



## Revenue Sharing Disclosure

### *Strategic Partnership Program*

Sigma Financial Corporation (“Sigma,” “we,” or “our”) offers its customers a wide variety of securities and investment products including mutual funds, variable and group annuities, variable life insurance, alternative investments, and retirement plans. We collectively refer to the companies that offer these securities and investment products as “Product Sponsors.”

Sigma has created a “strategic partnership program” that is available to interested Product Sponsors. This program consists of four partnership structures at increasing partnership fee levels—Basic, Executive, Premier, and Elite—that offer benefits which increase with each level. Depending on the level, such benefits can include, but are not limited to, joint reviews and planning sessions between key personnel of Sigma and the Product Sponsor, sharing of registered representative mailing lists and contact information, the ability to provide education and training for our registered representatives, co-branded email campaigns, presentation opportunities at corporate conferences, and access to virtual events throughout the year.

In all cases, the partnership fee that Sigma receives is a flat dollar amount. However, the partnership fees can vary from Product Sponsor to Product Sponsor based upon the partnership structure selected by the Product Sponsor. These partnership fees present a conflict of interest by creating an incentive for Sigma to steer clients and registered representatives toward participating Product Sponsors over non-participating Product Sponsors by promoting, touting, and otherwise favoring participating Product Sponsors in Sigma’s communications and marketing efforts. Furthermore, the fact that these fees can differ in amount from Product Sponsor to Product Sponsor presents a conflict of interest by creating an incentive for Sigma to steer customers and registered representatives toward participating Product Sponsors that pay more to Sigma than others.

Please note that our registered representatives do not receive any portion of the partnership fee payments that Sigma receives from Product Sponsors. All partnership fees are remitted by the Product Sponsor directly to Sigma. The current participating Product Sponsors and their payments (as of March 2023) to Sigma and its broker-dealer affiliate, Parkland Securities, LLC (“Parkland”), are listed below according to the various categories of available securities and investment products.

#### Elite

The following amounts were paid in the aggregate to Sigma and Parkland:

- Ash Brokerage – \$25,000
- Athene – \$75,000
- CUNA Mutual / Members Life – \$100,000
- Fidelity – \$75,000
- Prudential – \$50,000
- Producers Choice Network – \$25,000
- TruChoice Financial – \$25,000

#### Premier

The following amounts were paid in the aggregate to Sigma and Parkland:

- Jackson National – \$50,000
- MassMutual Ascend – \$50,000
- Mutual of Omaha – \$25,000
- Sammons Institutional Group – \$50,000
- Simplicity – \$25,000

### **Executive**

The following amounts were paid in the aggregate to Sigma and Parkland:

- Allianz – \$25,000
- Brighthouse Financial – \$50,000
- Lincoln Financial Group – \$25,000
- New York Life – \$25,000

### **Basic**

The following amounts were paid in the aggregate to Sigma and Parkland:

- Eagle Life Insurance Company – \$25,000
- Pacific Life Insurance Company – \$35,000
- VOYA – \$15,000

Additionally, in some cases Product Sponsors will provide additional educational and/or marketing payments to Sigma and/or its registered representatives to cover the expenses associated with attending conferences, acquiring financial planning software or education, or to reimburse them for costs incurred in connection with seminars or customer appreciation events.

For additional information regarding a particular security's or investment product's compensation arrangements and practices, please refer to that security's or investment product's prospectus, offering documents, or statements of additional information.

### ***Clearing Firm***

National Financial Services LLC ("NFS") is the clearing firm utilized by Sigma. In 2019, Sigma renewed its Fully Disclosed Clearing Agreement with NFS for an additional five (5) years. In connection with this renewal, Sigma will receive the following compensation from NFS:

- Sigma will receive annual Business Development Credits from NFS in the following amounts:

<b>Year</b>	<b>Business Development Credit</b>
2019	\$550,000
2020	\$540,000
2021	\$230,000
2022	\$145,000
2023	\$135,000

- For non-Fidelity mutual funds, NFS has entered into a No Transaction Fee ("NTF") Revenue-Sharing Program with Sigma, according to which Sigma receives the following compensation:

<b>Average Aggregate Balances</b>	<b>Basis Points Earned</b>
\$0 to \$10 million	0 basis points
\$10 million to \$25 million	4 basis points
\$25 million to \$50 million	6 basis points
\$50 million to \$100 million	8 basis points
More than \$100 million	10 basis points

- Sigma receives a monthly payment on all eligible Fidelity Money Market Sweep Fund balances. This is calculated at an annualized rate of the average net assets (calculated daily) of customers' beneficially owned shares in the Capital Reserve Class and Daily Money Class of eligible Fidelity core sweep funds:

<b>Average Fund Balances</b>	<b>Capital Reserve Class</b>	<b>Daily Money Class</b>
\$1 million to \$5 million	25 basis points	10 basis points
\$5 million to \$50 million	35 basis points	15 basis points
\$50 million to \$100 million	45 basis points	20 basis points
More than \$100 million	50 basis points	25 basis points

- Sigma receives a monthly revenue share from the Network Bank Deposit Sweep Program as set forth in the table below. This amount is inclusive of any interest to be passed through to customer accounts (i.e., customer interest). Sigma's share is calculated against average daily program assets on deposit at all depository institutions for the given calendar month:

<b>Targeted Fed Funds Rate ("TFF")</b>	<b>Revenue Share</b>
0.00% to 0.25%	1 basis point
0.25% to 0.50%	2 basis points
0.50% to 0.75%	4 basis points
0.75% to 1.00%	30 basis points
1.00% to 1.50%	55 basis points
1.50% to 2.00%	100 basis points
2.00% to 3.00%	150 basis points
3.00% or higher	TFF less 50 basis points

Customer accounts not electing a sweep option are eligible for credit interest on cash balances. In this situation, NFS credits Sigma with 80% of the National Financial Credit Rate less any amounts credited to such accounts.

- Sigma receives revenue from the use of margin in customers' brokerage accounts. For accounts that use margin, NFS charges customers on their margin debits as defined in the Customer Disclosure of Credit Terms on Transactions document. Thereafter, NFS credits Sigma with 100% of the customer margin interest income in excess of the Targeted Fed Funds Rate plus 1.5%.
- Sigma receives reimbursement from NFS for a portion of the transfer of assets fees and costs which customers incur from other clearing providers or otherwise in connection with the transfer of certain eligible assets to NFS. The amount of this reimbursement is equal to 0.1% (10 basis points) of eligible assets, subject to an annual cap of \$250,000.
- Sigma has marked up some of NFS's standard miscellaneous account fees disclosed on the Brokerage Fee Schedule. NFS collects these fee markups for Sigma and remits them back to Sigma. The following miscellaneous fees have been marked up by the following amounts: full transfer of accounts delivery (ACAT exit fee) by \$25; transfer and ship (DRS eligible) by \$10; trade and margin extension by \$13; mailgram by \$5; bounced check by \$10; stop payment by \$10; Select Access Cash Management Account with Visa Classic Debit Card by \$10; annual custody and recordkeeping (inactive brokerage) fee by \$25; and IRA maintenance fee by \$15.

Sigma also renewed its Technology Products and Services Agreement with NFS for an additional five (5) years. In connection with this renewal, Sigma will receive annual Technology Credits from NFS in various amounts.