



INVESTMENT ADVISER 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, 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?

We provide investment advice to you for a fee. This includes our Asset Allocation Managed Portfolios (“AAMP”), a wrap fee program where we recommend model portfolios that are created and managed by third-party Strategists and held in a brokerage account at a custodian selected by us. Alternatively, for our Third Party Managed Account (“TPMA”) program, we act as a solicitor or co-manager and will refer you to a third-party Manager who will manage a selected model in an account with a custodian selected by the third-party manager. We also provide financial planning services. More information about our investment advisory services is available in our Advisory Brochures available at cu.financial/disclosures.

Account Monitoring: We (for AAMP) or the third-party Manager (for TPMA) will monitor your advisory account on an ongoing basis to ensure it is aligned to the selected model portfolio. The frequency and limitations of this account monitoring depend on the advisory program that you select and on your financial needs. No less than annually we will attempt to meet with you to ensure the continued appropriateness of the model. We do not monitor any other accounts (besides your advisory account) as part of our advisory services.

Investment Authority: You will grant us (for AAMP) or the third-party Manager (for TPMA) authority to buy and sell securities in your advisory account (consistent with the model selected and with any restrictions you are able to place on this authority that we or the third-party Manager agree to) without asking for your consent in advance (also known as discretion).

Limits on Investment Advice: We limit our investment advice to recommending model portfolios managed by third-party Strategists we have approved (for AAMP) or recommending approved third-party Managers to manage a model you select (for TPMA). We do not provide investment advice with respect to proprietary investments.

Account Minimums and Other Requirements: Account minimums vary, but generally start at \$5,000. See our Wrap Fee Program Brochure (Form ADV Part 2A Appendix 1) brochure (for AAMP) available at cu.financial/disclosures or the Part 2A of the third-party managers (for TPMA). For our Financial Planning Services, we will accept new advisory clients regardless of their investable assets or account size.

ADDITIONAL INFORMATION: We provide investment advisory services to individuals and various types of entities. For a list of the approved third party Strategists (for AAMP) or approved third-party Managers (for TPMA) and additional information about these services please see the applicable Advisory Brochure available at cu.financial/disclosures. We are a wholly-owned subsidiary of a credit union. Our business model is to offer advisory services to members of our affiliated credit union and through bank networking arrangements with unaffiliated credit unions. Each of our investment advisor representatives is also a broker-dealer representative of CuFi. We also offer broker-dealer services. More information can be found in our Broker-Dealer Form CRS, also available at 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 an advisory fee based on a percentage of the assets for which we provide investment advice in your advisory account. The advisory fee, which is generally charged monthly, presents a conflict because it creates an incentive for us to encourage you to increase the assets in your advisory account. In addition, depending on the advisory program, we may receive more compensation when our financial professionals provide advisory services than when they provide broker-dealer services, which creates an incentive for us to recommend an advisory account. More information about these advisory fees is available in the applicable Advisory Brochure, which are available at cu.financial/disclosures. In addition to these advisory fees, the following are the other fees and charges you will typically pay in connection with your advisory account.

Transaction Fees: If you select our AAMP program, you will generally pay regulatory charges for the transactions which occur in your advisory account. If you select our TPMA program, depending on the Manager selected you may typically pay transaction fees in the form of commissions or markups/markdowns, including ticket charges, to buy and sell investments. We do not receive any portion of these transaction fees.

Fees Related to Specific Investments: You will also incur certain fees charged by mutual fund companies and exchange-traded funds which are disclosed in the applicable prospectus. Examples of these fees include administrative expenses, internal management fees and other service fees. For more

information about these fees please read the prospectus for each mutual fund and the disclosure document for ETFs. We and your Advisor may receive a portion of these fees.

Financial Planning Services: We may charge either a set fee or an hourly rate to create a personalized financial plan for you. There is no obligation for you to open a securities or advisory account with us to implement a financial plan we create for you.

Description of Other Fees and Costs: In addition to the fees described above, you may pay, and we may receive a portion of, certain fees associated with your advisory account, such as account termination fees, and account transfer or liquidation fees, depending on the advisory program, which include fees paid to the clearing firm or account custodian for their services.

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 all of the fees charged on advisory accounts is available in our Advisory Brochures available at 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 ACTING AS MY INVESTMENT ADVISER? HOW ELSE DOES YOUR FIRM MAKE MONEY AND WHAT CONFLICTS OF INTEREST DO YOU HAVE?

When we act as your investment adviser, 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 we provide you. Here are some examples to help you understand what this means.

Asset Based Pricing. Since we are paid based on the assets in your advisory account, the more assets there are in your account, the more you will pay in fees. This creates an incentive for us to encourage you to increase the assets in your advisory account.

Marketing Support. We receive compensation from certain TPMA Managers and AAMP Strategists for ongoing marketing and sales support activities.

Revenue Sharing. We participate in a revenue sharing program with our clearing broker-dealer based on the dollar amount of cash held in your AAMP account. These payments create an incentive for us to select or recommend those investment managers and service providers for your advisory account assets and to encourage you to increase the amount of assets in your account. More information about these revenue sharing payments received from product providers is available at cu.financial/disclosures.

ADDITIONAL INFORMATION: Other conflicts include the incentive to recommend our products and services when creating your financial plan and that we retain a higher portion of the advisory fee for AAMP accounts (compared to TPMA accounts). More information about our conflicts of interest is available in our Advisory Brochures which are available at 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?

We pay our financial professionals a portion of the investment advisory fees that we receive, which varies among financial professionals depending on the financial professionals' performance. This creates an incentive for our financial professional to increase advisory account assets to qualify for a higher portion of investment advisory fees the following year.

Depending on the specific type of investment advisory program, financial professionals may receive other forms of compensation, including business entertainment, expense reimbursement for travel associated with educational or similar business meetings, financial assistance in covering the cost of marketing and sales events, and small gifts from the Strategists or Managers of those programs. The receipt of these payments presents a conflict because it creates an incentive for the financial professional to recommend those investment advisory programs whose sponsors offer these forms of compensation.

Additional information about compensation received by financial professionals is available in our Advisory Brochures available at cu.financial/disclosures.

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

Yes. Please visit 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 is available in our Advisory Brochures available at 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.

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?*