



Product Provider Compensation Disclosure

Copper Financial receives compensation from each of the mutual fund companies, insurance and annuity (fixed and variable products) providers, and Real Estate Investment Trusts (“REIT”), collectively “Product Providers”, that are available to our clients. These payments include the standard transaction-based commissions and ongoing distribution fees (e.g. 12b-1 fees) paid to all firms offering those products.

In addition to the standard transaction-based commissions and fees, certain Product Providers also pay us a marketing allowance or “Revenue Sharing” payments. These payments are made to support our marketing and sales-force education and training efforts by providing supplemental training or educational meetings to our financial professionals.

Revenue Sharing payments are calculated based on either gross sales or assets under management (“AUM”). Payments exclude assets held in fee-based programs at Copper Financial. See below for additional information on how these payments are calculated.

We believe that receipt of Revenue Share does not compromise the advice your financial professional provides to you. Your financial professional's compensation is the same regardless of whether or not the sale generates a Revenue Sharing payment to Copper Financial. Those Product Providers who pay Revenue Sharing may have greater access to our financial professionals as a result of this additional support at training or other Copper Financial events.

Revenue Share –Insurance and Annuity Providers

Insurance and annuity Product Providers compensating Copper Financial based on gross sales may pay us up to 0.25% of purchase amounts. For example, if you purchased \$10,000 of an annuity offered by a participating insurance and annuity provider, Copper Financial could receive up to \$25.

Insurance and Annuity – Revenue Share Partners:

- Brighthouse Financial
- Equitable
- Security Benefit
- Delaware
- Midland National
- Protective Life
- Ash Brokerage*

*Ash Brokerage is an insurance marketing organization that makes many insurance carriers available to us through a consolidated platform. Ash Brokerage pays Copper Financial Revenue Sharing payments on certain insurance and annuity products.



Revenue Share – Mutual Fund Companies

Revenue Sharing payments made by mutual fund companies are typically calculated based on assets under management. For example, if Copper Financial clients hold \$10,000 at a mutual fund company paying .02% on AUM would pay us \$2.

Mutual Fund – Revenue Share Partners:

- Sammons

Revenue Share – REIT

REIT Product Providers compensate Copper Financial based on gross sales and may pay us up to 1.5% of purchase amounts. For example, if you purchased \$10,000 of a participating REIT, Copper Financial would receive up to \$150.

REIT – Revenue Share Partners:

- Cole Capital

Additional Information

Additional information about an annuity, mutual funds or REIT's fees and expenses may be found in the fee tables located in the prospectus. Also, the statement of additional information contains important information that you may wish to read.

Please visit cu.financial/disclosures to access our Customer Relationship Summary and Regulation Best Interest Disclosure.