

GWN Securities Inc. is registered with the Securities and Exchange Commission (SEC) as both a broker-dealer and an investment adviser and is a member of the Financial Industry Regulatory Authority (FINRA) and the Securities Investor Protection Corporation (SIPC). Brokerage and investment advisory services and fees differ and it is important for you, our client, to understand the differences. Additionally, free and simple tools are available to research firms and financial professionals at <https://www.investor.gov/CRS>, which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

We provide both brokerage and investment advisory services to clients. We've summarized below the main types of services that we offer and their key features:

BROKERAGE (COMMISSION-BASED)

As a broker-dealer, our primary service is buying and selling securities for your account. The brokerage programs we offer include non-discretionary services with an assigned Financial Professional who can offer recommendations to buy or sell securities but you must approve each transaction prior to execution.

In most cases, we provide recommendations to you on specific investments, but you make the final investment decisions for your account.

One of our obligations to you when providing brokerage services is that we must act in your best interest and not place our interests ahead of yours when we recommend an investment or an investment strategy involving securities. Additionally, when we provide any services to you, we must treat you fairly and comply with a number of specific obligations. However, our interest can conflict with your interests. When we provide recommendations, we must eliminate, mitigate or inform you of these conflicts, depending on the nature of the conflict.

Account Monitoring: We are not required to monitor your portfolio or investments on an ongoing basis. We may voluntarily, and without any agreement with you, review the holdings in your account for the purposes of determining whether to provide you with a recommendation. This voluntary review is not considered to be "account monitoring", and does not create an implied agreement with you to monitor your account.

Account Minimums: Other than limited exceptions related to particular client-types, we generally do not require a minimum account size to open a brokerage account. Some securities also have investment minimums.

Limited Investment Offerings: We offer and make recommendations on non-proprietary products. We do not offer or make recommendations on all products of any particular type; we do not offer or make recommendations on all mutual funds, or make available all shares classes of the offered mutual funds.

INVESTMENT ADVISORY (FEE-BASED)

The investment advisory programs we offer include Managed Account Programs. We or another firm, manage investments in your account. All firm managed programs are discretionary whereby we will decide which investments to buy or sell for your account. We have discretion to select, retain or replace third-party managers to manage your accounts. We do not permit clients to impose any restrictions on a grant of discretionary authority, unless the client is participating in either the Total Access Program or Premier Choice Program. To impose such restrictions, the restriction must be included in the client agreement or otherwise be submitted to us in writing.

We also offer **Financial Planning** where your financial professional helps you develop a detailed strategy or financial plan intended to achieve your financial objectives.

Account Monitoring: We and your financial professional monitor advisory accounts on an ongoing basis to ensure your allocations are in alignment. We will also conduct account reviews at least annually.

Account Minimums: Most advisory programs have minimum account size requirements.

Limited Investment Offerings: We provide advice on non-proprietary products. Depending on your choice of account type, strategy and model, you may receive advice with respect to a broad range of investments, or you may receive advice regarding a limited range of investments. For example, we do not make all mutual funds available for use in advisory programs and may limit the offered mutual funds to a single share class.

For additional information regarding our brokerage services, fees and other disclosures please see our website at <http://www.gwnsecurities.com>. Detailed information regarding our investment advisory services, fees and other disclosures can be found in our Form ADV Part 2A, Items 4, 5, 7, and 8 by clicking this link <https://adviserinfo.sec.gov/firm/brochure/128929>.

Key Questions to Ask Your Financial Professional

- **Given my financial situation, should I choose an investment advisory service? Should I choose a brokerage service? Should I choose both types of services? Why or Why Not?**
- **How will you choose investments to recommend to me?**
- **What is your relevant experience, including your licenses, education and other qualifications?**
- **What do these qualifications mean?**

What fees will I pay?

Fees Associated with Brokerage Services

For brokerage services, we charge a transaction-based fee (sometimes referred to as a commission) every time you buy or sell an investment. The amount you pay as a transaction-based fee varies according to the particular investment and amount invested. The more trades you make, the more transaction-based fees we earn. This creates an incentive to encourage you to trade often.

For investments in stocks or ETFs, the transaction-based fee is usually charged as a separate commission or sales charge. For investments in bonds, this fee is typically included as part of the price you pay for the investment (called a markup or markdown)

For investments in certain products like mutual funds and annuities, we receive transaction-based fees from investment product sponsor in the form of asset-based sales charges (e.g. sales loads). These fees are based on the amount invested in a product and, depending on the product, may be based on how long you hold the investment. Our receipt of asset-based sales loads creates an incentive to recommend products or sponsors that include such charges.

See the Brokerage Services link on our website <https://gwnsecurities.com/Home/CRS>

Fees Associated with Investment Advisory Accounts

The following summarizes the principal fees and costs associated with engaging our firm for investment advisory services. For detailed information, refer to our Form ADV Part 2A, Items 5 and 6 by clicking this link <https://adviserinfo.sec.gov/firm/brochure/128929>.

- **Asset Based Fees** - Our Managed Account Programs are either payable on a monthly or quarterly basis. Our Total Access Program is payable in arrears. Since the fees we receive are asset-based (i.e. based on the value of your account), we have an incentive to increase your account value which creates a conflict, especially for those accounts holding illiquid or hard-to-value assets;
- **Hourly Fees** - We generally require 1/2 of the estimated fee be paid upon executing the Advisory Agreement and the remaining balance to be paid upon completion of the services.
- **Fixed Fees** - We generally require 1/2 of the fee be paid upon executing the Advisory Agreement and the remaining balance to be paid upon completion of the services.
- **Commissions** - Since we are also a broker-dealer, we will receive customary commissions.
- **Other Advisory Fees** - You will pay advisory fees charged by third party investment advisers, which are separate and in addition to our fees.
- **Additional Fees** - Clients pay the following additional fees and/or expenses: mutual fund/ETF fees, brokerage fees, account maintenance fees, and transaction charges. If you purchase a variable annuity, you will pay fees related to variable annuities, including surrender charges.

Examples of the most common fees and costs applicable to our clients are:

- Custodian fees and Account maintenance fees;
- Fees related to mutual funds and exchange-traded funds;
- Transaction charges when purchasing or selling securities; and
- Other product-level fees associated with your investments.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. For additional information about our fees and charges, please see our website at <http://www.gwnsecurities.com>.

Key Questions to Ask Your Financial Professional

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

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

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

- **Compensation from Third Parties:** Individuals associated with our firm receive compensation in the form of transaction-based compensation, fee sharing arrangements, reimbursements, and non-cash compensation from third parties.
- **Revenue Sharing:** In addition to the third-party payments discussed above, we may retain a portion of the advisory fees paid by you for our advisory services and may also share in the advisory fee (a solicitor fee) paid by you to outside advisory services. These payments create an incentive for us to select or recommend those investment managers and service providers for your advisory account assets and to encourage you to increase the amount of assets in your account.
- **Third-Party Payments:** Persons providing advice on behalf of our firm are registered representatives with a broker-dealer and/or licensed as independent insurance agents. These persons receive compensation in connection with the purchase and sale of securities, other investment products, and/or insurance products. Compensation earned by these persons is separate and in addition to our advisory fees. This practice presents a conflict of interest because they have an incentive to recommend investment and/or insurance products to you based on the compensation received, rather than solely based on your needs.

For additional information about our compensation, please see our website at <http://www.gwnsecurities.com>. For additional information about our conflicts of interest and to help you understand what conflicts exist, refer to our Form ADV Part 2A by clicking this link: <https://adviserinfo.sec.gov/firm/brochure/128929>.

Key Questions to Ask Your Financial Professional

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

How do your financial professionals make money?

The financial professionals servicing your account(s) can offer various types of brokerage and advisory programs, platforms and services, and can earn more or less if a certain type of services, program or platform is recommended. They are also compensated in a variety of ways and the compensation can be based on factors such as: the amount of client assets they service; the time and complexity required to meet a client's needs; the product sold (i.e. differential compensation); product sales commissions; or revenue we earn from the financial professionals advisory services recommendations.

In their day-to-day business, it is not uncommon for our financial professionals to face decisions about whether a particular action or circumstance constitutes a conflict of interest. While many conflicts can be avoided, there are some conflicts that are unavoidable. Since our financial professionals are compensated for the services they provide, this presents an inherent conflict of interest.

Our financial professionals are compensated in the following ways: salary, bonus, product sales commissions, and/or non-cash compensation in the form of reimbursements for marketing expenses and business development costs, as well as invitations to conferences and due diligence meetings where travel-related costs, expenses, meals and entertainment are paid for or subsidized by the investment product providers. This additional compensation presents a conflict of interest because it provides a financial incentive for your financial professional to recommend particular investment products that offer additional compensation over those that do not.

Do you or your financial professionals have legal or disciplinary history?

Yes. These events are disclosed in our Form ADV or the specific individual's Form U4 and/or ADV 2B. These documents can be found by going to <https://www.investor.gov/CRS>.

Key Questions to Ask Your Financial Professional

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

You can find additional information about your investment advisory services and request a copy of the relationship summary by calling our office at 561-472-2710 or by clicking the following link: <https://adviserinfo.sec.gov/firm/brochure/128929>.

Key Questions to Ask Your Financial Professional

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

Document URLs

Investor.gov/CRS

<https://www.investor.gov/CRS>

GWN Securities Form ADV Part 2A

<https://gwnsecurities.com/FormAdv>

GWN Disclosures and Conflict of Interest

<https://gwnsecurities.com/Disclosures>