees waived by EPWP pursuant to this paragraph may be greater or less than the amount of fees earned by PFA on the client's assets invested in the Affiliated Registered Funds.

PFA and its affiliates may each, at its own expense and out of its own assets, including its legitimate profits from Fund-related activities, provide additional cash payments, travel or other expense reimbursements to financial intermediaries who sell shares of the Fund or assist in the marketing of the Fund, including placement agents and marketing specialists. Financial intermediaries include brokers, financial planners, banks, insurance companies, retirement or 401(k) plan administrators and others. These payments are generally made to financial intermediaries that provide shareholder or administrative services, or marketing support. Marketing support may include access to sales meetings, conference sponsorships, costs or expenses of attending adviser-sponsored due diligence conferences, sales representatives and financial intermediary management representatives, inclusion of the Fund on a sales list, including a preferred or select sales list, or other sales programs. These payments also may be made as an expense reimbursement in cases where the financial intermediary provides shareholder services to Fund shareholders.

EPWP and PFA have entered various arrangements to compensate certain EPWP employees in connection with the sale of PFA advised investment funds. As a result, certain EPWP employees have an additional incentive to recommend the sale of the funds. Clients who are investors in such funds, however, pay no extra fees relating to such compensation to invest in such funds. In addition, PFA pays a portion of its advisory fee for the Affiliated Registered Funds to certain employees of EPWP based on the amount of assets raised by such employees for these Funds. The payment of such compensation creates a conflict of interest for such employees in recommending these Funds to clients.

#### Administrative Services

EPWP is also affiliated with Mount Yale Administrative Services, LLC ("MYAS"), which provides human resource support and client onboarding support. Fees for such services are disclosed in the offering documents. EPWP also has a services arrangement with MYAS pursuant to which EPWP pays MYAS fees for services relating to EPWP's business. Such services include furnishing space and office supplies, providing personnel and providing general administrative services and support. EPWP's Managing Partners are MYAS employees.

#### Recommendation of other Investment Advisors

EPWP receives sponsorship fees or other payments to offset the expenses of such conferences from certain third-party investment managers and funds, including third party managers and funds that EPWP recommends to advisory clients. This creates a conflict of interest for EPWP. A list of such third-party manager sponsors is available by calling the telephone number listed on the cover page of this document.

#### Policies and Procedures to Address Conflicts of Interest

Except as may otherwise be required by applicable law, conflicts of interest described or contemplated herein and such other conflicts of interest that may arise from time to time will be resolved in the sole discretion of EPWP. There can be no assurance that any actual or potential conflicts of interest will not adversely affect a clients' portfolio and its performance. Furthermore, the present and future activities of EPWP and its affiliates in addition to those described or contemplated herein may give rise to additional conflicts of interest.

#### Recommendation of Affiliated Private Funds, Registered Funds, or Asset Management Services

EPWP's Investment Committee must review and approve all investment products or managers it recommends, including EPWP the Affiliated Registered Funds. The Investment Committee applies the same standards in considering and reviewing affiliated managers and funds as it does when considering and monitoring unaffiliated managers.

EPWP believes all recommendations it makes are in the best interests of clients depending on their individual circumstances and that it discloses all material information in its various program documents, the prospectuses and statements of additional information of the Affiliated Registered Funds, and in applicable Form ADV Part 2As to permit clients and their advisors to evaluate these conflicts of interest. Clients that have not granted EPWP discretion over their accounts are always free to choose not to accept EPWP's recommendations and to not invest in any Affiliated Registered Funds or retain EPWP to provide Asset Management Services.

#### **Item 11. Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

EPWP and PFA have adopted one Code of Ethics for all employees of the Firm describing its standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All employees at EPWP must acknowledge the terms of the Code of Ethics annually, or as amended.

EPWP's clients or prospective clients may request a copy of the Firm's Code of Ethics by contacting Michael Sabre at 1-888-862-3690, or emailing [AdvisReqA@Elevationpoint.com](mailto:AdvisReqA@Elevationpoint.com). A copy of EPWP's Code of Ethics is also posted at [www.ElevationPoint.com](http://www.ElevationPoint.com).

EPWP employees and managers may trade for their own accounts in securities which are recommended to and/or purchased for EPWP's clients. Because EPWP permits such personal trading, this creates the conflict that employees could use their knowledge of pending client transactions to benefit their own personal transactions. For example, if an employee owns a security the employee knows EPWP will be selling out of client accounts, the employee could sell the personal holding ahead of time to obtain a higher price than might exist when the client account holdings are sold. To address certain conflicts related to personal trading, the Code of Ethics prohibits excessive trading, prohibits the purchase of securities in an initial public offering, and requires pre-clearance of transactions involving private placements. Because EPWP does not prohibit employees from investing in the same securities in which client accounts invest (other than as described above), we review the periodic personal securities transactions and holdings reports to ensure that employees do not personally benefit from, or try to take advantage of, their knowledge of upcoming buys and sells within client accounts. In general, given the nature of our clients' investments, our limited trading activities and the limited personal securities activities of our employees, EPWP does not believe as a practical matter that employees will be able to benefit personally from such knowledge. EPWP's Code of Ethics also requires employees to obtain pre-approval of any personal transactions in the Affiliated Registered Funds to address any potential conflicts of interest related to their knowledge of a fund's activities.

EPWP managers and employees may also invest in the Affiliated Registered Funds without the imposition of a front-end sales load, if applicable. A conflict exists that relates to the advice that might be given to clients to invest in a fund. EPWP requires employees to put client interests first, however, and ensures that any recommendation to invest in Affiliated Registered Funds is made only to clients for whom such an investment is suitable. EPWP's Code of Ethics also requires employees to obtain pre-approval of any personal transactions in the Affiliated Registered Funds

to address any potential conflicts related to their knowledge of the fund's activities.

In the circumstances where EPWP has investment discretion, it is EPWP's policy that the Firm will not affect any principal or agency cross securities transactions for client accounts. EPWP will also not execute cross trades between client accounts. Principal transactions are generally defined as transactions where an advisor, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment advisor in relation to a transaction in which the investment advisor, or any person controlled by or under common control with the investment advisor, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an advisor is dually registered as a broker-dealer or has an affiliated broker-dealer.

## **Item 12. Brokerage Practices**

### Selection of Brokers

EPWP does not have or exercise discretion in selecting brokers with respect to client assets. Clients direct EPWP to execute all transactions through or with the client's chosen custodian (the "Broker/Custodian"). In all cases where EPWP is responsible for trading, EPWP affects all securities transactions through the Broker/Custodian.

For clients who choose to custody their assets at a Preferred Broker/Custodian (as defined below), EPWP advises Investment Managers that EPWP has negotiated the provision of custodial and execution services for client accounts and that, where consistent with best execution, execution of transactions through the Preferred Broker/Custodian facilitates settlement of client trades. However, Investment Managers have a duty to obtain the best execution for client accounts and are not required to use a Preferred Broker/Custodian for execution services.

Investment Managers retained by clients or retained by EPWP as subadvisors have discretion to determine which broker-dealers are used to effect client transactions and the Investment Managers undertake to do so consistent with their obligation to obtain best execution. Investment Managers often select the Preferred Broker/Custodian as the broker-dealer to execute securities transactions presumably, in part, because it offers competitive execution and custody services and because of the efficiency and convenience of execution through the client's custodial broker-dealer. In addition to considering the cost and quality of services provided, the Investment Managers may select broker-dealers, including the Preferred Broker/Custodians, based in part on the quality of research products and services provided by the broker-dealer. The Investment Managers may pay a broker-dealer, including the Preferred Broker/Custodian, a commission more than that which another broker-dealer might have charged for effecting the same transactions, in recognition of the value of the research products and services provided by the broker-dealer. In such cases, the Investment Managers are in effect paying for the research products and services in client commissions or so-called "soft dollars." Clients should review each Investment Manager's Form ADV Part 2A regarding their trading practices and use of client commissions available on the EPWP's website: [www.ElevationPoint.com](http://www.ElevationPoint.com).

### Recommendation of Broker/Custodians

EPWP may assist clients in arranging custodial services for individual client accounts. In doing so, EPWP generally recommends that clients custody their assets at Fidelity Brokerage Services LLC, Charles Schwab & Co., Pershing or Raymond James (collectively, "Preferred Broker/Custodians"). These are EPWP's Preferred Broker/Custodians because of the quality of their custodial services, safety due to size, reputation, advanced technology platform, efficient and economical execution capability and high level of client service. In addition, clients' use of the Preferred Broker/Custodians facilitates the execution and settlement of trades affected by Investment Managers through the Preferred Broker/Custodians.

Substantially all of EPWP's clients custody their assets at the Preferred Broker/Custodians although clients are not required to do so.

## Trading Client Accounts

Aggregate Trades. Where EPWP is responsible for trading in its investment advisory programs, given the nature of such programs, EPWP will generally purchase or sell the same security at the same time for several clients that all use the same Broker- Dealer/Custodian. In these cases, trades in the same security for clients using the same Broker-Dealer/Custodian will be “bunched” in a single order to obtain the best execution available with or through the Broker-Dealer/Custodian, or to allocate equitably among EPWP’s clients the differences in prices and commissions or other transaction costs that might have been obtained or incurred if client orders were individually placed. In bunched trades, all transactions (including any partial fills) will be averaged as to price (including transaction costs) and allocated among EPWP’s clients in proportion to the purchase and sale orders placed for each client on any given day.

## Trade Error Policy

Client account transactions may be affected on occasion in a manner that differs from what was intended for the account. EPWP reviews any trade errors that it discovers, on a case-by-case basis, and decides what corrective steps to take if any, in its sole discretion, after reviewing the error with one of the Firm’s principals. As a general matter, if a trade error results in a loss to a client’s account, EPWP will reimburse the client for the loss. If the trade error results in a gain to a client’s account, the custodian will donate the gain to a charity of the client’s choice. The calculation of the amount of any gain or loss will depend on the particular facts surrounding the trade error, and the methodology used by EPWP to calculate gain or loss may vary. Compensation is generally expected to be limited to direct and actual out-of-pocket monetary losses (in certain circumstances, net of any associated gains) and will not include any amounts that EPWP deems to be uncertain or speculative, nor will it cover investment losses not caused by the trade error or other opportunity costs.

## Allocation of Investment Opportunities Among Clients

There may be conflicts of interests over EPWP’s time devoted to managing any one account and the allocation of investment opportunities among all accounts managed by EPWP. In such a case, EPWP will attempt to resolve all such conflicts in a manner that is generally fair to all its clients. EPWP may give advice and act with respect to any of its clients that may differ from advice given or the timing or nature of action taken with respect to any particular client so long as it is EPWP’s policy, to the extent practicable, to allocate investment opportunities over a period of time on a fair and equitable basis relative to other clients. EPWP is not obligated to acquire any account any security that EPWP or its managers, members or employees may acquire for its or their own accounts or for the account of any other client, if in the absolute discretion of EPWP, it is not practical or desirable to acquire a position in such security for that account.

## Elevation Point Managed Volatility and Summit Portfolios

Clients direct EPWP to execute all transactions through or with the client’s chosen custodian (the “Broker/Custodian”). In all cases where EPWP is responsible for trading, EPWP affects all securities transactions through the client’s designated Broker/Custodian. Clients should be aware that not all investment advisers require clients to direct their brokerage.

In this case, the client should recognize that brokerage commissions (or other costs) for the execution of transactions in the client’s account may not be negotiated by EPWP. In addition, EPWP may not be free to seek the best price and execution for securities and futures transactions by placing transactions with other brokers or dealers. The clients assume that risk. Clients may wish to satisfy themselves in a directed brokerage arrangement that the broker or dealer participating in the arrangement can provide an adequate price and execution of most or all transactions.

Clients independently select their custodians for their account and EPWP does not make recommendations as to the use of any particular custodian. Separate account clients enter arrangements for custody of their account (which may be as part of an overall arrangement with a custodian’s affiliated financial advisor) pursuant to which the costs of custodial services as well as advisory and/or brokerage services using affiliates of the custodian for some, or all the client’s investment management and transactions have been set. EPWP is not a party to such arrangements and generally is not aware of the terms of such arrangements. Sometimes in connection with these arrangements

brokerage rates offered by affiliates of the custodian to such clients may have already been agreed to by the client, and EPWP is informed of the agreed upon rate.

A client should also consider that, depending upon the fee the client negotiates in these arrangements, the amount of portfolio activity in the client's account, the value of custodial services which are provided under the arrangement and other factors, the fee the client pays may exceed the amount the client would pay if EPWP were free to negotiate commissions and seek best price and execution of transactions for the client's account. Additionally, a client who has these arrangements may not be able to participate in block trades.

EPWP may receive complimentary research from clients' brokerage firms and/or custodians. EPWP does not engage in soft dollar transactions.

EPWP does not receive client referral fees from broker-dealers or third-party managers.

#### **Item 13. Review of Accounts**

EPWP performs detailed analysis of investment managers and investment funds that participate in EPWP's investment advisory programs with respect to performance, portfolio characteristics, style analysis and other portfolio information. Investments and the performance of the investment managers and funds selected by clients are monitored in relation to investment style and portfolio analytics. There is a quarterly review which includes the foregoing as well as a review of client asset allocation targets and directives and changes in the client's objectives as communicated to EPWP by the client or their financial advisor.

Performance monitoring is supervised by the Investment Committee, comprised of Greg Anderson and John Sabre, which, with its staff, is responsible for tracking the clients' investment performance, manager style adherence and shifts in internal management of each manager. A review of a client account is also triggered when the client's financial circumstances or investment objectives change as communicated by the client or their financial advisor.

EPWP makes available to clients through their financial advisors monthly and quarterly client-specific investment performance written reports. The quarterly reports provide clients with an analysis of their accounts managed by the specific investment managers including but not limited to asset composition and portfolio return monitoring. The custodians of client accounts also provide monthly custodial statements directly to the client.

#### **Item 14. Client Referrals and Other Compensation**

EPWP markets its services by using the services of financial advisors, broker/dealers, banks and other financial institutions ("Financial Advisors"). These Financial Advisors assist their clients in evaluating the recommendations EPWP makes and provide ongoing services to the client. The Financial Advisors receive fees from the client. Such fees and the services provided by the Financial Advisor are disclosed in the Client Advisory Agreement and related documentation, which is executed by the Financial Advisor, the client and EPWP. The fee the client pays the Financial Advisor is in addition to the fee the client pays EPWP for its services.

EPWP may engage solicitors, including Financial Advisors, to whom it pays cash, or a portion of the advisory fees paid by clients referred to it by those solicitors. In such cases, this practice is disclosed in writing to the client and EPWP complies with the other requirements of Rule 206(4)-1 under the Investment Advisors Act of 1940, as amended, to the extent required by applicable law.

From time to time, EPWP or its affiliates may determine that it is appropriate and useful to invite clients, prospects, Financial Advisors or consultants to its offices or offsite conference locations for the purposes of educating them about its business and the industry, educating them about third party investment managers and funds, receiving their input or advice about its business activities or for generally building business relationships. In connection with such invitations, EPWP or its affiliates may offer to pay the reasonable travel and lodging expenses of such persons and provide them with reasonable business meals and entertainment. EPWP's affiliate, MYAS, receives sponsorship fees or other payments to offset the expenses of such conferences from certain third-party investment managers and funds, including third party managers and funds that it recommends to advisory clients. This creates a conflict of interest for EPWP. A list of such third-party manager sponsors is available by calling the telephone number listed on



the cover page of this document.

Also, in the normal course of business, EPWP or its affiliates, subject to certain internal policies and procedures, may provide reasonable business gifts and/or business entertainment to clients, prospects, consultants or Financial Advisors. Similarly, upon the request of a client, prospect, Financial Advisor or consultant, EPWP or its affiliates may provide charitable contributions or other financial support to events, programs or seminars sponsored by or affiliated with such persons. Although these practices may raise certain issues related to conflicts of interest, EPWP believes its policies and procedures adequately address such conflicts as they relate to EPWP and its affiliates.

All clients or prospects are encouraged to check with their Financial Advisors or consultants regarding any compensation or other benefits they have received from EPWP, its affiliates or the affiliated private funds. With respect to other economic benefits EPWP receives from third parties related to its provision of advisory services to clients, please see Item 10 above.

#### Elevation Point Managed Volatility and Summit Portfolios

EPWP may engage solicitors, including non-affiliated financial advisors, to whom it pays cash, or a portion of the advisory fees paid by clients referred to it by those solicitors. In such cases, this practice is disclosed in writing to the client and EPWP complies with the other requirements of Rule 206(4)-1 under the Investment Advisers Act of 1940, as amended, to the extent required by applicable law. The costs of such referral fees are paid entirely by EPWP and do not result in any additional increase in fees charged to the client.

#### **Item 15. Custody**

EPWP does not maintain custody of client assets, although EPWP may be deemed by the applicable regulations to have custody of assets if clients give it authority to withdraw quarterly fees directly from their custodial accounts. Client assets must be maintained in an account at a qualified custodian, generally a broker dealer or bank. A custodian is appointed by each client to have possession of the assets of the account, settle transactions for the account and provide instructions from the account's investment managers regarding securities trading in the account.

Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains their investment assets. EPWP urges clients to carefully review such statements and compare such official custodial records to the account statements that EPWP may provide. EPWP statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. Clients should contact EPWP using the information on the cover page if they have any questions about their statements or if their qualified custodians stop sending them at least quarterly statements.

#### Third-Party Authorizations

Clients may provide the Custodian with written instruction authorizing EPWP to direct transfers to a specified third party, either on a set schedule or from time to time, subject to certain regulatory requirements. As a result of this limited authority, EPWP will be deemed to have custody of the client's assets, however we are not required to engage an independent CPA to conduct a surprise verification of the Account assets as long as we meet the following criteria:

1. Clients provide a written, signed instruction to the qualified Custodian that includes the third party's name and address or account number at a Custodian;
2. Clients authorize EPWP in writing to direct transfers to the third party either on a specified schedule or from time to time;
3. The Custodian verifies the client's authorization (e.g., signature review) and provides a transfer of funds notice to clients promptly after each transfer;
4. Clients can terminate or change the instruction;
5. EPWP has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party;
6. EPWP maintains records showing that the third party is not a related party to EPWP nor is it located at the same address as EPWP; and
7. The Custodian sends clients, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

**Item 16. Investment Discretion**

With respect to Advisory Services described in Item 4, EPWP may or may not provide discretionary investment or brokerage services depending on the Client Advisory Agreement between the client and EPWP.

In all cases discretion is to be exercised in a manner consistent with the stated investment objectives for the client account. EPWP is generally authorized to make the following determinations, consistent with each client's investment goals and policies, without client consultation or consent before a transaction is affected:

- Which securities and underlying funds to buy or sell; and
- Which subadvisors to retain.

The underlying funds and subadvisors in turn will have discretion to determine:

- The total amount of securities or other investments to buy or sell;
- The broker or dealer through whom securities are bought or sold;
- The commission rates at which securities or other investment transactions for client accounts are affected; and
- The price at which securities or other investments are to be bought or sold, which may include dealer spreads or mark-ups and transactions costs.

When selecting securities and determining amounts, EPWP observes the investment policies, limitations and restrictions of the clients for which it advises. For registered investment companies, EPWP's authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made.

With respect to the Elevation Point Managed Volatility and Summit Portfolios, EPWP accepts discretionary authority to select the identity and amount of securities to be bought or sold in the client's account, pursuant to a written investment advisory agreement. We observe reasonable investment limitations and restrictions that are communicated to us and agreed to by us. Investment limitations and restrictions must be provided to EPWP in writing. Except as otherwise required by law, EPWP will not be liable for any action or instruction of the client or the client's custodian. Clients who impose investment limitations and restrictions might affect the account's performance and limit EPWP's ability to employ various investment strategies. This may result in investment performance that differs from that of a benchmark or other client accounts utilizing the same or similar investment strategy.

**Item 17. Voting Client Securities**

Where a subadvisor or investment manager is retained to manage a client's account, it will be responsible for voting proxies.

**Elevation Point Managed Volatility and Summit Portfolios**

The client may delegate to EPWP, and EPWP accepts responsibility for voting proxies solicited by, or with respect to, issuers of securities held in the client's account that are actually received by EPWP. To the extent that EPWP does not receive a specific proxy, it will have no responsibility for ensuring that such a proxy is appropriately handled. However, a client may expressly retain the right and obligation to vote any proxies relating to securities held in the client's account, provided the client provides prior written notice to EPWP.

If EPWP is required to vote proxies, EPWP has developed written proxy voting policies and procedures that are available upon request. The general principles underlying the policies and procedures are that EPWP will vote any proxy or other beneficial interest in an equity security prudently and solely in the best long-term economic interest of advisory clients and their beneficiaries, considering all relevant factors and without undue influence from individuals or groups who may have an economic interest in the outcome of a proxy vote. EPWP's proxy voting guidelines cover certain types of proposals. These guidelines indicate whether EPWP votes for or against a particular proposal, or whether the matter should be considered on a case-by-case basis. EPWP's Investment Committee is responsible for reviewing all proxies and voting them consistent with the policies and procedures. Clients may direct a particular proxy vote at any time by contacting EPWP.

EPWP will make its best efforts to avoid material conflicts of interest in the voting of proxies. However, where material conflicts of interest arise, EPWP is committed to resolving the conflict in its clients' best interest. In situations where EPWP perceives a material conflict of interest involving it or any of its affiliates, EPWP may disclose the conflict to the relevant advisory clients and obtain their consent before voting; defer to the voting recommendation of the relevant advisory clients or an independent third party provider of proxy services; send the proxy directly to the relevant advisory clients for a voting decision; vote the proxy based on the voting guidelines set forth in the policies if the application of the guidelines to the matter presented involved little discretion on the part of EPWP; or take such other action in good faith which would protect the interest of advisory clients. Under certain circumstances, EPWP may not be able to vote proxies or may find that the expected economic costs from voting outweigh the benefits associated with voting. For example, EPWP may not vote proxies on certain foreign securities, local restrictions or customs.

Clients for whom EPWP has proxy voting responsibilities may obtain a copy of EPWP's proxy voting policies and procedures or information about how EPWP voted any proxies on behalf of their securities by contacting Michael Sabre at 1-888-862-3690, or emailing [AdvisReqA@ElevationPoint.com](mailto:AdvisReqA@ElevationPoint.com).

#### **Item 18. Financial Information**

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about EPWP's financial condition. EPWP has no financial condition that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.

## **Notice of Privacy Practices**

We at EPWP LLC, and the various private investment funds we or our affiliates sponsor and/or manage respect your privacy and protecting it is one of our top priorities. We also know that you expect us to conduct and process your business in an accurate and efficient manner. To do so, we must collect and maintain certain personal information about you. This may include your name and address, your Social Security Number or taxpayer identification number, your assets, your income, your investment activity and your accounts at other financial institutions.

***Where we get the information:*** The information we collect about you comes primarily from applications, subscriptions, profiles and other forms you or your financial advisor complete and send to us and from your transactions with us. We may also receive information about you that you authorize third parties, such as other investment managers, to provide to us.

***To whom we disclose the information:*** We do not sell information about current or former clients or their accounts to third parties and we do not disclose any nonpublic personal information about current or former clients except as set forth below. To provide you with better service and to provide you with new or enhanced products or services, we may disclose information about you within the EPWP group of companies. To provide necessary business services to your account, we may disclose information to service providers such as custodians, investment managers (including co-advisors and sub-advisors engaged on your behalf) and brokerage firms, all of which are required to maintain the confidentiality of such information. Finally, we will release information about you only if you direct us to do so or if we are compelled by law to do so.

***Protecting your personal information:*** To protect information about you, we restrict access to nonpublic personal information to those employees who need to know the information to provide services to you or to alert you to new, enhanced or improved products and services we provide. We maintain physical, electronic and procedural safeguards to maintain the confidentiality of your information.

As required by federal law, we will provide you with a privacy notice on an annual basis and with an updated notice if there are changes to our privacy policies and procedures that are legally required to be disclosed. DISCLOSING YOUR PERSONAL INFORMATION TO MOUNT YALE, YOU CONSENT TO THE COLLECTION, STORAGE, AND PROCESSING OF THIS INFORMATION BY MOUNT YALE IN A MANNER CONSISTENT WITH THIS PRIVACYPOLICY.

**If after reading this you have any questions, please feel free to call us at 303.382.2880, or to contact us in writing at 1580 Lincoln Street, Suite 680, Denver, CO 80203. We thank you for allowing us to service your investment accounts and look forward to a long relationship.**