

FIDUCIARY ACKNOWLEDGMENT FOR GUIDED INVESTING RETIREMENT ACCOUNTS

Copper Financial Network, LLC (“Copper Financial” or “we”) is providing you with the following acknowledgment for purposes of complying with the Department of Labor’s (“DOL”) Prohibited Transaction Exemption 2020-02 (“PTE 2020-02”), a prohibited transaction exemption under the Employee Retirement Income Security Act (“ERISA”) and the Internal Revenue Code (the “Code”) (together “Retirement Laws”) for investment advice fiduciaries with respect to your Guided Investing individual retirement accounts (IRAs) and other tax-qualified accounts that you hold with us, where applicable. If there is a conflict between this disclosure and your agreement with Copper Financial, this disclosure will govern.

FIDUCIARY ACKNOWLEDGMENT

As of February 1, 2022, or, if later, the date that the relief under DOL Field Assistance Bulletin 2021-02 (or subsequent similar guidance) ceases to be in effect, when Copper Financial provides investment advice or recommendations to you regarding your Guided Investing retirement or other tax-qualified accounts (e.g., IRAs, SEP IRAs, SIMPLE IRAs, Coverdell educational savings accounts), which for purposes of this acknowledgment will all be referred to as “Retirement Accounts” we are acting as fiduciaries within the meaning of the Retirement Laws.

The way we are compensated creates certain conflicts with your interests, so where applicable, we operate under PTE 2020-02, a special rule that requires us to act in your best interest and not put our interest ahead of yours when making investment recommendations. Under the provisions of PTE 2020-02, when providing you with individualized investment advice for your Guided Investing Retirement Accounts, we must:

- Meet a professional standard of care (give prudent advice);
- Never put our financial interests ahead of yours (give loyal advice);
- Avoid misleading statements about our conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about our conflicts of interest.

Rollovers from an Employer-Sponsored Retirement Plan

We **do not** provide recommendations or act as a fiduciary under the Retirement Laws regarding the rollover of any assets out of an employer-sponsored retirement plan (e.g., 401(k) plan, defined benefit pension plan) and into an IRA. We will only provide you with general information and education about the available options you should consider when deciding whether you should roll over your employer-sponsored retirement plan or keep it where it is.

Transfer of IRA to IRA

We **do not** provide recommendations or act as a fiduciary under Retirement Laws regarding transferring your assets from any IRA held at any institution, including Copper Financial, to a Guided Investing IRA held at Copper Financial. It is your obligation to consider whether you will be giving up certain investment-related benefits and you have determined that a Guided Investing Retirement Account is in your best interest because (1) greater services and/or other benefits can be achieved with the Copper Financial Guided Investing IRA; and (2) the costs associated, which may be higher or lower, with the Copper Financial Guided Investing IRA are justified by these services and benefits.

LIMITATIONS TO OUR ACKNOWLEDGMENT OF FIDUCIARY STATUS

This fiduciary acknowledgment does not create an ongoing duty to monitor your accounts or create or modify a contractual obligation or any fiduciary status under any state or federal laws other than the Retirement Laws. Additionally, there are many communications and recommendations that are not considered to be fiduciary “investment advice” under the Retirement Laws (which are subject to change), as such, this acknowledgment does not apply to certain services we provide, including without limitation:

Securities, advisory, and insurance products and services offered through Copper Financial Network, LLC (“Copper Financial”), Member FINRA/SIPC. Products offered through Copper Financial: **are not NCUA/NCUSIF or otherwise federally insured, are not guarantees or obligations of the credit union, and may involve investment risk, including possible loss of principal.** Copper Financial is a wholly-owned subsidiary of CommunityAmerica Credit Union. Copper Financial is not affiliated with any investment or insurance product provider.

- Recommendations with respect to non-retirement or taxable accounts you maintain with Copper Financial.
- Communications that are educational and general in nature and not intended to be viewed or construed as an individualized/personalized recommendation for you to take a particular course of action with respect to your retirement assets. Examples include:
 - ❖ Information we provide about the performance of a security in your account or your overall account performance.
 - ❖ General information and education about issues and alternatives that should be considered when deciding whether to roll out of an employer-sponsored retirement plan or transfer retirement account assets from one IRA to another.
 - ❖ Information we provide regarding the products and services we offer when you are considering whether to leave one financial institution to follow your financial professional to Copper Financial.
 - ❖ Marketing materials, including information, education, or general descriptions of our services, the products we make available to you, the fees we charge, and the reasons we think you should hire us to provide services to you for your retirement and other accounts.
 - ❖ Transactions or trades you execute without a recommendation from us, such as a trade you request, often referred to as an unsolicited trade, or transactions that are contrary or inconsistent with our recommendations.
 - ❖ Episodic or sporadic recommendations and interactions that are not provided as part of an ongoing or regular basis advice relationship as defined within the Retirement Laws, or recommendations made when there is no mutual understanding that our investment advice will serve as a primary basis for your investment decision(s).
 - ❖ General information and education about the financial markets, types of retirement accounts, characteristics of a retirement accounts, asset allocations, financial planning illustrations, and the advantages and risks of particular investments.

Copper Financial will not provide investment advice or securities recommendations on a regular or ongoing basis or provide ongoing monitoring of your Retirement Account(s) if they are held in a brokerage or insurance account. Brokerage relationships are intended for “buy and hold” investment strategies and for those investors who seek advice on a transaction-by-transaction basis and choose to pay for services through commissions and/or transaction fees instead of ongoing advisory fees. Insurance products offered by Copper Financial are also intended as “buy and hold” investments.

MORE INFORMATION REGARDING FEES, SERVICES and CONFLICTS

For additional information regarding our services, fees, and conflicts of interest, please refer to our Form CRS, Brokerage Fee Schedule, and Form ADV Part 2A Appendix 1 (Guided Investing Wrap Fee Program Brochure), which are available on the Disclosure page of our website at <https://cu.financial/disclosures>. You can also obtain a copy of any of these disclosures by contacting Copper Financial at 833.605.6681 or digital@cu.financial or .

Securities, advisory, and insurance products and services offered through Copper Financial Network, LLC ("Copper Financial"), Member FINRA/SIPC. Products offered through Copper Financial: **are not NCUA/NCUSIF or otherwise federally insured, are not guarantees or obligations of the credit union, and may involve investment risk, including possible loss of principal.** Copper Financial is a wholly-owned subsidiary of CommunityAmerica Credit Union. Copper Financial is not affiliated with any investment or insurance product provider.