



## BROKER-DEALER CUSTOMER RELATIONSHIP SUMMARY JULY 26, 2021

### **ITEM 1. INTRODUCTION**

Copper Financial Network, LLC (“CuFi”) is registered with the Securities and Exchange Commission (“SEC”) as both a broker-dealer and an investment adviser. Our brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free and simple tools are available for you to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

### **ITEM 2. RELATIONSHIP AND SERVICES: WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?**

As a broker-dealer, we can recommend and effect securities transactions for you, including buying and selling securities (including investment funds and products) that can be either held in accounts, including IRA accounts, with our clearing firm, Apex Clearing Corporation (“brokerage accounts”), or held in accounts directly with the issuer of the securities purchased (“direct accounts”). We also offer IRA accounts, where your investments will be held with the custodian of the IRA. In addition, our brokerage accounts offer the option to hold cash either as a free credit balance (i.e. uninvested) or have it invested in a bank account insured by the Federal Deposit Insurance Corporation (a “cash sweep vehicle”). More information about our broker-dealer services is available in our Regulation Best Interest Disclosure, which is available at [cu.financial/disclosures](https://cu.financial/disclosures).

**Account Monitoring:** While we remain available to assist you, after effecting a securities transaction for you (including those we recommend to you), we do not monitor your account on an ongoing basis.

**Investment Authority:** We do not have discretionary investment authority, which means that we cannot buy or sell investments in your account without first obtaining your consent. We may recommend investments to you, but you are responsible for making the decision whether to purchase or sell investments.

**Limits on Investment Offerings:** We do not limit our investment offerings to a specific menu of investment products. We also do not offer investments issued, sponsored, or managed by us or our affiliates (“proprietary investments”). Not all of our financial professionals can offer the full range of broker-dealer investments and services we offer.

**Account Minimums and Other Requirements:** We do not have any minimum account requirements for our brokerage accounts, but some of the investments you can purchase through us have minimum investment requirements that are typically set by the product issuer.

**ADDITIONAL INFORMATION:** We are a wholly-owned subsidiary of a credit union. Our business model is to offer broker-dealer services to members of our affiliated credit union and through bank networking arrangements with unaffiliated credit unions. Some of our broker-dealer registered representatives are also investment advisor representatives of CuFi, while others are investment advisor representatives of an unaffiliated registered investment advisor. For more information, see our Regulation Best Interest Disclosure available at [cu.financial/disclosures](https://cu.financial/disclosures). We also offer investment advisory services. More information can be found in our Investment Advisor Form CRS available at [cu.financial/disclosures](https://cu.financial/disclosures).

**CONVERSATION STARTER:** *Given my financial situation, should I choose an investment advisory service? Should I choose a brokerage service? Should I choose both types of services? Why or why not?*

**CONVERSATION STARTER:** *How will you choose investments to recommend to me?*

**CONVERSATION STARTER:** *What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?*

### **ITEM 3. FEES, COSTS, CONFLICTS, AND STANDARD OF CONDUCT**

#### **A. WHAT FEES WILL I PAY?**

**Description of Principal Fees and Costs:** We are paid each time you trade in your account or make a new investment in certain products, such as mutual funds and variable products. This payment is typically called a “commission,” but it may also be called a “sales charge” or a “markup.” This kind of payment presents a conflict for us because it creates an incentive to encourage you to trade more and make additional investments. The commission amount varies depending on the investment and the size or amount of the transaction. In addition, certain investments such as mutual funds, college savings plans and variable products, bear ongoing fees and expenses, which you pay indirectly because they are factored into the cost of the investment. We also may receive a portion of this ongoing fee, which creates a conflict for us as there is an incentive to recommend products that pay ongoing fees and recommend you make additional investments in those products. More information about commission payments, and the ongoing expenses assessed by certain products is available in our Regulation Best Interest Disclosure at [cu.financial/disclosures](https://cu.financial/disclosures).

**Description of Other Fees and Costs:** In addition to the foregoing investment fees, you will typically pay to the clearing firm, and we may receive a portion of, certain fees associated with maintaining your brokerage account and fees for certain services that you select, such as wire transfers or margin, and a termination fee when your brokerage account is terminated or transferred to another broker-dealer. A list of the fees for brokerage accounts is available at [cu.financial/disclosures](https://cu.financial/disclosures). Account servicing and maintenance fees are also charged on direct accounts but we do not receive a portion of those fees. Contact the direct account custodian for information on applicable fees.

**ADDITIONAL INFORMATION:** You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. More information about the fees and costs of the various products we offer can be found in our Regulation Best Interest Disclosure available at [cu.financial/disclosures](http://cu.financial/disclosures).

**CONVERSATION STARTER:** *Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

**B. WHAT ARE YOUR LEGAL OBLIGATIONS TO ME WHEN PROVIDING RECOMMENDATIONS? HOW ELSE DOES YOUR FIRM MAKE MONEY AND WHAT CONFLICTS OF INTEREST DO YOU HAVE?**

**When we provide you with a recommendation**, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the recommendations and investment advice we provide to you. Here are some examples to help you understand what this means.

**Commissions.** Because we are paid each time you trade in your account or make a new investment in certain products, we have an incentive to encourage you to trade more and make additional investments. These transaction-based payments, or commissions, create a conflict of interest for us because of the incentives to encourage more trading and additional investments.

**Third-Party Payments.** When we sell an investment fund or product to you, we receive payments from the issuer (such as a mutual fund or insurance company) and we may also receive ongoing payments, such as 12b-1 fees, from them. These payments create an incentive for us to sell you investments that entail such payments and to maintain our relationships with these issuers. Since the amount of compensation we receive varies between the issuers and the different investments that we offer as a broker-dealer, we have an incentive to sell you those investments that pay us more compensation.

**Revenue Sharing.** In addition to third-party payments, issuers and fund sponsors make payments to us that are sometimes called “revenue sharing” payments because they share with us a part of the revenue that they earn on your investments in their products. These payments are an incentive for us to offer investments that entail such payments and to encourage you to increase the amount of assets in those investments. Our clearing firm also shares some of the fees and revenues it earns on assets in your brokerage accounts, including balances held in cash or in the cash sweep vehicle.

**ADDITIONAL INFORMATION:** Additional information on potential conflicts, including those discussed in Item C below, have can be found in our Regulation Best Interest Disclosure available at [cu.financial/disclosures](http://cu.financial/disclosures).

**CONVERSATION STARTER:** *How might your conflicts of interest affect me, and how will you address them?*

**C. HOW DO YOUR FINANCIAL PROFESSIONALS MAKE MONEY?**

Our financial professionals are eligible to receive a portion of the commissions that we receive. As noted above, the commissions we receive generally vary based on the investments purchased and sold. Each credit union CuFi has entered into an arrangement with may have a different compensation plan for the financial professionals affiliated with that credit union. Those compensation plans outline what portion, if any, the financial professional receives of commissions they generate. There may be different incentives for financial professionals based on the compensation plan of their credit union, which can create different conflicts for financial professionals.

Issuers of certain products provide our financial professionals other forms of compensation, including but not limited to, business entertainment, small gifts, covering expenses related to training and educational meetings, and financial assistance in covering the cost of marketing and sales events. The receipt of these payments presents a conflict because it creates an incentive for the financial professional to recommend those products whose issuers offer these forms of compensation.

Additional information about compensation received by financial professionals is available in our Regulation Best Interest Disclosure available at [cu.financial/disclosures](http://cu.financial/disclosures).

**ITEM 4. DISCIPLINARY HISTORY: Do you or your financial professionals have legal or disciplinary history?**

Yes. Please visit [Investor.gov/CRS](http://Investor.gov/CRS) for a free and simple search tool to research us and our financial professionals.

**CONVERSATION STARTER:** *As a financial professional, do you have any disciplinary history? For what type of conduct?*

**ITEM 5. ADDITIONAL INFORMATION**

Additional information about our broker-dealer services is available in our Regulation Best Interest Disclosure available at [cu.financial/disclosures](http://cu.financial/disclosures). You can request a copy of this Customer Relationship Summary and up-to-date information by contacting us at (888) 695-3477, 9777 Ridge Drive, Ste 360 Lenexa, KS 66219, or [investments@cu.financial](mailto:investments@cu.financial).

**CONVERSATION STARTER:** *Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?*