

Form ADV Part 2A  
Investment Advisor Brochure



**SIGNATURE INVESTMENT ADVISORS, LLC**

**Cover Page**

This Form ADV Part 2A (Investment Advisor Brochure) provides information about the qualifications and business practices of Signature Investment Advisors, LLC (“SIA”).

SIA is an affiliated company to Signature Estate & Investment Advisors, LLC (“SEIA”).

If you have any questions about the contents of this brochure, please contact us at 888-349-3241 or [operations@seia.com](mailto:operations@seia.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority. Registration is mandatory for all persons meeting the definition of investment advisor and does not imply a certain level of training.

Additional information about SIA also is available on the SEC’s website at: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Attached are the Brochure Supplements for Deron McCoy (Chief Investment Officer), Andrew Lin, Troy Franzen, Matthew Kim & Alex Kirk. Also attached are SIA’s Privacy Notice and Business Continuity Program.

Date of Brochure: June 30, 2020

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Securities offered through Royal Alliance Associates, Inc. member FINRA/SIPC. Investment advisory services offered through SIA, LLC. SIA, LLC is a subsidiary of SEIA, LLC and its investment advisory services are offered independent of Royal Alliance Associates, Inc. Royal Alliance Associates, Inc. is separately owned and other entities and/or marketing names, products or services referenced here are independent of Royal Alliance Associates, Inc.

# Material Changes to Investment Advisor Brochure

## Material Changes

The purpose of this section is to discuss only material changes since the last annual update of the Signature Investment Advisors, LLC (“SIA”) Investment Advisor Brochure. The date of the last annual update was March 25, 2019.

1. Update to the section titled, “Advisory Business” to expand on the three services offered by SIA: Signature Elite, Signature Allocation Series, Signature Target Strategies
2. Update to the section titled, “Methods of Analysis, Investment Strategies And Risk of Loss” to further expand on the Risks of Loss including: Asset Allocation Risk, Market Risk, Credit Risk, Management Risk, Currency Risk, Risk of Options, Cybersecurity Risk and Sub-adviser & Third-Party Manager Risk.
3. Update to the section titled, “Brokerage Practices” to expand on The Custodians we Use, How we Select Custodians, Your Brokerage & Custody Costs and Other Fees & Expenses. Specific disclosure and definitions related to Other Fees & Expenses that can be incurred in connection with our management include separate account manager fees, short term redemption fees, redemption fees, short settlement fees, mutual fund expenses and no transaction fee funds.
4. Update to the section titled, “Brokerage Practices” to expand on Products & Services Available to us from Custodians and Other Third Parties, Best Execution and Error Correction Policy.
5. Update to the section titled, “Brokerage Practices” to update the firms Soft Dollar Practices to indicate SIA does not participate in any programs for soft dollar credits, Products & Services Available to us from Custodians and Other Third Parties, Best Execution and Error Correction Policy.
6. Update to the section titled, “Review of Accounts” to expand on the process our firm has to review existing accounts. These include but are not limited to maintaining an up to date client record and an annual mailing to confirm key details.
7. Update to the section titled, “Client Referrals & Other Compensation” to expand on the agreement between SIA and Royal Alliance. Royal Alliance acts as solicitor for SIA and SIA pays Royal Alliance solicitor fees based on SIA’s assets under management attributable to each client referred by Royal Alliance.
8. Update to the section titled, “Voting Client Securities” to clarify SIA’s policy on voting client securities and other corporate actions. SIA does not vote client securities. For other corporate actions in non-discretionary accounts, client must approve for SIA to take any action related to a corporate action. For corporate actions in discretionary accounts, Advisor will make the decision to act or not and take the associated action without seeking client approval.

Please review the full document SIA ADV 2A for further information associated with these changes.

## Delivery:

Within 120 days of our fiscal year end, which is December 31, we will deliver our annual Summary of Material Changes. SIA will provide you with a new Brochure as necessary based on changes or new information at any time. You can request SIP’s Brochure by contacting 888-349-3241, operations@seia.com or on our website, www.signatureia.com. The Brochure will be provided free of charge.



SIGNATURE INVESTMENT ADVISORS, LLC

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## Advisory Business

### Advisory Firm

Signature Investment Advisors, LLC® ("SIA") began providing Investment Advisory Services in 2011. SIA is majority owned by Signature Estate & Investment Advisors, LLC (SEIA). SEIA has been providing Investment Advisory Services since 1997. Both firms are Registered Investment Advisers under the Investment Advisers Act of 1940.

The principal owner, directly and through SEIA, is Brian D. Holmes, founder, President, CEO, and Secretary. Mr. Holmes has been in the financial services industry since 1984.

As of December 31, 2019, SIA has \$2,522,310,792 of assets under supervision on a discretionary basis, and \$450,975,378 of assets under supervision on a non-discretionary basis.

### Advisory Services

Clients work with an SIA Relationship Manager in coordination with client's Royal Alliance Associates, Inc. (RA) Corporate Registered Investment Advisor Representative (Financial Advisor) to determine the appropriate Investment Management Service to match the client's need.

- Signature Elite
- Signature Allocation Series
- Signature Target Strategies

### Signature Elite

SIA provides investment management services under a program called "Signature Elite." Signature Elite is a six-step investment management process designed to assist clients with their financial goals and objectives.

- Determine investors needs and objectives
- Assess risk tolerance and investor suitability
- Review asset allocation
- Implement strategic plan
- Rebalance and monitor portfolio
- Report the results

Signature Elite is a **non-discretionary** service. Prior to making changes, SIA will make a recommendation for client approval. If approved, the Financial Advisor will place the transaction. The portfolio is monitored on a continuous basis.

Services are based on the individual needs of the client. An initial interview and data gathering questionnaire are undertaken to determine the client's financial situation and investment objectives. When reviewing the asset allocation with clients, SIA may recommend stocks, bonds, open-end mutual funds, closed-end mutual funds, exchange traded funds ("ETFs"), exchange traded notes ("ETNs"), unit investment trusts, bank certificates of deposit, preferred stocks, options, structured products, hedge funds and/or private placements.

SIA may also recommend portion(s) of the portfolio to a Third-Party Money Manager. The Third-Party Money Manager will supervise that portion of the portfolio on a discretionary basis.

The advice provided by SIA under Signature Elite is limited to the security types and strategies mentioned above. The client may impose reasonable restrictions on the management of the account. Restrictions are subject to the SIA's acceptance.

At least quarterly, SIA will notify the client in writing to contact SIA if there have been any changes in the client's financial situation, investment objectives or to impose or modify account restrictions. SIA will contact or attempt to contact the client annually on these matters. It is the client's responsibility to notify SIA any time there are changes. Clients may call in at any time during normal business hours to discuss directly with SIA about the client's account, financial situation, or investment needs.

A qualified custodian maintains client funds and securities in a separate account for Client under Client's name. The client will retain rights of ownership of all securities and funds in the account to the same extent as if the client held the securities and funds outside SIA. Clients will receive from the custodian timely confirmations and at least quarterly statements containing a description of all transactions and all account activity. In addition to custodial statements, SIA sends quarterly reports to clients.

Clients will also be working with a Financial Advisor from RA that referred the Signature Elite account. The RA Financial Advisor as "Soliciting Rep" on behalf of SIA may assist in the initial data gathering and development of the Investment Policy Statement ("IPS") in conjunction with the client. However, all trading activity will be discussed between the client and SIA directly. The attached brochure supplements give additional information on key persons.

### Signature Allocation Series

SIA provides investment management services under a program called Signature Allocation Series ("SAS"). SAS is a six-step investment management process designed to assist clients with their financial goals and objectives. SAS uses the same six-step process used in Signature Elite.

SAS is a **discretionary** service. The portfolio is supervised (monitored) on a continuous basis by SIA's Chief Investment Officer (Deron McCoy) and his team. Mr. McCoy will rebalance the portfolio within the asset allocation range as needed, without contacting the client. (Mr. McCoy's brochure supplement is attached to this brochure.) SIA will have the limited power of attorney to select securities to be bought and sold (subject to the restrictions in the Investment Policy Statement), and the quantities. When reviewing the asset allocation with clients, clients will work with their Relationship Manager and/or Financial Advisor to create an Investment Policy Statement that will identify the asset allocation classes, investment styles, and other guidelines.

Services are based on the individual needs of the client. An initial interview and data gathering questionnaire are undertaken to determine the client's financial situation and investment objectives. SAS accounts may use stocks, bonds, open-end mutual funds, closed-end mutual funds, exchange traded funds ("ETFs"), exchange traded notes ("ETNs"), unit investment trusts, bank certificates of deposit, preferred stocks, options, structured products, hedge funds and/or private placements. The advice provided by SIA under SAS is limited to the security types mentioned above. The client is given the opportunity to impose reasonable restrictions on the management of the account. Buy / Sell restrictions must be symbol specific.

The security must have a symbol and be listed on an exchange. A buy / sell restriction cannot be based on an idea, CUSIP, fund family, theme, bond or company name. The client is responsible for updating all buy / sell restriction instructions as necessary for situations including but not limited to conversions, symbol changes or any other activity where the specific instructions SIA has on file no longer accurately represents the instructions. Buy / sell restriction are subject to the manager’s acceptance.

At least quarterly, SIA will notify the client in writing to contact SIA if there have been any changes in the client’s financial situation, investment objectives or to impose or modify account restrictions. SIA will contact or attempt to contact the client annually on these matters. It is the client’s responsibility to notify SIA any time there are changes. Clients may call in at any time during normal business hours to discuss directly with SIA about the client’s account, financial situation, or investment needs.

A qualified custodian maintains client funds and securities in a separate account for the Client under Client’s name. The client will retain rights of ownership of all securities and funds in the account to the same extent as if the client held the securities and funds outside SIA. Clients will receive from the custodian/brokerage firm timely confirmations and at least quarterly statements containing a description of all transactions and all account activity. In addition to custodial statements, SIA sends quarterly reports to clients.

### SAS Platforms

SAS consists of six model platforms (“S1, S2, S3, S4, S4+ & NTF”) with multiple asset classes, investment styles and vehicles. Each platform employs different investment vehicles according to the chart below. The Investment Policy Statement will indicate which platform is used as the base model, which can be further customized based on client need.

Platform	Exchange Traded Products	Mutual Funds	Individual Bonds	Individual Stocks	No Transaction Fee Mutual Funds
S1	X				
S2	X	X			
S3	X	X	X		
S4	X	X	X	X	
S4+	X	X	X	X	
NTF					X

### Signature Targeted Strategies

SIA provides investment management services under a program called Signature Targeted Strategies (“STS”). STS is an investment management process designed to target specific investment objectives or themes.

STS is a **discretionary** service. The portfolio is supervised (monitored) on a continuous basis by SIA’s Chief Investment Officer (Deron McCoy) and his team. Mr. McCoy will rebalance or trade the account as needed, without contacting the client. (Mr. McCoy’s brochure supplement is attached to this brochure.) STS accounts may use stocks, bonds, open-end mutual funds, closed-end mutual funds, exchange traded funds (“ETFs”), exchange traded notes (“ETNs”), unit investment trusts, bank certificates of deposit, preferred stocks, options, structured products, hedge funds and/or private placements. SIA will have the limited power of attorney to hire and fire sub-managers, select securities to be bought and sold, and the quantities

(subject to the restrictions in the Investment Policy Statement). The advice provided by SIA under STS is limited to the security types mentioned above.

Services are based on the individual needs of the client pursuant to the theme as stated in the Investment Policy Statement. An initial interview and data gathering questionnaire are undertaken to determine the client's financial situation and investment objectives. STS employs an active allocation approach that will use a combination of the security types mentioned above and sub-managers to target the specific investment objective or theme as stated in the Investment Policy Statement. The client is given the opportunity to impose reasonable restrictions on the management of the account. Buy / Sell restrictions must be symbol specific. The security must have a symbol and be listed on an exchange. A buy / sell restriction cannot be based on an idea, CUSIP, fund family, theme, bond or company name. The client is responsible for updating all buy / sell restriction instructions as necessary for situations including but not limited to conversions, symbol changes or any other activity where the specific instructions SIA has on file no longer accurately represents the instructions. Buy / sell restriction are subject to the manager's acceptance. Targeted Strategies are designed to be a part of, or supplement to, and not a substitute for, an overall well-diversified investment portfolio.

At least quarterly, SIA will notify the client in writing to contact SIA if there have been any changes in the client's financial situation, investment objectives, or to impose or modify account restrictions. SIA will contact or attempt to contact the client not less than annually on these matters. It is the client's responsibility to notify SIA at any time there are changes. Clients may call in at any time during normal business hours to discuss directly with SIA about the client's account, financial situation, or investment needs.

A qualified custodian maintains client funds and securities in a separate account, for the Client, under the Client's name. The client will retain rights of ownership of all securities and funds in the account to the same extent as if the client held the securities and funds outside SIA. Clients will receive from the custodian/brokerage firm timely confirmations and at least quarterly statements containing a description of all transactions and all account activity. In addition to custodial statements, SIA sends quarterly reports to clients.

### Ancillary Services

Seminars: SIA provides seminar services. These seminars may include presentations on current events, economic trends and cycles, market cycles, investment fundamentals, financial products, equities, fixed income, alternative investments, and/or financial planning strategies. A fee is not charged to those in attendance.

## Fees and Compensation

### Signature Elite, Signature Allocation Series & Signature Targeted Strategies Fees

Fees for **Signature Elite, Signature Allocation Series & Signature Targeted Strategies (together known as "Investment Management")** are computed at an annualized percentage of assets under management including cash balances, accrued interest and dividends.

The actual fee for any portfolio is negotiated based on the unique objectives of each client, the complexity of the investment plan, types of assets held in the account, and other factors. Fees are negotiable and may be a flat fee rate or a tiered fee rate. A flat fee rate would charge a single fee for all assets in the portfolio, whereas, a tiered fee rate would charge a different fee for assets at each level. The negotiated (actual) fee may be more or less than the ranges reflected in the fee schedule. The specific negotiated fee applicable to each client or client account will be stated in the Engagement Agreement.

The fees are payable quarterly in arrears. Fees begin accruing when accounts become linked to us or when funded. To allow for additional account setups, transfers, final strategy discussions, etc., at our discretion, SIA can delay or waive the first quarter fees. The first payment is assessed and due at the end of the first calendar quarter and will be assessed pro rata in the event the Agreement is executed at any time other than the first day of the current calendar quarter. Subsequent payments are due and will be assessed on the first day after the end of each calendar quarter based on the value of the account assets as of the close of business on the last business day of that quarter. Fees may be waived at our discretion, on the value of large deposits made shortly before the end of the quarter. The client, via their Relationship Manager, must submit the request to the SIA billing department to have the fee waived which will be reviewed on a case by case basis. Single account sizes under \$20,000 will not be billed a management fee.

These fees described above are for investment management services only and do not include other types of fees that will be incurred in connection with SIA investment management services. See “Brokerage Practices” below for further details.

In some cases, where two or more clients have a nexus, the two households may be eligible for their Investment Management assets to be viewed in conjunction with another client’s Investment Management assets (“Householding”) for the purposes of meeting a higher tier or breakpoint.

### “Equity/Blended” Portfolio Fees

Though the actual fee for any portfolio is negotiated based on the unique objectives of each client, the complexity of the investment plan, types of assets held in the account, and other factors, the table below shows the fee ranges generally charged at certain dollar levels for Investment Management “Equity/Blended” portfolios.

<u>Portfolio Value Between</u>	<u>Equity/Blended</u>
\$ 250,000 - \$ 999,999	0.90 - 1.50%
\$1,000,000 - \$2,499,999	0.70 - 1.30%
\$2,500,000 - \$4,999,999	0.60 - 1.20%
\$5,000,000 - \$9,999,999	0.50 - 1.10%
\$10,000,000 and above	negotiable

For Investment Management (“Equity/Blended” portfolios), the recommended minimum Household Portfolio (aggregate of all accounts in the same household) size to establish is generally \$250,000.



## “Fixed-Income” Portfolio Fees

Though the actual fee for any portfolio is negotiated based on the unique objectives of each client, the complexity of the investment plan, types of assets held in the account, and other factors, the table below shows the fee ranges generally charged at certain dollar levels for Investment Management “**Fixed Income**” portfolios. This schedule applies only to households who have chosen the “Fixed Income” model for their entire portfolio.

<u>Portfolio Value Between</u>	<u>Fixed Income</u>
\$ 250,000 - \$ 999,999	0.45 - 1.00%
\$1,000,000 - \$2,499,999	0.40 - 0.90%
\$2,500,000 - \$4,999,999	0.35 - 0.80%
\$5,000,000 - \$9,999,999	0.25 - 0.70%
\$10,000,000 and above	negotiable

For Investment Management (**“Fixed-Income” portfolios**), the recommended minimum Household Portfolio (aggregate of all accounts in the same household) size to be established is generally **\$500,000**.

## General Fee Disclosures

Client should assess the negotiated fee against all their available options. Other advisors may be able to provide similar services at a lower cost.

Client will authorize the custodian holding client funds and securities to deduct SIA advisory fees direct from the client account in accordance with calculations prepared and submitted to the custodian by SIA. The custodian will provide periodic account statements to the client. Such statements will reflect all fee withdrawals by SIA. It is the client’s responsibility to verify the accuracy of the fee calculation. The custodian will not determine whether the fee is properly calculated. In no case are Fees collected in advance for services to be performed.

## Termination

Services will continue until either party terminates the Engagement Agreement on immediate written notice. If termination occurs prior to the end of a calendar quarter, SIA maintains the right to charge fees due on a pro-rata basis. As of the date of termination SIA will no longer be the investment advisor of record. All assets will remain at the custodian and it will be Client's responsibility to monitor the account and instruct the custodian as to the final disposition of assets. SIA will not take any other action, unless specifically notified by the Client.

The Engagement Agreement contains a pre-dispute arbitration clause. Client understands that the agreement to arbitrate does not constitute a waiver of the right to seek a judicial forum where such a waiver would be void under the federal securities laws. Arbitration is final and binding on the parties.

## Performance-Based Fees and Side-By-Side Management

SIA does not charge performance-based fees. (A fee that is based on gains in the client account.)

## Types of Clients

SIA provides advisory services to individuals, trusts, estates, pension/profit sharing plans, charitable organizations, state or municipal government entities, insurance companies, corporations and other businesses.

Please see the section “Fees and Compensation” for SIA’s household minimum guidelines.

## Methods of Analysis, Investment Strategies And Risk of Loss

SIA’s Department of Investment Management and Economic Strategy (“DIMES”) is responsible for the research and development of SIA’s asset allocation targets. DIMES uses the principles found in Modern Portfolio Theory, proprietary research, and third-party research. Underlying this approach is:

- Strategic Macro Asset Allocation, which is based on asset class and style through the use of computer models, based on capital market assumptions and modern portfolio theory principles.
- Tactical Micro Allocation, which is based on business cycle, global and domestic macro / micro-economic conditions and other potential event-driven opportunities.

DIMES analysis and investment selection is driven by a two-prong approach to filter the investment universe of each asset class and style down to specific investments that meet SIA’s criteria.

- Quantitative metrics focus on identifying potential investments with consistent, good risk-adjusted performance returns based on mathematical and statistical methods and analysis.
- Qualitative metrics focus on the “quality” of potential investments that meet the above quantitative standards. DIMES focuses on attributes of investments that cannot be directly captured by quantitative measurement.

Allocation strategies and potential investments are then presented at SIA’s Investment Committee meeting for final discussion and determination. SIA’s Investment Committee is comprised of the Chief Investment Officer, Senior Partners, Financial Advisors and members of the research team. The Investment Committee meets monthly to monitor global economic cycles, track investment trends, and provide research on investment vehicles and third-party money managers.

While SIA will apply the asset allocation strategy to their client’s individual accounts and monitor the portfolios, the Investment Committee performs an oversight of the client portfolios. DIMES may use Technical Analysis in addition to the methods described above.

### Risk of Loss

The Financial markets are volatile and there are risks in all types of investment vehicles, including “low-risk” strategies. Client at all times shall elect unilaterally to follow or ignore completely, or in part, any information, recommendation, or advice given by SIA. There is no guarantee that the investment strategy selected for the client will result in the client’s goals being met, nor is there any guarantee of profit or protection from loss. **For those investments sold by prospectus, clients should read the prospectus in full.**

SIA predominantly utilizes the following investment vehicles in our portfolios: Stocks, bonds, open-end mutual funds, closed-end funds, Exchange Traded Funds (“ETFs”) and Exchange Traded Notes (“ETNs”).

Some of the risks associated with the financial markets and the securities we recommend to clients include but are not limited to:

**Asset Allocation Risk** - The asset classes in which a client account seeks investment exposure will perform differently from one another. Following, a client account will be affected by its allocation among equity securities, debt securities, alternative investments and cash-equivalent securities.

**Market Risk** – Also known as systematic risk, refers to the risk that an investment may face due to fluctuations in the market. The risk is that the investment’s value will decrease, sometimes rapidly and unpredictably. Market risk contrasts with specific risk, also known as business risk or unsystematic risk, which is tied directly with a market sector or the performance of a particular company. In other words, market risk refers to the overall economy or securities markets, while specific risk involves only a part.

**Credit Risk** - is the risk that a company won't be able to meet its obligations to pay back its debts. Which in turn could mean that potential investors will lose the money invested in the company. The more debt a company has, the higher the potential financial risk. The lower the rating of a debt security, the higher its credit risk.

**Business Risk** - is the exposure a company or organization has to factors that will lower its profits or lead it to fail such as a change in client sentiment towards the company or product, disasters, competition and regulation. Anything that threatens a company's ability to meet its target or achieve its financial goals is called business risk.

**Management Risk** - is the risk — financial, ethical or otherwise — associated with ineffective, destructive or underperforming management. Management risk can be a factor for investors holding stock in a company. Management risk can also refer to the risks associated with the management of an investment fund.

**Liquidity Risk** - The risk stemming from the lack of marketability of an investment that cannot be bought or sold quickly enough to prevent or minimize a loss or capture a gain.

**Interest Rate Risk** - is the risk that an investment's value will change as a result of a change in interest rates. This risk affects the value of bonds more directly than stocks. All debt securities are subject to interest rate risk and credit risk. Debt securities will generally lose value if interest rates increase. High yield securities, which are debt securities rated below investment grade, face higher credit risk and downgrade risk (the chance that a credit rating agency will downgrade their rating / opinion on the safety of the security) than other debt securities.

**Currency Risk** - When investing in foreign countries you must consider the fact that currency exchange rates affect asset prices. Currency risk applies to all financial instruments that are in a currency other than the US Dollar. As the value of an account managed by SEIA shares are calculated in U.S. dollars, it is possible for the account to lose money by investing in a foreign security if the local currency of a foreign market depreciates against the U.S. dollar, even if the local-currency value of the account’s holdings goes up. Generally, a strong U.S. dollar relative to other currencies will adversely affect the value of the account’s holdings in foreign securities.

**Country Risk** - A collection of risks associated with investing in a particular country. These risks include political risk, exchange rate risk, economic risk, sovereign risk and transfer risk, which is the risk of capital being locked up or frozen by government action. Country risk can reduce the expected return on an investment and must be taken into consideration if investing abroad.

The risks of **Mutual Funds** and **ETFs** depend on the underlying securities they hold, as well as added manager risk, which refers to the manager underperforming their benchmark. Stock funds have similar risks as stocks, just as bond funds have similar risks as bonds. Some ETFs that trade infrequently will have an added liquidity risk.

SIA may use **Options**. The predominant use of options at SIA is selling a covered call contract (“covered call”). When the investor sells the call option on a security held in the portfolio, the benefit is to increase income while holding the security. However, the investor limits the upside potential of the stock in a rising market if the stock increases in value over the strike price. The client can also suffer from a declining market in the value of the stock but can continue to sell more call options. The premium received is taxable income. The sale of the stock at the strike price may be a taxable event.

Other basic option contracts may be utilized at times by SIA Financial Advisors, although not a primary strategy. This includes buying a call, buying a put, or selling a put. These contracts have different and increased risks than the strategy described above. There are various risks associated with options. Options are complex derivative securities and should not be traded without full knowledge of all the factors affecting their value. These factors include but are not limited to changes in implied volatility in the market that can cause an increase/decrease in the value of an option with no concurrent change in the underlying price of the stock, changes in the underlying stock dividend, time to expiration, market interest rates and other factors can affect the value of an option position. Prior to buying or selling an option, investors should read a copy of the Characteristics & Risks of Standardized Options, also known as the options disclosure document (ODD) which is published by The Options Clearing Corporation (<https://www.theocc.com>). It explains the characteristics and risks of exchange traded options.

Risks of options include but are not limited to:

**Assignment Risk:** Having a short call or put in a position can lead to an assignment and involuntary transaction, which cannot otherwise be avoided. In the case of a short call, being assigned can lead to a forced sale of stock, whether it is held long in the portfolio or not. Being short a put can lead to a forced purchase of the underlying stock for which capital will have to be provided by the account holder.

**Losses and Limited Gains:** In the case of an option purchase (long call or long put), a Client’s entire initial investment of premium can be lost. In the case of a covered option short sale (short call or short put), upside gains can be limited by the sale of a short call against an underlying stock position (see also Assignment risk above) and a forced purchase of stock can occur in the case of a short cash covered put sale. In the case of a naked call or put sale (a call with no underlying stock position and a put with no cash to cover the possibility of a forced stock purchase) there is the risk of unlimited loss in the call position and substantial loss in the put position.

**Lack of Liquidity:** Some option markets are very thinly traded and highly illiquid, resulting in wide markets and limited trading opportunities. Should it be determined that an option trade will be attempted in such a market, there is the risk of a fill price that is either substantially higher (purchase) or substantially lower (sale) than mid-market. In addition, in such illiquid markets and despite best efforts there is the risk that no fill will occur at all for the intended order.

**Tax:** Client should consult with their tax advisor to address the tax consequences of options trading strategies.

## Other Risks:

**Cyber Security Risk** – With the increased use of technologies such as the Internet to conduct business, a portfolio is susceptible to operational, information security and related risks. In general, cyber incidents can result from deliberate attacks or unintentional events and are not limited to, gaining unauthorized access to systems, misappropriating assets or sensitive information, corrupting data, or causing operational disruption, including the denial-of-service attacks on websites. Cyber security failures or breaches internally or by a third-party service provider have the ability to cause disruptions and impact business operations, potentially resulting in financial losses, the inability to transact business, violations of applicable privacy and other laws, regulatory fines, penalties, reputational damage, and/or additional compliance costs, including the cost to prevent cyber incidents.

**Sub-Adviser and Third-Party Manager Risk:** The success of an account's investment through sub-advisers and/or third party managers in general is subject to a variety of risks, including those related to the quality of the management of the sub-adviser and/or third-party manager; the quality of the management of the operating companies and the ability of such management to develop and maintain successful business enterprises; and the ability of a sub-adviser and/or third-party manager to successfully source investment opportunities, operate and manage their investments.

## Disciplinary Information

An investment advisor must disclose material facts about any legal or disciplinary event that is material to a client's evaluation of the advisory business or of the integrity of its management personnel.

SIA does not have any disclosure items.

## Other Financial Industry Activities and Affiliations

SIA is independently owned. SIA is not, but the Investment Advisor Representatives (IAR) of SIA are associated with Royal Alliance Associates, Inc. (RA) as Registered Representatives. RA is a general securities broker/dealer, member FINRA & SIPC. RA is a subsidiary of Advisor Group, Inc. ("AG"). AG is one of the largest networks of independent wealth management firms in the United States. The four individual firms that comprise Advisor Group are Royal Alliance Associates, FSC Securities Corporation, SagePoint Financial, and Woodbury Financial Services. Royal Alliance is a diversified financial services company registered with the Financial Industry Regulatory Authority ("FINRA") as a broker-dealer engaged in the offer and sale of securities products. RA is separately owned and other entities and/or marketing names, products or services referenced herein are independent of RA and any subsidiaries or affiliates. Financial Advisors of SIA will not recommend commission-based securities or insurance products, nor will they receive any commission-based compensation. Clients are not obligated to act on any investment recommendations made by SIA through our firm or any affiliated entity.

Signature Estate & Investment Advisors, LLC (SEIA) is the parent company of SIA. SEIA and SIA have shared personnel. It is not anticipated that SIA clients will be clients of SEIA. However, if a client were to receive services of SEIA, then the client would receive the SEIA disclosure document.

Signature Intelligent Portfolios, LLC ("SIP") is a subsidiary Registered Investment Advisor of SEIA that provides automated portfolio allocation services to clients referred by SEIA, and to the general public.

SEIA and SIP have shared personnel. It is not anticipated that SIA clients will be clients of SIP. However, if a client were to receive services of SIP, then the client would receive the SIP disclosure document.

SEIA has other affiliated companies, Signature Comprehensive Insurance Services LLC (“SCIS”) & Signature Estate & Insurance Services LLC (“SEIS”) It is not anticipated that SIA clients will be clients of SCIS or SEIS. However, if a client were to receive services of SCIS or SEIS, then the client would receive disclosure. SIA and SCIS / SEIS have shared personnel.

## **Code of Ethics, Participation or Interest in Client Transactions, Personal Trading**

### Code of Ethics

SIA maintains a Code of Ethics. The Code of Ethics sets forth standards of conduct expected of advisory personnel; requires compliance with federal securities laws; and, addresses conflicts that arise from personal trading by advisory personnel. Clients or prospective clients may request a copy of the Code of Ethics.

### Employee Personal Trading

SIA’s policy is designed to mitigate conflicts of interest with our clients. We will adhere to the Advisor's fiduciary responsibilities to our clients. At times the interests of SIA and/or its access persons correspond with our client's interests, and then we may invest in the same securities that are recommended to clients. Additionally, these access persons may trade in securities not recommended to clients, when the investment objectives differ. SIA personnel may take more or less risk in their personal investing compared to what is recommended to clients. We are mindful that SIA and its access persons shall not misappropriate an investment opportunity that should first be offered to eligible clients.

SIA has a personal trading policy designed to supervise employees personal trading activities and monitor for potential conflicts of interest. SIA monitors its access persons’ personal security transactions on an on-going basis. All flags detected by the system will be reviewed by the compliance department and the review will be documented.

Should a material conflict be detected, disclosure will be made to the client(s) or in some instances the access person may be required to reverse the transaction and forfeit any profits. Incidental trading not deemed to be a conflict (i.e. a purchase or sale of an access person’s prior holding of a security which is minimal in relation to the total outstanding value, and as such would have negligible effect on the market price), would not be deemed a material conflict.

SIA and its access persons will keep records of all personal securities transactions whether executed through the firm or not.

## Brokerage Practices

### The custodians we use

SIA (“we” / “our”) does not maintain custody of your assets that we manage, although we may be deemed to have custody of your assets if you give us authority to withdraw assets or move money from your account (see the section on **Custody** below). For investment management services, your assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. SIA requires that our clients use Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member SIPC or Fidelity Brokerage Services LLC (Fidelity), a registered broker-dealer, member SIPC, as the qualified custodian. SIA is independently owned and operated and is not affiliated with Schwab or Fidelity. While we require that you use Schwab or Fidelity as custodian/broker, you will decide whether to do so and will open your account with Schwab or Fidelity by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so. If you do not wish to place your assets with Schwab or Fidelity, then we cannot provide investment management services for your account. Not all advisors require their clients to use a particular broker-dealer or custodian selected by the advisor. You may be able to find similar investment management services to those offered by SIA at a different advisor that may not require your accounts be held at Schwab or Fidelity. Even though your account is maintained at Schwab or Fidelity, we can still use other brokers to execute trades for your account as described below (see "Your brokerage and custody costs"). SIA does not permit clients (including retirement or ERISA plan clients) to direct brokerage as such direction may adversely affect our ability to manage the account. SIA is not affiliated with Schwab or Fidelity. The Investment Advisor Representatives of our firm are not registered representatives of Schwab or Fidelity and do not receive any commissions or fees from them for requiring or recommending the use of their services.

### How we select custodians

We seek to use a custodian/broker that will hold your assets and execute transactions on terms that are, overall, most advantageous when compared with other available providers and their services. We consider a wide range of factors, including but not limited to:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds (ETFs), etc.)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, security and stability
- Prior service to us and our clients
- Availability of other products and services that benefit us, as discussed below (see "Products and services available to us from Custodians and other third-parties")

## Your brokerage and custody costs

For our clients' accounts that Schwab or Fidelity maintain, Schwab and Fidelity generally do not charge you separately for custody services but are compensated by charging you commissions or other fees on trades that they execute or that settle into your account, transaction-based fees. Schwab and Fidelity are also compensated by earning interest on the uninvested cash in your account. For some accounts, Schwab or Fidelity may charge you a percentage of the dollar amount of assets in the account in lieu of commissions, asset-based pricing. Asset-based fees applicable to our client accounts were negotiated based on the collective assets SEIA and its affiliates (inclusive of SIA) maintain at each of the custodians. This commitment benefits you because the overall asset-based fees you pay are lower than they would be otherwise. In addition to transaction-based and asset-based fees, the custodian will charge you a flat dollar amount as a "prime broker" or "trade away" fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab or Fidelity account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have your custodian execute most trades for your account. We have determined that having your custodian execute most trades is consistent with our duty to seek "best execution" of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see "How we select brokers/custodians").

In select circumstances consistent with our duty to seek "Best Execution" SIA may "trade away" from the client's custodian. Fixed income transactions may be traded away for liquidity or best execution purposes. Fixed Income securities that are traded away are subject to Prime Broker fees, which is a different brokerage costs (may be better or worse depending on the complexity of the order) than if the trades were done at the client's custodian. These bonds will be custodied in the client's account at their custodian. Equity transactions may be traded away in certain circumstances for best execution purposes. Equities that are traded away receive a net price (price of the security inclusive of the Prime Broker's commission, which is a different brokerage cost and may be better or worse, depending on the complexity of the order, than if the trades were done at the client's custodian). See Trade Aggregation for further information. These equities will be custodied in the client's account at their custodian. Brokerage fees incurred from trading through one of our Prime Brokers are shown on client's trade confirmations and statements.

### Other Fees & Expenses:

SEIA's Advisory fees do not cover all fees that the client may incur. Other types of fees will be incurred in connection with SEIA advisory services including but not limited to separate account manager fees, short term redemption fees, redemption fees, short settlement fees, mutual fund expenses and no transaction fee funds. These fees will be paid by the client. Clients should carefully review the prospectus, offering documents and disclosures for all securities in their portfolio. Clients should understand the trading costs charged by the custodian and review the custodial statement for a record of all fees incurred in client's accounts. If you have any question about the fees incurred in your account, please contact your advisor. In the circumstances described, the following fees will be incurred in client accounts.

**Short Term Redemption Fees:** Short-term redemption fees (STRF) occur when a fund subject to STRF is sold and is held for less than a certain number of days, typically 60 to 90 days. Not all funds have short-term redemption fees. At Fidelity, STRF apply to No Transaction Fee (NTF) Mutual Funds. At Schwab, STRF apply to Mutual Funds on the OneSource platform and certain other NTF funds. For applicable funds that



are still within the short term window, the following activity would result in sales which would trigger applicable STRFs: (i) Firm Trading Activity: The firm monitors accounts on an ongoing basis and will implement trades to maintain the investment policy statement mandate. These activities include rebalances, investment implementations and new account implementations. For discretionary platform accounts these activities will be done at the firm's discretion based on market conditions. The firm can choose to incur the fee or delay implementation and wait out the short-term period at its discretion. (ii) Client Instructions: These activities include model changes by execution of a new investment policy statement, raise cash or otherwise liquidate account holdings. The firm believes prompt implementation of investment recommendations outweigh the benefits of delay implementation to avoid a STRF and will generally incur applicable STRF in the client account related to these activities. STRFs at Schwab are calculated as 8.5% of trade value with a maximum of \$49.95. STRF at Fidelity are calculated as 0.5% of trade value with a minimum of \$30 and a maximum of \$200. STRF can be avoided if the fund is held longer than the designed short-term period. The short-term redemption fee charged by the custodian is different and separate from a redemption fee assessed by the fund itself.

**Redemption Fee:** A redemption fee is another type of fee that some funds charge their shareholders at redemption (sale). A redemption fee is deducted from redemption proceeds and is typically used to defray fund costs associated with a shareholder's redemption and is paid directly to the fund. Not all funds have redemption fees, so please review the fund's prospectus to learn more about a potential redemption fee charged by a particular fund. For applicable funds, the following activity would result in sales which would trigger any applicable redemption fees: (i) Firm Trading Activity: The firm monitors accounts on an ongoing basis and will implement trades to maintain the investment policy statement mandate. These activities include rebalances, investment implementations and new account implementations. For discretionary platform accounts these activities will be done at the firm's discretion based on market conditions. (ii) Client Instructions: These activities include model changes by execution of a new IPS, raise cash or otherwise liquidate account holdings. The firm believes implementation of investment recommendations outweigh the benefits of holding a position or delayed implementation to avoid a redemption fee and will generally incur any applicable redemption fees in the client account related to these activities.

**Short Settlement Fees:** Short settlement is defined as a trade that settles earlier than the normal settlement cycle. Normal settlement is trade date plus two business days. These fees will be incurred in client accounts if the client trade instruction requires early settlement. Fees may be based on cents per share, percentage of transaction value or both. Ask your advisor or consult the custodian's trading costs disclosure for information on short settlement fees for a proposed transaction. The firm will not submit for short settlement except for by client request.

**Separate Account Manager / Third Party Manager Fees:** If a separate account manager is engaged by the client to manage all or part of a client portfolio the client account will be billed fees according to the separate account manager's fee schedule by the separate account manager directly. The separate account manager fees are in addition to any advisory fees paid to SEIA and any trading fees that may be incurred.

**Mutual Fund Expenses:** As with any business, running a mutual fund involves costs. For example, there are costs incurred in connection with particular investor transactions, such as investor purchases, exchanges, and redemptions. There are also regular fund operating costs that are not necessarily associated with any particular investor transaction, such as investment advisory fees, marketing and distribution expenses, brokerage fees, and custodial, transfer agency, legal, and accountants' fees. Some funds cover the costs associated with an individual investor's transactions and account by imposing fees and charges directly when investors buy or sell a fund, while others charge fees periodically to all shareholders in the fund. Mutual Fund expenses are presented in the fund's prospectus. Please review the fund's prospectus for information on all fees and expenses charged by a particular fund. These fees and charges are identified in a fee table, located near the front of a fund's prospectus, under the heading

“Shareholder Fees.” Funds typically pay their regular and recurring, fund-wide operating expenses out of fund assets, rather than by imposing separate fees and charges on investors. Keep in mind, however, that because these expenses are paid out of the fund’s assets, investors are paying them indirectly. These expenses are identified in the fee table in the fund's prospectus under the heading “Annual Fund Operating Expenses.”

**No Transaction Fee (NTF) Funds:** Allow an investor to buy and sell fund shares without incurring a commission. However, these funds will incur short-term redemption fees, if applicable, and a service charge assessed by the custodian: \$25 at Schwab and \$0 at Fidelity. This fee will be incurred in client accounts when purchasing NTF funds. This applies for all models and customizations but is of particular importance for SAS NTF platform accounts. The custodians reserve the right to change the funds they make available without transaction fees and to reinstate fees on any fund.

### Products and services available to us from Custodians and other third parties

Schwab and Fidelity provide us and our clients with access to their institutional brokerage services (trading, custody, reporting, and related services), many of which are not typically available to retail customers. Schwab and Fidelity also make available various support services. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. These support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. Following is a more detailed description of support services:

Services that benefit you. Schwab and Fidelity institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab and Fidelity include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Services described in this paragraph generally benefit you and your account.

Services that may not directly benefit you. Schwab and Fidelity also make available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both proprietary and that of third parties. We may use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at Schwab or Fidelity. In addition to investment research, Schwab and Fidelity also make available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data
- Facilitate payment of our fees from our clients' accounts
- Assist with back-office functions, recordkeeping, and client reporting

Services that generally benefit only us. Schwab and Fidelity also offer other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal, and business needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers

- Marketing consulting and support
- Compliance Technology

Schwab and Fidelity may provide some of these services themselves. In other cases, they will arrange for third-party vendors to provide the services to us. Schwab and Fidelity may discount or waive their fees for some of these services or pay all or a part of a third party's fees. Schwab and Fidelity may also provide us with other benefits, such as occasional business entertainment of our personnel. Other third parties, such as fund companies, may provide support that generally benefit only us. These companies may contribute to expenses of SIA seminars and other events.

The availability of these services from custodians benefits us because we do not have to produce or purchase them. We don't have to pay for these services. These services are not contingent upon us committing any specific amount of business to Schwab and Fidelity in trading commissions or assets in custody. This creates an incentive to require that you maintain your account with Schwab or Fidelity, based on our interest in receiving these services that benefit our business and Schwab or Fidelity's payment for services for which we would otherwise have to pay rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a conflict of interest. We believe, however, that our selection of Schwab or Fidelity as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of all services (see "How we select brokers/ custodians") and not only the services that benefit only us.

The availability of these services for other third parties benefits us because we do not have to produce or purchase them. We don't have to pay for these services. These services are not contingent upon us committing any specific amount of business to a fund company in trading or assets with one company. This creates an incentive to invest with specific fund companies, based on our interest in receiving these services that benefit our business and the third parties payment for services for which we would otherwise have to pay rather than based on your interest in receiving the best investment selection. This is a conflict of interest. We believe, however, that our investment selection is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of all services and not only the services that benefit only us.

### Best Execution

In seeking to obtain best execution, SIA looks to the most favorable terms for each transaction by taking into account that each transaction has its own set of unique variables including but not limited to character of the market for the security, size and type of transaction, number of markets and timeliness of the trade execution. Some market scenarios may require the trader to prioritize execution speed over transaction costs, but this again reiterates the firm's obligation to attain the most advantageous trade execution for each client as it pertains to that trade and may not always yield the lowest possible commission cost or the lowest or highest price.

SIA's trading department and Compliance meet periodically to review trades, any significant trends and issues that occurred during the period, which can result in establishing new procedures as needed.

SIA will review best execution on several factors which may include but is not limited to:

- Price improvement opportunities (i.e. the difference between the execution price and the best quotes prevailing at the time the order is received by the market)

- Differences in price dis-improvement (i.e. situations in which a client receives a worse price at execution than the best quotes prevailing at the time the order is received by the market)
- The likelihood of execution of limit orders
- The speed of execution
- Size of the order and impact to the market
- Commission & fee
- Client needs and expectations
- Broker-dealer's responsiveness.

### Error Correction

Although SIA takes all reasonable steps to avoid errors in our trading process, errors do occasionally occur. SIA's policy is that trade errors be resolved promptly from when they are discovered and, in a manner, so that the client will be in the same position as they would have been had the error not occurred. There is no single solution to every trading error. Resolution must be determined on a case-by-case basis in line with our fiduciary duty to the client. SIA will determine the most appropriate calculation methodology on a case-by-case basis with respect to the specific details of each trade error. A theoretical claim of a lost opportunity based on a what-if scenario is not considered a trade error.

### Cross Transactions

SIA does not execute Cross Transactions for equity securities. SIA does not execute Cross Transaction for fixed income. If in the normal course of business, a buy and sell order for the same fixed income security are received in close proximity, SIA may notify the custodian/broker of the potential Cross Transaction. SIA does not receive compensation for such transactions and the custodian, not SIA, will price and clear the transaction.

### Principal Trades

SIA does not participate in Principal trades.

### Pledged Accounts

Some client accounts at Fidelity or Schwab may be "pledged". This means the assets in the account are pledged as collateral against a loan. These accounts will look and function like margin accounts. SIA will not recommend the purchase of securities on margin. SIA does not take part in the lending process and has no financial interest in the process.

### Soft Dollar Practices

SIA does not participate in any programs for soft dollar credits. See the section titled, " Products and services available to us from Custodians and other third parties" for information on soft dollar benefits.

### Client Referrals from Brokers

See the main section heading on Client Referrals and Other Compensation for disclosure.

## Trade Aggregation

Client trades may be executed as a block trade. This would apply only to those accounts and transactions that are entered on a discretionary basis (e.g., Signature Allocation Series & Signature Targeted Strategies) and to a very limited extent bond trades that are placed after market close.

All aggregated trades will be done in the name of the Advisor. The executing broker will be informed that the trades are for the account of the Advisor's clients and not for the Advisor itself. No advisory account within the block trade will be favored over any other advisory account, and thus, each account will participate in an aggregated order at the average share price and receive the same commission rate. The Custodian will be notified of the amount of each trade for each account. SIA and/or its personnel may participate in block trades with clients and may also participate on a pro rata basis for partial fills, but only if clients receive fair and equitable treatment.

## Review of Accounts

### Review of Accounts

A record keeping profile is established and maintained on SIA's Client Relationship Management system for each client. This record will include information regarding client's financial profile. SIA will seek to keep this information up to date through an annual mailing where clients have the opportunity to update or confirm the information SIA has on file. SIA will periodically review your accounts as needed, but no less than annually. Such review and consultation typically contain, when warranted, advice regarding recommended changes to your investments and recommendations for implementation of proposed changes. In some cases, the SIA may recommend that holding be the most prudent strategy, such as when the current portfolio is performing as expected and continues to be in line with the client's stated objectives. Though trading activity is not always needed the firm continues to supervise and monitor the account.

Client's will receive quarterly reports which are for informational purposes only and based on information believed to be accurate, but that we have not verified. For accurate account information, you must refer to the account statement from the account custodian.

### Reports on Accounts

Clients receive standard account statements from the qualified custodian or investment sponsor, in addition to reports prepared by SIA. Clients have the option to receive hard-copy or electronic account statements from their custodian. Investment Management clients receive quarterly written reports from SIA. SIA quarterly reports include current and historic performance, performance by security, asset class and investment style summaries, a portfolio appraisal and statement of investment management fees. Additional reports, by request, can be customized to meet the needs of the client. Clients have the option to receive hard-copy or electronic account statements from SIA.

## Client Referrals & Other Compensation

SIA receives referrals from Royal Alliance Associates, Inc. (RA). SIA and RA have an agreement where RA Corporate RIA Representatives can offer SIA as a third-party money manager. Under the agreement RA acts as solicitor for SIA and SIA pays RA solicitor fees based on SIA’s assets under management attributable to each client referred by RA. RA is registered as an investment adviser with the Securities and Exchange Commission (“SEC”) in order to offer investment advisory products and services to its advisory clients. Such services are offered through certain RA Financial Advisers who have registered as RA Investment Adviser Representatives.

The solicitor agreement is in compliance with the Investment Advisers Act of 1940. In addition, all applicable federal and state laws will be observed. All clients procured by outside solicitors will be given full written disclosures by the solicitor, describing the terms and fee arrangements between SIA and the solicitor, prior to or at the time of entering into the advisory agreement. As part of this arrangement, SEIA or SIA may also sponsor due diligence meetings, training sessions & other meetings for RA Soliciting Rep.

From the client fee stated on the SIA Engagement Agreement, SIA retains the basis points (“bps”) identified on the following table. RA receives a fee of up to 10 basis points for providing supervisory services. The balance of the Client Fee is retained by the RA soliciting financial advisor. SIA will pay all solicitor fees under this arrangement to RA, and it will be the responsibility of RA to reallocate a portion of the referral fee to its Financial Advisors. Client will not be charged for the cost of obtaining the account in addition to the advisory fee.

Household Assets Between	SIA Annual Fee		
	Elite**	SAS*	STS ESG*
\$0 - \$499,999	30 bps	20 bps	20 bps
\$500,000 - \$999,999	30 bps	15 bps	15 bps
\$1,000,000 - \$3,999,999	21 bps	11 bps	11 bps
\$4,000,000 - \$9,999,999	14 bps	9 bps	9 bps
\$10,000,000 - \$19,999,999	12 bps	8 bps	8 bps
Over \$20,000,000 (negotiable by case)	11 bps	7 bps	7 bps

### Investment Committee

Investment Committee members other than Deron McCoy receive nominal compensation from SIA for serving on the committee’s monthly meetings.

### Charitable Contributions

SIA or its personnel may make contributions to charities that clients may be involved in. SIA personnel may serve on the board of these charities. SIA’s charitable contributions are in no way tied to clients or client accounts. SIA and its personnel make contributions to SIA’s charitable fund, the Signature Fund For Giving (SFFG). SFFG does not accept donations from clients or prospects.

### Custody

SIA has limited custody of our clients’ funds or securities when the clients authorize us to deduct our management fees directly from the client’s account. SIA is also deemed to have custody of clients’ funds

or securities when clients have standing letters of authorizations (“SLOA”) with their custodian to move money from a client’s account to a third-party or first-party wire and under that SLOA authorize us to designate the amount or timing of transfers with the custodian. The SEC has set forth a set of standards intended to protect client assets in such situations, which we follow. The conditions are as follows: (1) The client provides an instruction to the qualified custodian, in writing, that includes the client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed. (2) The client authorizes the investment adviser, in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time. (3) The client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client's authorization, and provides a transfer of funds notice to the client promptly after each transfer. (4) The client has the ability to terminate or change the instruction to the client's qualified custodian (5) The investment adviser has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction. (6) The investment adviser maintains records showing that the third party is not a related party of the investment adviser or located at the same address as the investment adviser. (7) The client's qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

A qualified custodian holds clients’ funds and securities. Clients will receive statements directly from their qualified custodian at least quarterly. The statements will reflect the client’s funds and securities held with the qualified custodian as well as any transactions that occurred in the account, including the deduction of our fee. Clients should carefully review the account statements they receive from the qualified custodian. When clients receive statements from SIA as well as from the qualified custodian, they should compare these two reports carefully. Clients with any questions about their statements should contact SIA at the address or phone number on the cover of this brochure. Clients who do not receive a statement from their qualified custodian at least quarterly should contact SIA or the Custodian directly.

Minor variations may occur because of reporting dates, accrual methods of interest and dividends, and other factors. The custodial statement is the official record of your account for tax purposes.

## **Investment Discretion**

A limited power of attorney will be obtained from clients. SIA will not have authority to withdraw funds or to take custody of client funds or securities, other than as described under **Custody** above.

**Signature Elite** accounts are non-discretionary. SIA only has the authority to execute trades pre-approved by clients.

Under **Signature Allocation Series & Signature Targeted Strategies**, client will sign a limited power of attorney and SIA will have the discretionary authority to determine the securities and the amount of securities to be bought or sold and to automatically rebalance/reallocate within an asset allocation range subject to the restrictions in the Investment Policy Statement. Signature Allocation Series & Signature Targeted Strategies are managed by SIA’s Chief Investment Officer, Deron McCoy, CFA, CFP®, CAIA. Mr. McCoy and his team are the only people authorized to direct trades on a discretionary basis. Mr. McCoy’s brochure supplement immediately follows this SIA Brochure. The client will designate the firm to be used for custodial services and trading except in cases of trade away as described in “Brokerage Practices.” The client is given the opportunity to impose reasonable restrictions on the management of the account. Buy

/ Sell restrictions must be symbol specific. The security must have a symbol and be listed on an exchange. A buy / sell restriction cannot be based on an idea, CUSIP, fund family, theme, bond or company name. The client is responsible for updating all buy / sell restriction instructions as necessary for situations including but not limited to conversions, symbol changes or any other activity where the specific instructions SIA has on file no longer accurately represents the instructions. Buy / sell restriction are subject to the manager's acceptance.

## **Voting Client Securities**

SIA does not vote client securities. It is the client's responsibility to vote with regards to their securities. SIA may respond to client inquiries regarding voting client securities in an educational fashion. Clients will receive voting materials and other relevant information directly from their custodian. If voting materials are inadvertently received by SIA they will be promptly forwarded to the client. Voting is ultimately the clients' decision and responsibility.

For other corporate actions in non-discretionary accounts, client must approve for SIA to take any action related to a corporate action. SIA will contact or attempt to contact client with respect to corporate actions where Advisor's recommendation is to act. If client does not approve or cannot be reached the Advisor will not take any action and the account will accept the default option. If the recommendation is not to act, the Advisor may not contact the client and the account will accept the default option. For corporate actions in discretionary accounts, Advisor will make the decision to act or not and take the associated action without seeking client approval.

## **Financial Information**

An investment advisor must provide financial information if a threshold of fee prepayments is met or, if there is a financial condition likely to impair the ability to meet contractual commitments; or, a bankruptcy within the past ten years. SIA does not have any disclosure items in this section.



Form ADV Part 2B  
Brochure Supplement

SIGNATURE INVESTMENT ADVISORS,  
LLC<sup>®</sup>

**Part 2B Supplement Deron McCoy**

Name of Supervised Person/IA Rep	Deron McCoy
Address	2121 Ave. of the Stars, Suite 1600, Los Angeles, CA 90067
Phone Number	310-712-2323
Date of Last Revision	March 25, 2020

Name of Registered Investment Advisor	Signature Investment Advisors (“SIA”)
Address	2121 Ave. of the Stars, Suite 1600, Los Angeles, CA 90067
Phone Number	310-349-3241
Website Address	<a href="http://www.signatureia.com">www.signatureia.com</a>

This Brochure Supplement provides information about Deron McCoy that supplements the SIA brochure. You should have received a copy of that brochure. Please contact the SIA Compliance Department if you did not receive SIA’s brochure or if you have any questions about the contents of this supplement. Additional information about Deron McCoy is available on the SEC’s website at: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

Deron McCoy is the Chief Investment Officer and head of SIA’s Department of Investment Management and Economic Strategy (“DIMES”). DIMES is responsible for the research and development of SIA’s asset allocation targets. Deron McCoy manages discretionary trading for accounts in Signature Allocation Series and Signature Targeted Strategies.



SIGNATURE INVESTMENT ADVISORS, LLC

## **Educational Background and Business Experience**

### Education and Business Background

Name: Deron McCoy, CFA, CFP®, CAIA, AIF®  
Year of Birth: 1972  
Education: University of California Los Angeles (UCLA), Los Angeles, CA  
BS Mathematics-Applied Science, Specialization in Economics, 1995  
Business: SEIA/SIA/SIP, Los Angeles, CA – Chief Investment Officer, DIMES  
SEIA - 9/2001 – present; SIA - 11/2011 – present; SIP - 10/2015 – present  
Royal Alliance Associates, Inc., Los Angeles, CA – Registered Representative  
11/18 – present  
Signator Investors, Inc., Los Angeles, CA – Registered Representative  
6/95 – 11/18

### Professional Designations Qualifications

**CFP®** - Certified Financial Planner is issued by the Certified Financial Planner Board of Standards, Inc. CFP is a professional designation attained by a financial planner or advisor who has successfully completed the requirements set by the Certified Financial Planner Board.

The CFP designation that denotes a person is a competent, professional and ethical financial planner. CFP professionals must adhere to a code of ethics, which also requires every applicant to pass a background check before obtaining his or her designation.

Candidates must meet the following requirements:

- Complete CFP® education program
- Bachelor's degree (or higher) from an accredited college or university
- Pass CFP® certification exam
- 3 years of full-time personal financial planning experience
- Continuing education requirement of 30 hours every 2 years

**CFA** – Chartered Financial Analyst is issued by the CFA Institute. A Chartered Financial Analyst (CFA) is a highly respected designation attained by an investment professional who has successfully completed all three parts of the CFA exam.

The CFA designation denotes that a person has a strong foundation of advanced investment analysis and real-world portfolio management skills. The CFA charter is one of the most respected designations in finance and is widely considered to be the gold standard in the field of investment analysis.

CFA designees must meet the following requirements for regular membership:

- Hold a bachelor's degree from an accredited institution or have equivalent education or work experience
- Complete and pass the CFA Program – a graduate-level self-study program culminating in three sequential six-hour exams
- Have at least 4 years of qualified work experience in the investment decision-making process
- Fulfill society requirements, which require two sponsor statements as part of each application
- Commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct
- Must be a regular member

**CAIA** - Chartered Alternative Investment Analyst is issued by CAIA Association. A Chartered Alternative Investment Analyst is a respected designation attained by an investment professional who has successfully completed both levels of the CAIA exam

The CAIA designation is meant for a financial professional who will be primarily in the alternative investment space, which may include but not limited to hedge funds and private equity

Candidates must meet the following requirements:

- Hold a U.S. bachelor's degree or the equivalent, and have more than one year of professional experience
- Successfully pass both the Level I and Level II exams
- Four years of experience in the financial industry
- Complete self-evaluation tool every three years

**AIF®** - Accredited Investment Fiduciary is issued by the Center for Fiduciary Studies

Candidates must meet the following requirements:

- Complete the AIF training program
- Pass the final certification exam
- Continuing education requirement of 6 hours per year

### **Disciplinary Information**

An investment advisor and its supervised persons (IA Reps) must disclose material facts about any legal or disciplinary event that is material to a client's evaluation of the advisory business or of the integrity of the IA Rep. Deron McCoy does not have any disclosure items.

### **Other Business Activities**

Deron McCoy is the Chief Investment Officer for Signature Estate & Investment Advisors, LLC ("SEIA"), Signature Investment Advisors, LLC ("SIA") and Signature Intelligent Portfolios, LLC ("SIP"). SIA and SIP are subsidiary companies of SIA. Each entity is a Registered Investment Advisor ("RIA"). This activity does not pose a conflict of interest.

Deron McCoy is a Registered Representative with Royal Alliance Associates, Inc. ("RAA"), a Broker-Dealer, member FINRA/SIPC. RAA is separately owned and other entities and/or marketing names, products or

services referenced here are independent of RAA. This activity does not pose a conflict of interest as Deron McCoy does not sell securities or insurance products.

**Additional Compensation**

Deron McCoy receives a portion of revenues derived from management of discretionary services offered through the Department of Investment Management. Deron McCoy does not receive any securities commissions.

**Supervision**

Deron McCoy serves on the Investment Committee, which provides research and formulates investment strategies. Deron McCoy will apply the asset allocation strategy as he sees fit to discretionary client accounts. The Investment Committee performs oversight. Further, Deron McCoy is supervised by the CEO, Brian D. Holmes. The CEO has created a Compliance Department to assist in monitoring for compliance with the Advisors Act. The CEO may be contacted at 310-712-2323.



SIGNATURE INVESTMENT ADVISORS, LLC

Form ADV Part 2B  
Brochure Supplement

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INVESTMENT ADVISORS, LLC ®

**Part 2B Supplement – Andrew Lin**

Name of Supervised Person/IA Rep	Andrew Lin
Address	2121 Ave. of the Stars, Suite 1600, Los Angeles, CA 90067
Phone Number	310-712-2323
Date of Last Revision	November 5, 2018

Name of Registered Investment Advisor	Signature Investment Advisors (“SIA”)
Address	2121 Ave. of the Stars, Suite 1600, Los Angeles, CA 90067
Phone Number	310-349-3241
Website Address	<a href="http://www.signatureia.com">www.signatureia.com</a>

This Brochure Supplement provides information about Andrew Lin that supplements the SIA brochure. You should have received a copy of that brochure. Please contact the SIA Compliance Department if you did not receive SIA’s brochure or if you have any questions about the contents of this supplement. Additional information about Andrew Lin is available on the SEC’s website at: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)



SIGNATURE INVESTMENT ADVISORS, LLC

### **Education and Business Background**

Name: Andrew Lin

Year of Birth: 1981

Education: University of California Los Angeles (UCLA), Los Angeles, CA  
BS in Psychology, 2004

Business: Signature Investment Advisors, LLC., Los Angeles, CA – Relationship Manager  
11/09- present

Signature Estate & Investment Advisors, LLC., Los Angeles, CA – Strategic Development  
11/09- present

Royal Alliance Associates, Inc., Los Angeles, CA – Registered Representative  
11/18 – present

Signator Investors, Inc., Los Angeles, CA – Registered Representative  
02/2011 – 11/18

United Capital Financial Advisors, Newport Beach, CA – Director of Operations  
02/2007 – 12/2009

Signature Estate and Investment Advisors, LLC., Los Angeles, CA – Analyst  
03/2004 – 01/2007

### **Disciplinary Information**

An investment advisor and its supervised persons (IA Reps) must disclose material facts about any legal or disciplinary event that is material to a client's evaluation of the advisory business or of the integrity of the IA Rep. Andrew Lin does not have any disclosure items.

### **Other Business Activities**

Andrew Lin is a Registered Representative with Royal Alliance Associates, Inc. ("RAA"), a Broker-Dealer, member FINRA/SIPC. RAA is separately owned and other entities and/or marketing names, products or services referenced here are independent of RAA. This activity does not pose a conflict of interest as Andrew Lin does not sell securities or insurance products.

### **Additional Compensation**

Andrew Lin receives economic benefit from SIA's parent company, SEIA, for serving on the Investment Committee. The Investment Committee assesses research, formulates investment strategies and provides oversight for discretionary accounts. This activity does not represent a conflict as the Investment Committee decisions permeate to the parent company and subsidiary companies equally. This activity represents less than 5% of time and income.

### **Supervision**

Andrew Lin is supervised by the CEO, Brian D. Holmes. The CEO has created a Compliance Department to assist in monitoring for compliance with the Advisors Act. The CEO may be contacted at 310-712-2323.



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Form ADV Part 2B

### Brochure Supplement

# SIGNATURE INVESTMENT ADVISORS, LLC<sup>®</sup>

## Part 2B Supplement – Mathew Kim

Name of Supervised Person/IA Rep	Mathew Kim
Address	2121 Ave. of the Stars, Suite 1600, Los Angeles, CA 90067
Phone Number	310-712-2323
Date of Last Revision	November 5, 2018

Name of Registered Investment Advisor	Signature Investment Advisors (“SIA”)
Address	2121 Ave. of the Stars, Suite 1600, Los Angeles, CA 90067
Phone Number	310-349-3241
Website Address	<a href="http://www.signatureia.com">www.signatureia.com</a>

This Brochure Supplement provides information about Mathew Kim that supplements the SIA brochure. You should have received a copy of that brochure. Please contact the SIA Compliance Department if you did not receive SIA’s brochure or if you have any questions about the contents of this supplement. Additional information about Mathew Kim is available on the SEC’s website at: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)



SIGNATURE INVESTMENT ADVISORS, LLC

### **Education and Business Background**

Name: Mathew Kim

Year of Birth: 1977

Education: University of California, Irvine  
BA in International Studies, 2000

Business: SIA, Los Angeles, CA – Relationship Manager  
01/2016 – present

Royal Alliance Associates, Inc., Los Angeles, CA – Registered Representative  
11/2018 – present

Signator Investors, Inc., Los Angeles, CA – Registered Representative  
01/2016 – 11/2018

Charles Schwab, New York City, NY – VP-Financial Consultant  
05/2000 – 12/2015

### **Disciplinary Information**

An investment advisor and its supervised persons (IA Reps) must disclose material facts about any legal or disciplinary event that is material to a client's evaluation of the advisory business or of the integrity of the IA Rep. Mathew Kim does not have any disclosure items.

### **Other Business Activities**

Mathew Kim is a Registered Representative with Royal Alliance Associates, Inc. ("RAA"), a Broker-Dealer, member FINRA/SIPC. RAA is separately owned and other entities and/or marketing names, products or services referenced here are independent of RAA. This activity does not pose a conflict of interest as Mathew Kim does not sell securities or insurance products.

### **Additional Compensation**

Mathew Kim receives economic benefit from SIA's parent company, SEIA, for serving on the Investment Committee. The Investment Committee assesses research, formulates investment strategies and provides oversight for discretionary accounts. This activity does not represent a conflict as the Investment Committee decisions permeate to the parent company and subsidiary companies equally. This activity represents less than 5% of time and income.

### **Supervision**

Mathew Kim is supervised by the CEO, Brian D. Holmes. The CEO has created a Compliance Department to assist in monitoring for compliance with the Advisors Act. The CEO may be contacted at 310-712-2323.





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Form ADV Part 2B

### Brochure Supplement

# SIGNATURE INVESTMENT ADVISORS, LLC<sup>®</sup>

#### **Part 2B Supplement – Troy Franzen**

Name of Supervised Person/IA Rep	Troy Franzen, CWS <sup>®</sup> , AIF <sup>®</sup>
Address	610 Newport Center Dr., Suite 300, Newport Beach, CA 92660
Phone Number	949-705-5188
Date of Last Revision	November 5, 2018

Name of Registered Investment Advisor	Signature Investment Advisors (“SIA”)
Address	2121 Ave. of the Stars, Suite 1600, Los Angeles, CA 90067
Phone Number	310-349-3241
Website Address	<a href="http://www.signatureia.com">www.signatureia.com</a>

This Brochure Supplement provides information about Troy Franzen that supplements the SIA brochure. You should have received a copy of that brochure. Please contact the SIA Compliance Department if you did not receive SIA’s brochure or if you have any questions about the contents of this supplement. Additional information about Troy Franzen is available on the SEC’s website at: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)



SIGNATURE INVESTMENT ADVISORS, LLC

### **Education and Business Background**

Name: Troy Franzen, CWS®, AIF®  
Year of Birth: 1970  
Education: California State University, Northridge (CSUN) Northridge, CA  
Bachelor of Science in Business, Finance, 2005  
Business: Signature Investment Advisors, LLC (“SIA”), Los Angeles, CA – Relationship Manager  
11/2013 – present  
Royal Alliance Associates, Inc., Los Angeles, CA – Registered Representative  
11/2018 – present  
Signator Investors, Inc., Los Angeles, CA – Registered Representative  
11/2013 – 11/2018  
City National Bank, Private Client Services – Senior Private Client Advisor  
07/2010 – 10/2013  
Comerica Bank, Wealth & Institutional Management – Wealth Advisors  
09/2001 – 07/2010

### **Professional Designations Qualifications**

#### **AIF® - Accredited Investment Fiduciary**

Candidates must meet the following requirements:

- Complete the AIF training program
- Pass the final certification exam
- Continuing education requirement of 6 hours per year

#### **CWS® – Certified Wealth Strategist**

Candidates must meet the following requirements:

- Three years of financial services industry experience
- Complete two instructor-led training sessions
- Complete self-directed study and the Capstone project
- Pass the final certification exam (ten sections)
- Continuing education requirement of 33 hours every two years

### **Disciplinary Information**

An investment advisor and its supervised persons (IA Reps) must disclose material facts about any legal or disciplinary event that is material to a client’s evaluation of the advisory business or of the integrity of the IA Rep. Troy Franzen does not have any disclosure items.

### **Other Business Activities**

Troy Franzen is a Registered Representative with Royal Alliance Associates, Inc. (“RAA”), a Broker-Dealer, member FINRA/SIPC. RAA is separately owned and other entities and/or marketing names, products or services referenced here are independent of RAA. This activity does not pose a conflict of interest as Troy Franzen does not sell securities or insurance products.



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### **Additional Compensation**

An investment advisor and its supervised persons (IA Reps) must disclose if someone who is not a client provides economic benefit to the supervised person for providing advisory services. Troy Franzen does not have any disclosure items.

### **Supervision**

Troy Franzen is supervised by the CEO, Brian D. Holmes. The CEO has created a Compliance Department to assist in monitoring for compliance with the Advisors Act. The CEO may be contacted at 310-712-2323.

Form ADV Part 2B  
Brochure Supplement

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**Part 2B Supplement – Alex Kirk**

Name of Supervised Person/IA Rep	Alexander H. Kirk
Address	2121 Ave. of the Stars, Suite 1600, Los Angeles, CA 90067
Phone Number	310-712-2379
Date of Last Revision	March 12, 2020

Name of Registered Investment Advisor	Signature Investment Advisors (“SIA”)
Address	2121 Ave. of the Stars, Suite 1600, Los Angeles, CA 90067
Phone Number	888-349-3241
Website Address	<a href="http://www.signatureia.com">www.signatureia.com</a>

This Brochure Supplement provides information about Alex Kirk that supplements the SIA brochure. You should have received a copy of that brochure. Please contact the SIA Compliance Department if you did not receive SIA’s brochure or if you have any questions about the contents of this supplement. Additional information about Alex Kirk is available on the SEC’s website at: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)



SIGNATURE INVESTMENT ADVISORS, LLC

**Education and Business Background**

Name: Alexander H. Kirk  
Year of Birth: 1986  
Education: California State University Northridge (CSUN), Northridge, CA  
BS in Finance 2012  
Business: Signature Investment Advisors, LLC., Los Angeles, CA – Relationship Manager  
11/09- present  
Signature Estate & Investment Advisors, LLC., Los Angeles, CA – Associate Relationship  
Manager  
02/15 – 11/19  
Sayan Holdings, Inc., Los Angeles, CA – Business Development  
11/12 – 12/15  
Kirkware, LLC, Los Angeles, CA – Founder  
06/08 – 12/12  
Gerber Kawasaki Wealth Management, LLC – Investment Advisor Representative  
11/11 – 10/12

**Disciplinary Information**

An investment advisor and its supervised persons (IA Reps) must disclose material facts about any legal or disciplinary event that is material to a client’s evaluation of the advisory business or of the integrity of the IA Rep. Alex Kirk does not have any disclosure items.

**Other Business Activities**

Alex Kirk is a Registered Representative with Royal Alliance Associates, Inc. (“RAA”), a Broker-Dealer, member FINRA/SIPC. RAA is separately owned and other entities and/or marketing names, products or services referenced here are independent of RAA. This activity does not pose a conflict of interest as Alex Kirk does not sell securities or insurance products.

**Additional Compensation**

An investment advisor and its supervised persons (IA Reps) must disclose if someone who is not a client provides economic benefit to the supervised person for providing advisory services. Alex Kirk does not have any disclosure items.

**Supervision**

Alex Kirk is supervised by the CEO, Brian D. Holmes. The CEO has created a Compliance Department to assist in monitoring for compliance with the Advisors Act. The CEO may be contacted at 310-712-2323.



SIGNATURE INVESTMENT ADVISORS, LLC

## Privacy Notice

### **NOTICE OF PRIVACY OF CONSUMER FINANCIAL INFORMATION**

Respect for clients' privacy is highly valued at Signature Investment Advisors, LLC ("we") and your privacy is important to us. We understand that the trust you have placed in us is conditional upon our proper handling of your personal information. This notice is meant to inform you of how we safeguard your non-public personal information. We restrict access to non-public personal information about you to those employees and supporting organizations that need access to the information to provide our products or services to you. We maintain physical, administrative and procedural safeguards that comply with federal standards to help guard your non-public personal information.

State and Federal law gives you the right to know what information is being collected about you and how the information will be used.

1. Information We Collect: In connection with providing our services, we collect non-public personal information about you which may include:
  - a. Information we receive from you on fact finding and account application documents such as your name, date of birth, social security number, driver's license number, passport number, or other similar identifiers, phone number, email address, occupation, financial goals, assets, expenses, tax bracket and income.
  - b. Information about your transactions in the accounts managed by SIA, our affiliates, or other third parties.
  - c. Information that you requested be forwarded to us by your other professional advisors.
2. Use of Personal Information: We use your personal information in connection with providing financial services to you, including:
  - a. To establish or maintain an account with an unaffiliated third party, such as a custodian or broker-dealer.
  - b. To process requests, such as asset movement or purchases and sales.
  - c. To keep you informed about information related to our business and other items of interest to you.
  - d. To comply with Federal, State, Self-Regulatory Organization and other Regulatory requirements
3. Categories of Parties to Whom We Disclose: We will not disclose information regarding you or your accounts except under the following circumstances:
  - a. To your Financial Advisor, their team and the back-office service team, to the extent it is necessary to have access to provide you with our services.
  - b. To companies that perform support services on our behalf as necessary to affect, administer, or process a transaction, or for maintaining and servicing your account. These include custodian, broker-dealer, executing brokers, investment companies or insurance companies.
  - c. To companies that perform support services for us, such as data processors, compliance monitoring technology, consultants, mailing services and information security administrators.

- d. To our parent company or affiliates, to the extent permitted by law.
  - e. To your attorney, certified public accountant, trustee or anyone else authorized by you in writing.
  - f. To our attorneys, accountants, consultants or auditors.
  - g. To government entities or other third parties in response to regulatory inquiries, subpoenas or other legal process as required by law.
  - h. SIA does not sell customer lists or customer information.
  - i. Rights under the California Consumer Privacy Act:
    - i. If you are a California Resident you have the right to:
      - 1. Request we disclose to you free of charge the following information covering the 12 months preceding your request:
        - a. the categories of Personal Information about you that we collected;
        - b. the categories of sources from which the Personal Information was collected;
        - c. the purpose for collecting Personal Information about you;
        - d. the categories of third parties to whom we disclosed Personal Information about you and the categories of Personal Information that was disclosed (if applicable) and the purpose for disclosing the Personal Information about you; and
        - e. the specific pieces of Personal Information we collected about you;
      - 2. Request we delete Personal Information we collected from you, unless the CCPA recognizes an exception; and
      - 3. Be free from unlawful discrimination for exercising your rights under the CCPA.
    - ii. How to Exercise Your Rights
      - 1. Completing the Personal Information Request Form and emailing the completed form to [operations@seia.com](mailto:operations@seia.com). This form is available on our website under the "CA Privacy Rights" section.
      - 2. Calling (800) 723-5115
4. Changes to Our Privacy Notice
  - a. We reserve the right to amend this privacy at our discretion and at any time. If we make material changes to this privacy notice, we will notify you through a mailing.
5. Question or Concerns:
  - a. You may contact us with questions or concerns about this policy and our practices by:
    - i. Write us at:
      - Signature Investment Advisors, LLC – Compliance Department
      - 2121 Avenue of the Stars, Suite 1600
      - Los Angeles, CA 90067
    - ii. Email us at:
      - 1. [operations@seia.com](mailto:operations@seia.com)
    - iii. Call us at:
      - 1. 888-349-3241



SIGNATURE INVESTMENT ADVISORS, LLC

### **Business Continuity Program**

Signature Investment Advisors, LLC and its affiliated company Signature Estate & Investment Advisors, LLC seek to provide uninterrupted client service. We believe the stability of our business practices, as well as our technology systems, is vital to earning your trust, therefore we make every effort to provide uninterrupted service through a Business Continuity Plan aligned with rigorous SEC and FINRA requirements.

In the event of a natural or unnatural disaster that interrupts our normal business operations at our corporate headquarters at 2121 Avenue of the Stars, in Los Angeles, California; our comprehensive Business Continuity Plans include but are not limited to the following:

Pre-defined alternate worksites and communications systems for all business-critical functions.

- Secure remote work solutions for employees that are critical to maintain service for all existing business.
- 610 Newport Center Dr. Suite 300, Newport Beach, CA 92660 Ph 949-691-3065 or 800-472-1066 Fax 949-705-5199
- 155 N. Lake Ave., Suite 780, Pasadena, CA 91101 Ph 626-795-2944 Fax 626-795-2994
- 1650 Tysons Blvd, Suite 1575, Tysons Corner, VA 22102 Ph 703-940-3000 Fax 703-738-2259
- 1848 S. Elena Ave., Suite 100, Redondo Beach, CA 90277 Ph 310-712-2322 Fax 310-712-2377
- 3 East Third Ave., #217, San Mateo, CA 94401 Ph 800-723-5115 Fax 310-712-2345
- 4801 Woodway Drive, Suite 245-W, Houston, TX 77056 Ph 832-378-6110 Fax 832-378-6109
  
- Multiple layer data backup and recovery systems.
  
- Preparing multiple methods of communicating with and providing service to clients via the Internet, physical mail, local offices and automated telephone forwarding services.
  
- Annual employee awareness and Business Continuity training.

While no contingency plan can eliminate all risk of service interruption or temporarily impeded account access, we continually assess, test, and update our Plan to mitigate all reasonable risk.

If we find it necessary to temporarily move our operations, we will attempt to notify you. Please understand that this may take 48 hours or longer.

Please refer to the Business Continuity Programs of your custodian for additional key information. A complete copy of our Business Continuity Plan may be viewed in our office during regular business hours.

Sincerely,

A handwritten signature in black ink, appearing to read "BDH".

Brian D. Holmes, MS, CFP®, CMFC, AIF®  
President, CEO